DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

City Planning Commission

Date: January 22, 2026
Time: After 8:30 a.m.
Place: Van Nuys City Hall
Council Chamber, 2nd Floor
14410 Sylvan Street
Van Nuys, CA 91401

This meeting may be available virtually, in a hybrid format. The meeting's telephone number and access code number will be provided no later than 72 hours before the meeting on the meeting agenda at https://planning.lacity.org/about/commissions boards-hearings and/or by contacting cpc@lacity.org

Case No.: CPC-2024-2010-GPA-ZC-CU3-SPPC
CEQA No.: SCN 2015111038: Venice Auxiliary Pumping Plant (VAAP) Project EIR
Incidental Cases: N/A
Related Cases: N/A
Council No.: 11- Park
Plan Area: Venice
Specific Plan: Venice Coastal Zone
Certified NC: Venice
GPLU: Low Medium II Residential
Zone: RW2-1
Applicant: Department of Public Works (DPW), LA Sanitation and Environment
Representative: DPW, Bureau of Engineering

Public Hearing: May 5, 2025
Appeal Status: Conditional Use and Project Compliance are appealable to City Council
Expiration Date: September 26, 2025
Multiple Approval: Yes

PROJECT LOCATION: 128, 133 & 139 E. Hurricane Street; 3817 & 3813 S. Esplanade; 3913 S. Esplanade West,

PROPOSED PROJECT: The construction of a two-story, 2,283 square-foot wastewater pumping plant (VAPP) to supplement the capacity of the existing Venice Pumping Plant (VPP) for conveyance of wastewater to the Hyperion Treatment Plant and a surface parking lot, providing three on-site parking spaces and seven off-site parking spaces. The project includes an amendment to the certified Venice Local Coastal Program Land Use Plan map, to redesignate the subject site from Low Medium II Residential to Public Facility and related text change.

REQUESTED ACTION:

1. The City Planning Commission shall consider, based on the whole of the administrative record, that the project was assessed in the previously certified Environmental Impact Report for the Venice Auxiliary Pumping Plant Project SCH 2015111038; and pursuant to CEQA Guidelines 15162 and 15164, and as supported by the Addendums dated October 29, 2021 and June, 2024, no major revisions are required to the EIR and no subsequent EIR is required for an approval of the project.

2. Pursuant to Los Angeles City Charter Section 555 and Los Angeles Municipal Code (LAMC) Chapter 1 Section 11.5.6, a General Plan Amendment to the:

   a. Venice Community Plan General Plan Land Use Map to amend the land use designation of the subject site from Low Medium II Residential to Public Facility;

b. Certified Venice Local Coastal Program Land Use Plan (LUP) map to amend the land use designation of the subject site from Low Medium II Multiple Family Residential to Public Facility; and

c. Certified Venice Local Coastal Program Land Use Plan (LUP) to amend related policies to facilitate the proposed project.

3. Pursuant to LAMC Chapter 1A Section 13B.1.4, a Zone Change from RW2-1 to PF-1.

4. Pursuant to the LAMC Chapter 1 Section 12.24 U.21, a Class 3 Conditional Use Permit to allow a pumping plant and a surface parking lot within the PF zone.

5. Pursuant to LAMC Chapter 1A Section 13B.4.2, a Project Compliance, for a project located within the Ballona Lagoon West Subarea of the Venice Coastal Zone Specific Plan.

RECOMMENDED ACTIONS:

1. **Find** the project was assessed in the Venice Auxiliary Pumping Plant Environmental Impact Report SCH No. 2015111038 certified on August 8, 2017; and pursuant to CEQA Guidelines 15162 and 15164, and the Addendums dated October 29, 2021 and June 2024, no major revisions are required to the EIR and no subsequent EIR or negative declaration is required for an approval of the project.

2. **Approve and Recommend** that the City Council Approve a General Plan Amendment pursuant to City Charter Section 555 and LAMC Chapter 1 Section 11.5.6., to amend the:

   a. Venice Community Plan General Plan Land Use Map to amend the land use designation of the subject site from Low Medium II Residential to Public Facility;

   b. Certified Venice Local Coastal Program Land Use Plan (LUP) map to amend the land use designation of the subject site from Low Medium II Multiple Family Residential to Public Facility; and

   c. Certified Venice Local Coastal Program Land Use Plan (LUP) to amend related text to facilitate the proposed project.

3. **Approve and Recommend** that the City Council adopt a Zone Change from RW2-1 to PF-1, pursuant to LAMC Chapter 1A Section 13B.1.4.

4. **Approve** a Class 3 Conditional Use Permit to allow a pumping plant and a surface parking lot within the PF Zone, pursuant to the LAMC Chapter 1 Section 12.24 U.21.

5. **Approve** a Project Compliance, for a project located within the Ballona Lagoon West Subarea of the Venice Coastal Zone Specific Plan, pursuant to LAMC Chapter 1A Section 13B.4.2.

6. **Adopt** the attached Conditions of Approval; and

7. **Adopt** the attached Findings.

VINCENT P. BERTONI, AICP
Director of Planning

Theodore L. Irving, AICP, Principal City Planner

Juliet Oh, Senior City Planner

Ira Brown, City Planner
Ira.Brown@lacity.org
(213) 978-1453

ADVICE TO PUBLIC: *The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the *Commission Secretariat, Room 273, City Hall, 200 North Spring Street, Los Angeles, CA 90012* (Phone No. 213-978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent to the week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to these programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request not later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1300.

TABLE OF CONTENTS

Project Analysis **A-1**

Project Summary
Background
Entitlement Request
Issues
Public Hearing and Communications
Environmental Review
Conclusion

Conditions of Approval **C-1**

Findings **F-1**

General Plan/Charter Findings
Entitlement Findings

Public Hearing and Communications **P-1**

Exhibits:

A – Maps

A1 – Vicinity Map
A2 – Project Site (Aerial)
A3 – Land Use Designation Map
A4 – Zoning Map

B – Plans

C – Environmental Clearance
C1 – Environment Impact Report
C2 – Addendum dated October 29, 2021
C3 – Addendum dated June, 2024

D – Map and Text Amendment

E – Coastal Development Permit No. 5-24-0123

F – Correspondence

PROJECT ANALYSIS

PROJECT SUMMARY

The project proposes the construction of a new two-story, 2,283 square foot wastewater pumping plant (Venice Auxiliary Pumping Plant – VAPP) to provide critical backup capacity to the existing Venice Pumping Plant (Pump Station No. 646) located at 140 Hurricane Street. The project includes subsurface improvements (below Hurricane Street) to connect the VAPP to the VPP and work within the Grand Canal to install a temporary cofferdam to construct a diversion structure and a 66-inch inlet pipe to connect the VAPP to the existing piping that runs below the Esplanade and Grand Canal to the VPP. The project includes the construction of a new surface parking lot at 128 Hurricane Street for the Venice Auxiliary Pumping Plant (VAPP) and the public.

As shown in Exhibit A, the proposed project consists of three main components: 1) above ground improvements, 2) below ground improvements and 3) a new surface parking lot.

Above Ground Improvements (3813 and 3817 South Esplanade and within the public right of way)

- A 2,283 square-foot, two-story, building that will house the operational control center for the plant including a generator room, a server room, an operations and maintenance room, an electrical and mechanical equipment room and a switchgear equipment room.
- Electrical equipment including termination boxes, switch gears, and HVAC equipment.
- Department of Water and Power (DWP) equipment including transformers and power poles.
- New sidewalk, curb and gutter.
- Decorative Fencing.
- Landscaping and habitat restoration.

Below Ground Improvements (3813 and 3817 South Esplanade and within the public right of way)

- Three 18-mgd (million gallons per day) wet-pit submersible pumps.
- 17-inch x 17-inch submerged diversion structure below the Grand Canal.
- A new 66-inch sewer to connect the VAPP to the new diversion structure below Hurricane Street.
- Three concrete wet wells and a valve vault, located up to 30 feet below grade to temporarily hold and pump wastewater.
- Temporary Cofferdam within the Grand Canal.
- 7,324 cubic yards of cut, 5,864 cubic yards of fill (net cut of 1,460 cubic yards).

Surface Parking Lot (128 Hurricane Street)

- Seven vehicle parking spaces including one ADA-compliant space and four bicycle parking spaces for use by VAPP employees and the public.
- Landscaping with a bioswale.
- A public art structure.
- Public Parking Sign Program.
- Oil well re-abandonment and site remediation

BACKGROUND

Venice Pumping Plant (VPP) and Critical Wastewater Infrastructure

The City owns and operates the Venice Pumping Plant (VPP) Pump Station No. 646, located at 140 Hurricane Street within the Venice Community Plan area, adjacent to the Ballona Lagoon and the Grand Canal. The VPP is the City's largest pumping plant and is considered a critical facility for conveying sewage from its tributary area to the Hyperion Treatment Plant, located just south of the Los Angeles International Airport. The VPP was designed and built in 1957. Five pumps currently serve the 68 year old facility. The VPP collects sewage from the City's Coastal Interceptor Sewer (CIS), which serves the communities of Topanga, Pacific Palisades, Brentwood, Venice, and Mar Vista. It also serves the City of Santa Monica and parts of Los Angeles County. Transporting wastewater over such long distances, and often uphill, requires considerable energy to overcome gravity. To address this obstacle, the Coastal Interceptor Sewer relies on a system of force mains (pressurized pipes) and pumping plants (mechanical systems that generate hydraulic pressure). Together these components generate the necessary transport power needed to move wastewater through the system and deliver it to its ultimate destination: the Hyperion Treatment Plant.

Unlike other portions of the City's sewage collection and conveyance system, there are no diversions for bypassing the VPP for required maintenance or in the event of an emergency. Pumping such a large volume of wastewater requires significant pressure, particularly because the Hyperion Treatment Plant sits approximately 60 feet higher in elevation than the Venice Pumping Plant. The failure of a single pump during high-flow periods could result in sewage backups. In the past, the City has rented portable pumps when one or more of the pumps were offline for repairs. However, portable pumps must operate above ground, which introduces additional impacts such as noise and odor that are otherwise avoided with permanent, below-grade pumps. In addition, the sourcing of temporary solid-waste pumps of the correct capacity can also be challenging, particularly in an emergency, when time is critical.

The terms 'wastewater' and 'sewage' are used interchangeably — sewage is not limited to restroom waste but includes water discharged from a variety of everyday urban activities. Common residential sources include laundry facilities, kitchens, and restrooms. Although the City maintains separate systems for sewage and stormwater, stormwater can still enter the sewer system (e.g., through manhole covers and pipes infiltrated by tree roots). As a result, rainfall must be factored into the design and capacity planning of the City's wastewater network.

At the VPP during dry-weather flows (no rain), two pumps generally pump an average of 20 million gallons per day (mgd) of sewage. However, all five pumps have been used simultaneously to convey sewage influent from the collection area to the Hyperion Treatment Plant during wet-weather flows (rain), depending on conditions. During certain years, flows during wet-weather conditions have reached 50 mgd and on several occasions, during extreme weather events, the flows exceeded the combined pumping capacity of the existing facility, resulting in near miss events, which would have required emergency discharges directly into the Grand Canal and Ballona Lagoon or overflows into the surrounding street network.

Therefore, the existing VPP is essentially built out and has no additional space for required back up pumps and associated equipment to ensure system reliability. To prevent such a failure and ensure system reliability, the City proposes VAPP to supplement the existing pumping capacity with new pumps. The VAPP is designed to provide this crucial redundancy, improve system reliability, and mitigate the risk of environmental contamination.

Timeline

On December 4, 2017, the City held a joint public hearing for Case Nos. DIR-2017-4167-PUB-CDP-SPP and the ZA-2017-3950-ZAA for the construction, use, and maintenance of a two-story, 2,500 square-foot wastewater pumping plant, built across two lots at 3813 and 3817 South Esplanade, to supplement the capacity of the existing Venice Pumping Plant (VPP) for conveyance of wastewater to the Hyperion Treatment Plant.

In addition, on December 4, 2017, the City held a joint public hearing for Case Nos. DIR-2017-4173-CDP-SPP and ZA-2017-3953-CU for the construction of a surface parking lot located at 128 Hurricane Street, providing seven (7) vehicle parking spaces and four (4) bicycle parking spaces for the Venice Auxiliary Pumping Plant.

On November 18, 2021, the Director of Planning and the Zoning Administrator issued a Joint Letter of Determination conditionally approving Case Nos. DIR-2017-4167-PUB-CDP-SPP and ZA-2017-3950-ZAA for the Venice Auxiliary Pumping Plant.

In addition, on November 18, 2021, the Director of Planning and the Zoning Administrator issued a second Joint Determination Letter conditionally approving Case Nos. DIR-2017-4173-CDP-SPP and ZA-2017-3953-CU for the construction of a surface parking lot for the Venice Auxiliary Pumping Plant.

On December 3, 2021, an appeal was filed by an adjoining neighbor and property owner for all four associated cases (DIR-2017-4167-PUB-CDP-SPP, ZA-2017-3950-ZAA, DIR-2017-4173-CDP-SPP, and ZA-2017-3953-CU) on the grounds that the facility is incompatible with the surrounding residential community and the project poses a threat to the sensitive coastal environment.

On August 11, 2022, the City Planning Commission held a hearing for the appeal and denied the appeal in part and granted the appeal in part to correct an error in the grant clause and sustained the Planning Director and the Zoning Administrator's Joint Letters of Determination dated November 18, 2021; the CPC Decision Letter was issued on September 13, 2022.

On December 19, 2022, the City's approval of the Coastal Development Permit, Case No. DIR-2017-4167-PUB-CDP-SPP, was appealed to the California Coastal Commission.

On March 28, 2024, the Department of Public Works submitted an application for a General Plan Amendment, Zone Change, Conditional Use, and Project Compliance. The Director of Planning initiated an amendment to the General Plan and certified Venice Land Use Plan (LUP) to satisfy the requirements outlined by the California Coastal Commission. In a memo dated December 13, 2023, the City Engineer outlined the instructions provided by the California Coastal Commission, to amend the Venice LUP to allow the expansion of the wastewater pumping plant use.

On May 5, 2025, a hearing officer held a public hearing on behalf of the City Planning Commission for the Department of Public Works application.

On September 11, 2025, the California Coastal Commission held a Substantial Issue and De Novo public hearing on the proposed project and found "substantial issue" regarding the project's conformity with the Coastal Act and the Venice LUP and approved the project with 19 Special Conditions. Special Condition No. 2 states:

> *Prior to issuance of the Coastal Development Permit, the City must submit and receive certification of a Venice Land Use Plan Amendment by the Coastal Commission, which must be final and effective in accordance with the procedures identified in the California*

Code of Regulations, Title 14, Division 5.5, Section 13544. The Venice Land Use Plan Amendment must change the land use designation of the subject properties from Low Medium II - Multi Family to a Public Facility land use designation. The Land Use Plan Amendment must also update Venice LUP Policy I.D.1 to allow for Public Facilities.

Project Site

The project site consists of three city-owned vacant lots with a total combined area of approximately 12,076 square feet. The three lots are not contiguous. The two lots at 3813 and 3817 Esplanade are bounded by the Grand Canal to the east, Hurricane Street to the south and Canal Court to the west and is the site for the new pumping plant. The two lots for the VAPP provide a frontage along Hurricane Street of 100 feet and a side yard along Canal Court of 78 feet for a lot area of approximately 7,848 square feet. The lot at 128 Hurricane is bounded by the Ballona Lagoon to the south, Canal Court to the east and Hurricane Street to the north and is the site for the new surface parking lot for the pumping plant. The lot for the surface parking lot provides a frontage of 60 feet on Hurricane Street and a side yard along Canal Court of 85 feet for a lot area of approximately 4,228 square feet.

The project site is located within the Dual Permit Jurisdiction of the Coastal Zone and a Calvo Exclusion Area. In addition, the project site is located in a Methane Zone, Liquefaction area, Tsunami Inundation Zone, and within 6.72 kilometers from the Santa Monica Fault.



General Plan Land Use Designation, Zoning, and Specific Plan

The project site is zoned RW2-1 with a Low Medium II residential land use designation within the Venice Community Plan and the Venice Coastal Zone Land Use Plan. The project site is also located within the Ballona Lagoon West Subarea of the Venice Coastal Zone Specific Plan and the Los Angeles Coastal Transportation Corridor Specific Plan.

Surrounding Properties

The neighborhood and properties surrounding the subject site contain a mix of residential, open space, and public facility land uses. North and west of the project site are single and multi-family residential uses in the RW2-1 and R3-1 zones with a Low Medium II Residential land use designation. These single and multi-family residential structures are two and three stories in height. There are three two-story, multi-family residential structures on the block of South Esplanade bounded by Hurricane Street, Galleon Street, and Canal Court. Directly across Canal Court from the project site is a three-story multi-family structure. Across South Esplanade and the Grand Canal are single-family residential structures ranging from two to three stories in height.

To the east of the proposed pumping plant is the Grand Canal, which is designated as open space. To the south of the proposed auxiliary pumping plant is the existing Venice Pumping Plant (VPP), which has a Public Facility land use designation and a zoning of RW2-1. To the south of the surface parking lot for the VAPP is the Ballona Lagoon with an Open Space land use designation and zoned OS-1-XL. To the west of the surface parking lot is the existing pumping plant.



Streets and Circulation

South Esplanade is a pedestrian walkway with a width of approximately 5 feet which runs along Grand Canal in the Venice Canal System with a waterway width of approximately 50 feet.

Hurricane Street is a Local Street (Standard), designated to a right-of-way width of 60 feet and a roadway width of 36 feet; the actual right-of-way width is approximately 30 feet and a roadway width of approximately 25 feet.

Canal Court is a Local Street (Standard), designated to a right-of-way width of 60 feet and a roadway width of 36 feet; the road is used as an alley with an actual right-of-way and roadway width of 20 feet.

Public Transit

Metro Route 108 stops approximately 377 feet west of the subject site near the intersection of Pacific Avenue and Hurricane Street providing service from Marina del Rey to Pico Rivera.

Big Blue Bus 18 stops approximately 641 feet east of the subject site near the intersection of Via Marina and Marquesas Way providing service from Marina del Rey to UCLA.

Commuter Express 437 stops approximately 950 feet south of the subject site near the intersection of Pacific Avenue and Lighthouse Street providing service from Marina del Rey to downtown Los Angeles.

Relevant Cases

Subject Site

DIR-2017-4173-CDP-SPP and ZA-2017-3953-CU – On November 18, 2021, the Director of Planning approved a Coastal Development Permit and Project Permit Compliance Review authorizing the construction of a surface parking lot providing seven (7) vehicle parking spaces and four (4) bicycle parking spaces for the Venice Auxiliary Pumping Plant (3813 and 3817 South Esplanade), a public art installation, and new landscaping, within the Dual Permit Jurisdiction of the Coastal Zone, located at 128 East Hurricane Street. The Zoning Administrator approved a Conditional Use Permit to allow the construction, use, and maintenance of a public parking area in the RW2-1 zone.

DIR-2017-4167-PUB-CDP-SPP and ZA-2017-3950-ZAA – On November 18, 2021, the Director of Planning approved an Alternative Compliance for a Public Benefit Project outlined in Section 14.00 A.6 for the construction, use, and maintenance of a public utility use and structure in the RW2-1 zone, and a Coastal Development Permit and Project Permit Compliance Review authorizing the construction of a two-story, 2,500 square-foot wastewater pumping plant, (built across two lots at 3813 and 3817 South Esplanade), to supplement the capacity of the existing Venice Pumping Plant (VPP) for the conveyance of wastewater to the Hyperion Treatment Plant, providing eleven parking spaces on-site, within the Dual Permit Jurisdiction of the Coastal Zone, located at 3813 & 3817 South Esplanade, and 133 & 139 Hurricane Street. The Zoning Administrator approved a Zoning Administrator's Adjustment to allow the encroachment of electrical equipment, four structures that are between six and a half and seven feet in height, within the rear yard setback.

Surrounding Properties

ZA-2022-6935-CDP-SPP-ZAA-MEL – On February 21, 2023, the Zoning Administrator approved a Coastal Development Permit and Project Permit Compliance Review authorizing the after-the-fact demolition of a single-family dwelling with a detached two-car garage, the after-the-fact construction of a two-story, 3,658 square-foot single-family dwelling, and interior and exterior improvements to the existing single-family dwelling, and a Zoning Administrator's Adjustment to allow a rear yard setback of 12 feet 6 inches (including one-half the width of an adjoining alley), in lieu of the minimum 15 feet otherwise required by LAMC Section 12.10 C.3, maintaining three parking spaces on-site, within the Dual Permit Jurisdiction of the Coastal Zone, located at 17 East Galleon Street.

ZA-2021-406-CDP-SPP-MEL-ZV-ZAA – On July 7, 2022, the Zoning Administrator approved a Coastal Development Permit and Project Permit Compliance Review authorizing the after-the-fact demolition of a one-story single-family dwelling, and the construction of a two story, 2,631 square-foot single-family dwelling and a 528 square foot Accessory Dwelling Unit (ADU) on the second floor of a detached garage, a Zone Variance

to allow a parking bay width of 37 feet in lieu of 45 feet 4 inches for one standard stall and 34 feet in lieu of 40 feet 4 inches for one compact stall, as otherwise required by LAMC Section 12.21 A.5(b), a Zoning Administrator's Adjustment to allow a front yard of 10 feet 11 inches in lieu of 15 feet required by LAMC Section 12.10 C.1, a Zoning Administrator's Adjustment to allow an easterly side yard of 3 feet 11 inches and a westerly side yard of 2 feet for the single-family dwelling and detached garage in lieu of the 4 feet 3 inches otherwise required by LAMC Section 12.10 C.2, and a Zoning Administrator's Adjustment to allow a detached garage to be located 1 foot and 6 inches from the rear property line, in lieu of the 5 feet and 10 feet from the centerline of the alley, as otherwise required by LAMC Section 12.21 C.5, within the Dual Permit Jurisdiction of the Coastal Zone, located at 17 West Jib Street.

DIR-2021-10374-CDP-MEL – On June 8, 2022, the Director of Planning approved a Coastal Development Permit authorizing the conversion of a 347 square-foot recreation room within a multi-family residential structure to an attached, Accessory Dwelling Unit (ADU), maintaining 4 parking spaces on-site, within the Dual Permit Jurisdiction of the Coastal Zone, located at 127 1-2 East Galleon Street.

DIR-2021-346-CDP-SPP-MEL – On May 31, 2022, the Director of Planning approved a Coastal Development Permit and Project Permit Compliance Review authorizing a Preliminary Parcel Map for the conversion of three dwelling units within a two-story, 3,928 square-foot triplex into three residential condominium units, maintaining six parking spaces on-site, within the Dual Permit Jurisdiction of the Coastal Zone, located at 3818 1-4 South Pacific Avenue.

DIR-2017-3789-CDP-SPP-MEL and ZA-2017-3788-ZAA – On October 5, 2018, the Director of Planning approved a Coastal Development Permit and Project Permit Compliance Review authorizing the remodel of and addition to an existing one-story 1,615 square-foot single-family dwelling and 456 square-foot, detached two-car garage, resulting in a two-story 2,602 square-foot single-family dwelling with a 555 square-foot, detached three-car garage with a new 690 square-foot Accessory Dwelling Unit (ADU) above, providing five parking spaces on-site, within the Dual Permit Jurisdiction of the Coastal Zone, located at 17 West Jib Street. The Zoning Administrator approved a Zoning Administrator's Adjustment to allow a second-story easterly side yard setback of 3 feet 11 inches, in lieu of the 4 feet 2.4 inches otherwise required per Section 12.10, and a Zoning Administrator's Adjustment to allow a two-story accessory building to be located zero feet from the rear lot line, in lieu of the minimum 5 feet otherwise required by Section 12.21 C.5(f).

ZA-2015-626-CDP-MEL-SPP – On February 8, 2016, the Zoning Administrator approved a Coastal Development Permit and Project Permit Compliance Review authorizing the construction of a single-family residence, within the Dual Permit Jurisdiction of the Coastal Zone, located at 16 West Hurricane Street.

APCW-2010-3101-SPE-CDP-SPP-MEL – On April 6, 2011, the West Los Angeles Area Planning Commission approved the requested Specific Plan Exception to permit seven (7) dwelling units on an approximately 3,150 square foot lot classified in the R3-1 zone, instead of the maximum two (2) dwelling units as otherwise permitted, a Specific Plan Exception to permit seven (7) parking spaces instead of the minimum 16 parking spaces that would as otherwise be required for a seven unit residential project (two parking spaces per unit and two guest parking spaces), and a Coastal Development Permit and Project Permit Compliance Review authorizing the conversion of four guest rooms and one recreation room into five dwelling units, providing seven parking spaces on-site, within the Dual Permit Jurisdiction of the Coastal Zone, located at 14 Jib Street.

ZA-2006-3903-CDP-MEL – On March 21, 2008, the Zoning Administrator approved a Coastal Development Permit authorizing the use and maintenance of a two-unit condominium conversion of a two-unit apartment, maintaining four parking spaces on-site, within the Dual Permit Jurisdiction of the Coastal Zone, located at 127 Galleon Street.

ZA-2003-1369-CDP-MEL – On October 13, 2004, the Zoning Administrator approved a Coastal Development Permit authorizing a two-unit condominium conversion, within the Dual Permit Jurisdiction of the Coastal Zone, located at 131 Galleon Street.

ZA-2002-4188-CDP-ZAA-SPP – On August 6, 2003, the Zoning Administrator approved a Coastal Development Permit and Project Permit Compliance Review authorizing a four-unit residential condominium project served by nine parking spaces, in conjunction with Parcel Map No. AA-2002-4187-PMLA, a Zoning Administrator's Adjustment from Sections 12.10 C.3 & 4, and 12.21 C.2 to permit 4 feet in lieu of 12-foot passageways on the ground floor, 4 feet in lieu of 7-foot side-yards along the first floor, 3 feet in lieu of 7-foot side yards along the upper floors (2, 3, and 4) on the northeast and southwest property lines, 9 feet in lieu of 6-foot high platforms with guard rails in order to provide pedestrian access on the northeast and southwest property lines, and 12.5 feet in lieu of 15-foot rear yard after dedication, within the Dual Permit Jurisdiction of the Coastal Zone, located at 114 and 116 Galleon Street.

REQUESTED ENTITLEMENTS

General Plan Amendment

Under the City Charter and the Los Angeles Municipal Code, only the City may initiate an Amendment to the General Plan or Specific Plan through action of the City Council, the City Planning Commission, or the Director of Planning. On December 13, 2023, the Department of Public Works Bureau of Engineering requested that the Director of Planning initiate a General Plan Amendment to facilitate the Venice Auxiliary Pumping Plant, and on January 9, 2024, the Director of Planning approved the filing of this General Plan Amendment.

The applicant requests a General Plan Amendment to re-designate the project site from Low Medium II Residential to Public Facility in the Venice Community Plan. The General Plan Amendment would also amend the certified Venice Coastal Zone Land Use Plan, adopted by the City Council on October 29, 1999 and certified by the California Coastal Commission on June 14, 2001. The Amendment would redesignate the land use designation from Low Medium II Residential to Public Facility and includes a related text change to facilitate the proposed project.

Zone Change

Pursuant to LAMC Chapter 1A Section 13B.1.4, the applicant requests a Zone Change to change the site's zoning classification from Residential Waterways Zone "RW2-1" to Public Facility Zone "PF-1".

Conditional Use

Pursuant to the LAMC Chapter 1 Section 12.24 U.21, the applicant requests a Class 3 Conditional Use Permit to allow a pumping plant and a surface parking lot within the PF zone.

Project Compliance

Pursuant to LAMC Chapter 1A Section 13B.4.2, the applicant requests a Project Compliance for a project within the Ballona Lagoon West Subarea of the Venice Coastal Zone Specific Plan. The Specific Plan was adopted as Ordinance 172,897, effective December 22, 1999 and later amended under Ordinance 175,693, effective January 19, 2004. The Specific Plan provides regulations for use, density, lot area, floor area ratio, height of buildings or structures, setbacks, yards, buffers, parking, drainage, fences, design standards, lighting, and trash enclosures that supersede the regulations outlined in the LAMC.

ISSUES

Coastal Commission Action

On September 11, 2025, the California Coastal Commission (CCC) found "substantial issue" with the City's approval of the project under Case No. DIR-2017-4173-CDP-SPP, citing the project's conformity with the Coastal Act and the certified Venice Land Use Plan. The CCC rescinded the City's Coastal Development Permit and approved the project under a "De Novo" Coastal Development Permit, Application No. 5-24-0123, with a condition that the City amend the certified Venice Coastal Zone Land Use Plan. The conditional approval requires the City to amend the Venice Coastal Zone LUP to change the land use designation of the project site from Low Medium II Residential to Public Facility.

The proposed project, as previously approved by the City under Case Nos. DIR-2017-4173-CDP-SPP, ZA-2017-3953-CU, DIR-2017-4167-PUB-CDP-SPP, and ZA-2017-3950-ZAA, has not changed. However, the proposed Public Facility land use designation and PF zone requires additional entitlements to allow the wastewater pumping plant and parking lot in the PF zone and within the Venice Specific Plan.

Community Concerns

At the public hearings (August 11, 2022, May 5, 2025 and September 11, 2025) for the proposed project and in written comments provided to the public record, neighbors, members of the public and the Venice Neighborhood Council expressed concerns regarding construction impacts including noise, vibration and air quality, and project-specific impacts including setbacks, neighborhood compatibility and the new surface parking lot.

Some of the concerns and issues raised by members of the public have been addressed by the mitigation measures provided in the Environmental Impact Report (EIR) and the Coastal Development Permit conditions of approval issued by the California Coastal Commission. Other concerns and issues raised by members of the public including a noise attenuation study and construction management plan will be addressed during the pre-construction phase of the proposed project. At the public hearing before the California Coastal Commission on September 11, 2025, and the CPC public hearing on May, 5, 2025 for this project, the applicant committed to continue to work with neighbors and members of the public during the pre-construction and construction phases of the proposed project.

The surface parking lot has generated significant opposition from neighbors. The surface parking lot is a requirement of the Coastal Development Permit issued by the California Coastal Commission and parking standards in the Venice Specific Plan to support public access to coastal resources. The subject site is located in a parking impacted area, Beach Impact Zone (BIZ), where new development requires additional parking beyond what is required by the Los Angeles Municipal Code. The subject site is approximately 1,000 feet from the Venice Beach shoreline and located at the trailhead of the Ballona Lagoon Marine Preserve Trail. The surface parking lot will be a key amenity for these coastal resources and will relieve demand for on-street parking.

PUBLIC HEARING AND COMMUNICATIONS

A public hearing was held virtually via Zoom by a hearing officer (Ira Brown) on May 5, 2025, at 10:30 a.m. on behalf of the City Planning Commission. (see Public Hearing and Communications, Page P-1).

ENVIRONMENTAL REVIEW

The City of Los Angeles found, based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in the Venice Auxiliary Pumping Plant Environmental Impact Report SCH No. 2015111038 certified on August 8, 2017; and pursuant to CEQA Guidelines 15162 and 15164, and the Addendums dated October 29, 2021 and June 2024, no major revisions are required to the EIR and no subsequent EIR or negative declaration is required for approval of the project. (see Exhibit C).

CONCLUSION

Approval of the requests herein will improve the reliability of the local wastewater system, providing critical backup capacity to protect public health and the environment. By modernizing this essential infrastructure, the VAPP project ensures the safe and effective management of wastewater for communities along the coast.

Based on evaluation of the project and information submitted, input from the public, and the proposed project's compliance with applicable regulations, Staff recommends the City Planning Commission approve the requested actions and adopt the attached Conditions of Approval and Findings.

CONDITIONS OF APPROVAL

1. Except as modified herein, the project shall be in substantial conformance with the plans and materials submitted by the Applicant, stamped "Exhibit A," and attached to the subject case file. No change to the plans will be made without prior review by the Department of City Planning and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the Los Angeles Municipal Code or the project conditions.

2. All other use, height and area regulations of the Municipal Code and all other applicable government/regulatory agencies shall be strictly complied with in the development and use of the property, except as such regulations are herein specifically varied or required.

3. **Coastal Zone.** The project is subject to Coastal Development Permit 5-24-0123 issued by the California Coastal Commission and any subsequent amendments.

4. **Height.** Within 60 feet of the mean high tide of the Ballona Lagoon or inland side of the Esplanade (City right-of-way), whichever is furthest from the water as determined by a licensed surveyor, Venice Coastal Development Projects shall not exceed a maximum height of 30 feet. Beyond 60 horizontal feet, one additional foot in height is permitted for each two additional horizontal feet to a maximum height of 38 feet. As shown in "Exhibit A", the project provides a height of 30 feet commencing at 60 horizontal feet from the Esplanade property line with an encroachment plane to a building height of 32 feet; height shall be measured from the average existing natural grade

5. **Canal Setback and Permeable Yard.** The project shall provide an average setback of 15 feet, but not less than ten feet from the lot line nearest to the water. An open, permeable yard with an area of at least 15 times the lot width and a minimum area of 450 square feet shall be maintained between the property line that faces the water and the front of any structure. No building extensions, including stairs and balconies, shall be allowed in the required Permeable yard area, except for ground level Permeable decks that do not exceed 18 inches in height. The combined height of any decks, railings, garden walls, and fences situated within the required Permeable yard shall not exceed six feet above the elevation of the adjacent public walkway. As shown in "Exhibit A", the project provides 2,921 square feet of Permeable yard adjoining Grand Canal and 1,074 square feet of Permeable yard adjoining the Ballona Lagoon.

6. **Yards.** The side yard shall be consistent with LAMC requirements but shall not be less than 3 feet 6 inches.

7. **Parking.** As shown in "Exhibit A" and as approved by the Department of Building and Safety, the project shall provide a total of eleven (11) vehicle parking spaces, where one parking space maybe substituted for four bicycle parking spaces. All vehicle access shall be from Hurricane Street.

   Signage for the surface parking lot shall be installed to clearly identify the public parking spaces and to inform the public of the hours of use, from sunrise to sundown.

8. **Drainage.** The applicant shall submit drainage plans to the Department of Building and Safety for its approval. All drainage for new construction shall be directed away from the Ballona Lagoon.

9. **Grading.** The project includes necessary grading and excavation, comprised of 7,324 cubic yards of cut and 5,864 cubic yards of fill and the export of 1,460 cubic yards of soil, subject to review and final approval by the Department of Building and Safety. The project shall comply with the Conditions of Approval required in the Geology and Soils Report Approval Letter issued by the Department of Building and Safety, Grading Division, dated November 15, 20218 (Log No. 104503-01) and any subsequent amendment thereto. All Conditions of Approval shall be incorporated and printed on the plans submitted for plan check.

10. All landscaping shall be drought tolerant and native or non-invasive plan species. No plant species listed as problematic and/or invasive by the California Native Plant Society, the California Exotic Pest Plant Council, or identified from time to time by the State of California shall be employed or allowed to naturalize or persist on the site. No plant species listed as "noxious weed" by the State of California or the U.S. Federal Government shall be utilized within the property.

11. Outdoor lighting shall be designed and installed with shielding so that light does not overflow into adjacent residential properties.

12. All graffiti on the site shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.

13. A copy of the first page of this grant and all Conditions and/or any subsequent appeal of this grant and its resultant Conditions and/or letters of clarification shall be printed on the building plans submitted to the Development Services Center and the Department of Building and Safety for purposes of having a building permit issued.

14. Prior to the issuance of any permits, a covenant acknowledging and agreeing to comply with all the terms and conditions established herein shall be recorded in the County Recorder's Office. The agreement (standard master covenant and agreement form CP-6770) shall run with the land and shall be binding on any subsequent owners, heirs or assigns. The agreement with the conditions attached must be submitted to the Development Services Center for approval before being recorded. After recordation, a certified copy bearing the Recorder's number and date shall be provided to the Department of City Planning for attachment to the subject case file.

Environmental Conditions – Mitigation Measures

15. The project shall be in substantial conformance with the mitigation measures in the Mitigation Monitoring and Reporting Program (MMRP) in the subject case file. The implementing and enforcing agencies may determine substantial conformance with mitigation measures in the MMP. If substantial conformance results in effectively deleting or modifying the mitigation measure, the Director of Planning shall provide a written justification supported by substantial evidence as to why the mitigation measure, in whole or in part, is no longer needed and its effective deletion or modification will not result in a new significant impact or a more severe impact to a previously identified significant impact.

16. If the Project is not in substantial conformance to the adopted mitigation measures or MMP, a modification or deletion shall be treated as a new discretionary action under CEQA Guidelines, Section 15162(c) and will require preparation of an addendum or subsequent CEQA clearance. Under this process, the modification or deletion of a mitigation measure shall not require a Plan Approval filing unless the Director of Planning also finds that the change to the mitigation measures results in a substantial change to the Project or are non-environmental.

Administrative Conditions

17. **Final Plans.** Prior to the issuance of any building permits for the project by the Department of Building and Safety, the applicant shall submit all final construction plans that are awaiting issuance of a building permit by the Department of Building and Safety for final review and approval by the Department of City Planning. All plans that are awaiting issuance of a building permit by the Department of Building and Safety shall be stamped by Department of City Planning staff "Final Plans". A copy of the Final Plans, supplied by the applicant, shall be retained in the subject case file.

18. **Notations on Plans.** Plans submitted to the Department of Building and Safety, for the purpose of processing a building permit application shall include all of the Conditions of Approval herein attached as a cover sheet, and shall include any modifications or notations required herein.

19. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review of approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning prior to clearance of any building permits, for placement in the subject file.

20. **Code Compliance.** Use, area, height, and yard regulations of the zone classification of the subject property shall be complied with, except where granted conditions differ herein.

21. **Department of Building and Safety**. The granting of this determination by the Director of Planning does not in any way indicate full compliance with applicable provisions of the Los Angeles Municipal Code Chapter IX (Building Code). Any corrections and/or modifications to plans made subsequent to this determination by a Department of Building and Safety Plan Check Engineer that affect any part of the exterior design or appearance of the project as approved by the Director, and which are deemed necessary by the Department of Building and Safety for Building Code compliance, shall require a referral of the revised plans back to the Department of City Planning for additional review and sign-off prior to the issuance of any permit in connection with those plans.

22. **Condition Compliance.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning.

23. **Indemnification and Reimbursement of Litigation Costs.**

    Applicant shall do all of the following:

    (i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

    (ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.

(iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than $50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

FINDINGS

General Plan/Charter Findings

1. General Plan Land Use Designation

The subject site is located within the Venice Community Plan area, adopted by the City Council on September 29, 2000. The Community Plan designates the subject site as Medium Residential. The subject site is also located within an area covered by the Venice Coastal Zone Land Use Plan (LUP), adopted as part of the Venice Community Plan and certified by the California Coastal Commission on June 14, 2001. The Venice LUP supersedes the Venice Community Plan area for portions in the Coastal Zone. The Venice LUP designates the project site as Low Medium II Multiple Family Residential. The corresponding zone for Low Medium II Multiple Family Residential is RW2 zone in the Venice Community Plan.

The requested General Plan Amendment would change the Venice Coastal Zone LUP and Venice Community Plan to re-designate the subject site from Low Medium II Multiple Family Residential to Public Facility with a corresponding zone of Public Facility (PF). The corresponding zone for the Public Facility land use designation in the Venice Community Plan is the Public Facility (PF) zone.

As such, the recommended Zone Change to PF for the subject site would be consistent with the adoption of the recommended general plan amendment and would be in substantial conformance with the purpose, intent, and provisions of the General Plan as it is reflected within the Venice Community Plan and the certified Venice Coastal Zone Land Use Plan.

2. General Plan Text

The General Plan serves as a blueprint for the future, prescribing goals, policies and objectives to shape and guide the physical development of the City. Further, the General Plan is a vision for how the City will evolve, reflecting the values and priorities of its communities. As such, the General Plan is intended to inform land use decisions. The General Plan consists of the Framework Element, the Land Use Element comprising 35 Community Plans and ten specific subject elements. The ten specific subject elements include: Housing, Safety, Health, Mobility, Conservation, Air Quality, Noise, Infrastructure Systems, Public Facilities & Services, and Open Space.

The subject site is located within the Venice Community Plan, adopted by the City Council on September 29, 2000. The subject site is also located within an area covered by the Venice Coastal Zone Land Use Plan (LUP), adopted as part of the Venice Community Plan and certified by the California Coastal Commission on June 14, 2001.

The requested General Plan Amendment text change would modify Policy I.D.1 (Canals and Ballona Lagoon Waterway) to list public facilities as an allowable land use adjacent to the Venice canals and the Ballona Lagoon.

Framework Element

The Framework Element of the General Plan was adopted by the City of Los Angeles in December 1996 and re-adopted in August 2001. The Framework Element is the organizing Element of the General Plan. Its policies address and connect all the Elements of the General Plan. The Framework Element is the strategy for long-term growth that sets a

citywide context to guide amendments to the Community Plans, zoning ordinances, and other land use decisions. The Framework Element defines Citywide policies regarding seven topic areas including Land Use, Housing, Urban Form and Neighborhood Design, Open Space and Conservation, Economic Development, Transportation, and Infrastructure and Public Services.

The Framework Element includes the following goals, objectives and policies relevant to the subject site and the requested General Plan Amendment and Zone Change. Below is an analysis of the Project's consistency with the objectives and policies of the Framework Element as described below.

Land Use

The Land Use Chapter of the Framework Element identifies objectives and supporting policies relevant to the proposed project. Those objectives and policies seek, in part, to support transportation and utility infrastructure needed to support anticipated population and job growth. The legislative actions and the proposed project would support and be consistent with the General Plan Framework Land Use Chapter as it accommodates infrastructure improvements to accommodate existing population and planned growth.

To support population growth, the Framework Element acknowledges that Los Angeles needs a strong, expanding economy, healthy neighborhoods, and a tax base that can support the basic public services necessary to maintain and improve its quality of life. In order for the City to provide services that the public expects, the Framework Element embraces a vision of Los Angeles as a sustainable city: one which manages its infrastructure and public services in a manner that avoids depletion or permanent damage of its natural resources.

Specifically, the Project would be consistent with the following goals, objectives, and policies, as set forth in the General Plan Framework Land Use Chapter:

Goal 3A (Distribution of Land Uses): A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more liveable city.

Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.

Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.

Objective 3.3: Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.

Policy 3.3.1: Accommodate projected population and employment growth in accordance with the Long-Range Land Use Diagram and forecasts in Table 2-2 (see Chapter 2: Growth and Capacity), using these in the formulation of the community plans and as the basis for the planning for and implementation of infrastructure improvements and public services.

Infrastructure and Public Services

The Infrastructure and Public Services Chapter of the Framework Element identifies objectives and supporting policies relevant to the Project Site. Those objectives and policies seek, in part, to support Infrastructure improvements that will be required to support the needs of the City's growth and, at the same time, to replace existing facilities that have deteriorated due to age or have become obsolete. The legislative actions and the proposed project would support and be consistent with the General Plan Framework Infrastructure and Public Services Chapter as it accommodates infrastructure improvements to accommodate existing population and planned growth.

The proposed project will comply with and supports the following goals, objectives, policies, implementation programs of the Infrastructure and Public Services Chapter.

Goal 9A (Wastewater): Adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.

Objective 9.2: Maintain the wastewater collection and treatment system, upgrade it to mitigate current deficiencies, and improve it to keep pace with growth as measured by the City's monitoring and forecasting efforts.

Policy 9.2.1: Collect and treat wastewater as required by law and Federal, State, and regional regulatory agencies.

Policy 9.2.2: Maintain wastewater treatment capacity commensurate with population and industrial needs.

Policy 9.2.3: Provide for additional wastewater treatment capacity in the Hyperion Service Area (HSA), as it becomes necessary.

Policy 9.2.4: Continue to implement programs to upgrade the wastewater collection system to mitigate existing deficiencies and accommodate the needs of growth and development.

Policy 9.2.5: Review other means of expanding the wastewater system's capacity.

Objective 9.4: Ensure continued provision of wastewater collection and treatment after an earthquake or other emergency.

Goal 9B (Stormwater): A stormwater management program that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations.

Objective 9.5: Ensure that all properties are protected from flood hazards in accordance with applicable standards and that existing drainage systems are adequately maintained.

Policy 9.5.1: Develop a stormwater management system that has adequate capacity to protect its citizens and property from flooding which results from a 10-year storm (or a 50-year storm in sump areas).

Policy 9.5.3: Implement programs to correct any existing deficiencies in the stormwater collection system.

Policy 9.5.4: Ensure that the City's drainage system is adequately maintained.

Implementation Program P7: Formulate/update a wastewater plan to provide sufficient capacity to correct existing deficiencies and meet the needs of future growth. Consider the following actions when developing/updating this Element:

a. Identify necessary additional wastewater treatment capacity, collection and conveyance facilities, including, but not limited to, a new wastewater treatment facility for the Hyperion Service Area, a replacement sewer for the North Outfall Sewer and the implementation of an ongoing program to identify and promptly rehabilitate and/or replace deteriorated sewers.

b. Use as the standard for facility planning the hydraulic relief for any part of the collection system that averages over 50 percent capacity and the level of wastewater treatment necessary for compliance with all applicable State and Federal water quality requirements.

The Framework Element acknowledges the strategic pressures and challenges in maintaining and upgrading the vast, complex and aging network of public facilities and infrastructure. Much of the city's infrastructure is between 20 and 100 years old and is increasingly at risk of failure. The city faces the constant need to implement preventative maintenance, replace worn-out equipment, and make timely repairs to keep its foundational systems functioning effectively. In addition, Los Angeles must make significant infrastructure improvements to comply with federal and state laws governing clean air, clean water, and solid waste diversion. These regulations establish a minimum quality of service that the city is legally required to provide its citizens.

As previously stated, the existing VPP is essentially built out and has no additional space for required back up pumps and associated equipment to ensure system reliability. To prevent such a failure and ensure system reliability, the City proposes VAPP to supplement the existing pumping capacity with new pumps. The VAPP is designed to provide this crucial redundancy, improve system reliability, and mitigate the risk of environmental contamination. As such, the legislative actions and the proposed project would support and be consistent with the General Plan Framework as it accommodates infrastructure improvements to accommodate existing population and planned growth.

Land Use Element

Venice Community Plan

The Venice Community Plan was adopted by the City Council on September 29, 2000. The Venice Community Plan Area contains approximately 2,061 acres, representing 0.7 percent of the land in the City of Los Angeles. The Community Plan's purpose is to promote an arrangement of land use, circulation, and services, which all encourage and contribute to

the economic, social, health, and welfare of the Community. In that regard, the Venice Community Plan establishes land use designations and corresponding zones that can be applied to properties. The Project site is located within the Venice Community Plan, which designates the site for Medium Residential land uses. The Venice Community Plan sets forth goals, objectives, policies, and programs that can assist decision makers to review new development proposals or to consider a proposed ordinance or policy.

The proposed project will comply with and supports the following goals, objectives and policy of the Venice Community Plan:

Goal 18: Preservation of the scenic and visual qualities of coastal areas.

Objective 18-1 To govern the manner in which the City of Los Angeles implements the California Coastal Act of 1976, as well as the establishment of land uses and their subsequent development.

Policy 18-1.1 The location and amount of new development should maintain and enhance public access to the coast.

Policy 18-1.2 The protection of estuaries and wetlands and the restoration and protection of the Venice Canals.

The project proposes the construction of a new two-story, 2,283 square foot wastewater pumping plant to provide critical backup capacity to the existing Venice Pumping Plant. The project also includes a number of co-benefits a new public parking lot and habitat restoration to enhance coastal access and coastal resources.

Venice Coastal Zone Land Use Plan

The Venice Coastal Zone Land Use Plan (LUP) was adopted by the City Council on October 29, 1999 and certified by the California Coastal Commission on June 14, 2001. The LUP is part of the Local Coastal Program intended for the Venice Coastal Zone. However, the necessary Implementation Plan was not adopted. The LUP was adopted by means of a plan amendment to the Community Plan and provides policies applicable to development in the Venice Coastal Zone. The Venice Coastal Zone Land Use Plan is an amendment to the Venice Community Plan and supersedes the Venice Community Plan for areas within the Coastal Zone. The subject site is located within the Ballona Lagoon West Subarea with a land use designation Low Medium II Residential.

The unique geography of the Venice Coastal Zone, characterized by its canals, lagoon, and extensive beachfront, combined with intense visitor traffic, places significant demands on its public infrastructure. To manage the pressures of development while protecting sensitive coastal resources, the Venice Coastal Zone Land Use Plan establishes a comprehensive set of policies for public works. Chapter II of the LUP outlines the land use policies for new development in the Venice Coastal Zone.

The proposed project will comply with and supports the following goals, objectives, and policy of the certified Venice Coastal Zone Land Use Plan:

Policy II.C.1. General Non-Vehicular Coastal Access Policy. Pedestrian and bicycle access ways are identified on Exhibit 19. Pedestrian Access and Bicycle Trails shall be developed, protected and maintained, and new development adjacent to the coast and

coastal waterways shall be required to provide public access in a manner that is consistent with the policies of the Coastal Act.

A network of pedestrian and bicycle routes shall be developed, enhanced and maintained to provide linkages within residential neighborhoods and between visitor-serving commercial areas and coastal recreational access points, transit routes, existing and projected parking facilities, and areas of historical significance to facilitate circulation of visitors within the heavily congested areas in Venice.

Policy IV.B.3. Ballona Lagoon Development Standards. The setbacks and height of buildings adjacent to the lagoon shall continue to be limited as provided in Policies I.A.4b, I.A.4c, and I.A.4d so that development is compatible with the continuance of the environmentally sensitive habitat area and avoids adverse impacts on avian flight patterns.

Policy V.A.1. General. Public services shall consider the competing needs of residents and visitors for use of roadways, existing parking, service systems, domestic water, public restrooms, etc., and shall allocate resources to expand the use of these existing facilities and create new facilities where necessary in a manner that they do not adversely affect residents. Public works projects shall be reviewed for consistency with the Coastal Act and the Venice Land Use Plan through the coastal development permit process as required by the Coastal Act.

Policy V.A.3. Infrastructure. New sewer, storm drain, and water lines shall be installed using the least environmentally disturbing method feasible. The City of Los Angeles Department of Public Works shall develop a comprehensive citywide Storm Water Management Program, as discussed further in Implementation Strategy of Policy IV.C.1 of this LUP, to control stormwater run-off from new public and private developments and, where feasible, to remove pollutants from that run-off. Development of infrastructure shall precede or be constructed concurrently with the construction of developments or in lieu-fee should be paid.

Historically, the Venice Coastal Zone has faced significant challenges related to sewer capacity and accidental raw sewage discharges from the Venice Pumping Plant. As noted in the LUP's summary of historical issues, these points of failure created the policy imperative for a robust, modern, and well-maintained wastewater system capable of protecting public health and sensitive marine environments like the Venice Canals and Ballona Lagoon. As previously stated, the existing VPP is essentially built out and has no additional space for required back up pumps and associated equipment to ensure system reliability. To prevent such a failure and ensure system reliability, the City proposes the VAPP to supplement the existing pumping capacity with new pumps. The VAPP is designed to provide this crucial redundancy, improve system reliability, and mitigate the risk of environmental contamination.

The proposed General Plan Amendment will amend the following policies to facilitate the proposed project:

Policy I.A.7. Multi-family Residential-Low Medium II Density: Accommodate the development of multi-family dwelling units in the areas designated as “Multiple Family Residential” and “Low Medium II Density” on the Venice Coastal Land Use Plan.

Policy I.D.1. Canals and Ballona Lagoon Waterways. The Venice estuaries and wetlands including the Ballona Lagoon, Venice Canals, and Grand Canal south of

Washington Boulevard, are designated in the Land Use Plan as natural and coastal recreational resources, and are rezoned to the "Open Space" designation.

Adjacent Use/Development: The only permitted development adjacent to the canals and lagoon shall be habitat restoration, single-family dwellings, public parks and walkways, subterranean or surface public parking lots, maintenance activities and emergency repairs. Surface public parking lots shall be permitted only where sufficient access and roadway capacity exists to accommodate such parking. New construction along the Canals, and Ballona Lagoon shall comply with standards for setbacks, noise barriers, landscape plan, pervious surfacing with drainage control measures to filter storm run-off and direct it away from environmentally sensitive habitat areas, buffer areas in permanent open space, land dedication for erosion control, and wetland restoration including off-site drainage improvements. For more details refer to the provisions contained in Policy Group I.A., Residential Land Use and Development Standards, and Policies IV.C.1 and IV.C.2, Stormwater Runoff and Circulation.

The proposed amendment will change the land use designation from Low Medium II Residential to Public Facility and add public facilities as an allowable use adjacent to the Grand Canal and the Ballona Lagoon. As such, the legislative actions and the proposed project would support and be consistent with the Venice Community Plan and Venice Coastal Zone Land Use Plan as it enhances environmental protection and Coastal access.

Public Facilities & Services Element

This Element provides a strategic framework for maintaining the City's vast and complex network of public services. This Element identifies a number of challenges including maintaining and upgrading vast, aging systems, accurately identifying and planning for future improvements and meeting federally and state-mandated service levels and environmental laws. The plan for sewerage provides the following objectives:

To provide a basis for the development of a safe, efficient and economical sewerage system for the City of Los Angeles.

To establish criteria for the location, design and installation of sewerage facilities which will minimize odor and unsightliness.

To provide a basis for the improvement of existing sewerage facilities, the development of proposed facilities, and the accommodation of future technical improvements and alternative concepts of City development.

To recognize that the system should not be limited by political boundaries.

The central challenge addressed by the city's policies is balancing the need for capacity expansion to support growth with the imperative of sustainable resource management. This involves not only upgrading and maintaining physical systems but also implementing demand-side management, conservation, and resource reclamation strategies.

As previously stated, the existing VPP is essentially built out and has no additional space for required back up pumps and associated equipment to ensure system reliability. To prevent such a failure and ensure system reliability, the City proposes the VAPP to supplement the existing pumping capacity with new pumps. The VAPP is designed to provide this crucial redundancy, improve system reliability, and mitigate the risk of

environmental contamination. As such, the legislative actions and the proposed project would support and be consistent with the Public Facilities & Services Element as it provides a crucial redundancy, improve system reliability, and mitigate the risk of environmental contamination of the City's wastewater system.

No Net Loss of Housing Element Sites – Compliance Findings

California Government Code Section (GCS) 65863 generally prohibits local jurisdictions from approving development projects that result in fewer units by income category than were projected for any parcel(s) identified in the 2021-2029 Housing Element, unless a finding can be made that the Housing Element's remaining sites have sufficient capacity to meet the jurisdiction's unmet Regional Housing Need Allocation (RHNA) for each income category.

The project site is located on parcel(s) identified to accommodate 0.107 Lower Income units in the City's 2021-2029 Housing Element. The proposed development includes a total of zero dwelling units. Consequently, the City must make the following written finding, supported by substantial evidence, to approve the development project:

The remaining sites identified in the housing element are adequate to meet the requirements of Government Code Section (GCS) 65583.2 and to accommodate the jurisdiction's share of the regional housing need pursuant to GCS 65584. The finding shall include a quantification of the remaining unmet need for the jurisdiction's share of the regional housing need at each income level and the remaining capacity of sites identified in the housing element to accommodate that need by income level.

Pursuant to GCS 65863(b)(2), the City finds that while the proposed project would result in fewer units by income category than anticipated for that site in the 2021-2029 Housing Element, the remaining sites identified in the Housing Element of the General Plan are adequate to meet the requirements of GCS 65583.2 and accommodate the jurisdiction's share of the regional housing need pursuant to GCS 65584. As noted in Chapter 4 of the 2021-2029 Housing Element, the City assumed the identified Housing Element Sites would individually have a very low likelihood of redevelopment into housing. Therefore, the Housing Element assigned very low projected density/capacity figures that are well below the maximum zoned capacity of each individual Housing Element Site. Chapter 4 of the 2021-2029 Housing Element also notes that the City followed guidance from the California Department of Housing and Community Development (HCD) by setting a target capacity that is 10% higher than the RHNA for lower-income units, and 15% higher than the RHNA for moderate-income units.

Based on the sites inventory and inventory of candidate sites included in the 2021-2029 Housing Element, as well as the most recent Annual Progress Report on the Housing Element submitted to HCD, the City has an unmet need of 110,694 Very Low Income Units, 62,625 Low Income Units, 74,249 Moderate Income Units, and 139,842 Above-Moderate Income Units. In addition, as of April 1, 2025, the City has a remaining capacity of 306,137 Very Low Income Units, 306,137 Low Income Units, 53,188 Moderate Income Units, and 885,801 Above-Moderate Income Units. The excess Above-Moderate Income Unit capacity may accommodate both Moderate and Above-Moderate Unit RHNA Allocations. Therefore, the City finds that there are adequate remaining sites in the Housing Element to accommodate the remaining RHNA Allocation for the planning period, and in compliance with the requirements of GCS 65583.2.

Remaining General Plan Elements

The Housing Element, Mobility Element, Health and Wellness Element, Safety Element, Conservation Element, Air Quality Element and Noise Element do not provide subject site or wastewater objectives or policies. However, all of these elements to varying degrees emphasize the operational integrity of the city's economy and the health of its population depends directly on the capacity and resilience of its core infrastructure.

3. **Charter Finding 555.** The General Plan may be amended in its entirety, by subject elements or parts of subject elements, or by geographic areas, provided that the part or area involved has significant social, economic, or physical identity.

   The General Plan Amendment is to facilitate the development of the Venice Auxiliary Pumping Plant by re-designating the land use designation from Low Medium II residential to Public Facility for the project site within the Venice Community Plan and Venice Coastal Zone Land Use Plan maps. The General Plan Amendment also includes a text change to allow public facilities to be located adjacent to the Grand Canal and the Ballona Lagoon.

   The General Plan amendment is for an area with a significant economic and physical identity. The City owns and operates the Venice Pumping Plant (VPP) Pump Station No. 646, located at 140 Hurricane Street within a Public Facility Land Use Designation in the Venice Community Plan area. The VPP is the City's largest pumping plant and is considered a critical facility for conveying sewage from its tributary area to the Hyperion Treatment Plant, located just south of Los Angeles International Airport. The facility was designed and built in 1957. Five pumps currently serve the 68 year old facility. The VPP collects sewage from the City's Coastal Interceptor Sewer (CIS), which serves the communities of Topanga, Pacific Palisades, Brentwood, Venice, and Mar Vista. It also serves the City of Santa Monica and parts of Los Angeles County. However, the existing VPP is essentially built out and has no additional space for required back up pumps and associated equipment to ensure system reliability. To prevent such a failure and ensure system reliability, the City proposes this project to supplement the existing pumping capacity with new pumps on three adjacent city-owned vacant lots at 3813 and 3817 Esplanade and 128 Hurricane for a surface parking lot.

   The General Plan Amendment is to facilitate the expansion of an existing facility with strong economic and physical identity at this location with an auxiliary facility to support the primary function of the VPP. The VPP and VAPP will be located on adjacent lots separated by Hurricane Street and Canal Court creating a unified project site providing the same function. Therefore, the General Plan amendment and the proposed project would contribute to and strengthen an area which has significant social, economic or physical identity.

4. **Charter Finding 556.** When approving any matter listed in Section 558, the City Planning Commission and the Council shall make findings showing that the action is in substantial conformance with the purposes, intent and provisions of the General Plan. If the Council does not adopt the City Planning Commission's findings and recommendations, the Council shall make its own findings.

   The subject site is located within the Venice Community Plan area, adopted by the City Council on September 29, 2000. The Community Plan designates the subject site as Medium Residential. The subject site is also located within an area covered by the Venice Local Coastal Zone Land Use Plan (LUP), adopted as part of the Venice Community Plan and certified by the California Coastal Commission on June 14, 2001. The Venice Coastal Zone LUP designates the project site as Low Medium II Multiple Family Residential. The

corresponding zone for Low Medium II Multiple Family Residential is RW2 in the Venice Community Plan.

The requested General Plan Amendment would re-designate the subject site from Low Medium II Multiple Family Residential to Public Facility with a corresponding zone of Public Facility (PF). The corresponding zone for the Public Facility land use designation in the Venice Community Plan is Public Facility (PF).

As discussed in Finding No. 2, the General Plan Amendment is consistent with and is in substantial conformance with the purposes, intent and provisions of the General Plan.

5. **Charter Finding 558**.

The proposed Amendment to the Venice Community Plan and certified Venice Coastal Zone Land Use Plan will be in conformance with public necessity, convenience, general welfare and good zoning practice.

The subject site is located within the Venice Community Plan area, adopted by the City Council on September 29, 2000. The Community Plan designates the subject site as Medium Residential. The subject site is also located within an area covered by the Venice Coastal Zone Land Use Plan (LUP), adopted as part of the Venice Community Plan and certified by the California Coastal Commission on June 14, 2001. The Venice LUP designates the project site as Low Medium II Multiple Family Residential. The corresponding zone for Low Medium II Multiple Family Residential is RW2 in the Venice Community Plan.

The requested General Plan Amendment would re-designate the subject site from Low Medium II Multiple Family Residential to Public Facility with a corresponding zone of Public Facility (PF). The corresponding zone for the Public Facility land use designation in the Venice Community Plan is Public Facility (PF).

Public Necessity, Convenience and General Welfare.

The City owns and operates the Venice Pumping Plant (VPP) Pump Station No. 646, located at 140 Hurricane Street within the Venice Community Plan area, adjacent to the Ballona Lagoon and the Grand Canal. The VPP is the City's largest pumping plant and is considered a critical facility for conveying sewage from its tributary area to the Hyperion Treatment Plant, located just south of Los Angeles International Airport. The facility was designed and built in 1957. Five pumps currently serve the facility. The VPP collects sewage from the City's Coastal Interceptor Sewer (CIS), which serves the communities of Topanga, Pacific Palisades, Brentwood, Venice, and Mar Vista. It also serves the City of Santa Monica and parts of Los Angeles County. Transporting wastewater over such long distances, and often uphill, requires considerable energy to overcome gravity. To address this obstacle, the Coastal Sewer relies on a system of force mains (pressurized pipes) and pumping plants (mechanical systems that generate hydraulic pressure). Together these components generate the necessary transport power needed to move wastewater through the system and deliver it to its ultimate destination: the Hyperion Treatment Plant.

Unlike other portions of the City's sewage collection and conveyance system, there are no diversions for bypassing the VPP for required maintenance or in the event of an emergency. Pumping such a large volume of wastewater requires significant pressure, particularly because the Hyperion Treatment Plant sits approximately 60 feet higher in elevation than the Venice Pumping Plant. The failure of a single pump during high-flow periods could result in sewage backups. In the past, the City has rented portable pumps when one or more of

the pumps were offline for repairs. However, portable pumps must operate above ground, which introduces additional impacts such as noise and odor that are otherwise avoided with permanent, below-grade pumps. In addition, the sourcing temporary solid-waste pumps of the correct capacity can also be challenging, particularly in an emergency, when time is critical.

During dry-weather flows (no rain), two pumps generally pump an average of 20 million gallons per day (mgd) of sewage. However, all five pumps have been used simultaneously to convey sewage influent from the collection area to the Hyperion Treatment Plant during wet-weather flows (rain), depending on conditions. During certain years, flows during wet-weather conditions have reached 50 mgd and on several occasions, during extreme weather events (e.g., El Niño in 1997), the flows exceeded the combined and simultaneous pumping capacity of the facility, resulting in near miss events, which would have required emergency discharges directly into the Grand Canal and Ballona Lagoon or overflows into the surrounding street network.

Therefore, the existing VPP is essentially built out and has no additional space for required back up pumps and associated equipment to ensure system reliability. To prevent such a failure and ensure system reliability, the City proposes this project to supplement the existing pumping capacity with new pumps. The VAPP is designed to provide this crucial redundancy, improve system reliability, and mitigate the risk of environmental contamination. As such, the VAPP is a public necessity contributing to the general welfare.

Good Zoning Practice

Los Angeles is guided by a comprehensive policy framework, articulated in the General Plan, that governs critical infrastructure systems, making a deliberate shift from responding to hazards to proactively enlisting planners and engineers to engage in pre-disaster planning and risk reduction for essential systems. The VAPP is part of a strategic roadmap to modernize the City's foundational systems, correct existing service deficiencies and accommodate future growth. Specifically, the VAPP is the continuation of the City's investment in upgrading the wastewater system that started with the Venice Dual Force Main project in 2015.

As such, the requested General Plan Amendment from Low Medium II Residential to Public Facility for the subject site to allow the development of the Venice Auxiliary Pumping Plant supports the long term capital investment plan (CIP) by the Department of Public Works representing good planning practice.

Entitlement Findings

6. Zone Change Findings.

   a. **The action substantially conforms to the purposes, intent and provisions of the General Plan.**

      The General Plan is the City's roadmap for future growth and development. The General Plan elements establish goals, policies, purposes, and programs that provide for the regulatory environment in managing the City, and for addressing environmental concerns and problems. The majority of the policies derived from these elements are in the form of LAMC requirements. Except for the entitlements described herein, the project does not propose to deviate from any other LAMC requirements. The General Plan is comprised of the Framework Element, seven state-mandated elements, and four

additional elements adopted by the City Council. The Framework Element establishes the broad overall policy and direction for the General Plan. The request is consistent with the following Framework objectives and policies for the City's Infrastructure and Public Services:

Goal 9A Adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.

Objective 9.2 Maintain the wastewater collection and treatment system, upgrade it to mitigate current deficiencies, and improve it to keep pace with growth as measured by the City's monitoring and forecasting efforts.

Policy 9.2.4 Continue to implement programs to upgrade the wastewater collection system to mitigate existing deficiencies and accommodate the needs of growth and development.

The proposed VAPP is a City infrastructure improvement project that will supplement the operation of the existing VPP. It is a necessary public infrastructure project that will provide safety and protect human life from a potential release of sewage into the Venice Grand Canal. The applicant is requesting a Conditional Use to allow the construction, use, and maintenance of new auxiliary pumping plant and a new surface parking lot in the proposed Public Facility – PF zone. As discussed in Finding No. 10, and further conditioned, the proposed height, setbacks, permeable yards, and parking conform with the policies and requirements of the certified LUP, Specific Plan, and LAMC. The proposed VAPP and new parking lot would upgrade and enhance an existing system, consistent with the goals and objective of the Framework Element and LUP of the General Plan. As such and as discussed in further detail in Finding No. 2, the Project is in substantial conformance with the purpose, intent and provisions of the General Plan, the applicable community plan and applicable specific plan.

b. **The proposed ordinance is in conformity with public necessity, convenience, general welfare, and good zoning practice.**

Public Necessity, Convenience and General Welfare

The existing Venice Pumping Plant is the City's largest wastewater pumping facility and serves as critical infrastructure for conveying sewage from the surrounding Venice area, as well as portions of the City of Los Angeles, the City of Santa Monica, and Los Angeles County. The facility currently lacks capacity for additional pumps to ensure system reliability during wet weather conditions. The proposed VAPP is intended to provide needed redundancy to prevent system failure during such events. By supplementing the existing pumping capacity, the VAPP is engineered to ensure system reliability, protect public health, and prevent catastrophic environmental damage to sensitive coastal waters.

The proposed project includes many features that support convenience and public welfare including:

1. A new surface parking lot will provide seven parking spaces, including one ADA-compliant parking space, and four bicycle parking spaces.

2. The re-abandonment of an inactive oil well, originally abandoned in 1932, to meet modern safety standards. The contaminated soil on the site will be excavated and safely removed.

3. A landscaped bioswale will be installed to naturally capture and filter stormwater runoff from the parking lot, protecting the water quality of the adjacent and ecologically sensitive Ballona Lagoon.

4. The new lot will feature landscaping with drought-tolerant plants and a public art installation, enhancing the site's aesthetic and function.

In short, the granting of the requested legislative action is a public necessity and is beneficial to the general welfare by providing an essential public service within the Venice Community Plan area. The Venice Auxiliary Pumping Plant is a critical infrastructure project designed to protect public health and the local environment by preventing sewage overflows into the Grand Canal and surrounding streets. It addresses a pressing need for system redundancy and resilience, particularly during heavy storms. In addition to its primary mission, the project will deliver lasting community benefits, including an environmentally cleaned-up site, new public parking, improved stormwater management, and public amenities that will enhance the Venice community. Therefore, the Project would be consistent with the public necessity, convenience, and general welfare of the surrounding area.

Good Zoning Practice

Los Angeles is guided by a comprehensive policy framework, articulated in the General Plan, that governs critical infrastructure systems, making a deliberate shift from responding to hazards to proactively enlisting planners and engineers to engage in pre-disaster planning and risk reduction for essential systems. The VAPP is part of a strategic roadmap to modernize the City's foundational systems, correct existing service deficiencies and accommodate future growth. Specifically, the VAPP is the continuation of the City's investment in upgrading the wastewater system that started with the Venice Dual Force Main project in 2015.

As such, the requested General Plan Amendment from Low Medium II Residential to Public Facility for the subject site to allow the development of the Venice Auxiliary Pumping Plant supports the long term capital investment plan (CIP) by the Department of Public Works representing good planning practice.

Conditional Use Findings
Pursuant to the LAMC Section 12.24 U.21, the applicant requests a Class 3 Conditional Use Permit to allow a pumping plant and a surface parking lot within the Public Facility Zone "PF".

7. **The project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city, or region**.

The proposed project consists of the construction of a two-story, 2,283 square-foot wastewater pumping plant (VAPP) to supplement the capacity of the existing Venice Pumping Plant (VPP) for conveyance of wastewater to the Hyperion Treatment Plant and a surface parking lot, providing three on-site parking spaces and seven off-site parking spaces. The project includes an amendment to the certified Venice Coastal Zone Land Use Plan map to redesignate the subject site from Low Medium II Residential to Public Facility, and a Zone

Change from Residential Waterways Zone "RW2" to Public Facilities Zone "PF". The Applicant requests a Class 3 Conditional Use Permit pursuant to LAMC Section 12.24 U.21, to allow a pumping plant and a surface parking lot within the Public Facilities Zone "PF".

The City owns and operates the Venice Pumping Plant (VPP) Pump Station No. 646, located at 140 Hurricane Street within the Venice Community Plan area, adjacent to the Ballona Lagoon and the Grand Canal. The VPP is the City's largest pumping plant and is considered a critical facility for conveying sewage from its tributary area to the Hyperion Treatment Plant, located just south of Los Angeles International Airport. The facility was designed and built in 1957. Five pumps currently serve the facility. The 68 year old VPP collects sewage from the City's Coastal Interceptor Sewer (CIS), which serves the communities of Topanga, Pacific Palisades, Brentwood, Venice, and Mar Vista. It also serves the City of Santa Monica and parts of Los Angeles County. Transporting wastewater over such long distances, and often uphill, requires considerable energy to overcome gravity. To address this obstacle, the Coastal Interceptor Sewer relies on a system of force mains (pressurized pipes) and pumping plants (mechanical systems that generate hydraulic pressure). Together these components generate the necessary transport power needed to move wastewater through the system and deliver it to its ultimate destination: the Hyperion Treatment Plant.

Unlike other portions of the City's sewage collection and conveyance system, there are no diversions for bypassing the VPP for required maintenance or in the event of an emergency. Pumping such a large volume of wastewater requires significant pressure, particularly because the Hyperion Treatment Plant sits approximately 60 feet higher in elevation than the Venice Pumping Plant. The failure of a single pump during high-flow periods could result in sewage backups. In the past, the City has rented portable pumps when one or more of the pumps were offline for repairs. However, portable pumps must operate above ground, which introduces additional impacts such as noise and odor that are otherwise avoided with permanent, below-grade pumps. Additionally, the sourcing temporary solid-waste pumps of the correct capacity can also be challenging, particularly in an emergency, when time is critical.

Therefore, the existing VPP is essentially built out and has no additional space for required back up pumps and associated equipment to ensure system reliability. To prevent such a failure and ensure system reliability, the City proposes this project to supplement the existing pumping capacity with new pumps. The VAPP is designed to provide this crucial redundancy, improve system reliability, and mitigate the risk of environmental contamination. As such, the project provides a service that is essential and beneficial to the community, city, and region.

8. **The project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety**.

The Project is located in an urbanized area developed with residential uses and a pumping plant, adjacent to the Grand Canal and Ballona Lagoon. As discussed in Finding No. 10.A.5, the development of the VAPP and surface parking lot will be compatible with the character of the surrounding neighborhood and will supplement the operation of the VPP. In terms of the mass and scale, the proposed VAPP building conforms with all applicable development standards in the Venice LUP and is similar in height and design to the residential structures located within this neighborhood.

The new parking lot will provide seven required parking spaces including one ADA-compliant space and four bicycle parking spaces. The public parking spaces are public amenity for the neighborhood area adjacent to the Grand Canal, Ballona Lagoon, Esplanade trails and Venice Beach. The provision of adequate onsite parking with new development is one means by

which to protect public access because sufficient on-site parking can help minimize access conflicts between residents, workers, and visitors to the area who compete for public street parking in popular coastal areas, such as Venice. Furthermore, the project will improve the site and water quality by providing new landscaping, a bioswale and public art.

The VAPP EIR and Addendums provide a full discussion of the environmental impacts and further identified mitigation measures (MMRP) to ensure any potential impacts are reduced to a less than significant level. For example, the project includes the re-abandonment of an inactive oil well, originally abandoned in 1932, to meet modern safety standards. The California Coastal Commission issued Coastal Development Permit places additional conditions of approval that further reduces environmental impacts from the project. For example, the project provides a landscaped bioswale to naturally capture and filter stormwater runoff from the parking lot, protecting the water quality of the adjacent and ecologically sensitive Ballona Lagoon. As conditioned, the VAPP conforms with the policies and requirements of the certified Venice LUP, Venice Coastal Zone Specific Plan, and LAMC. As such, the Project will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

9. **The project substantially conforms to the purpose, intent and provisions of the General Plan, the applicable community plan, and any applicable specific plan**.

The General Plan is the City's roadmap for future growth and development. The General Plan elements establish goals, policies, purposes, and programs that provide for the regulatory environment in managing the City, and for addressing environmental concerns and problems. The majority of the policies derived from these elements are in the form of LAMC requirements. Except for the entitlements described herein, the project does not propose to deviate from any other LAMC requirements. The General Plan is comprised of the Framework Element, seven state-mandated elements, and four additional elements adopted by the City Council. The Framework Element establishes the broad overall policy and direction for the General Plan. The request is consistent with the following Framework objectives and policies for the City's Infrastructure and Public Services:

Goal 9A Adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.

Objective 9.2 Maintain the wastewater collection and treatment system, upgrade it to mitigate current deficiencies, and improve it to keep pace with growth as measured by the City's monitoring and forecasting efforts.

Policy 9.2.4 Continue to implement programs to upgrade the wastewater collection system to mitigate existing deficiencies and accommodate the needs of growth and development.

The proposed VAPP is a City infrastructure improvement project that will supplement the operation of the existing VPP. It is a necessary public infrastructure project that will provide safety and protect human life from a potential release of sewage into the Venice Grand Canal. The applicant is requesting a Conditional Use to allow the construction, use, and maintenance of new auxiliary pumping plant and a new surface parking lot in the proposed Public Facility – PF zone. As discussed in Finding No. 10, and further conditioned, the proposed height, setbacks, permeable yards, and parking conform with the policies and requirements of the certified LUP, Specific Plan, and LAMC. The proposed VAPP and new parking lot would upgrade and enhance an existing system, consistent with the goals and objective of the Framework Element and LUP of the General Plan. As such and as discussed in further detail

in Finding No. 2, the Project is in substantial conformance with the purpose, intent and provisions of the General Plan, the applicable community plan and applicable specific plan.

Project Compliance Findings

10. **The project substantially complies with the applicable regulations, findings, standards, and provisions of the Venice Coastal Zone Specific Plan.**

The project proposes the construction of a two-story, 2,283 square-foot wastewater pumping plant (VAPP) to supplement the capacity of the existing Venice Pumping Plant (VPP) for conveyance of wastewater to the Hyperion Treatment Plant and a surface parking lot, providing three on-site parking spaces and seven off-site parking spaces. The project includes an amendment to the certified Venice Coastal Zone Land Use Plan map, to re-designate the subject site from Low Medium II Residential to Public Facility and a related text change.

As conditioned, the proposed project complies with the applicable General Land Use and Development Regulations set forth in Section 9, Land Use and Development regulations for the Ballona Lagoon West Bank Subarea set forth in Section 10.A, and the Parking provisions set forth in Section 13 of the Specific Plan as evidenced below:

A. Section 8.C Findings
The project meets the required findings set forth in Section 8.C of the Venice Coastal Zone Specific Plan, as shown below:

1. **That the Venice Coastal Development Project is compatible in scale and character with the existing neighborhood, and that the Venice Coastal Development Project would not be materially detrimental to adjoining lots or the immediate neighborhood**.

The project proposes the construction of a two-story, 2,283 square-foot wastewater pumping plant (VAPP) to supplement the capacity of the existing Venice Pumping Plant (VPP) for conveyance of wastewater to the Hyperion Treatment Plant and a surface parking lot, providing three on-site parking spaces and seven off-site parking spaces. The project includes an amendment to the certified Venice Coastal Zone Land Use Plan map, to re-designate the subject site from Low Medium II Residential to Public Facility, and a related text change.

The VAPP site is comprised of two vacant lots fronting the Grand Canal and the VAPP parking lot is comprised of a vacant lot fronting the Ballona Lagoon. Both parcels are zoned RW2-1 and designated as Low Medium II Residential land use. The Project Site is a highly urbanized area within the Ballona Lagoon West subarea of the Venice Coastal Zone Specific Plan. This area contains a mix of residential, open space, and public facility uses. North and west of 3813 and 3817 South Esplanade are single and multi-family residential uses in the RW2-1 and R3-1 zone. To the east is the Venice Canal System, which is designated as open space. To the south is the existing VPP in the RW1-1 zone with a public facilities land use designation. The VAPP site fronts South Esplanade (Grand Canal) and abuts Canal Court and Hurricane Street, the VAPP parking lot fronts the Ballona Lagoon) and abuts Canal Court and Hurricane Street.

The existing VPP, proposed VAPP, and parking lot are located within a residential neighborhood, developed with single and multi-family residential structures that

are two and three stories in height. There are three two-story, multi-family residential structures on the block of South Esplanade bounded by Hurricane Street, Galleon Street, and Canal Court. Directly across Canal Court from the project is a three-story multi-family structure. Across South Esplanade and the canal are single-family residential structures ranging from two to three stories in height. The proposed two-story structure is designed with a flat roofline and a raised parapet to screen rooftop equipment; the building height varies from 30 to 32 feet. The proposed height and massing are consistent with the existing two and three-story structures adjacent to the Grand Canal. The proposed structure provides an average setback of 15 feet from the Esplanade. A six-foot tall decorative fence encloses the subject site. However, the project provides a 10-foot wide open space area for public use, immediately adjacent to the Esplanade walkway. The proposed surface parking lot is fully landscaped including a new bioswale.

In short, the proposed VAPP building conforms with all applicable development standards in the Venice Coastal Zone LUP and is similar in height and design to the residential structures located within this neighborhood. As such, the proposed project is compatible in scale and character with the existing neighborhood and will not be detrimental to the adjoining properties or the immediate area.

2. **That the Venice Coastal Development Project is in conformity with the certified Venice Local Coastal Program**.

A Local Coastal Program is comprised of a Land Use Plan and Implementation Plan, certified by the California Coastal Commission. The Venice Local Coastal Land Use Plan ("LUP") was certified by the Coastal Commission on June 14, 2001, however, the necessary Implementation Plan was not certified. As such, the Venice Community Plan area does not have a certified Venice Local Coastal Program. The project includes an amendment to the certified Venice Coastal Zone Land Use Plan map, to redesignate the subject site from Low Medium II Residential to Public Facility, and related text changes.

The proposed project will comply with and supports the following goals, objectives, and policy of the certified Venice Coastal Zone Land Use Plan:

Policy II.C.1. General Non-Vehicular Coastal Access Policy. Pedestrian and bicycle access ways are identified on Exhibit 19. Pedestrian Access and Bicycle Trails shall be developed, protected and maintained, and new development adjacent to the coast and coastal waterways shall be required to provide public access in a manner that is consistent with the policies of the Coastal Act.

A network of pedestrian and bicycle routes shall be developed, enhanced and maintained to provide linkages within residential neighborhoods and between visitor-serving commercial areas and coastal recreational access points, transit routes, existing and projected parking facilities, and areas of historical significance to facilitate circulation of visitors within the heavily congested areas in Venice.

Policy IV.B.3. Ballona Lagoon Development Standards. The setbacks and height of buildings adjacent to the lagoon shall continue to be limited as provided in Policies I.A.4b, I.A.4c, and I.A.4d so that development is

compatible with the continuance of the environmentally sensitive habitat area and avoids adverse impacts on avian flight patterns.

Policy V.A.1. General. Public services shall consider the competing needs of residents and visitors for use of roadways, existing parking, service systems, domestic water, public restrooms, etc., and shall allocate resources to expand the use of these existing facilities and create new facilities where necessary in a manner that they do not adversely affect residents. Public works projects shall be reviewed for consistency with the Coastal Act and the Venice Land Use Plan through the coastal development permit process as required by the Coastal Act.

Policy V.A.3. Infrastructure. New sewer, storm drain, and water lines shall be installed using the least environmentally disturbing method feasible. The City of Los Angeles Department of Public Works shall develop a comprehensive citywide Storm Water Management Program, as discussed further in Implementation Strategy of Policy IV.C.1 of this LUP, to control stormwater run-off from new public and private developments and, where feasible, to remove pollutants from that run-off. Development of infrastructure shall precede or be constructed concurrently with the construction of developments or in lieu-fee should be paid.

Historically, the Venice Coastal Zone has faced significant challenges related to sewer capacity and accidental raw sewage discharges from the Venice Pumping Plant. As noted in the LUP's summary of historical issues, these points of failure created the policy imperative for a robust, modern, and well-maintained wastewater system capable of protecting public health and sensitive marine environments like the Venice Canals and Ballona Lagoon. As previously stated, the existing VPP is essentially built out and has no additional space for required back up pumps and associated equipment to ensure system reliability. To prevent such a failure and ensure system reliability, the City proposes the VAPP to supplement the existing pumping capacity with new pumps. The VAPP is designed to provide this crucial redundancy, improve system reliability, and mitigate the risk of environmental contamination.

The proposed General Plan Amendment will amend the following policies to facilitate the proposed project:

Policy I.A.7. Multi-family Residential-Low Medium II Density: Accommodate the development of multi-family dwelling units in the areas designated as “Multiple Family Residential” and “Low Medium II Density” on the Venice Coastal Land Use Plan.

Policy I.D.1. Canals and Ballona Lagoon Waterways. The Venice estuaries and wetlands including the Ballona Lagoon, Venice Canals, and Grand Canal south of Washington Boulevard, are designated in the Land Use Plan as natural and coastal recreational resources and are rezoned to the “Open Space” designation.

Adjacent Use/Development: The only permitted development adjacent to the canals and lagoon shall be habitat restoration, single-family dwellings, public parks and walkways, subterranean or surface

public parking lots, maintenance activities and emergency repairs. Surface public parking lots shall be permitted only where sufficient access and roadway capacity exists to accommodate such parking. New construction along the Canals, and Ballona Lagoon shall comply with standards for setbacks, noise barriers, landscape plan, pervious surfacing with drainage control measures to filter storm run-off and direct it away from environmentally sensitive habitat areas, buffer areas in permanent open space, land dedication for erosion control, and wetland restoration including off-site drainage improvements. For more details refer to the provisions contained in Policy Group I.A., Residential Land Use and Development Standards, and Policies IV.C.1 and IV.C.2, Stormwater Runoff and Circulation.

The proposed amendment will change the land use designation from Low Medium II Residential to Public Facility and add public facilities as an allowable use adjacent to the Grand Canal and the Ballona Lagoon. As such, the proposed development is consistent with the policies of the Land Use Plan and the standards of the Specific Plan and will not prejudice the ability of the City to prepare a Local Coastal Program that is in conformity with Chapter 3 of the California Coastal Act.

4. **That the applicant has guaranteed to keep the rent levels of any Replacement Affordable Unit at an affordable level for the life of the proposed Venice Coastal Development Project and to register the Replacement Affordable Units with the Los Angeles Department of Housing**.

   The project proposes the construction of a pumping plant and surface parking lot on vacant lots. Therefore, Replacement Affordable Units are not proposed or required for this project.

5. That the Venice Coastal Development Project is consistent with the special requirements for low and moderate income housing units in the Venice Coastal Zone as mandated by California Government Code Section 65590 (Mello Act).

   The project proposes the construction of a pumping plant and surface parking lot on vacant lots. No affordable units are proposed or required for this project.

In addition to the requisite findings set forth in Section 8.C of the Specific Plan, the project also complies with all applicable provisions of the Specific Plan, as set forth below:

B. Section 9. General Land Use and Development Regulations

1. *Lot Consolidation*. The project includes a Zone Change from Residential Waterways Zone "RW2" to Public Facility Zone "PF." There are no limitations to the number of Public Facility-zoned lots that maybe consolidated. As such, the proposed project is in conformance with Section 9.A of the Venice Coastal Specific Plan.

2. *Height*. As shown in "Exhibit A", the height of the structure is measured from the average existing natural grade and conforms to the standards of measurement as outlined in Section 9.B of the Venice Coastal Specific Plan.

3. *Roof Structures*. The proposed project does not include a Roof Access Structure.

C. Sections 10.A Land Use and Development Regulations for Ballona Lagoon West Subarea

1. ***Height.*** *Within 60 feet of the mean high tide of the Ballona Lagoon or inland side of the Esplanade (City right-of-way), whichever is furthest from the water as determined by a licensed surveyor, Venice Coastal Development Prcjects shall not exceed a maximum height of 30 feet. Beyond 60 horizontal feet, one additional foot in height is permitted for each two additional horizontal feet to a maximum height of 38 feet.*

   As shown in "Exhibit A", the proposed project maintains the ascending height limit respective to the horizontal depth. Within 60 feet of the Esplanade, the proposed project maintains a maximum height of 29 feet 6 inches with an increasing height to a maximum of 32 feet 6 inches. No buildings are proposed for the new surface parking lot. As such, the project complies with Section 10.A.1 of the Specific Plan.

2. ***Setbacks and Yards.*** *An average setback of 15 feet, but not less than ten feet shall be maintained from the lot line nearest to the water. An open, permeable yard with an area of at least 15 times the lot width and a minimum area of 450 square feet shall be maintained between the property line that faces the water and the front of any structure. No building extensions, including stairs and balconies, shall be allowed in the required Permeable yard area, except for ground level Permeable decks that do not exceed 18 inches in height. The combined height of any decks, railings, garden walls, and fences situated within the required Permeable yard shall not exceed six feet above the elevation of the adjacent public walkway. The side yard shall be consistent with LAMC requirements but shall not be less than 3 feet 6 inches.*

   As shown in "Exhibit A", the project site for the VAPP has a lot width of 78 feet 5 inches, which requires approximately 1,176 square feet of Permeable Yard area. The project provides a 10-foot 2-inch landscaped front yard setback along the Grand Canal property line for 2,932 square feet of Permeable Yard. The project site for the surface parking lot has a lot width of 35 feet, which would require 525 square feet of Permeable Yard area, a total of 1,074 square foot permeable yard area is proposed. In addition, as shown in "Exhibit A, the new fence and public art installation are less than six feet in height.

   Lastly, as conditioned, the side yard setbacks shall be consistent with LAMC requirements but not less than 3 feet 6 inches in width. As such, the project complies with Section 10.A.2 of the Specific Plan.

3. ***Fill.*** *No fill shall be permitted in the lagoon and buffer area, except for the minimum amount necessary for habitat restoration and public access.*

   The only fill proposed for the lagoon is backfill for habitat restoration and will comply with the mitigation measures outlined in the EIR and MMRP.

4. ***Drainage****. Prior to issuance of a building permit for a new Venice Coastal Development Prcject or an expansion of the existing building footprint by more than ten percent, the applicant shall submit drainage plans to the Department of Building and Safety for its approval. All drainage for new construction shall be directed away from Ballona Lagoon. The applicant and all successors in interest*

shall maintain the approved Venice Coastal Development Prcject consistent with the drainage plans approved by the Department of Building and Safety.

As conditioned, the applicant shall submit drainage plans to the Department of Building and Safety for its approval and all drainage shall be directed away from the Ballona Lagoon.

D. Section 13: Parking

1. Parking Requirement and Beach Impact Zone Parking Requirement.

As shown in "Exhibit A", and consistent with the Parking Requirement Table, the Beach Impact Zone Parking Requirements and the California Coastal Commission issued Coastal Development Permit, the project provides a total of 10 parking spaces – three (3) parking spaces on-site and seven (7) parking spaces within the surface parking lot.

11. **The project incorporates mitigation measures, monitoring measures when necessary, or alternatives identified in the environmental review, which would mitigate the negative environmental effects of the project, to the extent physically feasible.**

The City of Los Angeles found, based on the independent judgment of the decision-maker, after consideration of the whole of the administrative record, the project was assessed in the Venice Auxiliary Pumping Plant Environmental Impact Report SCH No. 2015111038 certified on August 8, 2017; and pursuant to CEQA Guidelines 15162 and 15164, and the Addendums dated October 29, 2021 and June 2024, no major revisions are required to the EIR and no subsequent EIR or negative declaration is required for approval of the project.

ADDITIONAL MANDATORY FINDING

12. The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 172,081, have been reviewed and it has been determined that this project is located in Zone AE, base flood elevations determined.

PUBLIC HEARING AND COMMUNICATIONS

PUBLIC HEARING

A public hearing was held virtually via Zoom on May 5, 2025, at 10:30 a.m. The hearing was conducted by a Hearing Officer, Ira Brown, on behalf of the City Planning Commission in taking testimony for Case No. CPC-2024-2010-GPA-ZC-CU3-SPPC. All interested parties were invited to attend the public hearing at which they could listen, ask questions, or present testimony regarding the project. The purpose of the hearing was to obtain testimony from affected and/or interested parties regarding this application. Interested parties were also invited to submit written comments regarding the requested actions prior to the hearing. The public hearing was attended by the applicant's representative and nine members of the public spoke at the public hearing.

Applicant Team Presentation:

Christine Heinrich-Josties, PE – Applicant's representative provided a brief overview of the project objectives, project description and project timeline.

Summary of Public Comments:

Steve Bradley (Community Representative)

- The project directly conflicts with the Venice Land Use Plan, specifically Policy I.C.1, which requires the scale of industrial facilities to be compatible with adjacent uses, and Policy 1.B.1, which limits development adjacent to the Grand Canal and Lagoon to single-family homes, parks, and habitat restoration.
- The project lacks adequate landscaping buffer and screening of the transformers and power poles.
- Significant concerns about the unaddressed hazards of methane gas seepage.
- Significant concerns about construction impacts including inadequate off-site parking for workers, significant noise, dust, and air quality issues, and the exacerbation of pre-existing emergency access problems on the peninsula.
- Expressed the community's opposition to the proposed public parking lot.
- Significant concerns regarding a "lack of binding written recorded conditions of approval."
- The project is expected to cause property damage from vibrations, leading to declining property values, and creating financial hardship. He recommended compensation for landlords who lose tenants and for residents who may be displaced during construction.

Robin Rudisill (Venice Neighborhood Council Member, speaking as an individual)

- The proposed project is in violation of the following certified Venice Land Use policies:
    - Policy 5.A.1 (Public Services) requires public services to be expanded "in a manner that does not adversely affect residents" and that all projects must be reviewed for consistency with the Coastal Act.
    - Policy 1.C.1 (Industrial Facility Compatibility) requires the project's scale and design to be compatible with neighboring residential uses.
    - Policy 1.D.1 (Permitted Uses Near Grand Canal) limits uses adjacent to habitat restoration, single-family homes, and parks.
- The project is incompatible with the adjacent environmentally sensitive area, where aesthetic considerations should be "paramount" and negative impacts must be kept to a "bare minimum."
- The project is "poorly designed," citing the proximity of transformers to a resident's bedroom, the lack of a proper buffer, and an unnecessary public parking lot.

Kenya Lee (Adjacent Resident and Venice Neighborhood Council Representative)

- Primary concern is the minimal 3.5-foot buffer between the proposed facility and her home at 3809 and 3811 Esplanade.
- The project places transformers "directly facing my bedroom.
- Concerned that her family will be unable to live in their home during construction due to health and safety hazards.
- Currently experiences a "subtle vibration" from the original pumping plant that "shakes our windows from time to time" and expects this nuisance will worsen significantly with the new, larger facility.

Michael Hoffs (Hurricane Street Resident)

- Strong opposition to the public parking lot.
- Concerned the public parking lot would attract overnight parking and homeless encampments, creating a "dangerous" situation that the already overworked police department cannot adequately service.
- Supported claims of other speakers of existing noise issues.

Bethany Gorfine (Resident across the canal)

- Residents have already experienced significant disruption from past projects and is deeply concerned about future impacts.
- Described a negative experience with a previous sewer project that involved constant shaking, dirt, and contractor parking that blocked access for local vendors.
- Concerns regarding the existing homelessness issue at the existing plant and the issue is expected to get worse with the new project and parking lot.
- The construction scheduled to 2030 has not been thought out and will negatively affect the entire area, including residents across the canal.

Mary Antonette Goldberg (Resident and Former Adjacent Resident)

- Construction noise will pose challenges to the many residents who work from home, affecting their ability to conduct business.
- City is meeting its infrastructure needs: it must also meet the needs of the residents who "are going to endure" years of construction.
- Existing security is inadequate to monitor the site even before major construction begins.

Perry Roth (Property Owner)

- Indicated the city is "railroading residents and homeowners" on this project and there needs to be genuine negotiation.
- Indicated "serious good faith efforts" to negotiate concessions with residents on issues like landscaping, buffers, and setbacks to avoid litigation is needed.
- The unwanted bike racks illustrate the disconnect between the city's offerings and the community's actual requests, such as measures to prevent homeless encampments.

Roger (Community Member at 20 Ironside Street)

- Not directly impacted but expressed sympathy for the residents and stated that he finds their points "very reasonable."

Claire Bronowski (Resident)

- The project was designed over a decade ago with no community input until an appeal was filed.
- Public Works has been "unwilling to change one single thing in the 10 years that we've been arguing about this."
- Specific design flaws including HVAC equipment placed too close to a residence and unscreened transformers and equipment, which could be moved closer to the existing facility to shield them from the neighborhood.
- The project site has been "a mess for 20 years" indicating a pattern of neglect rather than consistent maintenance.
- Requested mitigation, including locking the parking lot gates at sunset, installing screening and rolling gates for the transformers, and moving equipment away from the residential property line to create a landscaped buffer.

SUMMARY OF COMMUNICATIONS

Venice Neighborhood Council

- On September 17, 2024, the Venice Neighborhood Council Board of Officers passed the following motion by a vote of 13-4-0 to oppose the proposed project unless Department of Public Works materially and in good faith addresses the community's serious issues with this project

Adam Goldberg (Resident at 112 Galleon Street)

- Demands robust mitigation for the potential release of methane gas and other chemicals.
- Requests the provision of off-site workspace for home-based workers, a plan to protect residents from property damage due to seismic ground shaking, and adherence to CEQA noise guidelines with independent 3rd-party monitoring.
- The loss of 20-25 street parking spaces, inadequate emergency access during construction, and the need for limited construction hours, particularly on Saturdays and for high-impact activities like pile driving.

Alison Ashton (Resident, Cort Street, Marina Peninsula)

- Demands real-time monitoring, proactive community protection, and an immediate shutdown protocol for any release of methane gas or other hazardous materials.
- Insists that noise levels must not exceed CEQA guidelines and calls for ongoing independent, third-party monitoring of all noise, air, and dust issues.
- Concern that the project will exacerbate disaster-response challenges on the Marina Peninsula.

Clare Bronowski & Jeff Lee (Residents/Owners, Esplanade)

- States that there has been no meaningful community engagement from Public Works since an initial meeting in 2017, despite promises to incorporate neighborhood feedback.
- The facility is fundamentally incompatible with the residential neighborhood and violates Venice LUP policies governing project scale and compatibility.
- Criticizes the lack of setbacks, buffers, or landscaping to blend the facility into the neighborhood. Requests a redesign that orients noisy and obtrusive equipment (e.g., transformers) away from residences and toward the existing pumping plant.

- Cites a history of neglect at the existing site (weeds, trash, graffiti) and demands a long-term maintenance plan, security measures, and a 24-hour phone number for resident complaints.

Daniel P. Whalen (Architect & Former Property Owner, 128 E Hurricane Street)

- Project fails to comply with the 2021 FEMA flood map update by placing the building's lowest finished floor elevation 16 inches below the minimum required level.
- The two-story design lacks an elevator for disabled employees, as the only restroom and office are on the second floor.

Felicia Glade (Resident, 116 Galleon Street)

- Concern that toxins from construction dust could trigger severe health issues due to pre-existing conditions.
- Demands for monitoring, protection, and shutdown protocols regarding methane and other chemical releases.

Harvey Plotnick (Landlord at 110 Hurricane Street)

- Concerns about "significant and unavoidable" damage to residential properties from vibration and liquefaction; and demands a clear plan from the city to cure any defects to adjacent properties.
- Requests a plan for compensation for lost rental income should tenants be forced to leave due to construction impacts.
- The parking lot at 128 Hurricane Street should be sold to a private owner with the proceeds used to fund community benefits.
- Supports the need for off-site workspace, noise/air/dust control, security, and limited construction hours.

Kenya Lee (Adjacent Resident, 3811 Esplanade)

- The Environmental Impact Report (EIR) is out-of-date (2017) and "failed to disclose that habitat for the El Segundo blue butterfly (the sea cliff buckwheat) was planted in the area."
- Indicates the design proposes zero setback from her property line, a direct violation of the Venice LUP and Venice Coastal Zone Specific Plan, which require minimum 3.5-foot side yards. The project also violates policies on lot consolidation and permissible uses adjacent to the Grand Canal.
- The project will harm the Environmentally Sensitive Habitat Area (ESHA) of the Grand Canal and Ballona Lagoon, citing impacts to Southern Coastal Salt Marsh habitat.
- Requests redesigning the project to include a ten-foot landscaped buffer and a solid block wall along her property line.

Michael Holt (Resident, 115 Hurricane Street)

- As a home-based worker, the construction will make it "impossible" to work effectively and demands a guaranteed provision of appropriate off-site workspace.
- Demands mitigation for methane gas release, control of noise and dust, and limited construction hours, especially on Saturdays.

Mike Pelletier (Resident, 111 Galleon Street)

- Concern that construction dust and other releases could cause severe, life-long health consequences for his family.
- Demands methane gas release (monitoring, protection, shutdown) and calls for third-party monitoring of all dust and toxins.
- Concern that the project duration has grown to over three years, increasing the period of risk and disruption.

Robert Debiase (Resident, Hurricane Street)

- Demands that residents have input into negotiating an alternative site.
- Demands that the work week be limited to five days per week.

Steve Bradbury (Resident, Hurricane Street)

- The VAPP represents a flagrant disregard for the Venice Land Use Plan (LUP) and Los Angeles Municipal Code (LAMC)—regulations specifically enacted to prevent the exact type of industrial encroachment on residential life.
- The VAPP project presents critical health and safety concerns for residents.
- Inadequate Emergency Access and Preparedness
- Strongly opposes this public lot citing valid concerns that it will materially increase traffic on a small residential street.
- Excessive Construction Hours. The city plans for a six-day work week, from 8:00 a.m. to 5:00 p.m. This schedule is unnecessarily disruptive.
- Anticipated Economic Losses. The community anticipates direct financial harm from property devaluation, lost rental income, and potential displacement. The city has not offered a clear path to compensation.
- Inadequate Support for Home-Based Workers
- Lack of Binding Enforcement and Real-Time Recourse. The current proposal for addressing resident complaints is unacceptable.
- History of Poor Maintenance and Lack of a Future Plan. The current VPP is in a state of neglect, which serves as a troubling precedent for the new facility.

Robin Rudisill (Resident, Ocean Front Walk)

- The project violates every applicable Venice Land Use Plan (LUP) policy, including those prohibiting hazardous industrial uses next to residences (*Policy I.C.6*), requiring compatibility with neighborhood character (*Policy I.C.1*), seeking to preserve multifamily neighborhoods (*Policy I.A.5*), and restricting development adjacent to the canal to uses like parks and homes (*Policy I.D.1*).
- The project is an expansion of an industrial facility in the middle of a residential neighborhood.
- The parking lot is "unnecessary" and "incompatible" with the neighborhood.

Susanne Cumming (Resident, 14010 Captain's Row)

- Concerns about the potential release of methane and other chemical hazards and supports the demand for real-time monitoring, proactive protection, and an immediate shutdown protocol.
- Expressed the need for an improved emergency preparedness plan for the Marina Peninsula.

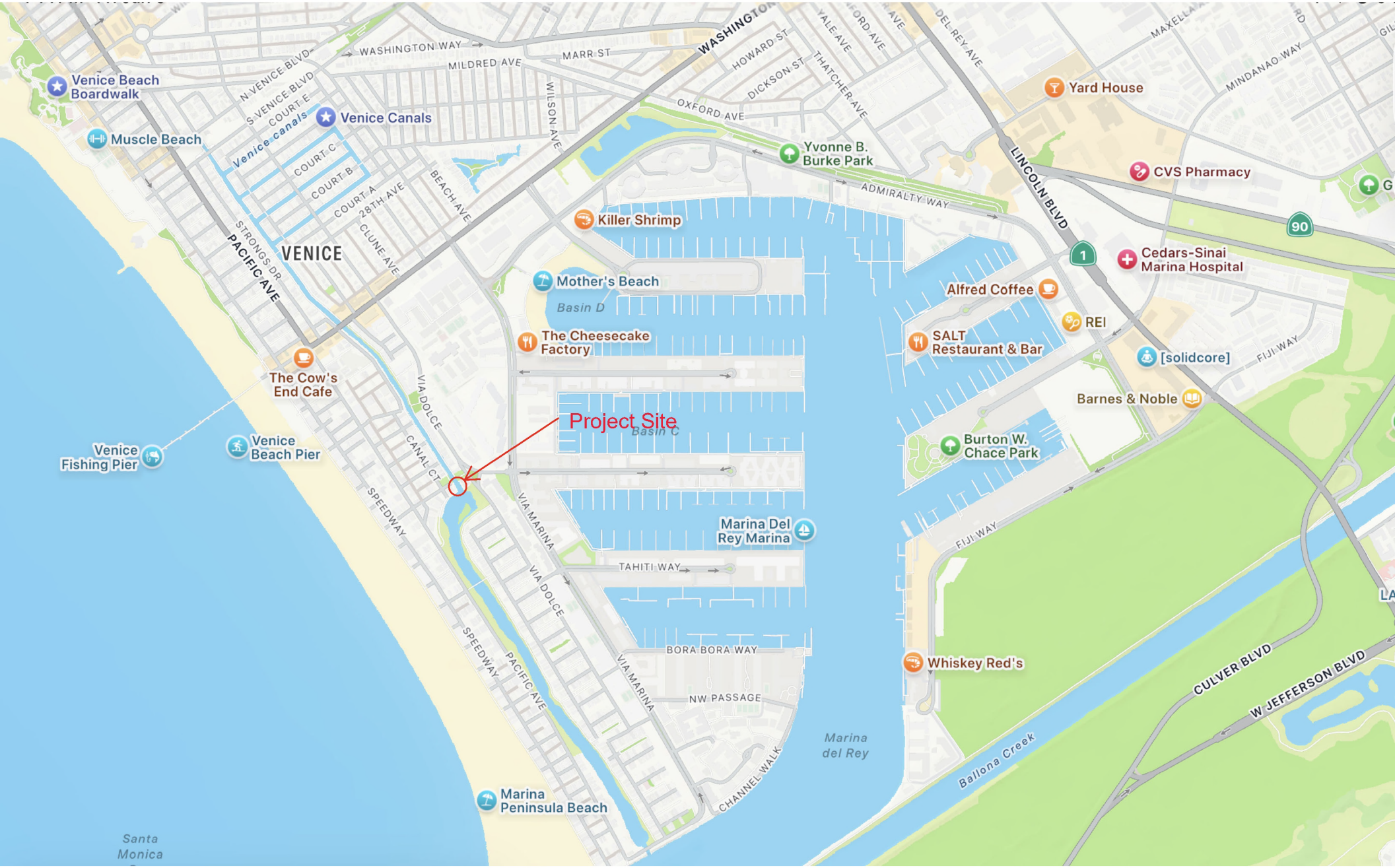
Victoria Wynn (Landlord, 110 Hurricane Street)

- Many tenants work from home and will be impacted by noise from pile drivers and jackhammers and requests sophisticated sound barriers.
- Hurricane Street is too narrow to handle the traffic that a public parking lot would generate.
- Demands that a civil engineer conduct foundation checks on adjoining buildings before and after construction, and that the City of Los Angeles be held liable for repairing any damage.

CPC-2024-2010-GPA-ZC-CU3-SPPC

Exhibit A: Maps

A.1 – Vicinity Map


Project Site
Venice Beach Boardwalk
Muscle Beach
Venice Canals
Venice Fishing Pier
Venice Beach Pier
The Cow's End Cafe
VENICE
Killer Shrimp
Mother's Beach
Basin D
Basin C
The Cheesecake Factory
Yvonne B. Burke Park
Yard House
CVS Pharmacy
Cedars-Sinai Marina Hospital
Alfred Coffee
REI
SALT Restaurant & Bar
[solidcore]
Barnes & Noble
Burton W. Chace Park
Marina Del Rey Marina
Whiskey Red's
Marina Peninsula Beach
Marina del Rey
Ballona Creek
Santa Monica
WASHINGTON WAY
MILDRED AVE
MARR ST
OXFORD AVE
ADMIRALTY WAY
LINCOLN BLVD
N VENICE BLVD
S VENICE BLVD
COURT E
Venice canals
COURT C
COURT B
COURT A
28TH AVE
BEACH AVE
WILSON AVE
CLUNE AVE
STRONGS DR
PACIFIC AVE
VIA DOLCE
CANAL CT
SPEEDWAY
VIA MARINA
TAHITI WAY
BORA BORA WAY
NW PASSAGE
CHANNEL WALK
FIJI WAY
CULVER BLVD
W JEFFERSON BLVD
HOWARD ST
DICKSON ST
THATCHER AVE
YALE AVE
DEL REY AVE
MINDANAO WAY
90
1

CPC-2024-2010-GPA-ZC-CU3-SPPC

Exhibit A: Maps

A.2 – Project Site (Aerial)


ESPLANADE
OS-1XL
RW2-1
HWY DED
MARQUESAS WAY
GALLEON ST
CANAL CT
R3-1
HURRICANE ST
RW1-1
VIA DOLCE
A1-1XL
GRAND CL
ESPLANADE EAST
[Q]RD15-1
LARIAC6 2020 Color-Ortho

CPC-2024-2010-GPA-ZC-CU3-SPPC

Exhibit A: Maps

A.3 – Land Use Designation Map



Exhibit 9

Land Use Plan (Map): Marina Peninsula • Silver Strand • Ballona Lagoon West • Ballona Lagoon (Grand Canal) East

CPC-2024-2010-GPA-ZC-CU3-SPPC

Exhibit A: Maps

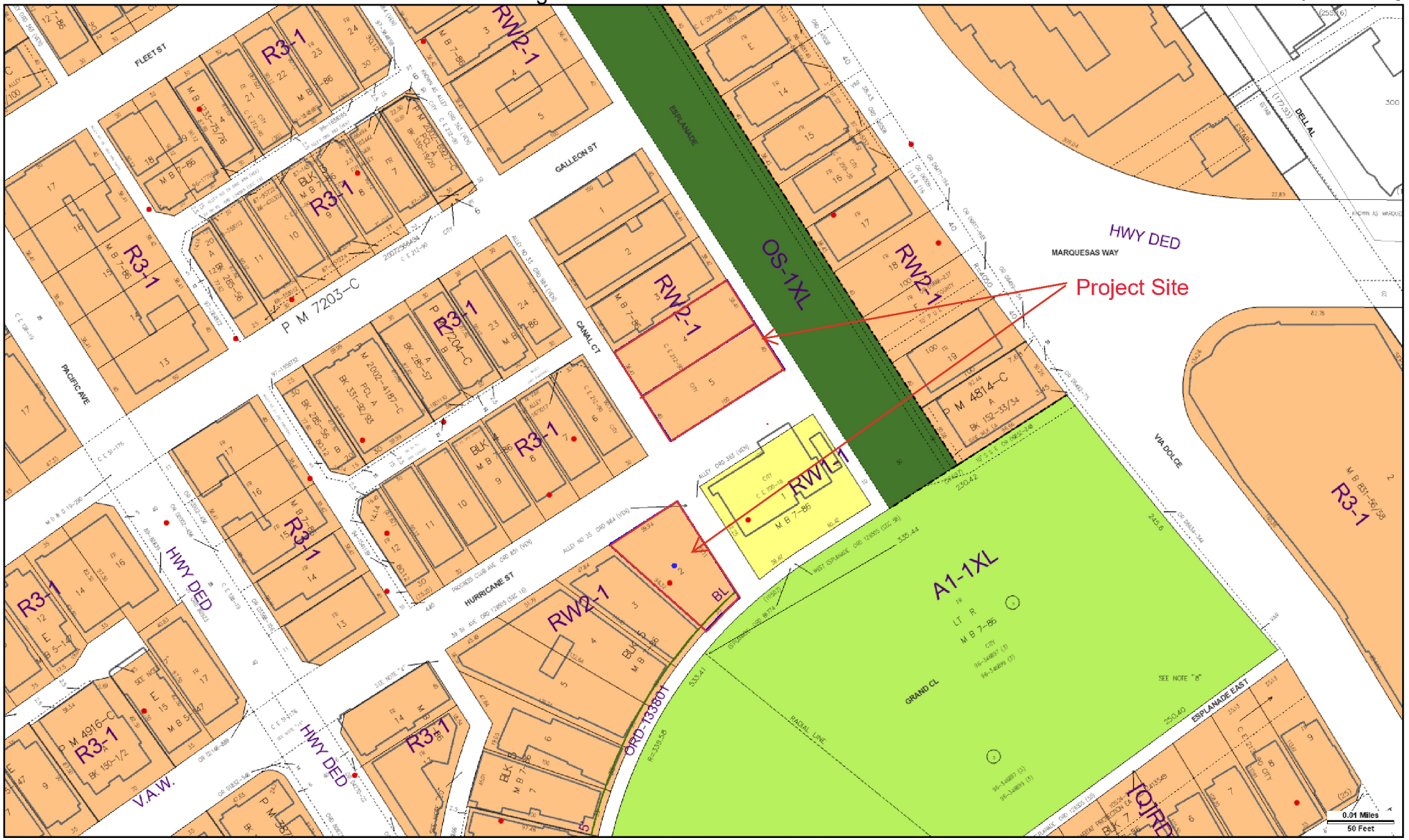
A.4 – Zoning Map

ZIMAS INTRANET

Generalized Zoning

02/25/2022

City of Los Angeles
Department of City Planning



Address: 3913 S ESPLANADE WEST
APN: 4225010016
PIN #: 103-5A147 284

Tract: SILVER STRAND
Block: BLK 5
Lot: 2
Arb: None

Zoning: RW2-1
General Plan: Medium Residential

N
W
E
S

CPC-2024-2010-GPA-ZC-CU3-SPPC

Exhibit B: Plans



WEST ELEVATION - CANAL CT



NORTHWEST ELEVATION - CANAL CT



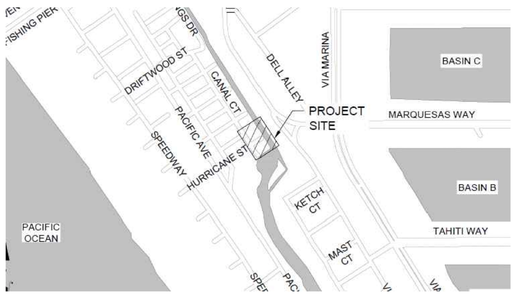
PARKING AREA, NORTH VIEW



PARKING AREA, HURRICANE ST, SOUTH VIEW



SOUTHEAST ELEVATION - HURRICANE ST



VICINITY MAP



EAST ELEVATION - ESPLANADE



ASSESSOR'S MAP

PROJECT INFORMATION:

OWNER:
CITY OF LOS ANGELES - BUREAU OF ENGINEERING

VENICE AUXILIARY PUMPING PLANT (VAPP)
133 E. HURRICANE STREET & 3813 S. ESPLANADE
LOS ANGELES, CA 90292
APN: 4225-008-904

PARKING LOT
128 1-3 E. HURRICANE ST
LOS ANGELES, CA 90292
APN: 4225-010-901

BUILDING HEIGHT:

IN ACCORDANCE WITH CBC CHAPTER 2, "BUILDING HEIGHT" IS DEFINED AS: "THE VERTICAL DISTANCE FROM GRADE PLANE TO THE AVERAGE HEIGHT OF THE HIGHEST ROOF SURFACE." FOR THIS BUILDING, TOP OF ROOF STRUCTURAL SLAB IS 24'-6" ABOVE FIRST FLOOR SLAB, PLUS 6" ABOVE GRADE, PLUS 8" RIGID INSULATION, SO 24'-6" + 6" + 6" (AVERAGE ROOF SURFACE); BUILDING CODE HEIGHT = 25'-6"; ZONING CODE HEIGHT = 45'. THE PARAPET IS NOT INCLUDED. PARAPET HEIGHT VARIES FROM 28'-6" TO 32'-6" ABOVE FINISH GRADE. BUILDING CANNOT EXCEED HEIGHT OF ADJACENT BUILDINGS IF USING SECTION 19.00.4.6.

DEFERRED APPROVALS:

SEPARATE PERMITS REQUIRED AS PART OF THIS PROJECT ARE LISTED BELOW:

1. MECHANICAL SYSTEMS
2. PLUMBING SYSTEMS
3. ELECTRICAL SYSTEMS
4. EQUIPMENT ANCHORAGE
5. FIRE PROTECTION SYSTEM

FIRE SEPARATION:

BUILDING IS OF TYPE IIB UNSPRINKLERED CONSTRUCTION. WALL SURFACE AREAS (TOP OF FLOOR SLAB TO TOP OF ROOF STRUCTURE) ARE 637 SF, NORTH AND SOUTH; 1249.5 SF WEST AND EAST. ALL EXTERIOR OPENINGS ARE 45 MIN. RATED. PER CBC TABLE 705.8, FOR 'PROTECTED' OPENINGS:

NORTH:
OPENINGS ALLOWED:75%;
ACTUAL: 5.4%

WEST:
OPENINGS ALLOWED: NO LIMIT;
ACTUAL: 0.8%

SOUTH:
OPENINGS ALLOWED: 45%;
ACTUAL: 17.9%

EAST:
OPENINGS ALLOWED: NOT REQUIRED;
ACTUAL: 2.9%

ALL FIRE SEPARATION DISTANCES ARE COMPLIANT.

BUILDING SET-BACKS:

NORTH: SET-BACK IS 16'-0" (TO EXISTING HOUSES).
RESIDENTIAL REQUIRED SETBACK = 7'-10".
PF REQUIRED SETBACK = NONE.

WEST: SET-BACK IS 19'-8" (TO STREET).
RESIDENTIAL REQUIRED SETBACK = 10'-0".
PF REQUIRED SETBACK = NONE.

SOUTH: SET-BACK IS 8'-6" (TO STREET).
RESIDENTIAL REQUIRED SETBACK = 7'-10".
PF REQUIRED SETBACK = NONE.

EAST: SET-BACK IS 52'-4" (TO PROPERTY LINE).
RESIDENTIAL REQUIRED SETBACK = 15'-0".
PF REQUIRED SETBACK = NONE.

ALL SET-BACKS ARE COMPLIANT WITH RESIDENTIAL WATERWAY ZONE "RW2-1".

PROJECT SCOPE SUMMARY:

THE VENICE AUXILIARY PUMPING STATION (VAPP) IS DESIGNED TO SUPPLEMENT THE EXISTING VENICE PUMPING PLANT (VPP) BY PROVIDING ADDITIONAL OPERATIONAL RELIABILITY THROUGH STANDBY PUMPING CAPACITY. THE VENICE PUMPING PLANT (VPP) CONSISTS OF FIVE PUMPS WITH A TOTAL DESIGN CAPACITY OF 18 MILLION GALLONS PER DAY (MGD) FOR CONVEYING WASTEWATER INTO THE CENTRAL RECEPTOR SEWER. DURING PEAK WEATHER FLOWS, ALL FIVE PUMPS MUST BE ONLINE TO HANDLE THE INCREASED VOLUME, RESULTING IN AN ELEVATED RISK OF SPILLS DUE TO THE LACK OF BYPASS OR STANDBY PUMPS. THE VPP IS A CRITICAL FACILITY, WITH NO CURRENT DIVERSION STRUCTURES TO BYPASS AND NO REDUNDANCY IN ITS OPERATION, MAKING IT VULNERABLE DURING HIGH-DEMAND PERIODS. THE NEW VAPP PROJECT WILL PROVIDE OPERATIONAL RELIABILITY AND REDUCE THE RISK OF A SPILL DURING PEAK FLOW WEATHER CONDITIONS. THE PROJECT IMPROVEMENTS INCLUDE CONSTRUCTION OF A SEWER DIVERSION STRUCTURE IN THE GRAND CANAL, A NEW UNDERGROUND PUMP STATION BUILDING WITH THREE SUBMERSIBLE PUMPS, AN ABOVE GROUND ELECTRICAL ROOM, AN INTERCONNECTING SEWER/FORCE MAIN PIPE NETWORK AND A NEW PARKING LOT FOR PUBLIC USE.

VENICE COASTAL ZONE SPECIFIC PLAN NOTES:

SECTION 10. LAND USE AND DEVELOPMENT REGULATIONS FOR SUBAREAS. IN ADDITION TO THE REGULATIONS IN SECTION 9, THE FOLLOWING REGULATIONS SHALL APPLY WITHIN EACH OF THE SPECIFIED SUBAREAS IN THE SUB-SECTIONS BELOW.

A. BALLONA LAGOON WEST BANK.

1. HEIGHT. WITHIN 60 FEET OF THE MEAN HIGH TIDE OF THE BALLONA LAGOON OR INLAND SIDE OF THE ESPLANADE (CITY RIGHT-OF-WAY), WHICHEVER IS FURTHEST FROM THE WATER AS DETERMINED BY A LICENSED SURVEYOR, VENICE COASTAL DEVELOPMENT PROJECTS SHALL NOT EXCEED A MAXIMUM HEIGHT OF 30 FEET. BEYOND 60 HORIZONTAL FEET, ONE ADDITIONAL FOOT IN HEIGHT IS PERMITTED FOR EACH TWO ADDITIONAL HORIZONTAL FEET TO A MAXIMUM HEIGHT OF 38 FEET. NO PORTION OF ANY STRUCTURE (INCLUDING ROOF ACCESS STRUCTURES, ROOF DECK RAILINGS AND ARCHITECTURAL FEATURES) SHALL EXCEED THE 30 FOOT HEIGHT LIMIT WITHIN 60 HORIZONTAL FEET OF THE MEAN HIGH TIDE LINE OF BALLONA LAGOON OR THE INLAND SIDE OF THE ESPLANADE, WHICHEVER IS FURTHEST FROM THE WATER.

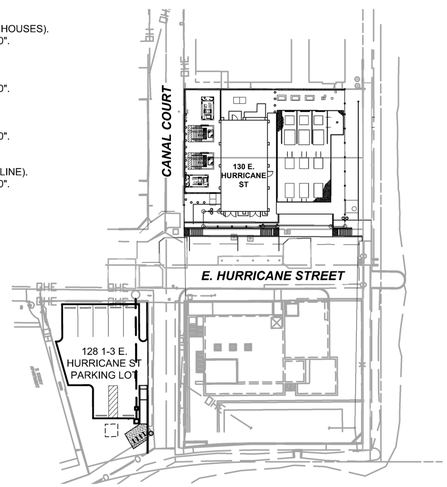
2. LAGOON BUFFER/SET-BACK/YARDS.

B. LOTS LOCATED NORTH OF IRONSIDES STREET:

(1) ALL VENICE COASTAL DEVELOPMENT PROJECTS SHALL BE SET BACK AN AVERAGE OF 15 FEET BUT NOT LESS THAN TEN FEET FROM THE LOT LINE NEAREST TO THE WATER. ACTUAL IS 52'-4".

(2) AN OPEN, PERMEABLE YARD WITH AN AREA OF AT LEAST 15 TIMES THE LOT WIDTH AND A MINIMUM OF 450 SQUARE FEET SHALL BE MAINTAINED BETWEEN THE PROPERTY LINE THAT FACES THE WATER AND THE FRONT OF ANY STRUCTURE. NO BUILDING EXTENSIONS, INCLUDING STAIRS AND BALCONIES, SHALL BE ALLOWED IN THE REQUIRED PERMEABLE YARD AREA, EXCEPT FOR GROUND LEVEL PERMEABLE DECKS THAT DO NOT EXCEED 18 INCHES IN HEIGHT.

(3) THE COMBINED HEIGHT OF ANY DECKS, RAILINGS, GARDEN WALLS AND FENCES SITUATED WITHIN THE REQUIRED PERMEABLE YARD SHALL NOT EXCEED SIX FEET ABOVE THE ELEVATION OF THE ADJACENT PUBLIC WALKWAY. THE SIDEYARD SHALL BE CONSISTENT WITH LAMC REQUIREMENTS, BUT SHALL NOT BE LESS THAN 3 1/2 FEET.



SITE PLAN

PROJECT DATA:

OWNER:	CITY OF LOS ANGELES
CONSTRUCTION TYPE:	IIB
OCCUPANCY:	B - OFFICE GROUP
BUILDING HEIGHT:	32' - 6" ABOVE FINISHED GRADE
LAMC ALLOWABLE HEIGHT:	35' - 0" ABOVE FINISHED GRADE

FIRST FLOOR		OCCUPANTS
SWITCHGEAR 101	830 SF	3
GENERATOR 102	175 SF	1
SUB-TOTALS	1005 SF	4
SECOND FLOOR		
UNISEX RESTROOM 201	65 SF	1
WORKSTATIONS 202	375 SF	4
SERVICE ROOM 203	228 SF	1
EL/ME EQUIP 204	374 SF	2
SUB-TOTALS	1042 SF	8
STAIR # 1	236 SF	-

TOTAL AREA / ALLOWABLE = 2283 SF / 23,000

= 0.09 < 1.0 COMPLIES

PARKING SUMMARY:

A. PARKING REQUIRED:

BUILDING AREA / OCCUPANCY B FACTOR = 2283 / 500 + 2 SPACES = 7 SPACES

BEACH IMPACT ZONE PARKING	2 SPACES
REPLACEMENT STREET PARKING REQUIRED FOR COASTAL ACCESS	2 SPACES
TOTAL SPACES REQUIRED:	11 SPACES

B. PARKING PROVIDED:

ON-SITE, VAPP	3 SPACES
OFF-SITE, PARKING LOT	7 SPACES
FOUR BIKE PARKING SPACES SUBSTITUTING ONE AUTOMOBILE STREET PARKING SPACES	1 SPACE
	2 SPACES
TOTAL SPACES PROVIDED:	13 SPACES

C. PERMEABLE AREA:

REFER TO SHEET G-8 FOR PERMEABLE AREA BREAKDOWN

	1ST FLOOR		2ND FLOOR		TOTAL SF
LAMC (ZON'G)	900.77	+	992.27	=	1893.04
LABC (BLD'G)	1152.02	+	992.27	=	2144.29
LAUSD (SCHOOL)	1326.00	+	1166.25	=	2492.25

ZONING:

A. VENICE
VENICE AUXILIARY PUMPING PLANT (VAPP)
133 E. HURRICANE STREET & 3813.S. ESPLANADE

(1) ZONING
CURRENT: RESIDENTIAL WATERWAY ZONE "RW2-1"

FUTURE: PUBLIC FACILITY ZONE "PF"

(2) LAND USE DESIGNATION
CURRENT: LOW MEDIUM II RESIDENTIAL
FUTURE: PUBLIC FACILITY ZONE "PF"

B. PARKING LOT
128 1-3 E. HURRICANE ST

(1) ZONING
CURRENT: RESIDENTIAL WATERWAY ZONE "RW2-1"

FUTURE: PUBLIC FACILITY ZONE "PF"

(2) LAND USE DESIGNATION
CURRENT: LOW MEDIUM II RESIDENTIAL

FUTURE: PUBLIC FACILITY ZONE "PF"

SUBJECT SITE IS LOCATED WITHIN:

TSUNAMI HAZARD AREA
LIQUEFACTION AREA
FLOOD ZONE AE
METHANE ZONE

EARTHWORK QUANTITIES

REFER TO SHEET C-16 FOR EARTHWORK CUT AND FILL ESTIMATES

FOR PERMITTING PURPOSE ONLY NOT FOR CONSTRUCTION

ARCADIS
LEGAL ENTITY:
ARCADIS U.S., INC.
333 S. HOPE STREET
SUITE C200
LOS ANGELES,
CA 90071

THE CITY OF LOS ANGELES OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF ELECTRONIC COPIES OF THIS PLAN SHEET.

REVISION DATES (DESIGN STAGE ONLY)

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING

ENGINEERING CITY OF LOS ANGELES

NO.	REVISIONS:	DATE:	BY:
1	-	-	-
2	-	-	-
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4	-	-	-
5	-	-	-

CIP NO: C922

INDEX NO. D-31898

THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED

TED ALLEN, P.E. CITY ENGINEER

		DATE:
ENGINEER:	JENA PRIOR	01/2026
	LIC. NO. CA-69143	
	DESIGN GROUP	01/2026
DESIGNED BY:	LUDWING PEREZ	01/2026
DRAWN BY:	C. PUTTEGOWDA	01/2026
CHECKED BY:	LUDWING PEREZ	01/2026
APPROVED BY:	HECTOR ARIAS	01/2026

VERTICAL CONTROL: NAVD 88 (2000)
HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

SHEET TITLE: PROJECT SUMMARY COVER SHEET

PROJECT: VENICE AUXILIARY PUMPING PLANT

ADDRESS: 133 HURRICANE STREET
LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923

DRAWING NO. G-6

SHEET OF SHEETS

NOTES:

1. A COPY OF THE CONSTRUCTION DOCUMENTS OR A COMPARABLE DOCUMENT INDICATING THE INFORMATION FROM ENERGY CODE SECTION 110.10(b) THROUGH 110.10(c) SHALL BE PROVIDED TO THE OCCUPANT.

2. **PARKING SUMMARY:**

PARKING REQUIRED:

PROPOSED PUBLIC UTILITY FACILITY: 2 SPACES + 2,283 SF* (1 PER 500 SF) =	7 SPACES
BEACH IMPACT ZONE:	2 SPACES
REPLACEMENT STREET PARKING REQ'D FOR COASTAL ACCESS	2 SPACES
TOTAL SPACE REQUIRED:	11 SPACES

PARKING PROVIDED:

ON-SITE - VAPP SITE	3 SPACES
OFF-SITE - PARKING LOT	7 SPACES
FOUR BIKE PARKING SPACES - SUBSTITUTE ONE AUTOMOBILE PARKING SPACE	1 SPACE
STREET SPACES:	2 SPACES
TOTAL SPACES PROVIDED:	13 SPACES

3. PERMEABLE AREA

VAPP (APN:4225-008-904)
133 E. HURRICANE STREET

TOTAL LOT AREA	7,841 SF
PERMEABLE AREA REQUIRED (25% TOTAL SITE AREA)	1,961 SF
PERMEABLE AREA PROVIDED VAPP:	2,949 SF
PLANTING AREA (GREEN SPACE)	744 SF
DECOMPOSED GRANITE	2,205 SF

PARKING LOT (APN:4225-010-901)
128 1-3 E. HURRICANE STREET

TOTAL LOT AREA	4,230 SF
PERMEABLE AREA PROVIDED:	1,183 SF
GREEN SPACE	1,074 SF
DECOMPOSED GRANITE	109 SF

THE CITY OF LOS ANGELES OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF ELECTRONIC COPIES OF THIS PLAN SHEET.

REVISION DATES (DESIGN STAGE ONLY)

ARCADIS
LEGAL ENTITY:
ARCADIS U.S., INC.
333 S. HOPE STREET
SUITE C200
LOS ANGELES,
CA 90071

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING

VERTICAL CONTROL: NAVD 88 (2000)
HORIZONTAL CONTROL: NADB3, ZONE 5, EPOCH 1991.5

SHEET TITLE: GREEN BUILDING NOTES 2
PROJECT: VENICE AUXILIARY PUMPING PLANT
ADDRESS: 133 HURRICANE STREET
LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923
DRAWING NO. G-8
SHEET OF SHEETS

THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED

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ENGINEERING
CITY OF LOS ANGELES

CIP NO. C922
INDEX NO. D-31898

CITY ENGINEER
TED ALLEN, P.E.
DESIGN GROUP

ENGINEER:	JENA PRIOR	LIC. NO. CA-69143	DATE: 01/2026
DESIGNED BY:	LUDWING PEREZ		01/2026
DRAWN BY:	C. PUTTEGOWDA		01/2026
CHECKED BY:	LUDWING PEREZ		01/2026
APPROVED BY:	HECTOR ARIAS		01/2026

GENERAL NOTES:

1. SPECIFICATIONS: ALL WORK SHALL CONFORM TO THE LATEST EDITION AND SUPPLEMENTS OF "THE STANDARD SPECIFICATIONS FOR PUBLIC WORKS CONSTRUCTION" (SSPWC), AND THE CORRESPONDING "ADDITIONS AND AMENDMENTS TO THE LATEST EDITION OF THE STANDARD SPECIFICATIONS FOR PUBLIC WORKS CONSTRUCTION" (BROWN BOOK) AND PROJECT SPECIFICATIONS.
2. THIS IMPROVEMENT CONSISTS OF WORK CALLED FOR ONLY ON THIS PLAN.
3. INSPECTION:

   ALL WORK AND MATERIALS ARE SUBJECT TO INSPECTION PURSUANT TO SECTION 01452 OF THE PROJECT SPECIFICATIONS. CALL (213) 580-5080 (METRO) FOR INSPECTION LEAST 24 HOURS BEFORE STARTING WORK.
4. THE CONTRACTOR, IN CONFORMANCE WITH LOS ANGELES CITY ORDINANCE NO. 150,478 SHALL POTHOLE EXISTING SUBSURFACE INSTALLATIONS CARRYING UNSTABLE SUBSTANCES TO DETERMINE THEIR LOCATIONS AND ELEVATIONS BEFORE COMMENCING EXCAVATION AT NO ADDITIONAL COST TO THE CITY.
5. UNDERGROUND SERVICE ALERT:

   BEFORE COMMENCING ANY EXCAVATION, THE CONTRACTOR SHALL OBTAIN AN UNDERGROUND SERVICE ALERT (USA) INQUIRY I.D. NUMBER BY CALLING (800) 221-2600. TWO WORKING DAYS SHALL BE ALLOWED AFTER THEIR I.D. NUMBER IS OBTAINED AND BEFORE THE CONTRACTOR STARTS THE EXCAVATION WORK SO THAT UTILITY OWNERS CAN BE NOTIFIED. IF THE UTILITY OWNER IS THE CITY OF LOS ANGELES, A CONFIRMATION NUMBER INDICATING THE CITY HAS BEEN NOTIFIED SHALL BE OBTAINED BY USA AND/OR THE CONTRACTOR FROM THE APPROPRIATE CITY DEPARTMENT. THE I.D. NUMBER TOGETHER WITH THE DATE ACQUIRED SHALL BE REPORTED TO THE BUREAU OF CONTRACT ADMINISTRATION WHEN CALLING FOR ALL INSPECTION. I.D. NUMBERS WILL NOT BE GIVEN MORE THAN 10 DAYS BEFORE STARTING EXCAVATION WORK.
6. AT LEAST THIRTY (30) DAYS BEFORE THE START OF CONSTRUCTION THE CONTRACTOR SHALL CONTACT BUREAU OF STREET SERVICES, COORDINATING SECTION AT (213) 485-5691 TO VERIFY THAT THERE IS NO PROPOSED PROJECT IN THIS AREA.
7. NOTIFICATION:

   ALL RESIDENTIAL UNITS LOCATED WITHIN 500 FEET OF CONSTRUCTION SITES SHALL BE SENT A NOTICE REGARDING THE CONSTRUCTION SCHEDULE OF THE PROPOSED PROJECT. A SIGN, LEGIBLE AT A DISTANCE OF 50 FEET SHALL ALSO BE POSTED AT THE CONSTRUCTION SITE. ALL NOTICES AND THE SIGNS SHALL INDICATE THE DATES AND DURATION OF CONSTRUCTION ACTIVITIES, AND SHALL PROVIDE A TELEPHONE NUMBER WHERE RESIDENTS CAN INQUIRE ABOUT THE CONSTRUCTION PROCESS AND REGISTER COMPLAINTS. ALL NOTICES SHALL BE IN ENGLISH AND ANY OTHER APPROPRIATE LANGUAGE(S) FOR THE NEIGHBORHOOD, AND POSTED NOTICES SHALL BE PLACED AT LEAST 10 DAYS PRIOR TO THE START OF CONSTRUCTION.
8. TRAFFIC CONTROL SHALL BE IN ACCORDANCE WITH THE LATEST EDITION OF THE WORK AREA TRAFFIC CONTROL HANDBOOK (WATCH) ADOPTED BY THE BOARD OF PUBLIC WORKS OF THE CITY LOS ANGELES.
9. ADVANCE CONSTRUCTION NOTICE SIGNS:

   IN ADDITION TO SIGNS REQUIRED BY THE PROVISIONS OF THE "WORK AREA TRAFFIC CONTROL HANDBOOK" (WATCH), LATEST EDITION, THE CONTRACTOR SHALL FURNISH AND PLACE SIGNS FOR GIVING ADVANCE NOTICE TO MOTORISTS OF TRAFFIC DISRUPTION AS PART OF THIS PROJECT IN ACCORDANCE WITH STANDARD PLAN S-791-1 AND "BROWN BOOK". CREDIT SIGN INFORMATION SHALL BE PROVIDED TO THE CONTRACTOR PRIOR TO THE START OF THE CONSTRUCTION.
10. STORMWATER POLLUTION CONTROL:

    THE CONTRACTOR SHALL COMPLY WITH THE PROVISIONS IN SECTION 01571 OF THE PROJECT SPECIFICATIONS.
11. THE CONTRACTOR SHALL FAMILIARIZE HIMSELF WITH THE PLANS, THE REMEDIATION ACTION PLAN, THE SOILS AND/OR GEOLOGY REPORTS, AND THE SITE CONDITIONS PRIOR TO COMMENCING WORK.
12. THE LOCATION OF EXISTING PIPING UTILITIES IS APPROXIMATE. PRIOR TO THE INSTALLATION OF ANY SUPPORT OF EXCAVATION COMPONENTS, UNDERGROUND UTILITIES, OR UNDERGROUND STRUCTURES, THE CONTRACTOR SHALL FIELD VERIFY THE LOCATION OF EXISTING UTILITIES, PIPING, EQUIPMENT AND OTHER RELEVANT EXISTING CONDITIONS. CONTRACTORS SHALL NOTIFY THE ENGINEER OF ALL DISCREPANCIES BEFORE PROCEEDING WITH THE WORK.
13. THE CONTRACTOR SHALL MAINTAIN CONTINUOUS SERVICE TO ALL EXISTING BUILDINGS TO REMAIN, UNLESS OTHERWISE APPROVED BY THE OWNER. THE CONTRACTOR SHALL NOTIFY THE OWNER IN WRITING AT LEAST 72 HOURS PRIOR TO ANY SERVICE INTERRUPTIONS TO EXISTING BUILDINGS TO REMAIN.
14. THE CONTRACTOR SHALL ASSUME SOLE AND COMPLETE RESPONSIBILITY FOR JOB SITE CONDITIONS, INCLUDING SAFETY OF ALL PERSONS AND PROPERTY, DURING THE COURSE OF CONSTRUCTION OF THIS PROJECT. THIS REQUIREMENT SHALL APPLY CONTINUOUSLY, AND SHALL NOT BE LIMITED TO NORMAL WORKING HOURS. THE CONTRACTOR SHALL DEFEND, INDEMNIFY AND HOLD THE OWNER AND ENGINEER HARMLESS FROM ANY AND ALL LIABILITY, REAL OR ALLEGED, IN CONNECTION WITH THE PERFORMANCE OF WORK ON THIS PROJECT.
15. ALL ELEVATIONS BASED ON NAVD 88 DATUM.
16. CONTRACTOR SHALL TAKE CARE TO AVOID DAMAGE TO EXISTING PAVEMENT, TREES, VEGETATION, STRUCTURES AND UTILITIES THAT ARE NOT INDICATED TO BE DEMOLISHED, REMOVED OR RELOCATED. ANY DAMAGE TO EXISTING PAVEMENT, TREES, VEGETATION, STRUCTURES AND UTILITIES NOT INDICATED SHALL BE REPAIRED, REPLACED OR RELOCATED AT THE CONTRACTOR'S EXPENSE.

ENVIRONMENTAL NOTES:

1. HAZARDOUS MATERIALS ABATEMENT AND CONTROL:

   THE CONTRACTOR SHALL COMPLY WITH THE PROVISIONS IN SECTION 01562 OF THE PROJECT SPECIFICATIONS.
2. PRIOR TO BUILDING DEMOLITION, REVIEW ASBESTOS CONTAINING MATERIALS (ACM) AND LEAD-BASED PAINT (LBP) SURVEYS. ALL ACM AND LBP SHALL BE REMOVED OR OTHERWISE ABATED PRIOR TO DEMOLITION. REMOVAL AND ABATEMENT ACTIVITIES SHALL COMPLY WITH ALL APPLICABLE LAWS, REGULATIONS, AND RULES.
3. THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (AQMD) "NOTIFICATION OF DEMOLITION OR ASBESTOS REMOVAL" FORM (HTTP://WWW.AQMD.GOV) SHALL BE FILLED OUT, SIGNED, PAID, SUBMITTED AND MAILED TO SOUTH COAST AQMD BY THE CONTRACTOR PERFORMING THE REMOVAL AND/OR DEMOLITION JOB AT LEAST 14 CALENDAR DAYS PRIOR TO THE START OF ASBESTOS REMOVAL OR ANY DEMOLITION.
4. THE CONTRACTOR OR QUALIFIED SUBCONSULTANT SHALL KEEP A CURRENT SITE-SPECIFIC HEALTH AND SAFETY PLAN ON-SITE, WHICH INCLUDES THE FINDINGS OF ALL PAST ASBESTOS CONTAINING MATERIALS (ACM) AND LEAD-BASED PAINT (LBP) SURVEYS AND REMEDIAL ACTION REPORTS. THE HEALTH AND SAFELY PLAN SHALL SPECIFY WORKER TRAINING AND PROTECTION; AND PROVIDE CAUTION SIGNS, SITE SECURITY, AND AIR MONITORING REQUIREMENTS.
5. THE CONTRACTOR SHALL MONITOR EXCAVATION FOR METHANE AND OXYGEN DEFICIENCY.
6. PROTECT GROUNDWATER MONITORING WELLS IN PLACE UNTIL CLEARANCE HAS BEEN OBTAINED FROM THE LOS ANGELES FIRE DEPARTMENT AND DIRECTED BY THE ENGINEER. ABANDON GROUNDWATER MONITORING WELLS IN ACCORDANCE WITH CALIFORNIA WELL STANDARDS.
7. ANY MATERIAL WITH DETECTABLE LEAD SHALL BE HANDLED IN ACCORDANCE WITH FEDERAL OSHA LEAD EXPOSURE IN CONSTRUCTION RULES (29CFR PART 1926) AND CAL/OSHA'S LEAD EXPOSURE IN CONSTRUCTION RULES (TITLE 8 CCR 1532.1).
8. PRIOR TO DEMOLITION OF BUILDINGS, COORDINATE WITH THE GREATER LOS ANGELES VECTOR CONTROL DISTRICT (GLAVCD) AND IMPLEMENT VECTOR (RODENT) ERADICATION.
9. A QUALIFIED ARCHAEOLOGICAL MONITOR RETAINED BY THE CONTRACTOR SHALL MONITOR GRADING AND/OR EXCAVATION ACTIVITIES. MONITORING SHALL CONSIST OF DIRECTLY WATCHING THE EXCAVATION AND EARTHMOVING ACTIVITIES. MONITORING SHALL OCCUR DURING THE ENTIRE WORKDAY, AND SHALL CONTINUE ON A DAILY BASIS UNTIL CONSTRUCTION INVOLVING GROUND DISTURBANCE IS COMPLETE, OR PROFESSIONAL JUDGMENT CONCLUDES THAT THERE IS NO CONTINUING POTENTIAL FOR ENCOUNTERING CULTURAL RESOURCES. SEE SECTION 01562 OF THE PROJECT SPECIFICATIONS FOR PROJECT ENVIRONMENTAL MITIGATION REQUIREMENTS.

AIR QUALITY NOTES:

1. GROUND WATERING TO CONTROL DUST SHALL BE REQUIRED DURING CONSTRUCTION ACTIVITIES, PURSUANT TO SCAQMD RULE 403.
2. ALL CLEARING, EARTH MOVING OR EXCAVATION ACTIVITIES SHALL CEASE DURING PERIODS WHEN WINDS EXCEED 15 MILES PER HOUR.
3. ALL MATERIALS TAKEN OFF-SITE SHALL BE EITHER SUFFICIENTLY WATERED OR SECURELY COVERED TO PREVENT EXCESSIVE AMOUNTS OF DUST.
4. ON-SITE VEHICLE SPEED SHALL BE POSTED AT 15 MILES PER HOUR.
5. STREETS ADJACENT TO THE SITE SHALL BE SWEPT AS NEEDED TO REMOVE SILT WHICH MAY HAVE ACCUMULATED FROM CONSTRUCTION ACTIVITIES.
6. ENGINES MUST BE MAINTAINED IN GOOD CONDITION ACCORDING TO MANUFACTURER'S SPECIFICATIONS. BOTH GRADING AND CONSTRUCTION ACTIVITIES ARE TO BE SCHEDULED TO EVEN OUT EMISSION PEAKS.
7. UNLESS ALREADY COVERED, FABRIC SHALL BE PLACED AT EXISTING FENCES TO REDUCE WIND-BLOWN DUST.
8. ALL STORED SOIL AND SAND SHALL BE COVERED OR TREATED WITH SOIL BINDERS. ALL DEBRIS SHALL BE CLEANED UP DAILY AND PUT IN A DUMPSTER WHICH SHALL HAVE A LID AND THE LID SHALL BE SECURED AT THE END OF THE DAY.

DEMOLITION NOTES:

1. ALL DEBRIS SHALL BE WET AT TIME OF HANDLING TO PREVENT DUST.
2. CALL FOR INSPECTION AT LEAST 24 HOURS BEFORE STARTING WORK.
3. APPROVAL OF PROTECTION FENCES AND CANOPIES IS REQUIRED PRIOR TO DEMOLITION.
4. STORAGE OF MATERIALS ON FLOORS SHALL NOT EXCEED 100 PSF LIVE LOAD.
5. A SEPARATE DEMOLITION PERMIT SHALL BE OBTAINED FROM LADBS FOR EACH BUILDING OR STRUCTURE EXCEPT FOR ACCESSORY BUILDINGS.
6. 30-DAY WRITTEN NOTIFICATION TO ADJACENT PROPERTY OWNER(S) IS REQUIRED DUE TO PROPOSED DEMOLITION WORK PER INFORMATION BULLETIN NO. P/BC 2008-060
7. THE "DEMOLITION INSPECTION RECORD" FORM NO. B-8B MUST BE POSTED ON THE JOB SITE. THIS CARD MUST BE SIGNED BY THE INSPECTOR APPROVING THE METHOD OF DEMOLITION TO BE USED BEFORE WORK IS STARTED. A SEPARATE APPROVAL SIGNATURE IS REQUIRED FOR EACH DEMOLITION METHOD USED. IF THE METHOD OF DEMOLITION IS TO BE CHANGED DURING THE COURSE OF THE JOB, THE INSPECTOR MUST BE CALLED AND A NEW APPROVAL SIGNATURE OBTAINED BEFORE THE NEW METHOD IS STARTED.
8. METHOD OF DEMOLITION:
   A. HAND WRECKING: HAND WRECKING METHODS MAY BE USED ON ANY TYPE OF BUILDING, PROVIDED THE REQUIRED PROTECTION DEVICES ARE INSTALLED AND APPROVED. HAND WRECKING MAY INCLUDE THE USE OF ANY TYPE OF HAND HELD TOOLS. THE USE OF SMALL WHEEL MOUNTED PNEUMATIC TOOLS WILL BE PERMITTED IF FIRST APPROVED BY THE BUILDING INSPECTOR.
   B. DOZER OR LOADER WRECKING: DOZER OR LOADER WRECKING SHALL NOT BE USED EXCEPT ON ONE OR TWO STORY BUILDINGS WITH A MAXIMUM WALL HEIGHT OF 24 FEET. THE BUILDING MUST BE LOCATED A MINIMUM DISTANCE FROM THE PUBLIC WAY AND ADJOINING PROPERTY AT LEAST EQUAL TO THE MAXIMUM WALL HEIGHT OF THE BUILDING.
   C. CLAM SHELL WRECKING: CLAM SHELL WRECKING SHALL NOT BE USED UNLESS THE BUILDING IS LOCATED A DISTANCE FROM THE PUBLIC RIGHT-OF-WAY AND ADJOINING PROPERTY WHICH IS AT LEAST EQUAL TO ONE-HALF THE MAXIMUM HEIGHT OF THE BUILDING. THIS DISTANCE NEED NOT, HOWEVER, EXCEED TWICE THE MAXIMUM HEIGHT OF THE BUILDING.
   D. CABLE WRECKING: "CABLE WRECKING" SHALL INCLUDE ALL WRECKING METHODS USING A CABLE, WHETHER APPLIED TO A SINGLE WALL OR TO AN ENTIRE BUILDING.

   CABLE WRECKING WILL BE ALLOWED ONLY IN THOSE CASES WHERE THE BUILDING IS LOCATED A DISTANCE FROM THE PUBLIC WAY AND ADJOINING PROPERTY GREATER THAN ONE AND ONE-HALF TIMES THE MAXIMUM HEIGHT OF THE BUILDING. WHERE CABLE WRECKING IS TO BE USED ON A SINGLE WALL, THE CLEAR DISTANCED REQUIRED NEED NOT EXCEED TWICE THE HEIGHT OF THE WALL BEING DEMOLISHED.

   PRIOR TO THE ISSUANCE OF A PERMIT FOR CABLE WRECKING, A DETAILED DESCRIPTION OF THE METHOD AND SEQUENCE FOR DEMOLISHING THE BUILDING AND THE SAFETY PRECAUTIONS TO BE TAKEN SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT FOR APPROVAL.

DEMOLITION NOTES (CONT.):

   E. BALL WRECKING: BALL WRECKING SHALL NOT BE USED UNLESS THE BUILDING IS LOCATED A DISTANCE FROM THE PUBLIC WAY AND ADJOINING PROPERTY AT LEAST EQUAL TO ONE AND ONE-HALF TIMES THE MAXIMUM HEIGHT OF THE BUILDING. THE SEPARATION NEED NOT, HOWEVER, EXCEED 50 FEET.

   PRIOR TO THE ISSUANCE OF A PERMIT FOR BALL WRECKING, THE DEMOLITION CONTRACTOR SHALL SUBMIT FOR APPROVAL TO THE BUILDING DEPARTMENT A DETAILED DESCRIPTION OF THE METHOD AND SEQUENCE FOR DEMOLISHING THE BUILDING AND THE SAFETY PRECAUTIONS TO BE TAKEN.
9. REMOVE ALL EXISTING IMPROVEMENTS AND UTILITIES THAT INTERFERE WITH THE CONSTRUCTION, EXCAVATION, AND GRADING OF THIS PROJECT UNLESS OTHERWISE NOTED.
10. THE CONTRACTOR SHALL DEMOLISH AND REMOVE ALL EXISTING STRUCTURES AND FACILITIES INDICATED ON THESE PLANS.
11. ALL CURBS, GUTTERS, DRIVEWAYS, CROSS-GUTTERS, AND CONCRETE AND A.C. PAVEMENTS INDICATED SHALL BE REMOVED TO THE LIMITS INDICATED.
12. SANITARY SEWER MAINTENANCE HOLES TO REMAIN SHALL BE ADJUSTED TO PROPOSED FINISHED GRADE AND FITTED WITH HEAVY DUTY MAINTENANCE HOLE COVERS IF NOT ALREADY IN PLACE.
13. ALL DEBRIS FROM THE DEMOLITION WORK SHALL BE REMOVED FROM THE SITE AND DISPOSED OF AT A DUMP SITE APPROVED BY THE CITY.
14. THE CONTRACTOR SHALL OBTAIN ALL NECESSARY PERMITS FOR THE DEMOLITION OF WORK.
15. THE EXISTENCE, LOCATION AND CHARACTERISTICS OF UNDERGROUND UTILITY INFORMATION SHOWN ON THESE PLANS HAS BEEN OBTAINED FROM A REVIEW OF AVAILABLE RECORD DATA. NO REPRESENTATION IS MADE AS TO THE ACCURACY OR COMPLETENESS OF THE INFORMATION. IT IS THE CONTRACTOR'S RESPONSIBILITY TO FIELD VERIFY ALL DIMENSIONS, SIZES, LOCATIONS, AND QUANTITIES OF ALL EXISTING UTILITIES, AND TO RESOLVE ALL DISCREPANCIES PRIOR TO THE COMMENCEMENT OF ANY WORK.
16. SHOULD ANY EXISTING UTILITIES NOT SHOWN HENCEFORTH BE ENCOUNTERED, THE CONTRACTOR SHALL NOTIFY THE OWNER AND ENGINEER PRIOR TO DEMOLITION OR CONSTRUCTION.

REFERENCE NOTES:

1. THE FOLLOWING PLANS SHALL BE USED AS A REFERENCE FOR THIS PROJECT:

   D-13360
   D-13639
   D-13394
   D-28347
   D-34101
   D-34683

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REVISION DATES (DESIGN STAGE ONLY)

ARCADIS
LEGAL ENTITY:
ARCADIS U.S., INC.
333 S. HOPE STREET
SUITE C200
LOS ANGELES,
CA 90071

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
ENGINEERING
CITY OF LOS ANGELES
INDEX NO. D-3898
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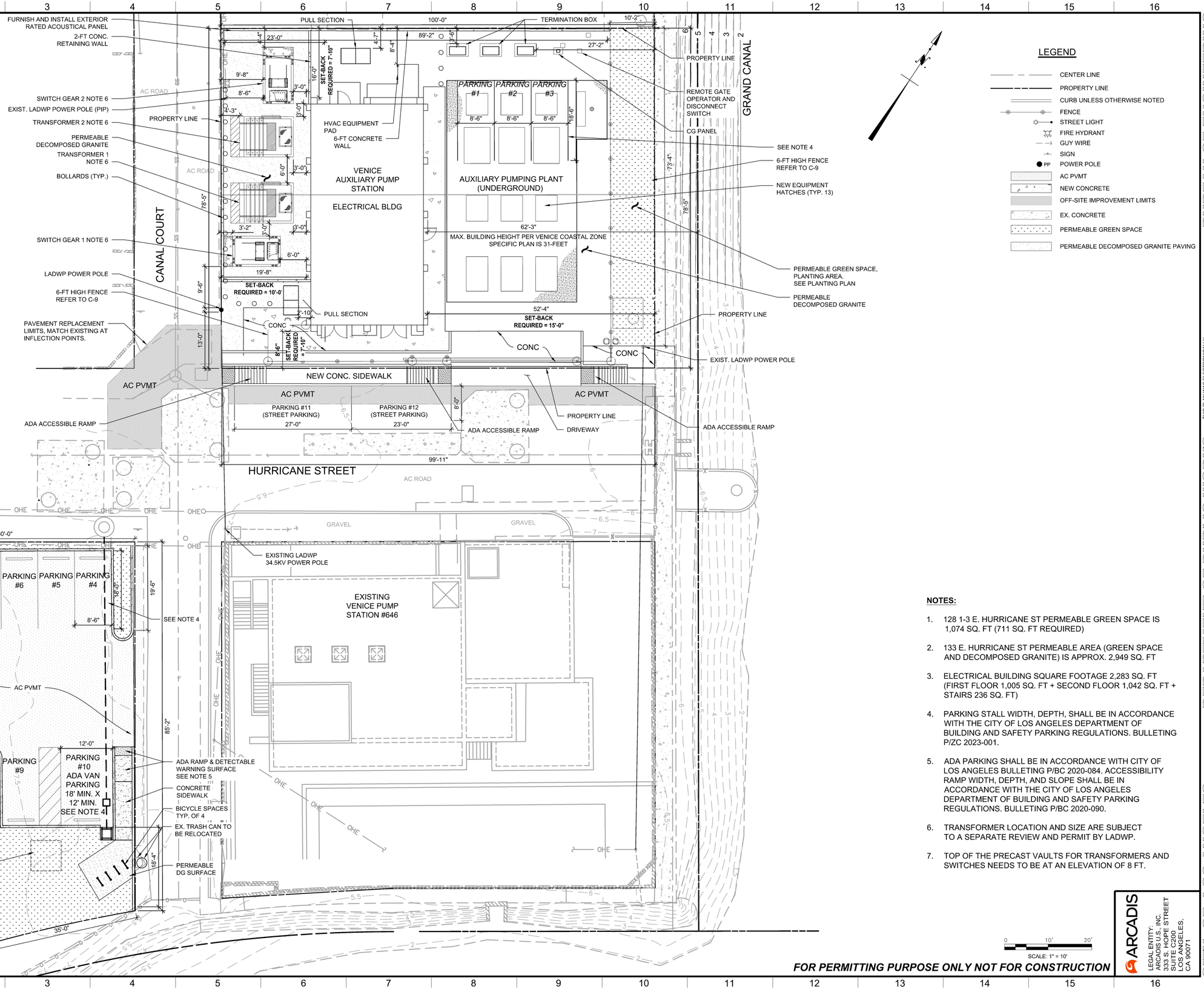
TED ALLEN, P.E. CITY ENGINEER
ENGINEER: JENA PRIOR LIC. NO. CA-69143 DATE: 01/2026
DESIGN GROUP
DESIGNED BY: LUDWING PEREZ 01/2026
DRAWN BY: C. PUTTEGOWDA 01/2026
CHECKED BY: LUDWING PEREZ 01/2026
APPROVED BY: HECTOR ARIAS 01/2026
VERTICAL CONTROL: NAVD 88 (2000)
HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5
SHEET TITLE: GENERAL NOTES
PROJECT: VENICE AUXILIARY PUMPING PLANT
ADDRESS: 133 HURRICANE STREET
LOS ANGELES, CALIFORNIA
WORK ORDER NO. SZC12923
DRAWING NO. G-3
SHEET OF SHEETS



NOTES:

1. 128 1-3 E. HURRICANE ST PERMEABLE GREEN SPACE IS 1,074 SQ. FT (711 SQ. FT REQUIRED)
2. 133 E. HURRICANE ST PERMEABLE AREA (GREEN SPACE AND DECOMPOSED GRANITE) IS APPROX. 2,949 SQ. FT
3. ELECTRICAL BUILDING SQUARE FOOTAGE 2,283 SQ. FT (FIRST FLOOR 1,005 SQ. FT + SECOND FLOOR 1,042 SQ. FT + STAIRS 236 SQ. FT)
4. PARKING STALL WIDTH, DEPTH, SHALL BE IN ACCORDANCE WITH THE CITY OF LOS ANGELES DEPARTMENT OF BUILDING AND SAFETY PARKING REGULATIONS. BULLETING P/ZC 2023-001.
5. ADA PARKING SHALL BE IN ACCORDANCE WITH CITY OF LOS ANGELES BULLETING P/BC 2020-084. ACCESSIBILITY RAMP WIDTH, DEPTH, AND SLOPE SHALL BE IN ACCORDANCE WITH THE CITY OF LOS ANGELES DEPARTMENT OF BUILDING AND SAFETY PARKING REGULATIONS. BULLETING P/BC 2020-090.
6. TRANSFORMER LOCATION AND SIZE ARE SUBJECT TO A SEPARATE REVIEW AND PERMIT BY LADWP.
7. TOP OF THE PRECAST VAULTS FOR TRANSFORMERS AND SWITCHES NEEDS TO BE AT AN ELEVATION OF 8 FT.

SCALE: 1" = 10'

FOR PERMITTING PURPOSE ONLY NOT FOR CONSTRUCTION

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TED ALLEN, P.E.	
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ENGINEER: JENA PRIOR	LIC. NO. CA-69143 01/2026
DESIGNED BY: LUDWING PEREZ	01/2026
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APPROVED BY: HECTOR ARIAS	01/2026

VERTICAL CONTROL: NAVD 88 (2000)
HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

SHEET TITLE: OVERALL SITE PLAN
PROJECT: VENICE AUXILIARY PUMPING PLANT
ADDRESS: 133 E. HURRICANE STREET LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923
DRAWING NO. C-0
SHEET OF SHEETS

REVISION DATES (DESIGN STAGE ONLY)

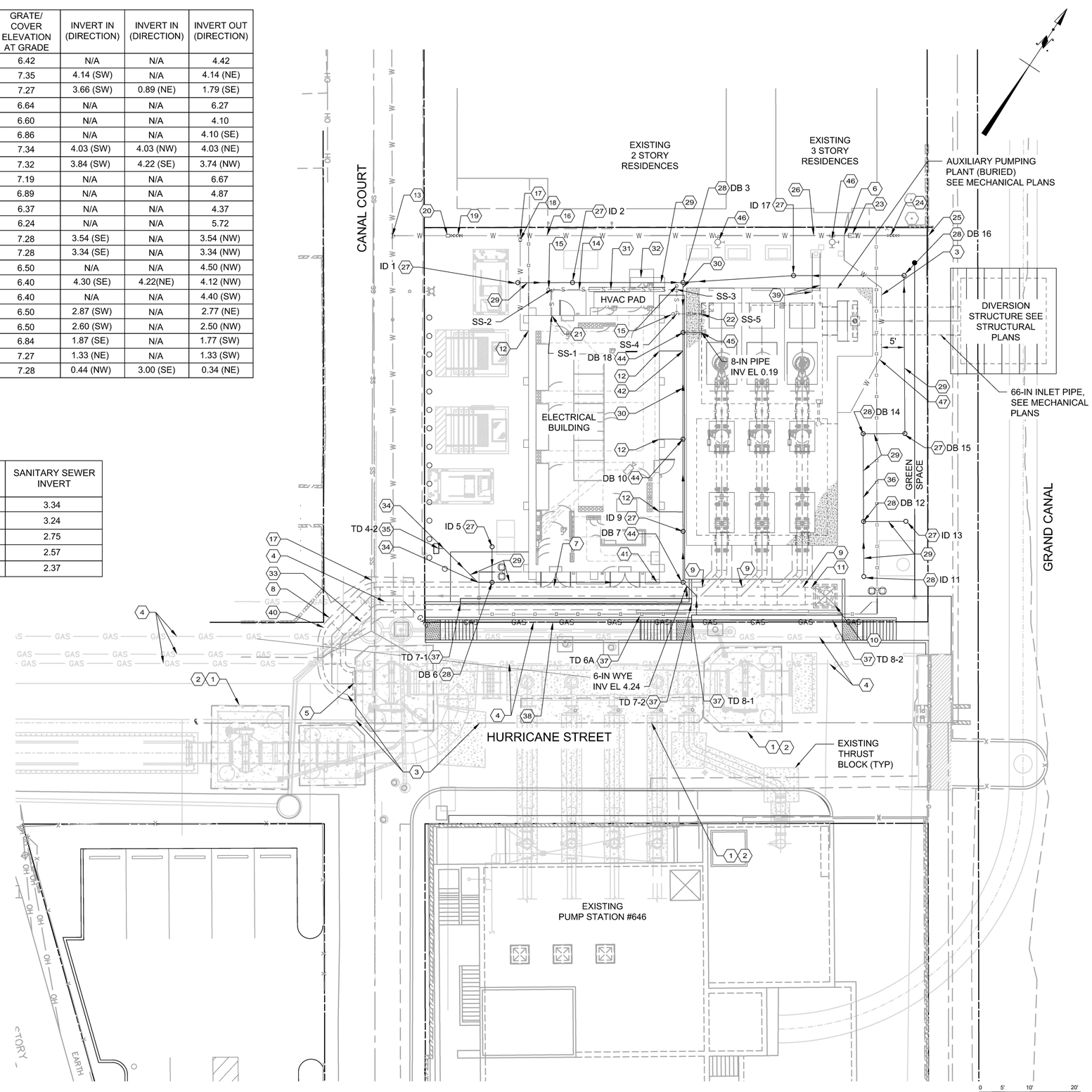
User:CPI00880 Spec:########## File:C:\USERS\CPI00880\DCACCDOCS\ARCADIS ACC LIS\AAU-30220432-VAPP PRE NTP 4 DESIGN AND PERMITTING\PROJECT FILES\10_WIP\10T_ARC_CIVILCADD\C-0.DWG Scale:1:1 SavedDate:1/8/2026 Time:11:53
THE CITY OF LOS ANGELES OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF ELECTRONIC COPIES OF THIS PLAN SHEET.

Sheet Version 3.0

DRAIN/BASIN TRENCH DRAIN ID	GRATE/ COVER ELEVATION AT GRADE	INVERT IN (DIRECTION)	INVERT IN (DIRECTION)	INVERT OUT (DIRECTION)
ID 1	6.42	N/A	N/A	4.42
ID 2	7.35	4.14 (SW)	N/A	4.14 (NE)
DB 3	7.27	3.66 (SW)	0.89 (NE)	1.79 (SE)
TD 4-1	6.64	N/A	N/A	6.27
TD 4-2	6.60	N/A	N/A	4.10
ID 5	6.86	N/A	N/A	4.10 (SE)
DB 6	7.34	4.03 (SW)	4.03 (NW)	4.03 (NE)
DB 7	7.32	3.84 (SW)	4.22 (SE)	3.74 (NW)
TD 7-1	7.19	N/A	N/A	6.67
TD 7-2	6.89	N/A	N/A	4.87
TD 8-1	6.37	N/A	N/A	4.37
TD 8-2	6.24	N/A	N/A	5.72
ID 9	7.28	3.54 (SE)	N/A	3.54 (NW)
DB 10	7.28	3.34 (SE)	N/A	3.34 (NW)
ID 11	6.50	N/A	N/A	4.50 (NW)
DB 12	6.40	4.30 (SE)	4.22(NE)	4.12 (NW)
ID 13	6.40	N/A	N/A	4.40 (SW)
DB 14	6.50	2.87 (SW)	N/A	2.77 (NE)
DB 15	6.50	2.60 (SW)	N/A	2.50 (NW)
DB 16	6.84	1.87 (SE)	N/A	1.77 (SW)
ID 17	7.27	1.33 (NE)	N/A	1.33 (SW)
DB 18	7.28	0.44 (NW)	3.00 (SE)	0.34 (NE)

ID - INLINE DRAIN
DB - DRAIN BASIN
TD - TRENCH DRAIN

SANITARY SEWER LOCATION ID	SANITARY SEWER INVERT
SS-1	3.34
SS-2	3.24
SS-3	2.75
SS-4	2.57
SS-5	2.37



CONSTRUCTION NOTES

1. CAD RECORD DRAWINGS OF THE MANIFOLD FOR THE VAPP HAVE BEEN PROVIDED AND HAVE BEEN LOCATED BASED ON THE SURVEY SUCH THAT THE DRAWINGS BEST REFLECT ACTUAL FIELD CONDITIONS. CONTRACTOR SHALL VERIFY AS NEEDED FOR CONSTRUCTION.
2. HAND MARKED DRAWINGS OF THE VPP MANIFOLD INDICATE THAT SHEET PILES WERE LEFT IN PLACE AFTER CONSTRUCTION AND THAT THE TOP 4-FEET ONLY HAS BEEN REMOVED. CONTRACTOR SHOULD EXERCISE CAUTION AS SHEET PILING MAY BE ENCOUNTERED DURING EXCAVATION. CONTRACTOR SHALL REMOVE SHEET PILING AS NEEDED FOR CONSTRUCTION. CONTRACTOR SHALL DISPOSE OF SHEET PILING REMOVED FOR CONSTRUCTION.
3. WATER LINE SHALL BE PLACED A MINIMUM OF 4 FEET FROM THE STORM DRAIN LINE AND A MINIMUM OF 1 FOOT ABOVE THE TOP OF THE STORM DRAIN LINE.
4. CONTRACTOR TO VERIFY THIS IS VENT GAS PIPING PRIOR TO CONSTRUCTION. CONTRACTOR TO REROUTE VENT GASE PIPING AS INDICATED AND AVOID CONFLICTS.
5. CONNECT 54-IN 90 BEND TO EXISTING PIPE. SEE DETAIL ON SHEET C-7.
6. INSTALL 1 1/2-IN x 1/2-IN TEE.
7. 42-IN EFFLUENT LINE, SEE PROFILE ON C-6.
8. ENCASE PIPE FROM CONNECTION TO LIMITS INDICATED. SEE DETAIL ON SHEET C-7.
9. 42-IN x 24-IN WYE. SEE MECHANICAL PLANS FOR CONTINUATION.
10. CONCRETE VAULT AND HATCH PER DETAIL ON C-6.
11. 42-IN x 30-IN 90 DEG REDUCING BEND. SEE MECHANICAL PLANS FOR DETAIL.
12. CONNECT TO BUILDING STORM DRAIN SEE PLUMBING PLANS.
13. 8-IN BY 1 1/2-IN TAPPING SLEEVE AND VALVE.
14. 4-IN PVC SDR 35 SEWER SERVICE.
15. 4-IN SEWER CLEANOUT PER BOE STANDARD PLAN S-164.
16. 1-1/2-IN WATER SERVICE IN TRENCH PER BOE STANDARD DETAIL S-251-1 CASE 1 MODIFIED SUCH THAT TYPE A MATERIAL SHALL EXTEND A MINIMUM OF 4-INCHES ABOVE TOP OF PIPE.
17. CONTRACTOR TO PROTECT EXISTING SEWER LINE IN PLACE DURING CONSTRUCTION OR TEMPORARILY REROUTE AND REPLACE.
18. 1 1/2-IN VALVE.
19. 1 1/2-IN BACK FLOW PREVENTER. SEE DETAIL SHEET C-7.
20. 1-1/2-IN WATER METER PER WATER COMPANY REQUIREMENTS.
21. SEE PLUMBING DRAWINGS FOR CONTINUATION OF 4-IN SEWER SERVICE.
22. CONNECT SEWER SERVICE TO WET WELL. SEE MECHANICAL PLAN FOR CONNECTION DETAIL.
23. FLOW METER FOR IRRIGATION SERVICE. SEE IRRIGATION PLAN FOR SIZE.
24. BACKFLOW PREVENTER FOR IRRIGATION SERVICE, SEE IRRIGATION PLAN FOR SIZE.
25. SEE IRRIGATION PLAN FOR CONTINUATION.
26. 1-1/2" WATERLINE FOR IRRIGATION SERVICE.
27. 8-IN INLINE DRAIN WITH DOMED GRATE AND REDUCER TO 6-IN PIPE PER DETAIL ON C-8.
28. 10-IN DRAIN BASIN WITH 8-IN DOMED GRATE PER DETAIL ON C-8.
29. 6-IN STORM DRAIN. MATCH INVERTS INDICATED ON PLAN. STORM DRAIN SHALL BE SDR 35 PVC PIPE OR MAY BE CORRUGATED HDPE DUAL WALL PIPE WITH SMOOTH INTERIOR. ALL JOINTS SHALL BE WATER TIGHT.
30. 8-IN STORM DRAIN. MATCH INVERTS INDICATED ON PLAN. STORM DRAIN MAY BE SDR 35 PVC PIPE OR MAY BE CORRUGATED HDPE DUAL WALL PIPE WITH SMOOTH INTERIOR. ALL JOINTS SHALL BE WATER TIGHT.
31. ENCASE SEWER PIPE PER BOE STANDARD DRAWING S-251-1 CASE 5 FOR FULL LENGTH BENEATH HVAC PAD EXTENDING A MINIMUM OF 1-FT BEYOND PAD EACH DIRECTION.
32. ENCASE STORM DRAIN PIPE PER BOE STANDARD DRAWING S-251-1 CASE 5 FOR FULL LENGTH BENEATH HVAC PAD EXTENDING A MINIMUM OF 1-FT BEYOND PAD EACH DIRECTION.
33. CONTRACTOR SHALL FILL SPACE BETWEEN PIPE AND MANHOLE WITH FLOWABLE CONCRETE CONFORMING TO THE REQUIREMENTS OF SPECIFICATION 03300 FOR LEAN CONCRETE.
34. INSTALL 6-IN 45 DEG BEND.
35. IN LINE TRENCH DRAIN CATCH BASIN OR BOTTOM OUTLET. INVERT AS NOTED ON TABLE THIS PAGE.
36. 6-IN STORM DRAIN TEE.
37. TRENCH DRAIN PER DETAIL ON SHEET C-8.
38. REROUTED GAS VENT LINE.
39. 1-IN SCH 80 CPVC SAMPLE INLET AND OUTLET. SEE MECHANICAL AND ELECTRICAL PLANS FOR CONTINUATION.
40. 42-IN 45 DEG BEND.
41. 6-IN TEE.
42. 6-IN X 8-IN TEE.
43. 8-IN 45 DEG BEND.
44. 10-IN DRAIN BASIN WITH GRATE. SEE DETAIL ON C-08
45. CONNECT TO WET WELL, SEE MECHANICAL PLANS FOR CONNECTION DETAIL.
46. 1-IN HOSE BIB PER DETAIL ON C-7.
47. 1/2-IN WATER LINE TO VALVE VAULT. SEE MECHANICAL PLANS FOR CONTINUATION.

DOMESTIC WATER SERVICE NOTES

1. DOMESTIC SERVICE LINE SHALL BE INSTALLED IN ACCORDANCE WITH D.W.P. SPECIFICATION D101 (LATEST VERSION).
2. MINIMUM COVER OVER DOMESTIC SERVICE SHALL BE 2-FT. DOMESTIC SERVICE MAY BE ROUTED TO AVOID OTHER CONFLICTS IN THE FIELD AS NEEDED.
3. TAPPING SLEEVE AND VALVE CONNECTION TO THE MAIN SHALL BE MADE BY D.W.P.
4. WATER METER SHALL BE INSTALLED BY D.W.P.
5. DOMESTIC SERVICE INSTALLATION SHALL CONFORM TO D.W.P. STANDARD DETAIL A9467 OF A9468 DEPENDING ON EXISTING WATER MAIN PIPE MATERIAL.
6. WATER VALVES SHALL BE INSTALLED WITHIN A VALVE BOX LARGE ENOUGH TO ALLOW PROPER OPERATION OF THE VALVE. VALVE BOX MAY BE EITHER CONCRETE OR PLASTIC.

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REVISION DATES (DESIGN STAGE ONLY)

Sheet Version 3.0

BUREAU OF ENGINEERING
ENGINEERING
CITY OF LOS ANGELES

NO.	REVISIONS:	DATE:	BY:
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-	-	-	-
-	-	-	-
-	-	-	-

CIP NO. C922
INDEX NO. D-31898

DEPARTMENT OF PUBLIC WORKS
CITY OF LOS ANGELES

TED ALLEN, P.E. CITY ENGINEER DATE: 01/2026
LIC. NO. CA-69143

ENGINEER:	JENA PRIOR	DESIGN GROUP
DESIGNED BY:	LUDWING PEREZ	01/2026
DRAWN BY:	C. PUTTEGOWDA	01/2026
CHECKED BY:	LUDWING PEREZ	01/2026
APPROVED BY:	HECTOR ARIAS	01/2026

SHEET TITLE: SITE UTILITY PLAN

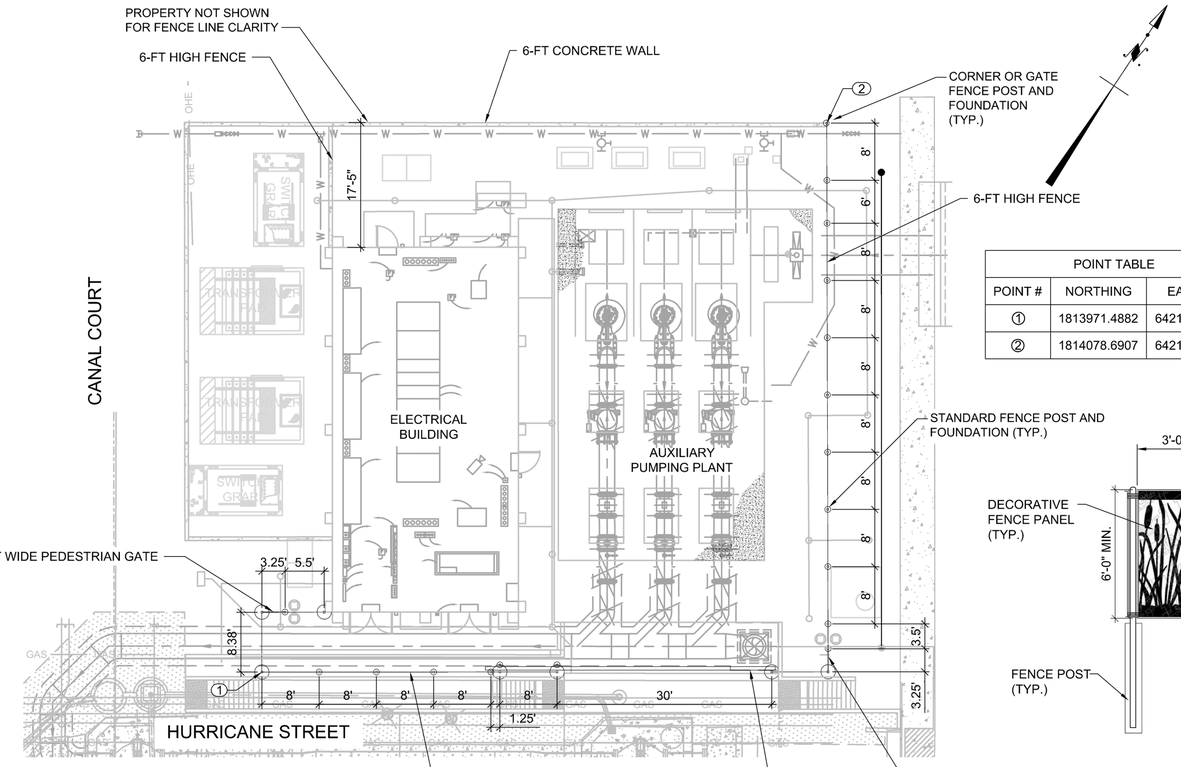
PROJECT: VENICE AUXILIARY PUMPING PLANT

ADDRESS: 133 HURRICANE STREET
LOS ANGELES, CALIFORNIA

VERTICAL CONTROL: NAVD 88 (2000)
HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

ARCADIS
LEGAL ENTITY:
ARCADIS U.S., INC.
333 S. HOPE STREET
SUITE C200
LOS ANGELES,
CA 90071

WORK ORDER NO. SZC12923
DRAWING NO. C-5
SHEET OF SHEETS

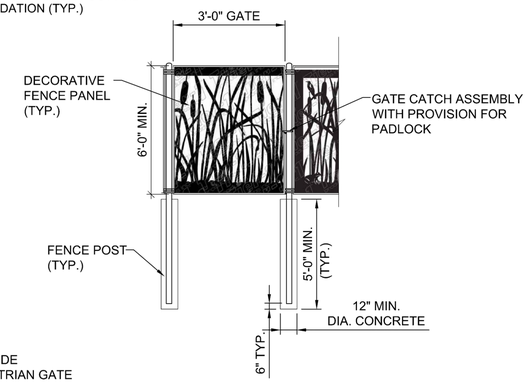


FENCE PLAN

SCALE: 1" = 10'

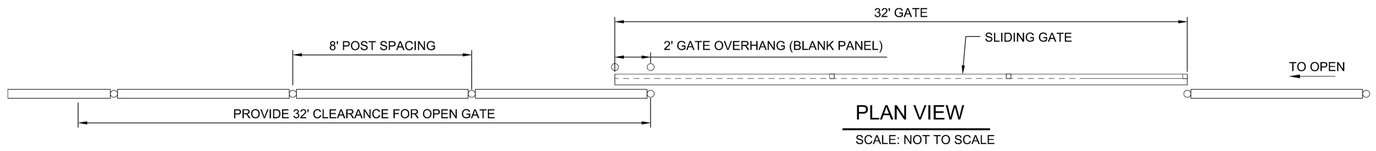
SCALE: 1" = 10'

POINT TABLE		
POINT #	NORTHING	EASTING
①	1813971.4882	6421797.5363
②	1814078.6907	6421822.5990



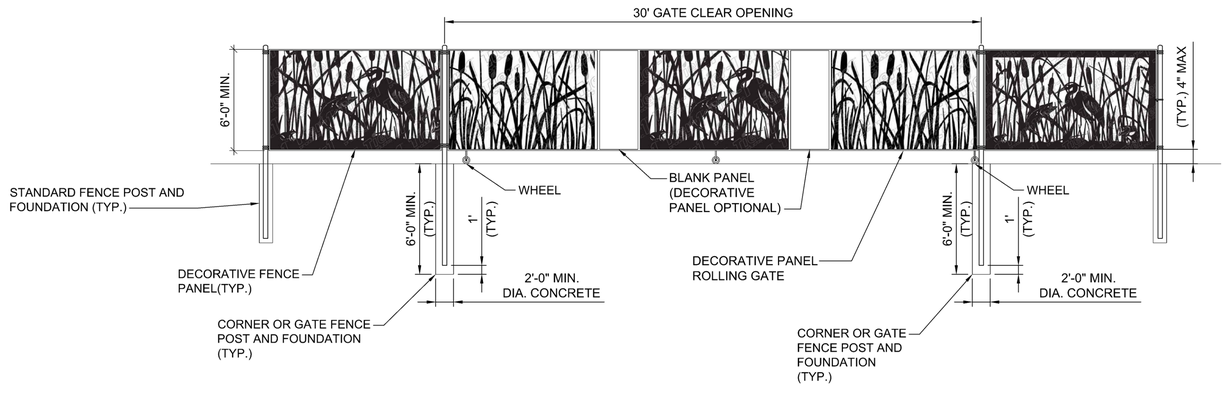
3 FT WIDE PEDESTRAIN GATE

SCALE: NOT TO SCALE



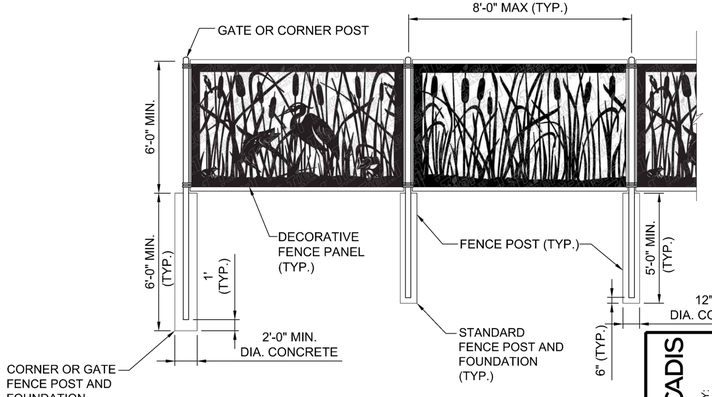
PLAN VIEW

SCALE: NOT TO SCALE



30' SLIDING GATE ELEVATION

SCALE: NOT TO SCALE



TYPICAL FENCE ELEVATION

SCALE: NOT TO SCALE

NOTES

1. PROVIDE FENCE IN ACCORDANCE WITH THESE DETAILS.
2. ALL FITTINGS SHALL BE HEAVY DUTY DESIGN.
3. ALL CORNER, GATE, AND FENCE POSTS SHALL BE CAPPED.
4. CONTRACTOR SHALL COORDINATE WITH DECORATIVE PANEL MANUFACTURER TO DEVELOP A FRAME AND FITTINGS FOR PANELS AND HOW TO CONNECT THEM TO THE FENCE POSTS.
5. CONTRACTOR SHALL WORK WITH DECORATIVE PANEL MANUFACTURER AND SLIDING GATE MANUFACTURER TO DEVELOP A SLIDING GATE PER DETAIL THIS SHEET. GATE MANUFACTURER SHALL DEVELOP SLIDING METHOD FOR GATE, WHEELS SHOWN ON DETAIL ARE FOR REFERENCE ONLY, AND SUBJECT TO MANUFACTURER'S DESIGN.
6. DECORATIVE PANEL DESIGNS ARE BULRUSH, HERON, FROG, FISH AND DRAGONFLY AND SIMPLE BULRUSH. THE DESIGNS SHOWN ARE FROM RAILING ART AND ARE PRE-APPROVED BY CULTURAL AFFAIRS.
7. CORNER, GATE, AND FENCE POSTS SHALL BE SQUARE, METAL AND HEAVY DUTY DESIGN. SIZE SHALL BE PER THE FENCE MANUFACTURER'S DESIGN BASED ON THE FENCE DESIGN CRITERIA BELOW.
8. ALL FENCE AND GATE ELEMENTS AND FITTINGS SHALL BE EITHER PAINTED OR POWDER COATED USING A PAINT OR POWDER COAT SUITABLE TO A MARINE ENVIRONMENT. PAINT OR POWDER COAT SHALL BE A MATTE BLACK COLOR.
9. GATE DESIGN MAY BE CONSTRUCTED OF ALUMINUM TO MAKE MANUAL OPERATION EASIER.
10. GATE OFFSET IN CLOSED POSITION SHALL NOT EXCEED 4 INCHES.
11. ALL CONCRETE FOR FENCE POSTS SHALL BE 3000 PSI MINIMUM.
12. CONCRETE FOR POSTS THAT MAY OVERLAP SHALL BE COMBINED INTO A SINGLE FOOTING AS NEEDED, ABLE TO SUPPORT BOTH POSTS.
13. CONCRETE FOOTINGS FOR POSTS THAT CONFLICT WITH CURB AT THE SURFACE SHALL BE "NOTCHED" TO ALLOW INSTALLATION OF CURB AS NEEDED. A MASTIC EXPANSION MATERIAL MAY BE USED BETWEEN THE CURB AND FOOTING.
14. THERE IS EXISTING METHANE VENT GAS PIPING THAT MAY CONFLICT WITH THE FENCE INSTALLATION. CONTRACTOR SHALL FIELD VERIFY FENCE ALIGNMENT AND NOTIFY ENGINEERING IF CONFLICTS EXIST PRIOR TO START OF FENCE INSTALLATION.
15. CONTRACTOR SHALL PREPARE A COMPLETE FENCE AND GATE DELEGATED DESIGN PACKAGE AND SHALL SUBMIT THE PACKAGE FOR APPROVAL PRIOR TO FABRICATION OF THE FENCE AND GATES. SUBMITTAL SHALL BE DESIGNED SIGNED AND SEALED BY A LICENSED STATE OF CALIFORNIA PROFESSIONAL ENGINEER.
16. CONTRACTOR SHALL ADHERE TO THE FOLLOWING REQUIREMENTS FOR THE FENCE DESIGN CALCULATIONS:

SEISMIC DESIGN DATA:

1.1. RISK CATEGORY=II
1.2. SEISMIC IMPORTANCE FACTOR, IE = 1.25
1.3. MAPPED SPECTRAL RESPONSE ACCELERATIONS:
  A) Ss = 16.59%
  B) SI = 6.60%
1.4 SITE CLASS = D
1.5 SPECTRAL RESPONSE COEFFICIENTS:
  A) Sds = 11.06%
  B) Sdi = 6.60%
1.6 SEISMIC DESIGN CATEGORY = D

WIND DESIGN DATA:

1. ULTIMATE DESIGN WIND SPEED=110 MPH
2. NOMINAL DESIGN WIND SPEED = 85 MPH
3. RISK CATEGORY = II
4. WIND EXPOSURE = D
5. ULTIMATE DESIGN WIND PRESSURE = 30.43 PSF FOR (COMPONENTS AND CLADDING)
6. NOMINAL DESIGN WIND PRESSURE = 18.17 PSF FOR (COMPONENTS AND CLADDING)

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REVISION DATES (DESIGN STAGE ONLY)

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CITY OF LOS ANGELES

BUREAU OF ENGINEERING

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CIP NO. C922

INDEX NO. D-31898

THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS

CITY ENGINEER	DATE:
TED ALLEN, P.E.	01/2026
DESIGN GROUP	LIC. NO. CA-69143
ENGINEER: JENA PRIOR	01/2026
DESIGNED BY: LUDWING PEREZ	
DRAWN BY: C. PUTTEGOWDA	01/2026
CHECKED BY: LUDWING PEREZ	01/2026
APPROVED BY: HECTOR ARIAS	01/2026

VERTICAL CONTROL: NAVD 88 (2000)
HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

SHEET TITLE: FENCE PLAN AND DETAILS

PROJECT: VENICE AUXILIARY PUMPING PLANT

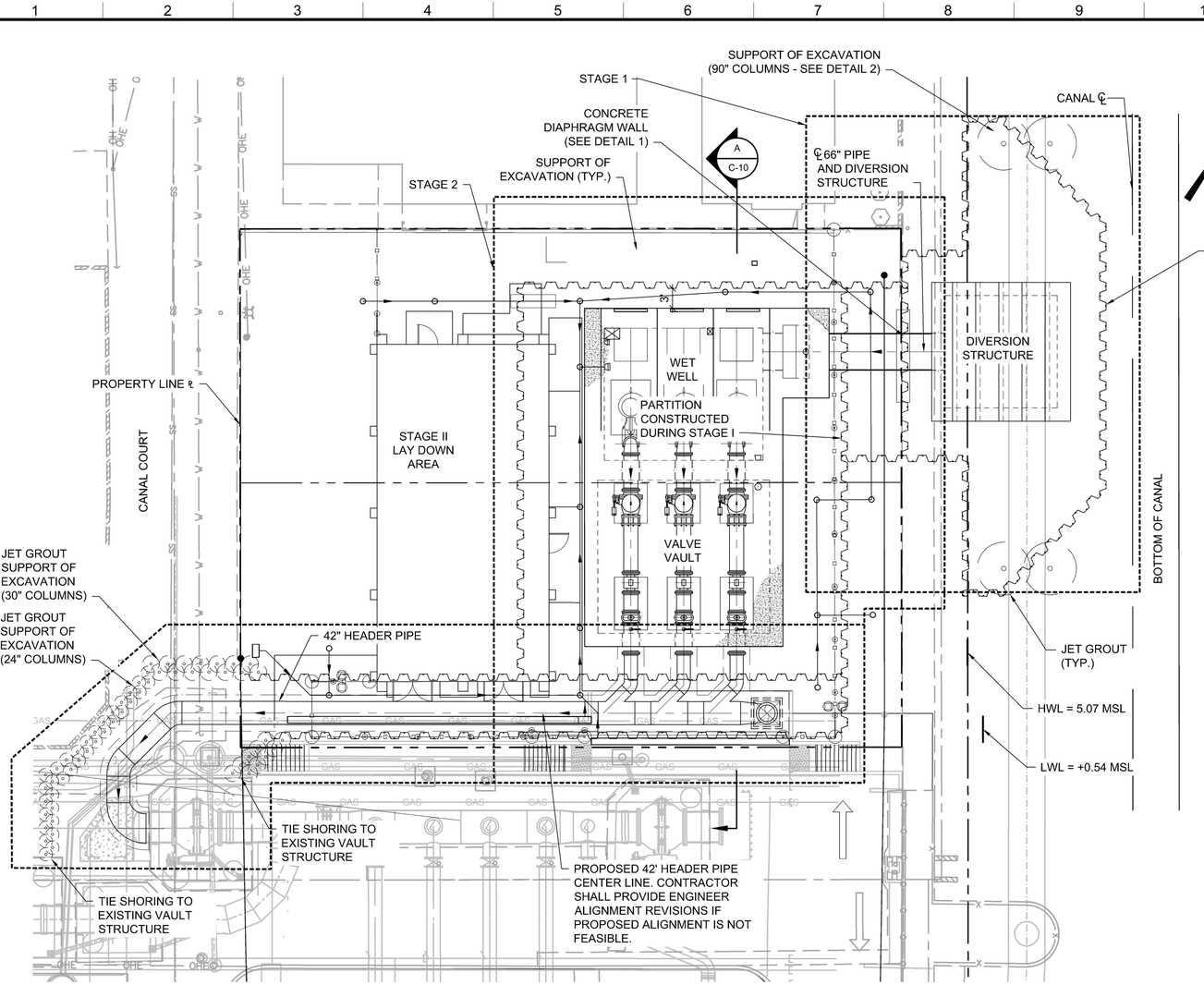
ADDRESS: 133 E. HURRICANE STREET LOS ANGELES, CALIFORNIA

ARCADIS
LEGAL ENTITY:
ARCADIS U.S., INC.
333 S. HOPE STREET
SUITE C200
LOS ANGELES,
CA 90071

WORK ORDER NO. SZC12923

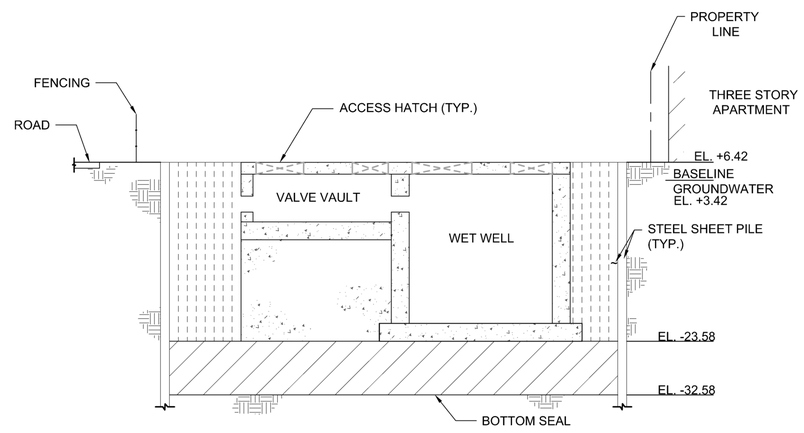
DRAWING NO. C-9

SHEET OF SHEETS



PLAN

SCALE: 1" = 10'

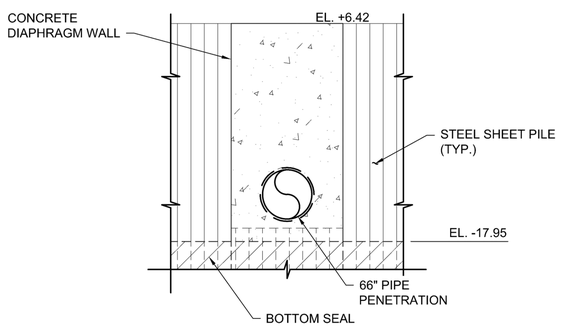


SECTION A

SCALE: NOT TO SCALE

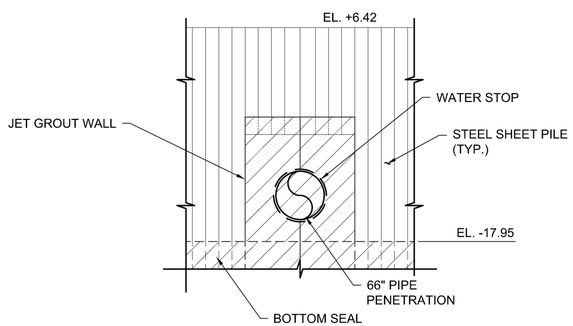
NOTES

1. THE CONTRACTOR IS RESPONSIBLE FOR THE DESIGN OF THE SUPPORT OF EXCAVATION.
2. THE SUPPORT OF EXCAVATION ITEMS SHOWN ARE SCHEMATIC OPTIONS FOR SUPPORT OF EXCAVATION.
3. PROVIDE ACCESS AND BARRICADES PER CAL OSHA AND LOS ANGELES DOT REQUIREMENTS. SPLASH SCREENS SHALL BE ERECTED ON TOP OF THE BARRICADES TO A MINIMUM HEIGHT OF 8-FT IN THE VICINITY OF ANY EXCAVATION TO BE PERFORMED IN THE "WET". THE CONTRACTOR SHALL REPLACE OR REPAIR THE SPLASH SCREEN WHEN DAMAGED.
4. DESIGN THE WATER-TIGHT EXCAVATION SUPPORT SYSTEMS PER REQUIREMENTS IN THE SPECIFICATIONS. SUBMIT ALL REQUIRED DESIGN DETAILS TO THE CITY FOR APPROVAL. ALL ENGINEERING CALCULATIONS, DESIGN DRAWINGS, AND WORK PLANS SHALL BE PREPARED AND STAMPED BY PROFESSIONAL CIVIL OR STRUCTURAL ENGINEER(S) REGISTERED IN THE STATE OF CALIFORNIA.
5. DESIGN GROUNDWATER TABLE ELEVATIONS SHALL BE TAKEN FROM THE GEOTECHNICAL REPORT DATED DECEMBER 14, 2015 AND SUPPLEMENTAL REPORT DATED JUNE 27, 2016. UNLESS OTHERWISE NOTED, ALL ELEVATIONS SHOWN REFERENCE THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD88).
6. BRACING NOT SHOWN FOR CLARITY.
7. THE CONTRACTOR SHALL COORDINATE THE SHORING METHOD AND SEQUENCING OF SHORING INSTALLATION AND REMOVAL WITH THE INSTALLATION OF ELECTRICAL CONDUIT RUNS AND OTHER FEATURES TO BE INSTALLED CONCURRENT WITH AND SUBSEQUENT TO THE CONSTRUCTION OF THE BURIED STRUCTURES.
8. SHORING SYSTEMS (IF REQUIRED) FOR ELECTRICAL BUILDING, ELECTRICAL EQUIPMENT, AND OTHER SUBSURFACE WORK NOT SHOWN.
9. A PRE-DRILL MEETING SHALL BE REQUIRED WITH INSPECTOR, SOIL ENGINEER, CONTRACTOR, ENGINEER AND CONSTRUCTION MANAGER PRIOR TO DRILLING.



DETAIL 1

SCALE: NOT TO SCALE



DETAIL 2

SCALE: NOT TO SCALE

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING

ENGINEERING — CITY OF LOS ANGELES

INDEX NO. D-31898 | CIP NO. C922

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-	-	-	-
-	-	-	-
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THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED.

TED ALLEN, P.E. — CITY ENGINEER

		DATE:
ENGINEER:	JENA PRIOR — LIC. NO. CA-69143	01/2026
DESIGNED BY:	LUDWING PEREZ	01/2026
DRAWN BY:	C. PUTTEGOWDA	01/2026
CHECKED BY:	LUDWING PEREZ	01/2026
APPROVED BY:	HECTOR ARIAS	01/2026

DESIGN GROUP

VERTICAL CONTROL:	NAVD 88 (2000)
HORIZONTAL CONTROL:	NAD83, ZONE 5, EPOCH 1991.5
SHEET TITLE:	SHEET PILE EXCAVATION SUPPORT PLAN
PROJECT:	VENICE AUXILIARY PUMPING PLANT
ADDRESS:	133 HURRICANE STREET LOS ANGELES, CALIFORNIA

ARCADIS
LEGAL ENTITY:
ARCADIS U.S., INC.
333 S. HOPE STREET
SUITE C200
LOS ANGELES,
CA 90071

WORK ORDER NO. SZC12923

DRAWING NO. C-10

SHEET OF SHEETS

REVISION DATES (DESIGN STAGE ONLY)

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HURRICANE STREET

GREEN SPACE

CONCRETE SIDEWALK

CANAL COURT

PARKING #8 | PARKING #7 | PARKING #6 | PARKING #5 | PARKING #4

2'

18' (TYP.)

8.5' (TYP.)

SEE NOTE 4

ROW

PROPOSED PARKING LOT (7 SPACES)

27'

25'

12'

PARKING # 9

PARKING #10 ADA VAN PARKING

5'

WHEEL STOP (TYP.)

FUTURE 3D ARTWORK SEE NOTE 3

PERMEABLE DG SURFACE

EXISTING VENICE PUMP STATION #646

2 STORY APARTMENT

EARTH

R3'

OHE

OH

SIGNING AND STRIPING NOTES

1. INSTALL ACCESSIBLE SIGN PER SPECIFICATION SECTION 10443.
2. INSTALL 4-IN THICK WHITE STRIPING AS INDICATED ON PLANS. PAVEMENT MARKINGS SHALL BE PER SPECIFICATION SECTION 02848.
3. INSTALL ACCESSIBILITY PAVEMENT MARKING IN ACCESSIBLE SPACE. COMPLY WITH FIGURE 11B-70..7.2.1 WITH BLUE COLOR NO 15090 IN FEDERAL STANDARD 595B PER LOS ANGELES DEPARTMENT OF BUILDING AND SAFETY. PAVEMENT MARKINGS SHALL BE PER SPECIFICATION SECTION 02848.
4. STRIPE ACCESSIBLE PARKING AS INDICATED WITH DIAGONAL STRIPING AT 45-DEG AT 12-IN ON CENTER. USE 4-IN WIDE STRIPING. PAVEMENT MARKINGS SHALL BE PER SPECIFICATION SECTION 02848.

NOTES:

1. 128 HURRICANE PERMABLE GREEN OPEN SPACE IS 1,074 SQ FT (711 SQ FT REQUIRED).
2. SEE LANDSCAPING PLANS FOR LANDSCAPE DETAILS.
3. FUTURE 3D ARTWORK IS LIMITED TO 6 FEET IN HEIGHT.
4. FURNISH AND INSTALL TWO (2) "NO PARKING" SIGNS. SIGNS SHALL READ "NO PARKING BETWEEN 10PM TO 5AM" IN ACCORDANCE WITH LABOE STANDARD PLAN S-791.

ENVIRONMENTAL MITIGATION NOTE:

(A) SEE MITIGATION MEASURE MM HAZ-1b ON SHEET G-3.

(X) POINT TABLE

POINT #	NORTHING	EASTING
1	1813892.10	6421754.96
2	1813877.12	6421764.71
3	1813872.71	6421763.43
4	1813856.28	6421782.03
5	1813847.54	6421803.62
6	1813861.65	6421825.46
7	1813861.74	6421791.41
8	1813861.01	6421794.86
9	1813877.21	6421815.35
10	1813879.92	6421819.54
11	1813902.55	6421804.84
12	1813899.84	6421800.63
13	1813915.16	6421790.67
14	1813887.40	6421744.10
15	1813823.64	6421815.60

0 5' 10'
SCALE: 1" = 5'

FOR PERMITTING PURPOSE ONLY NOT FOR CONSTRUCTION

ARCADIS
LEGAL ENTITY:
ARCADIS U.S., INC.
333 S. HOPE STREET
SUITE C200
LOS ANGELES,
CA 90071

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
ENGINEERING
CITY OF LOS ANGELES

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TED ALLEN, P.E. CITY ENGINEER

		DATE:
ENGINEER:	JENA PRIOR LIC. NO. CA-69143 DESIGN GROUP	01/2026
DESIGNED BY:	LUDWING PEREZ	01/2026
DRAWN BY:	C. PUTTEGOWDA	01/2026
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VERTICAL CONTROL: NAVD 88 (2000)
HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

SHEET TITLE: PARKING LOT SITE, STRIPING & SIGNING PLAN

PROJECT: VENICE AUXILIARY PUMPING PLANT

ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923

DRAWING NO. C-13

SHEET OF SHEETS

REVISION DATES (DESIGN STAGE ONLY)

THE CITY OF LOS ANGELES OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF ELECTRONIC COPIES OF THIS PLAN SHEET.

XREFS: None IMAGES: None
User: Prior Spec: PIRNIE_STANDARD File: D:\cad\c_pro\06332002 - Venice Pump Station\2-SHEETS\02-C-CIVIL\SP-EX02.DWG Scale: 1:1 Date: 06/22/2017 Time: 15:44 Layout: Blank

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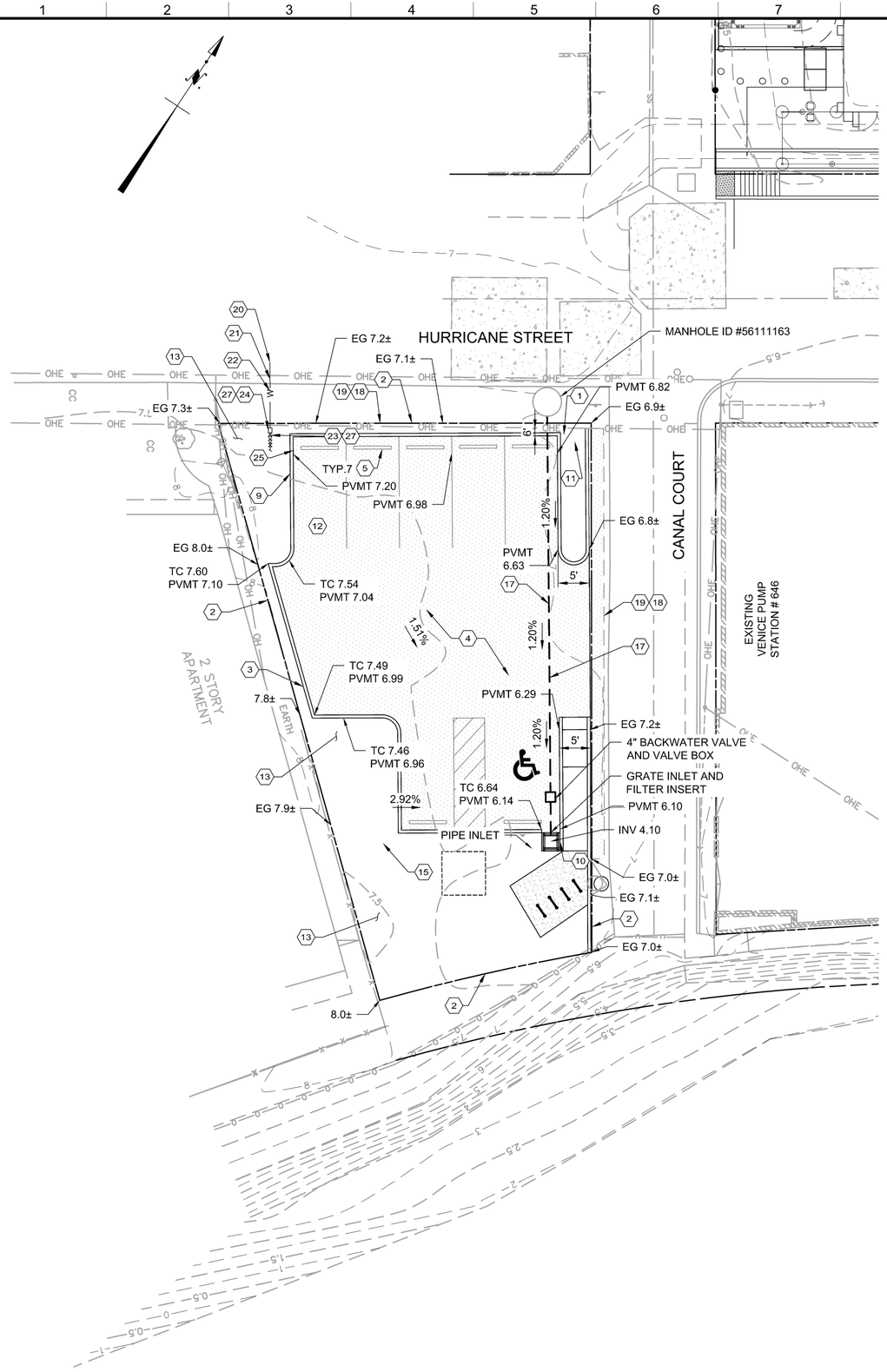
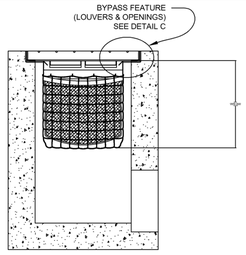
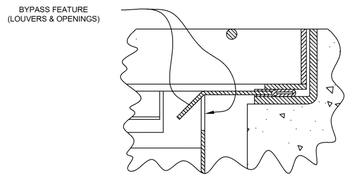
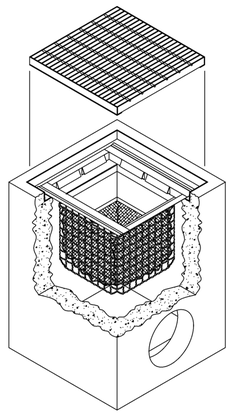




DETAIL B
SECTION VIEW



DETAIL C
BYPASS FEATURES



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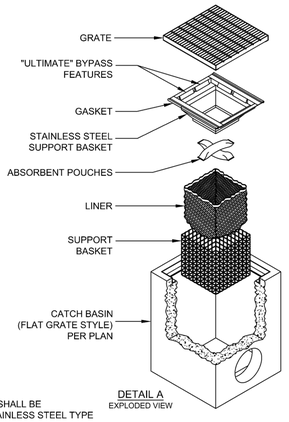

DETAIL A
EXPLODED VIEW

NOTES:
1. FILTER SUPPORT FRAME SHALL BE CONSTRUCTED FROM STAINLESS STEEL TYPE 304.
2. FILTERED FLOW RATE INCLUDES A SAFETY FACTOR OF TWO.

KRISTAR MODEL NO.	SPECIFIER CHART				
	INLET ID Inside Dimension (inch x inch)	GRATE OD Outside Dimension (inch x inch)	TOTAL BYPASS CAPACITY (cu. ft. / sec.)	SOLIDS STORAGE CAPACITY (cu. ft.)	FILTERED FLOW (cu. ft. / sec.)
FGP-M2436F8	24 X 36	24 X 40	8.0	1.95	1.15

NOTES:
1. FILTER INSERTS SHALL BE KRISTAR FLOGARD+PLUS, UNITED STROM WATER INC, DRAIN PAC, OR APPROVED EQUAL.
2. KRISTAR PRODUCT IS SHOWN. AN ALTERNATIVE PRODUCT MEETING OR EXCEEDING THE WATER QUALITY SPECIFICATIONS FOR THE FLOGARD PRODUCT IS ACCEPTABLE

1 / C-14 GRATE INLET WITH FILTER INSERT

NOT TO SCALE

PAVING AND GRADING NOTES

1. CONSTRUCT SIDEWALK PER BOE STANDARD PLAN S-444-0. WIDTH AS NOTED.
2. MATCH EXISTING GRADE ALONG PROPERTY BOUNDARY.
3. CONSTRUCT TYPE A CURB PER BOE STANDARD PLAN S-410-2.
4. CONSTRUCT PAVEMENT SECTION PER DETAIL ON SHEET C-15.
5. INSTALL PRECAST CONCRETE WHEEL STOP AND ANCHOR PER MANUFACTURER'S RECOMMENDATIONS.
6. NOT USED.
7. NOT USED.
8. GRADES INDICATED ON PLAN ARE FINISH GRADE UNLESS OTHERWISE NOTED AS TOP OF CURB OR OTHER GRADE ELEVATION.
9. CONSTRUCT 5-FT CURB TERMINATION PER DETAIL ON SHEET C-7.
10. INSTALL CATCH BASIN PER BOE STANDARD PLAN S-355-0 WITH CATCH BASIN INSERT. CATCH BASIN SHALL BE MODIFIED SO THAT IT IS ONLY 2 FEET DEEP. CATCH BASIN INSERT SHALL BE CAPABLE OF HANDLING THE FIRST 3/4-IN OF RUNOFF FROM A STORM EVENT. CATCH BASIN INSERT SHALL BE MADE OF A FILTRATION SYSTEM THAT WILL ALLOW POLLUTANTS TO BE REMOVED WITHOUT RELEASING THEM. CATCH BASIN INSERT SHALL BE DRAINPAC BY UNITED STORMWATER OR EQUIVALENT.
11. END GREEN SPACE/ BEGIN SIDEWALK.
12. NOT USED.
13. GREEN SPACE.
14. NOT USED.
15. FUTURE 3D ARTWORK.
16. NOT USED.
17. INSTALL 4" PVC DRAIN PIPE AT MIN. 2% SLOPE. CONNECT TO MANHOLE #56111163. SUBJECT TO SEPARATE REVIEW AND APPROVAL BY LASAN.
18. INSTALL ASPHALT PAVEMENT. MATCH SECTION AND TYPE OF EXISTING ASPHALT IN HURRICANE AND CANAL STREETS (BASE AND ASPHALT). COMPACT BASE TO 95% RELATIVE DENSITY.
19. SAWCUT EXISTING ASPHALT TO CLEAN EDGE 2-FT WIDER THAN CONSTRUCTION AREA OR TRENCH AND REMOVE SAWCUT EXISTING ASPHALT.
20. INSTALL 8-IN BY 1 1/2-IN TAPPING SLEEVE AND VALVE. SURVEY DID NOT SHOW WATER IN HURRICANE STREET, HOWEVER, A FIELD VISIT ON APRIL 11, 2018 UTILITY LOCATION INFORMATION INDICATED AN EXISTING WATER LINE ON THE NORTHWEST SIDE OF THE STREET.
21. 1 1/2-IN WATER SERVICE IN TRENCH PER BOE STANDARD DETAIL S-251-1, CASE 1, MODIFIED SUCH THAT TYPE A MATERIAL SHALL EXTEND A MINIMUM OF 4-IN ABOVE THE TOP OF PIPE.
22. 1 1/2-IN WATER METER PER WATER COMPANY REQUIREMENTS.
23. INSTALL 1 1/2-IN VALVE.
24. INSTALL 1 1/2-IN BACKFLOW PREVENTER. SEE DETAIL SHEET C-7.
25. SEE IRRIGATION PLANS FOR CONTINUATION.
26. IF AN EXISTING WATER SERVICE EXISTS FOR THIS LOT, CONTRACTOR MAY USE EXISTING WATER SERVICE AND PROVIDE THE WATER METER, VALVE AND BACKFLOW PREVENTER.
27. METER BOX AND BACKFLOW PREVENTER LOCATIONS ARE APPROXIMATE. CONTRACTOR SHALL PLACE THEM SO THAT THEY DO NOT CONFLICT WITH OTHER APPURTENANCES.

FOR PERMITTING PURPOSE ONLY NOT FOR CONSTRUCTION

SCALE: 1" = 10'

ARCADIS
LEGAL ENTITY:
ARCADIS U.S., INC.
333 S. HOPE STREET
SUITE C200
LOS ANGELES,
CA 90071

WORK ORDER NO.
SZC12923

DRAWING NO.
C-14

SHEET OF SHEETS

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
ENGINEERING
CITY OF LOS ANGELES

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-	-	-	-

CIP NO. C922
INDEX NO. D-31898

THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED

TED ALLEN, P.E. CITY ENGINEER

		DATE:
ENGINEER:	JENA PRIOR LIC. NO. CA-69143 DESIGN GROUP	01/2026
DESIGNED BY:	LUDWING PEREZ	01/2026
DRAWN BY:	C. PUTTEGOWDA	01/2026
CHECKED BY:	LUDWING PEREZ	01/2026
APPROVED BY:	HECTOR ARIAS	01/2026

VERTICAL CONTROL: NAVD 88 (2000)
HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

SHEET TITLE: PARKING LOT PAVING, GRADING & DRAINAGE PLAN

PROJECT: VENICE AUXILIARY PUMPING PLANT

ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA

REVISION DATES (DESIGN STAGE ONLY)

THE CITY OF LOS ANGELES OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF ELECTRONIC COPIES OF THIS PLAN SHEET.

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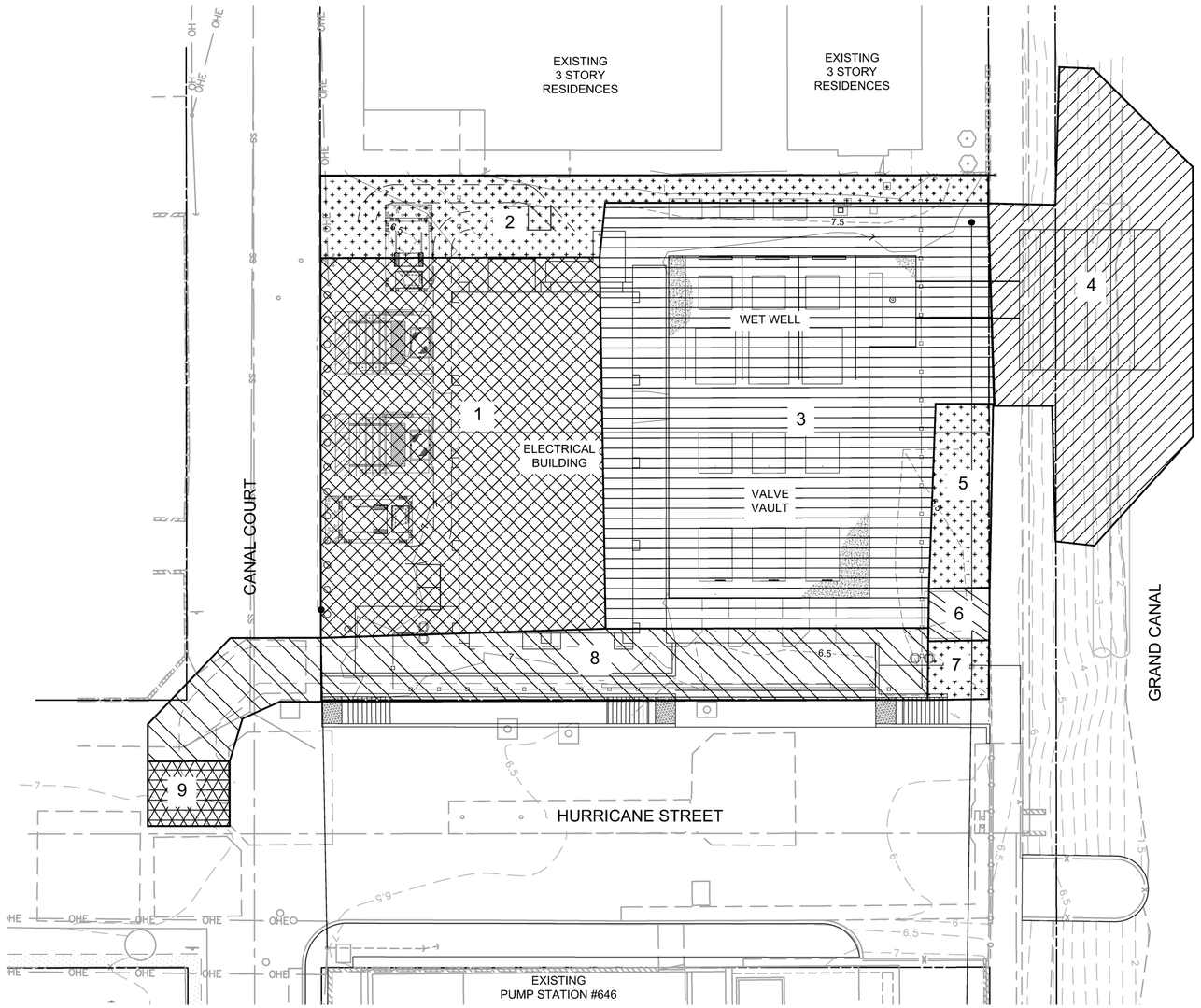

EXCAVATION LEGEND

- EXCAVATION DEPTH 0-6 FT
- EXCAVATION DEPTH 6-7 FT
- EXCAVATION DEPTH 11-12 FT
- EXCAVATION DEPTH 14-15 FT
- EXCAVATION DEPTH 23-24 FT
- EXCAVATION DEPTH 29-30 FT

CUT AND FILL ESTIMATE

SURFACE ESTIMATE

CUT: 69 CY
FILL: 10 CY
NET: 59 CY CUT

OVERALL EXCAVATION ESTIMATE

	CUT	FILL	NET CUT/FILL
AREA 1:	774 CY	697 CY	77 CY CUT
AREA 2:	84 CY	76 CY	8 CY CUT
AREA 3:	4,408 CY	3,361 CY	1,047 CY CUT
AREA 4:	1,327 CY	1,115 CY	212 CY CUT
AREA 5:	27 CY	24 CY	3 CY CUT
AREA 6:	31 CY	27 CY	4 CY CUT
AREA 7:	9 CY	8 CY	1 CY CUT
AREA 8:	531 CY	488 CY	43 CY CUT
AREA 9:	64 CY	58 CY	6 CY CUT
TOTAL:	7,255 CY	5,854 CY	1,401 CY CUT

NOTES:

1. FILL ESTIMATE IS NATIVE FILL. ENGINEERED FILL IS NOT ESTIMATED IN THIS ESTIMATE.
2. EXCAVATION IN TRENCHES WILL BE BACKFILLED WITH PIPE BEDDING AS INDICATED IN THESE PLANS AND NATIVE FILL.
3. SURFACE ESTIMATE IS SURFACE GRADING ONLY AND NOT EXCAVATION.
4. ESTIMATES DO NOT INCLUDE ANY ADJUSTMENT FACTORS.
5. EARTHWORK QUANTITIES SHOWN ARE ESTIMATES ONLY. CONTRACTOR SHALL PERFORM INDEPENDENT CALCULATIONS TO VERIFY ALL QUANTITIES AND SHALL BE RESPONSIBLE FOR DETERMINING EARTHWORK QUANITIES FOR BIDDING, CONTRACT AND CONSTRUCTION PURPOSES.

0 5' 10' 20'
SCALE: 1" = 10'

FOR PERMITTING PURPOSE ONLY NOT FOR CONSTRUCTION

ARCADIS
LEGAL ENTITY:
ARCADIS U.S., INC.
333 S. HOPE STREET
SUITE C200
LOS ANGELES,
CA 90071

WORK ORDER NO.
SZC12923
DRAWING NO.
C-16
SHEET OF SHEETS

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING

TED ALLEN, P.E. CITY ENGINEER
LIC. NO. CA-69143

		DATE:
ENGINEER:	JENA PRIOR	01/2026
DESIGNED BY:	LUDWING PEREZ	01/2026
DRAWN BY:	C. PUTTEGOWDA	01/2026
CHECKED BY:	LUDWING PEREZ	01/2026
APPROVED BY:	HECTOR ARIAS	01/2026

DESIGN GROUP

NO.	REVISIONS:	DATE:	BY:
-	-	-	-
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-	-	-	-
-	-	-	-
-	-	-	-

THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED

ENGINEERING
CITY OF LOS ANGELES

CIP NO. C922
INDEX NO. D-31898

SHEET TITLE: CUT AND FILL EXHIBIT
PROJECT: VENICE AUXILIARY PUMPING PLANT
ADDRESS: 133 HURRICANE STREET
LOS ANGELES, CALIFORNIA

VERTICAL CONTROL: NAVD 88 (2000)
HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

REVISION DATES (DESIGN STAGE ONLY)

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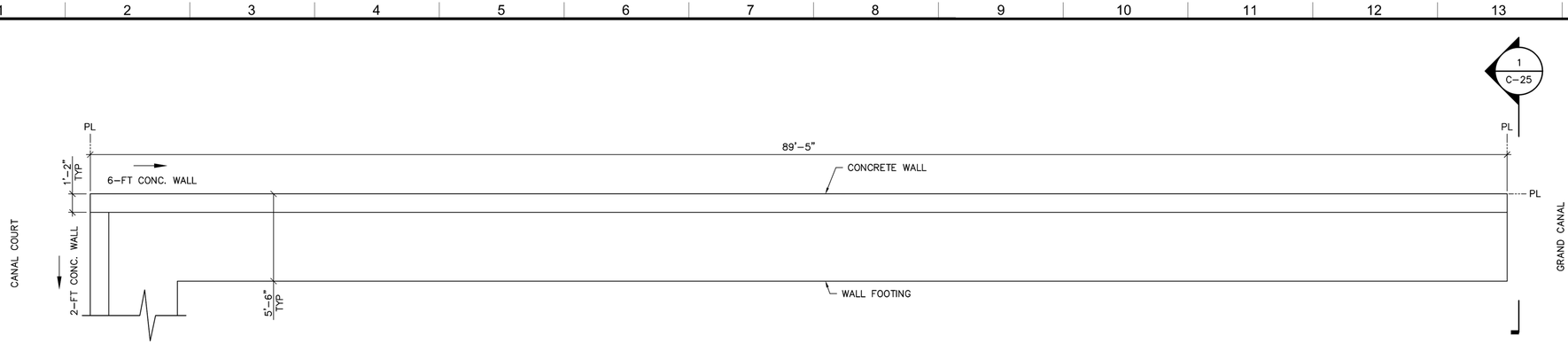
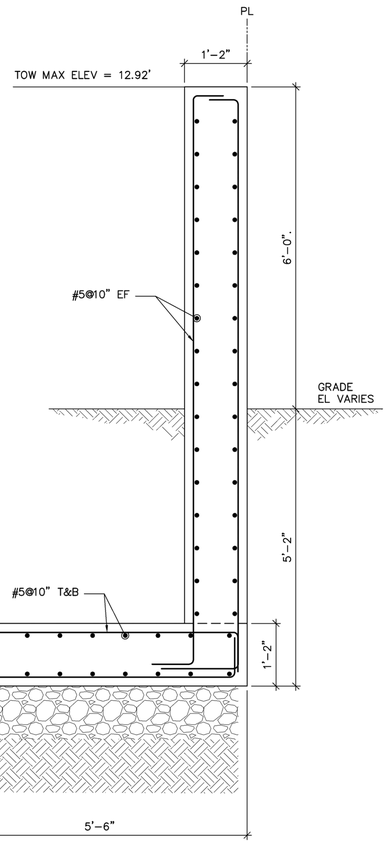


NORTH WALL – PLAN

SCALE: 1/4" = 1'-0"



1 / C-25 SECTION

3/4" = 1'-0"

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REVISION DATES (DESIGN STAGE ONLY)

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CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS

BUREAU OF ENGINEERING

ENGINEERING CITY OF LOS ANGELES

NO.	REVISIONS:	DATE:	BY:
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-	-	-	-

INDEX NO. D-31898

CIP NO. C922

"THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED."

TED ALLEN, P.E. CITY ENGINEER

		DATE:
ENGINEER:	DESIGN GROUP	LIC. NO. CA-69143
DESIGNED BY:	JENA PRIOR	01/2026
DRAWN BY:	LUDWING PEREZ	01/2026
CHECKED BY:	C. PUTTEGOWDA	01/2026
APPROVED BY:	LUDWING PEREZ	01/2026
	HECTOR ARIAS	01/2026

VERTICAL CONTROL: NAVD 88 (2000)

HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

SHEET TITLE: COMPOUND WALL PLAN, ELEVATION AND SECTION

PROJECT: VENICE AUXILIARY PUMPING PLANT

ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923

DRAWING NO. C-25

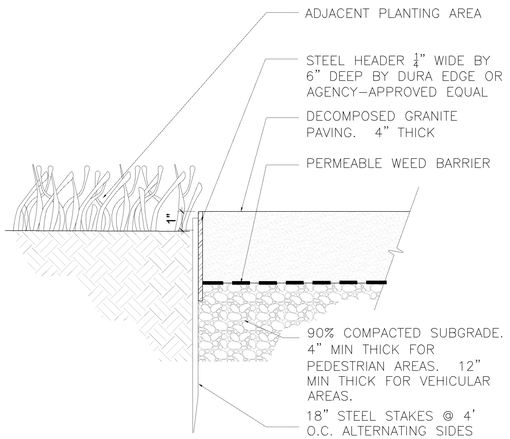
SHEET OF SHEETS

ARCADIS

LEGAL ENTITY:
ARCADIS U.S., INC.
333 S. HOPE STREET
SUITE C200
LOS ANGELES,
CA 90071

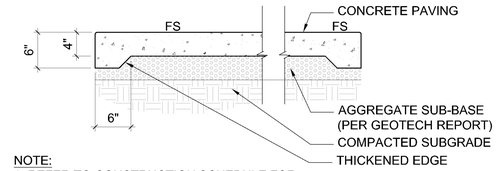
REFERENCE NOTES SCHEDULE

SYMBOL	CODE	DESCRIPTION	DETAIL	MATERIAL	FINISH	COLOR	MANUFACTURER	REMARKS
EDGING								
	E-101	STEEL EDGING	1/L-1	STEEL	POWDER COAT PER MFG.	BLACK	DURA EDGE	1/4" THICK X 5" WIDTH, W/ METAL STAKES PER MFG.
SYMBOL	CODE	DESCRIPTION	DETAIL	MATERIALS	FINISH	COLOR	MANUFACTURER	REMARKS
PAVING								
	P-101	CIP CONCRETE PAVING	3/L-1	CIP CONCRETE	TOPCAST#03	NATURAL	TRADEMARK CONCRETE SYSTEMS	
	P-301	STABILIZED DECOMPOSED GRANITE	1/L-1	DECOMPOSED GRANITE FINES WITH STABILIZER	COMPACTED	CALIFORNIA GOLD	SOUTHWEST BOULDER AND STONE	TO INCLUDE INTEGRAL STABILIZER. 4" DEPTH, SET IN 2 EQUAL LIFTS AND COMPACTED.
	P-501	PAVING	-	REFER TO CIVIL	REFER TO CIVIL	REFER TO CIVIL	REFER TO CIVIL	REFER TO CIVIL
SYMBOL	CODE	DESCRIPTION	DETAIL	MODEL/MATERIAL	FINISH	COLOR	MANUFACTURER	REMARKS
SITE FURNISHINGS								
	S-102	BIKE RACK	2/L-1	SONANCE #SN01-3	POWDER COAT	GLOSS BLACK	KEYSTONE RIDGE DESIGNS	724-284-1213



1 L-1 DECOMPOSED GRANITE WITH STEEL EDGING

SCALE:

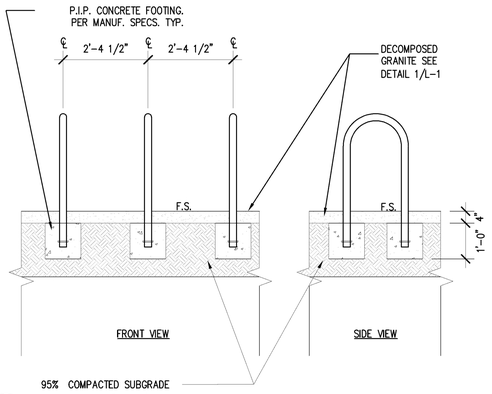


NOTE:
1. REFER TO CONSTRUCTION SCHEDULE FOR ALL COLORS, TYPES, AND FINISHES.
2. REFER TO GEOTECHNICAL REPORT FOR ALL SUBGRADE PREPARATION.

3 L-1 CIP CONCRETE PAVING

1" = 1'-0"

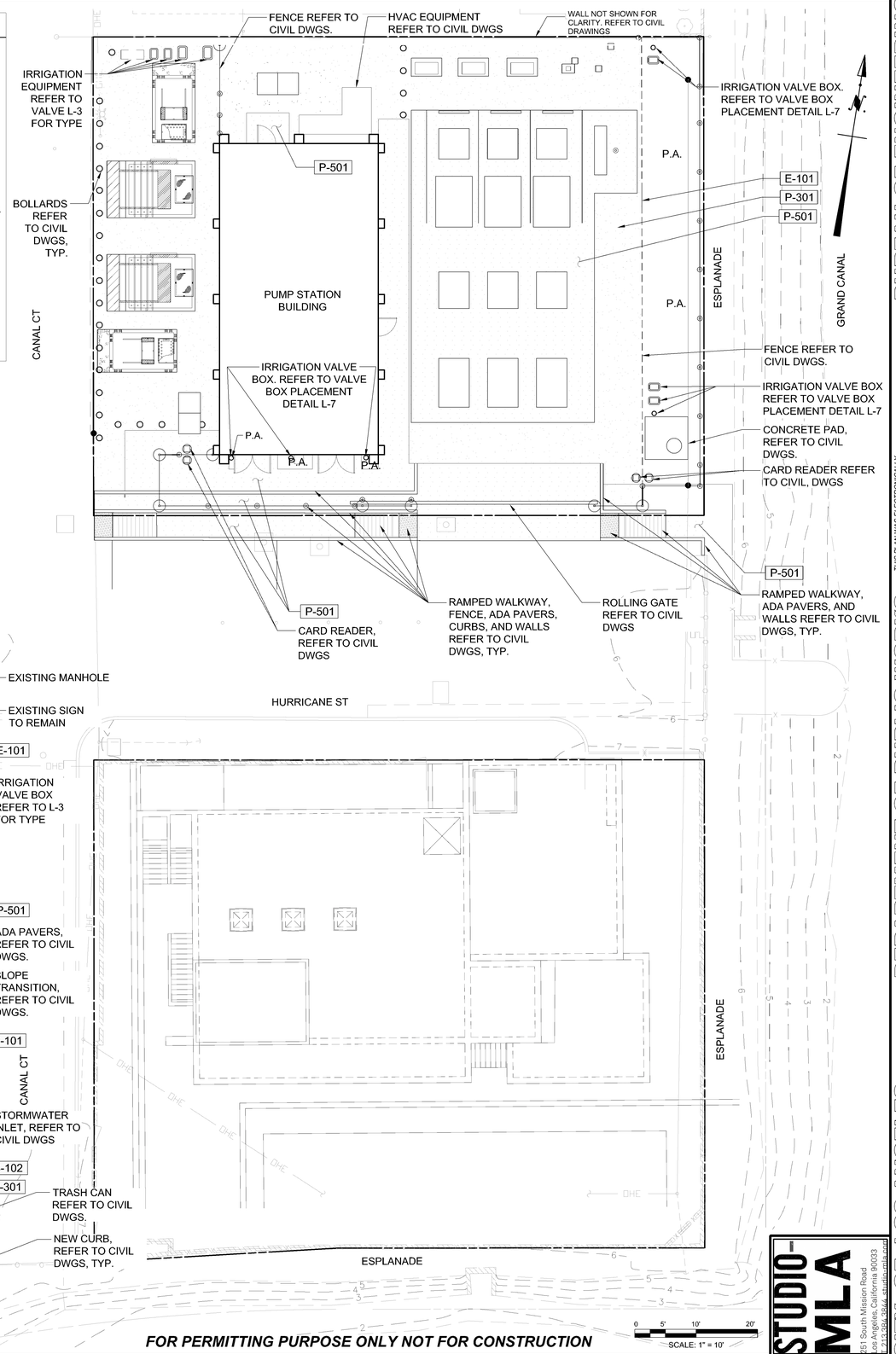
NOTES:
1. INSTALLATION TO BE COMPLETED IN ACCORDANCE WITH MANUFACTURERS SPECIFICATIONS.
2. CONTRACTOR TO SUBMIT SHOP DRAWING FOR ALL SIGNAGES FOR APPROVAL



2 L-1 BIKE RACK

1/2" = 1'-0"

P-VE-323313-06



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251 South Mission Road
Los Angeles, California 90033
(323) 526-1042 www.studio-mla.com

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REVISION DATES (DESIGN STAGE ONLY)

Sheet Version 3.0

ENGINEERING CITY OF LOS ANGELES

BUREAU OF ENGINEERING

DATE: BY:

NO. REVISIONS:

CIP NO. C922

INDEX NO. D-31898

THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED.

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS

TED ALLEN, P.E. CITY ENGINEER

DESIGN GROUP — DATE:

LIC. NO.CA-5823

LANDSCAPE ARCHITECT: JAN DYER 1/2026

DESIGNED BY: MATT ROMERO 1/2026

DRAWN BY: DANTE GAMACHE 1/2026

CHECKED BY: MIKE HEE 1/2026

APPROVED BY: JAN DYER 1/2026

VERTICAL CONTROL: NAVD 88 (2000)

HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

SHEET TITLE: CONSTRUCTION PLAN

PROJECT: VENICE AUXILIARY PUMPING PLANT

ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923

DRAWING NO. L-1

SHEET OF SHEETS

PLANT SCHEDULE PUMP PLANT

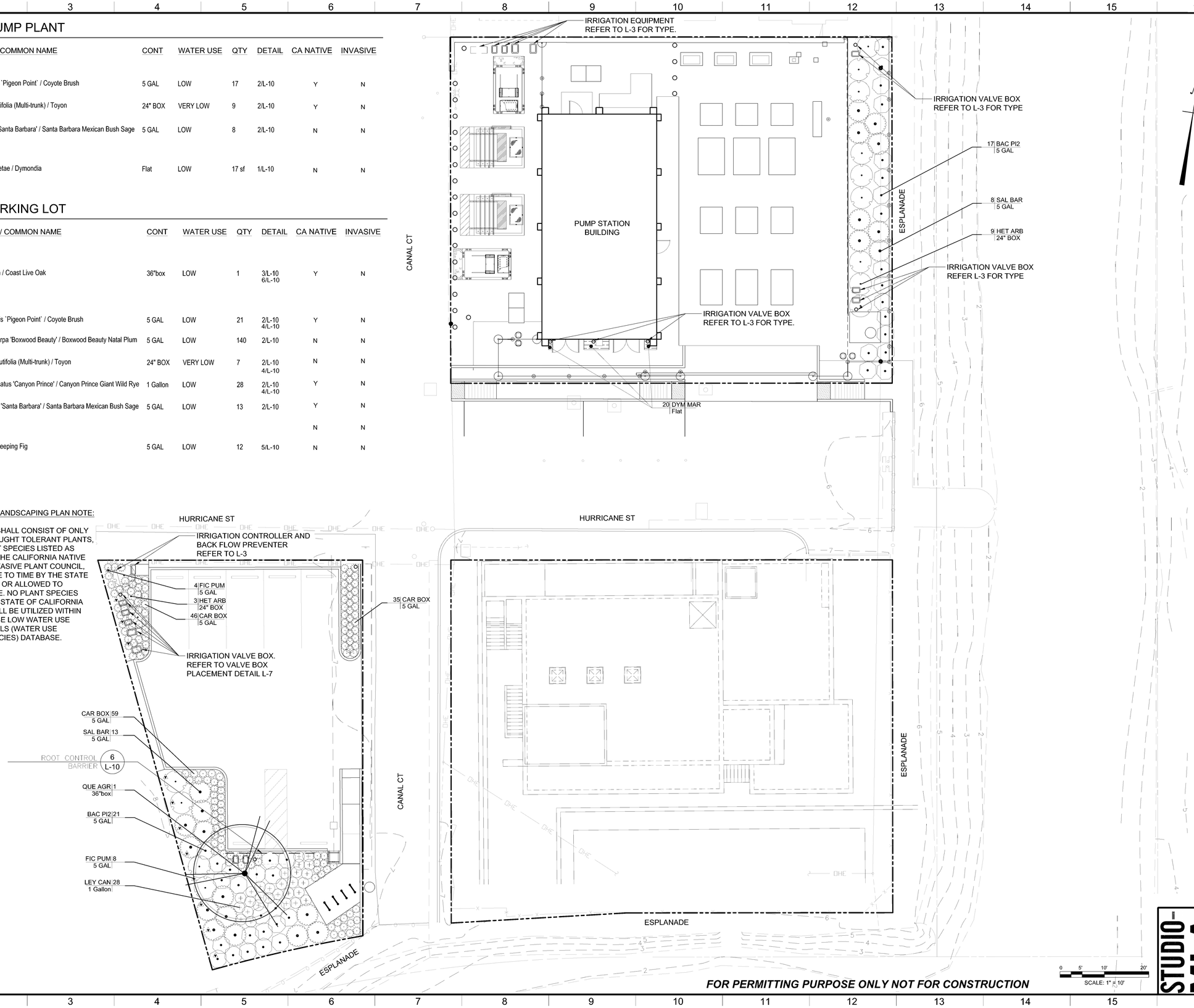
SYMBOL	CODE	BOTANICAL / COMMON NAME	CONT	WATER USE	QTY	DETAIL	CA NATIVE	INVASIVE
SHRUBS								
	BAC PI2	Baccharis pilularis `Pigeon Point` / Coyote Brush	5 GAL	LOW	17	2/L-10	Y	N
	HET ARB	Heteromeles arbutifolia (Multi-trunk) / Toyon	24" BOX	VERY LOW	9	2/L-10	Y	N
	SAL BAR	Salvia leucantha 'Santa Barbara' / Santa Barbara Mexican Bush Sage	5 GAL	LOW	8	2/L-10	N	N
GROUND COVERS								
	DYM MAR	Dymondia margaretae / Dymondia	Flat	LOW	17 sf	1/L-10	N	N

PLANT SCHEDULE PARKING LOT

SYMBOL	CODE	BOTANICAL / COMMON NAME	CONT	WATER USE	QTY	DETAIL	CA NATIVE	INVASIVE
TREES								
	QUE AGR	Quercus agrifolia / Coast Live Oak	36"box	LOW	1	3/L-10 6/L-10	Y	N
SHRUBS								
	BAC PI2	Baccharis pilularis `Pigeon Point` / Coyote Brush	5 GAL	LOW	21	2/L-10 4/L-10	Y	N
	CAR BOX	Carissa macrocarpa 'Boxwood Beauty' / Boxwood Beauty Natal Plum	5 GAL	LOW	140	2/L-10	N	N
	HET ARB	Heteromeles arbutifolia (Multi-trunk) / Toyon	24" BOX	VERY LOW	7	2/L-10 4/L-10	N	N
	LEY CAN	Leymus condensatus 'Canyon Prince' / Canyon Prince Giant Wild Rye	1 Gallon	LOW	28	2/L-10 4/L-10	Y	N
	SAL BAR	Salvia leucantha 'Santa Barbara' / Santa Barbara Mexican Bush Sage	5 GAL	LOW	13	2/L-10	Y	N
VINE/ESPALIER							N	N
	FIC PUM	Ficus pumila / Creeping Fig	5 GAL	LOW	12	5/L-10	N	N

CALIFORNIA COASTAL COMMISSION LANDSCAPING PLAN NOTE:

1. VEGETATED LANDSCAPED AREAS SHALL CONSIST OF ONLY NATIVE PLANTS OR NON-NATIVE DROUGHT TOLERANT PLANTS, WHICH ARE NON-INVASIVE. NO PLANT SPECIES LISTED AS PROBLEMATIC AND/OR INVASIVE BY THE CALIFORNIA NATIVE PLANT SOCIETY, THE CALIFORNIA INVASIVE PLANT COUNCIL, OR AS MAY BE IDENTIFIED FROM TIME TO TIME BY THE STATE OF CALIFORNIA SHALL BE EMPLOYED OR ALLOWED TO NATURALIZE OR PERSIST ON THE SITE. NO PLANT SPECIES LISTED AS A 'NOXIOUS WEED' BY THE STATE OF CALIFORNIA OR U.S. FEDERAL GOVERNMENT SHALL BE UTILIZED WITHIN THE PROPERTY. ALL PLANTS SHALL BE LOW WATER USE PLANTS AS IDENTIFIED BY THE WUCOLS (WATER USE CLASSIFICATION OF LANDSCAPE SPECIES) DATABASE.



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REVISION DATES (DESIGN STAGE ONLY)

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DEPARTMENT OF PUBLIC WORKS
CITY OF LOS ANGELES

ENGINEERING
CITY OF LOS ANGELES

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-	-	-	-

CIP NO. C922

INDEX NO. D-31898

THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED.

TED ALLEN, P.E. CITY ENGINEER DATE: 1/2026
LIC. NO.CA-5623 1/2026
DESIGN GROUP 1/2026
LANDSCAPE ARCHITECT: JAN DYER 1/2026
DESIGNED BY: MATT ROMERO
DRAWN BY: DANTE GAMACHE
CHECKED BY: MIKE HEE
APPROVED BY: JAN DYER

VERTICAL CONTROL: NAVD 88 (2000)
HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

SHEET TITLE: PLANTING PLAN

PROJECT: VENICE AUXILIARY PUMPING PLANT

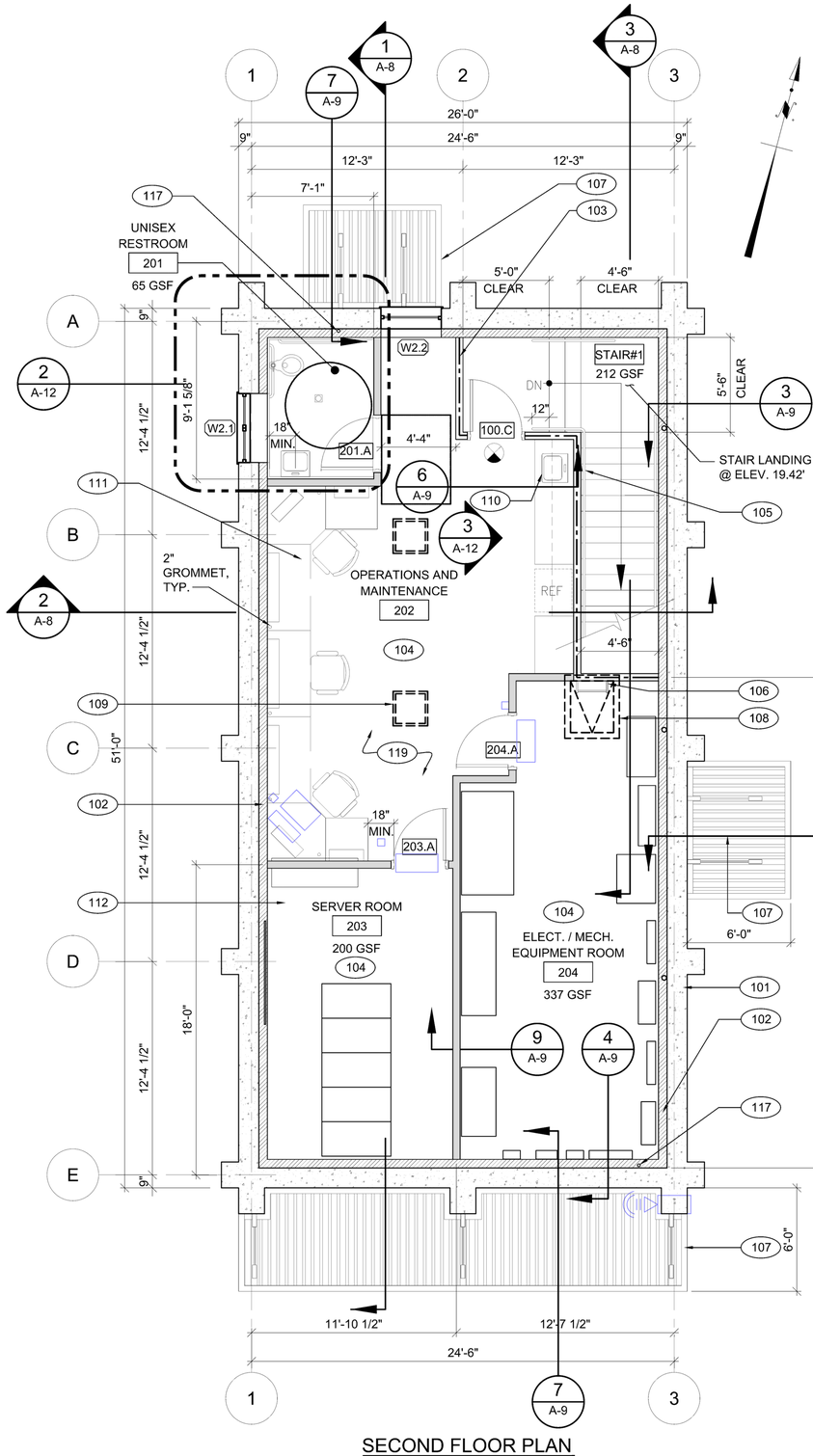
ADDRESS: 133 HURRICANE STREET
LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923

DRAWING NO. L-9

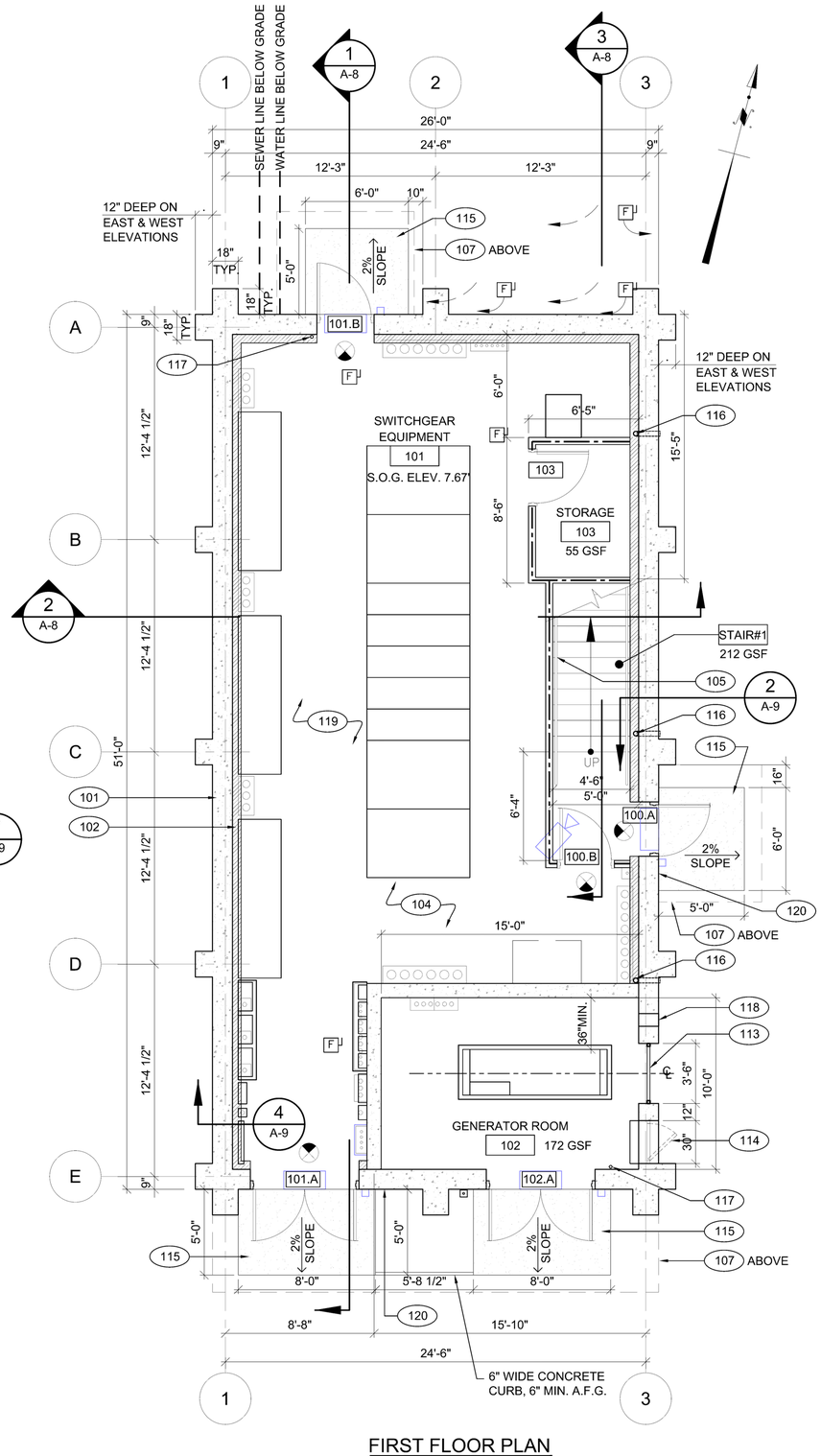
SHEET OF SHEETS

STUDIO-MLA
251 South Mission Road
Los Angeles, California 90033
T:213.935.3644 studio-mla.com



SECOND FLOOR PLAN

SCALE: 1/4" = 1'-0"



FIRST FLOOR PLAN

SCALE: 1/4" = 1'-0"

KEYNOTES:

101 REINFORCED CONCRETE WALL PER STRUCTURAL

102 FURRED WALL WITH BATTEN INSULATION & TYPE 'X' GYPSUM BD FINISH, TYP. AT ENTIRE PERIMETER

103 FULL HEIGHT METAL STUD WALL WITH 5/8" TYPE 'X' GYPSUM BOARD WALL EACH SIDE, TYP. FOR STAIR #1 WALLS

104 FLOORING PER FINISH SCHEDULE

105 METAL HANDRAIL EACH SIDE, TYPICAL

106 GALV. STEEL LADDER SECURED TO WALL FRAMING

107 GALV. STEEL CANOPY WITH SIKA DECOR ROOFING SYTEM PER DETAIL 7/A-9

108 ROOF HATCH PER DETAIL 3/A-10

109 24 x 24 TRANSLUCENT LIGHT DIFFUSER FROM SOLATUBES ON ROOF, TYP. OF 2

110 WASH SINK WITH UPPER AND LOWER CABINETRY

111 WORKSTATION AREA WITH CONCEALED ACCESS COMPUTER CABLE TRAY BENEATH DESK UNITS; CONTRACTOR PROVIDED, SEE DIVISION 17400 CONTROL ROOM FURNITURE

112 SERVER ROOM WITH CABLE RACKS ABOVE EQUIPMENT

113 42"W x 36"H ACOUSTICAL LOUVER PER MECHANICAL

114 30" WIDE GENERATOR REMOTE FUEL, SEE SPEC 16410

115 REINFORCED CONCRETE PAD PER STRUCTURAL. SLOPE AWAY FROM BUILDING 2% MAX., TYP.

116 ROOF DRAIN IN FURRED WALL TO BE TIED INTO STORM DRAINAGE SYSTEM PER CIVIL, TYP. OF 3 LOCATIONS. EXTEND THROUGH CONCRETE WALL AT LOWEST POINT POSSIBLE.

117 2" METHANE VENT STACK PER METHANE MITIGATION DRAWINGS CONCEALED IN FURRED WALL

118 9" x 9" AIR INTAKE FAN PER MECHANICAL

119 ALL INTERIOR FLOORS TO BE SLIP RESISTANT FINISH COMPLYING WITH ANSI 137.1 TO ACHIEVE A WET DYNAMIC COEFFICIENT OF FRICTION OF NOT LESS THAN 0.42, USING A BOT 3000E DIGITAL TRIBOMETER (DCOF ACUTEST)

120 PROVIDE SIGN "AUTHORIZED PERSONNEL ONLY NO PUBLIC ACCESS"

LEGEND:

ONE HOUR WALL PER DETAIL 6/A-9

NON-RATED WALL PER DETAIL 9/A-9

FURRED WALL PER DETAIL 4/A-9

ILLUMINATED EXIT SIGN PER ELECTRICAL

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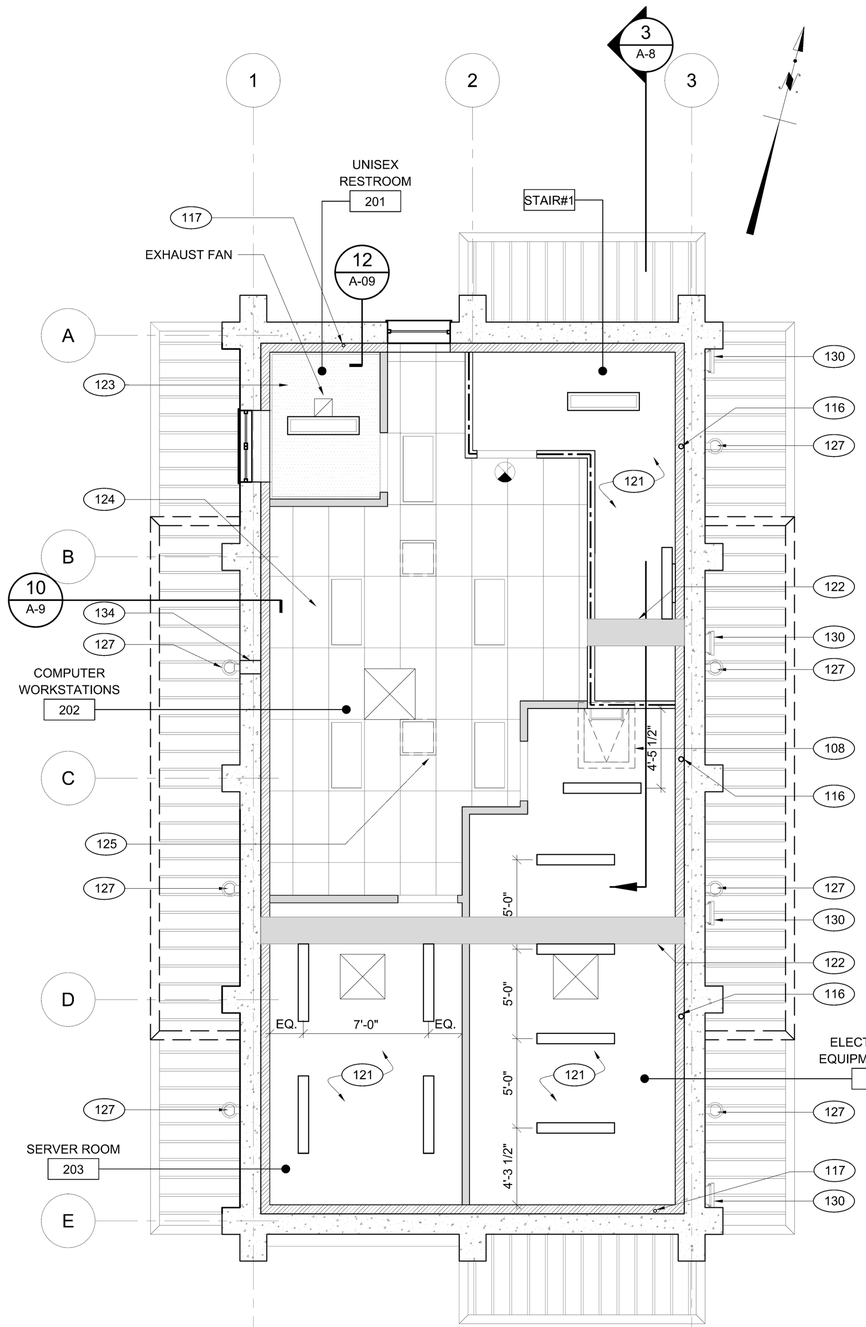
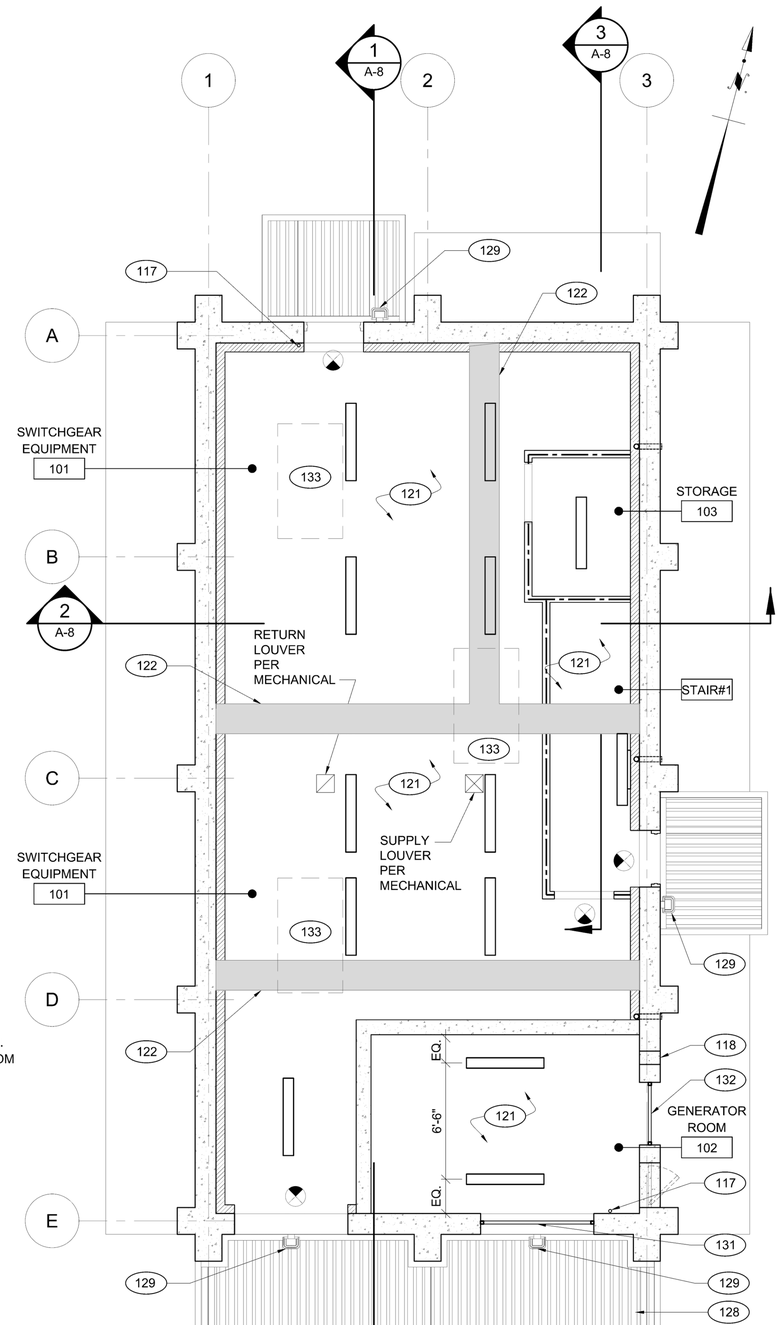
REVISION DATES (DESIGN STAGE ONLY)

ARCADIS
LEGAL ENTITY:
ARCADIS U.S., INC.
333 S. HOPE STREET
SUITE C200
LOS ANGELES,
CA 90071

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
ENGINEERING
CITY OF LOS ANGELES
CIP NO. C922
INDEX NO. D-31898
NO. REVISIONS: DATE: BY:
THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED
TED ALLEN, P.E. CITY ENGINEER DATE: 6/2025
LIC. NO.CA-18945
ENGINEER: DAVID JOHNSON
DESIGNED BY: DEAN HAWKINS/ DAVID JOHNSON
DRAWN BY: CATHY CARPIO
CHECKED BY: DAVID JOHNSON
APPROVED BY: DAVID JOHNSON
DESIGN GROUP
VERTICAL CONTROL: NAVD 88 (2000)
HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5
SHEET TITLE: ELECTRICAL BUILDING FLOOR PLANS
PROJECT: VENICE AUXILIARY PUMPING PLANT
ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA
WORK ORDER NO. SZC12923
DRAWING NO. A-3
SHEET OF SHEETS



SECOND FLOOR
REFLECTED CEILING PLAN
SCALE: 1/4" = 1'-0"



FIRST FLOOR
REFLECTED CEILING PLAN
SCALE: 1/4" = 1'-0"

KEYNOTES:

108	ROOF HATCH PER DETAIL 3/A-10
117	2" METHANE VENT STACK PER METHANE MITIGATION DRAWINGS
118	9" x 9" AIR INTAKE FAN PER MECHANICAL
121	EXPOSED CONCRETE STRUCTURE ABOVE
122	EXPOSED CONCRETE BEAM. SEE STRUCTURAL S-12.
123	PAINTED GYP. BOARD CEILING
124	24" x 48" SUSPENDED CEILING SYSTEM WITH LAY-IN ACOUSTIC TILES
125	24" x 24" TRANSLUCENT SOLATUBE DIFFUSER WITH SOLATUBE EXTENDING UP TO ROOF, TYP. OF 2 SEE DETAIL 1/A-10
126	EVAPORATOR PER MECHANICAL
127	WALL SCONCE WITH DOWNWARD PROJECTION, TYP. OF 7 (LITHONIA OLW 23)
128	PAINTED GALV. STEEL DECKING UNDER SIKA DECOR ROOFING SYSTEM
129	WALL SCONCE MOUNTED PER ELEVATIONS AT EXIT DOOR, TYP. OF 4 (LITHONIA OLW 14)
130	LIGHT FIXTURE TYPE 'D' PER ELECTRICAL
131	72"W x 36"H INTAKE ACOUSTICAL LOUVER PER MECHANICAL
132	42"W x 36"H INTAKE ACOUSTICAL LOUVER PER MECHANICAL
133	MECHANICAL EQUIPMENT PER MECHANICAL DRAWINGS

LEGEND:

SEE ELECTRICAL FOR LIGHTING FIXTURE TYPES.

- 2' x 4' LED TROFFER WITHIN SUSPENDED CEILING, TYP. OF 5
- SURFACE MOUNTED LED FIXTURE
- PENDANT LIGHT FIXTURE
- WALL MOUNTED LIGHT FIXTURE
- WALL MOUNTED LIGHT SCONCES
- FLOOD LIGHT
- ILLUMINATED EXIT SIGN PER ELECTRICAL

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REVISION DATES
(DESIGN STAGE ONLY)

Sheet Version 3.0

ENGINEERING
CITY OF LOS ANGELES

BUREAU OF ENGINEERING

NO.	REVISIONS:	DATE:	BY:

CIP NO. C922

INDEX NO. D-31898

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CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS

CITY ENGINEER	DATE:
TED ALLEN, P.E.	6/2025
LIC. NO.CA-18945	6/2025
DESIGN GROUP	6/2025
ENGINEER: DAVID JOHNSON	6/2025
DESIGNED BY: DEAN HAWKINS/ DAVID JOHNSON	
DRAWN BY: CATHY CARPIO	
CHECKED BY: DAVID JOHNSON	
APPROVED BY: DAVID JOHNSON	

VERTICAL CONTROL: NAVD 88 (2000)
HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

SHEET TITLE: ELECTRICAL BUILDING REFLECTED CEILING PLAN

PROJECT: VENICE AUXILIARY PUMPING PLANT

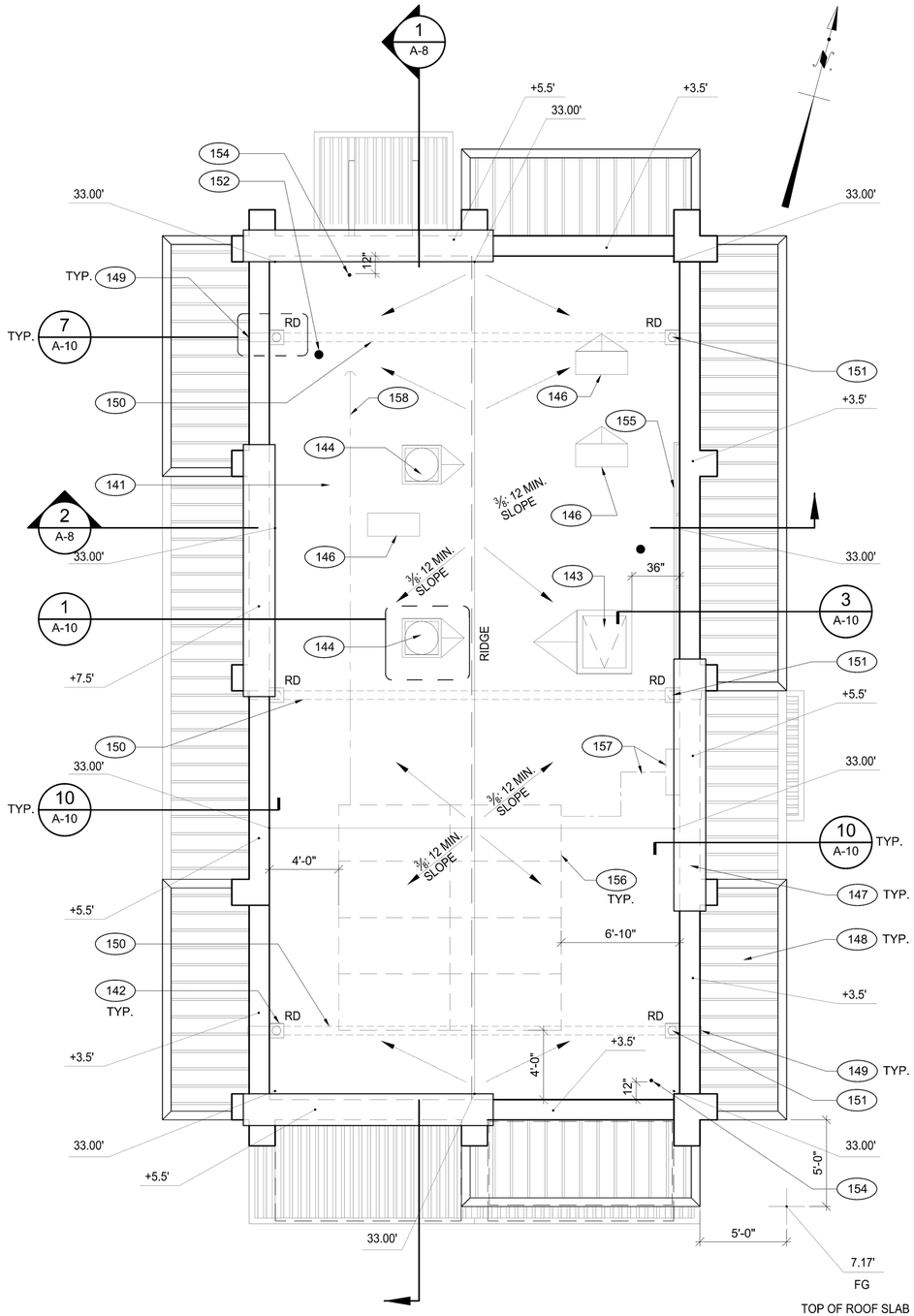
ADDRESS: 133 HURRICANE STREET
LOS ANGELES, CALIFORNIA

ARCADIS
LEGAL ENTITY:
ARCADIS U.S., INC.
333 S. HOPE STREET
SUITE C200
LOS ANGELES,
CA 90071

WORK ORDER NO.
SZC12923

DRAWING NO.
A-4

SHEET OF SHEETS



TOP OF ROOF SLAB = 32.17'
TOP OF1ST FLR SLAB = 7.67'

ROOF PLAN
SCALE: 1/4" = 1'-0"

KEYNOTES:

141 PVC COOL ROOFING SYSTEM, TYPICAL

142 ROOF AND OVERFLOW DRAIN PER DETAIL 7/A-10, TYP. OF 6

143 ROOF HATCH PER DETAIL 3/A-10

144 27" x 27" SOLATUBES, TYP. OF 2
SEE DETAIL 1/A-10 (RR 25251)

145 ROUTING OF ELECTRICAL TO WATER HEATER SYSTEM BY ELECTRICAL ENGINEER

146 MECHANICAL EQUIPMENT
SEE MECHANICAL.

147 METAL COPING OVER PARAPET PER DETAIL 11/A-10

148 EXTRUDED ALUMINUM LOUVER EYEBROW CANOPY

149 OVERFLOW SCUPPER, TYPICAL OF 6

150 ROOF DRAIN TO EXTEND BENEATH ROOF FRAMING TO EAST SIDE, TYP. OF 3

151 ROOF DRAIN TO BE PLACED WITHIN FURRED WALL AND TIED BELOW GRADE TO STORM WATER SYSTEM PER PLUMBING & CIVIL PLANS, TYP. OF 3

152 VENT STACK FROM RESTROOM PER MECHANICAL

153 NOT USED

154 METHANE VENT STACK @ +12" AFS, 12" MIN. OFFSET FROM PARAPET

155 METAL GUARDRAIL (42" HIGH MIN.)

156 FUTURE PHOTOVOLTAIC PANELS (8 @ 39" x 77")

157 FUTURE INVERTER AND CONDUIT

158 FUTURE PLUMBING FROM FUTURE SOLAR ARRAY TO WATER HEATER

FUTURE SOLAR ARRAY BREAKDOWN (NOT IN CONTRACT)		
TOTAL ROOF AREA		1152 SF
EQUIPMENT, HATCHES, ETC.	-	50 SF
NET ROOF AREA		1102
15% FUTURE SOLAR ARRAY	x	15%
FUTURE PROPOSED ARRAY AREA REQUIREMENT		165 SF
SOLAR AREA REQUIRED		165 SF
SOLAR AREA PROVIDED		166.83 SF
FUTURE POTENTIAL SOLAR ARRAY (COMPLIES)		166.83 SF

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ENGINEERING
CITY OF LOS ANGELES

BUREAU OF ENGINEERING
DEPARTMENT OF PUBLIC WORKS
CITY OF LOS ANGELES

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CIP NO. C922

INDEX NO. D-31898

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TED ALLEN, P.E.	CITY ENGINEER	DATE:
ENGINEER:	DAVID JOHNSON	6/2025
	LIC. NO.CA-18945	
DESIGN GROUP		
DESIGNED BY:	DEAN HAWKINS/ DAVID JOHNSON	6/2025
DRAWN BY:	CATHY CARPIO	6/2025
CHECKED BY:	DAVID JOHNSON	6/2025
APPROVED BY:	DAVID JOHNSON	6/2025

VERTICAL CONTROL: NAVD 88 (2000)
HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

SHEET TITLE: ELECTRICAL BUILDING ROOF PLAN

PROJECT: VENICE AUXILIARY PUMPING PLANT

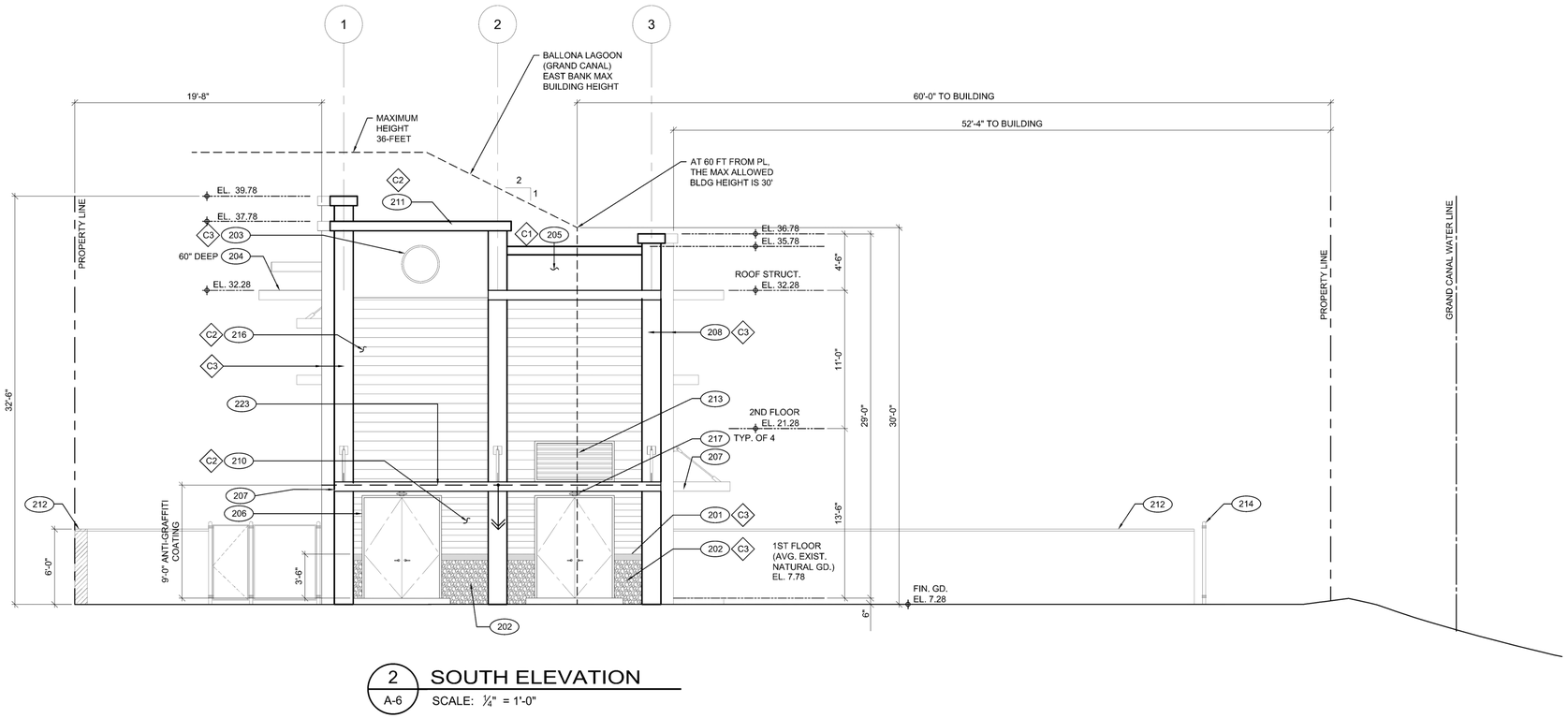
ADDRESS: 133 HURRICANE STREET
LOS ANGELES, CALIFORNIA

ARCADIS
LEGAL ENTITY:
ARCADIS U.S., INC.
333 S. HOPE STREET
SUITE C200
LOS ANGELES,
CA 90071

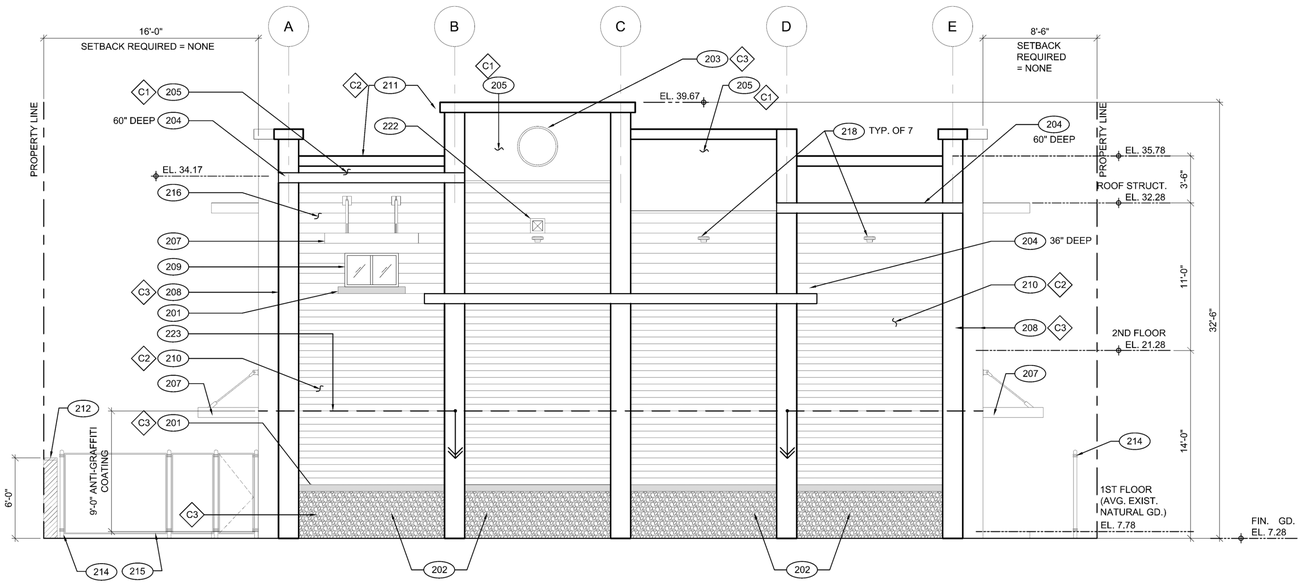
WORK ORDER NO.
SZC12923

DRAWING NO.
A-5

SHEET OF SHEETS



2 SOUTH ELEVATION
A-6
SCALE: ¼" = 1'-0"



1 WEST ELEVATION
A-6
SCALE: ¼" = 1'-0"

KEYNOTES:

201 4" x 6" CONCRETE SILL. TOP OF SILL @+42" ABOVE FINISH SLAB ELEVATION, U.N.O.

202 TEXTURED CONCRETE WITH COBBLESTONE PATTERN PER SPECIFICATIONS

203 1 ½" CIRCULAR REVEAL x 36" DIA. WITH RECESSED 2" CONCRETE SET WITHIN

204 EXTRUDED ALUMINUM HORIZ. LOUVER EYEBROW

205 COLORED CONCRETE

206 GALV. STEEL DOOR AND FRAME PER DOOR SCHED. A-11

207 METAL CANOPY WITH GALV. STEEL ROD HANGERS AND SARNAFIL DECOR ROOFING SYSTEM PER DETAIL 7/A-09

208 REINFORCED CONCRETE PILASTER PER STRUCTURAL

209 ALUMINUM WINDOW

210 1" HORIZONTAL REVEALS IN CONCRETE WALL SPACED @ 6" O.C.

211 REINFORCED CONCRETE PARAPET CAP WITH CONCRETE SEALER, TYP.

212 6'-0" HIGH CMU WALL PER CIVIL

213 72"W x 36"H AIR INTAKE ACOUSTICAL LOUVER PER MECHANICAL

214 SECURITY FENCE &/OR GATE

215 EQUIPMENT PAD PER CIVIL

216 1" HORIZONTAL REVEALS IN CONCRETE WALL SPACED @ 9" O.C.

217 WALL SCONCE AT ENTRY DOOR (LITHONIA OLW 14)

218 WALL SCONCE AT +23' AFS (LITHONIA OLW 23)

219 LIGHT FIXTURE 'D', 20'-0" AFG PER ELECTRICAL

220 42"W x 36"H ACOUSTICAL LOUVER PER MECHANICAL

221 30" WIDE FUEL ACCESS PANEL

222 9" x 9" AIR INTAKE FAN PER MECHANICAL

223 PROVIDE ANTI-GRAFFITI COATING AT THE LOWER 9 FEET MEASURED ABOVE FINISHED GRADE ON EXTERIOR WALLS AND DOORS, LAMC 91.6306

224 SLIDING GATE

CONCRETE COLOR SCHEDULE:

C1 DAVIS COLORS, OMAHA TAN # 5084

C2 DAVIS COLORS, PALAMINO # 5447

C3 DAVIS COLORS, ADOBE # 61078

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LEGAL ENTITY:
ARCADIS U.S., INC.
333 S. HOPE STREET
SUITE C200
LOS ANGELES,
CA 90071

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING

THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED

ENGINEERING
CITY OF LOS ANGELES

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-	-	-	-
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-	-	-	-
-	-	-	-

CIP NO. C922

INDEX NO. D-31898

TED ALLEN, P.E. CITY ENGINEER

	DESIGN GROUP	DATE:
ENGINEER:	DAVID JOHNSON	6/2025
	LIC. NO.CA-18945	
DESIGNED BY:	DEAN HAWKINS/ DAVID JOHNSON	6/2025
DRAWN BY:	CATHY CARPIO	6/2025
CHECKED BY:	DAVID JOHNSON	6/2025
APPROVED BY:	DAVID JOHNSON	6/2025

VERTICAL CONTROL: NAVD 88 (2000)
HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

SHEET TITLE: ELECTRICAL BUILDING EXTERIOR ELEVATIONS

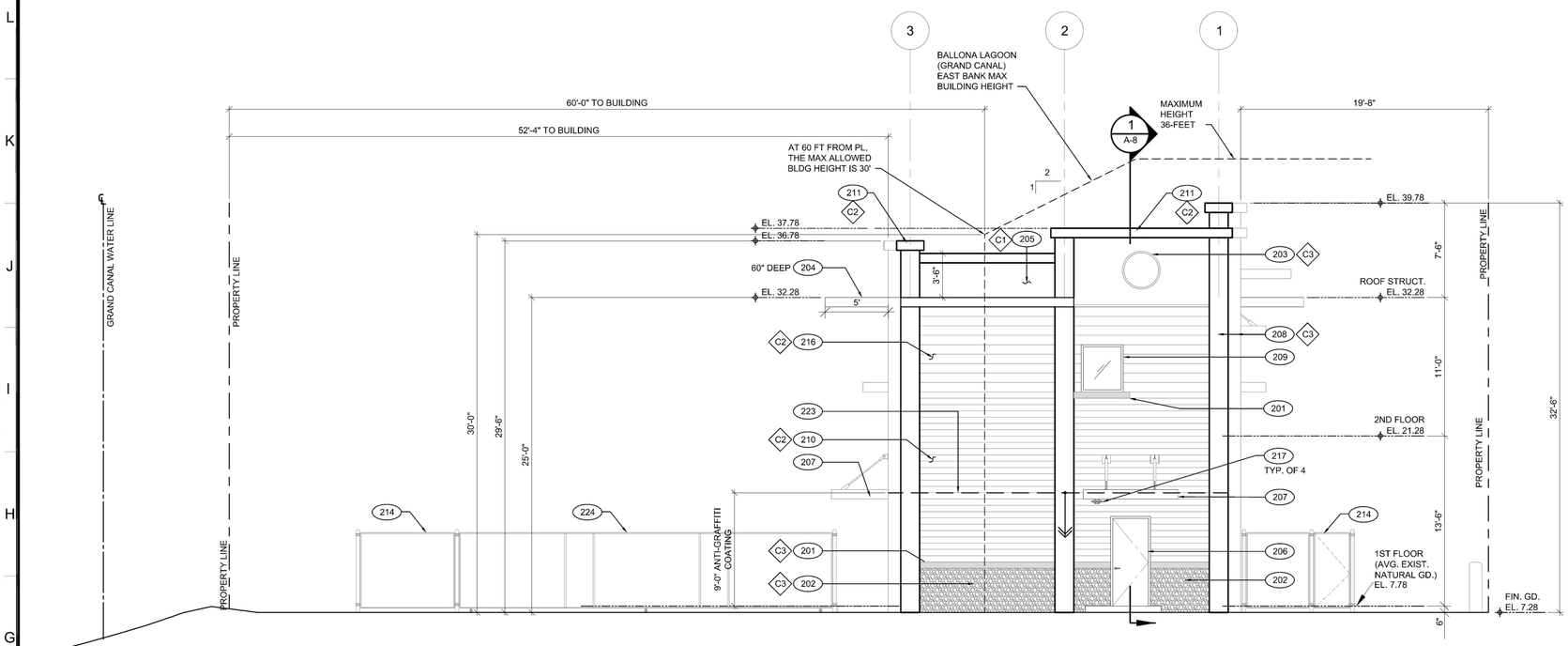
PROJECT: VENICE AUXILIARY PUMPING PLANT

ADDRESS: 133 HURRICANE STREET
LOS ANGELES, CALIFORNIA

WORK ORDER NO.
SZC12923

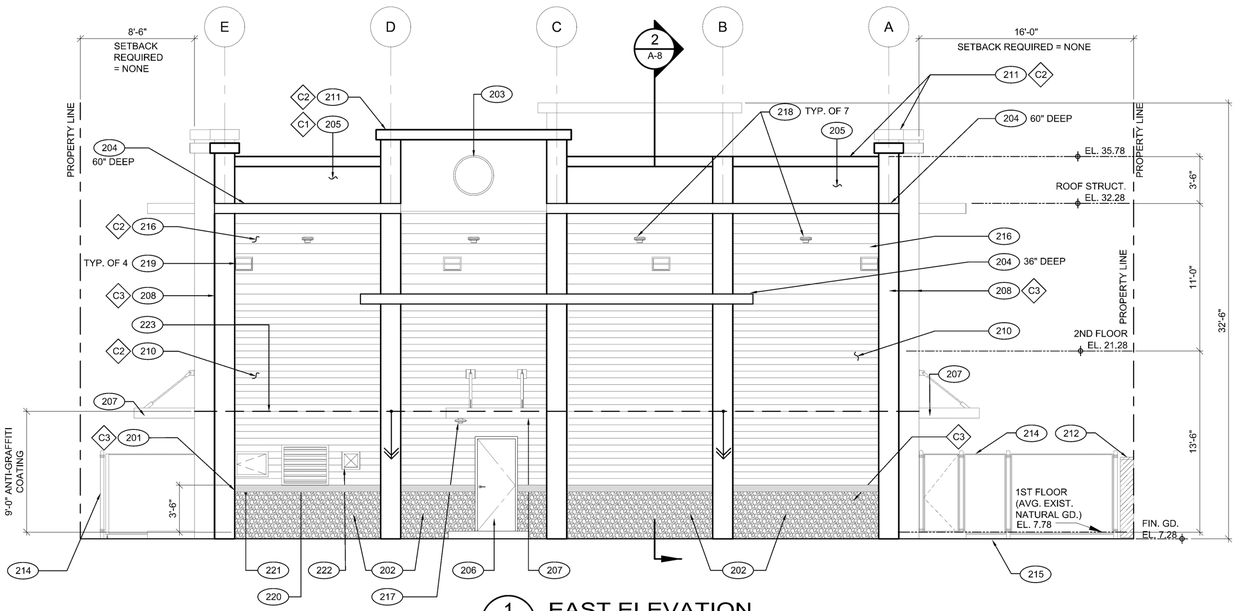
DRAWING NO.
A-6

SHEET OF SHEETS



2 A-7 NORTH ELEVATION

SCALE: ¼" = 1'-0"



1 A-7 EAST ELEVATION

SCALE: ¼" = 1'-0"

KEYNOTES:

201	4" x 6" CONCRETE SILL. TOP OF SILL @+42" ABOVE FINISH SLAB ELEVATION, U.N.O.
202	TEXTURED CONCRETE WITH COBBLESTONE PATTERN PER SPECIFICATIONS
203	1 ½" CIRCULAR REVEAL x 36" DIA. WITH RECESSED 2" CONCRETE SET WITHIN
204	EXTRUDED ALUMINUM HORIZ. LOUVER EYEBROW
205	COLORED CONCRETE
206	GALV. STEEL DOOR AND FRAME PER DOOR SCHED. A-11
207	METAL CANOPY WITH GALV. STEEL ROD HANGERS AND SARNAFIL DECOR ROOFING SYSTEM PER DETAIL 7/A-09
208	REINFORCED CONCRETE PILASTER PER STRUCTURAL
209	ALUMINUM WINDOW
210	1" HORIZONTAL REVEALS IN CONCRETE WALL SPACED @ 6" O.C.
211	REINFORCED CONCRETE PARAPET CAP WITH CONCRETE SEALER, TYP.
212	6'-0" HIGH CMU WALL PER CIVIL
213	72"W x 36"H AIR INTAKE ACOUSTICAL LOUVER PER MECHANICAL
214	SECURITY FENCE &/ WALL
215	EQUIPMENT PAD PER CIVIL
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217	WALL SCONCE AT ENTRY DOOR (LITHONIA OLW 14)
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219	LIGHT FIXTURE 'D', 20'-0" AFG PER ELECTRICAL
220	42"W x 36"H ACOUSTICAL LOUVER PER MECHANICAL
221	30" WIDE FUEL ACCESS PANEL
222	9" x 9" AIR INTAKE FAN PER MECHANICAL
223	PROVIDE ANTI-GRAFFITI COATING AT THE LOWER 9 FEET MEASURED ABOVE FINISHED GRADE ON EXTERIOR WALLS AND DOORS, LAMC 91.6306
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REVISION DATES (DESIGN STAGE ONLY)

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LEGAL ENTITY:
ARCADIS U.S., INC.
333 S. HOPE STREET
SUITE C200
LOS ANGELES,
CA 90071

BUREAU OF ENGINEERING
ENGINEERING
CITY OF LOS ANGELES

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CIP NO. C922

INDEX NO. D-31898

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CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS

TED ALLEN, P.E.	CITY ENGINEER	DATE:	
ENGINEER:	DAVID JOHNSON	LIC. NO.CA-18945	6/2025
DESIGNED BY:	DEAN HAWKINS/ DAVID JOHNSON	DESIGN GROUP	6/2025
DRAWN BY:	CATHY CARPIO		6/2025
CHECKED BY:	DAVID JOHNSON		6/2025
APPROVED BY:	DAVID JOHNSON		6/2025

VERTICAL CONTROL: NAVD 88 (2000)
HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

SHEET TITLE: ELECTRICAL BUILDING EXTERIOR ELEVATIONS

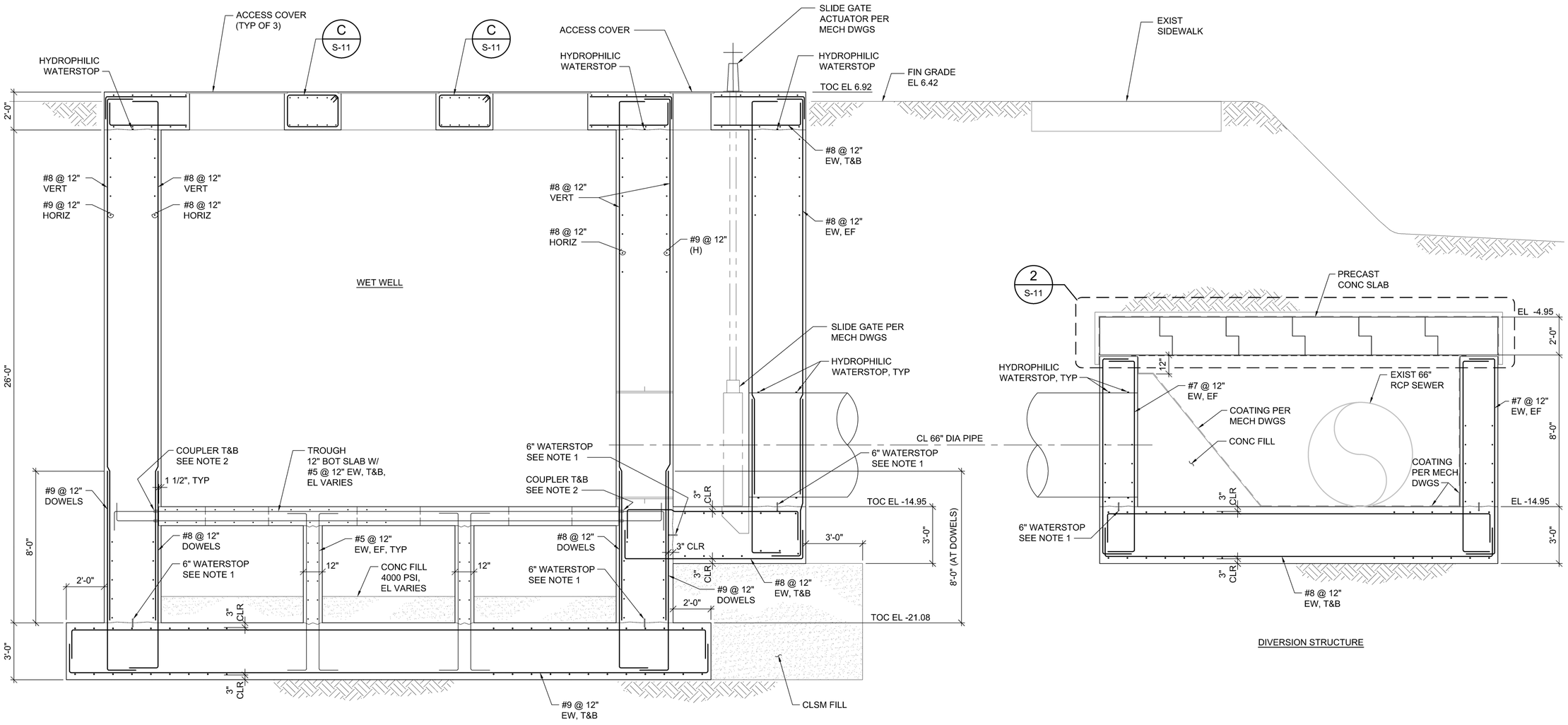
PROJECT: VENICE AUXILIARY PUMPING PLANT

ADDRESS: 133 HURRICANE STREET
LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923

DRAWING NO. A-7

SHEET OF SHEETS



DIVERSION STRUCTURE

NOTES:

1. 6" WATERSTOP SHALL BE "GREENSTREAK 679", FLAT-RIBBED, PVC.
2. REINFORCING STEEL COUPLERS SHALL BE "ERICO, LENTON COUPLERS", THREADED MECHANICAL CONNECTORS, ICC-ES ER-3967.

S-5, S-6	SECTION A
SCALE: 3/8" = 1'-0"	S-8

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ARCADIS
LEGAL ENTITY: ARCADIS U.S., INC.
333 S. HOPE STREET
SUITE C200
LOS ANGELES, CA 90071

Beyaz & Patel
BEYAZ & PATEL INC.
10920 VIA FRONTERA, SUITE 210
SAN DIEGO CA 92127

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING

ENGINEERING CITY OF LOS ANGELES

NO.	REVISIONS:	DATE:	BY:

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THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED.

TED ALLEN, P.E. CITY ENGINEER
DESIGN GROUP
ENGINEER: SUBHASH PATEL
DESIGNED BY: HUNG-I WU
DRAWN BY: JANE NIEDERKORN
CHECKED BY: SUBHASH PATEL
APPROVED BY: VENU KOLLI
DATE:
LIC. NO. S4233

VERTICAL CONTROL: NAVD 88 (2000)
HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

SHEET TITLE: PUMPING FACILITY AND DIVERSION STRUCTURE SECTION
PROJECT: VENICE AUXILIARY PUMPING PLANT
ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923
DRAWING NO. S-8
SHEET OF SHEETS

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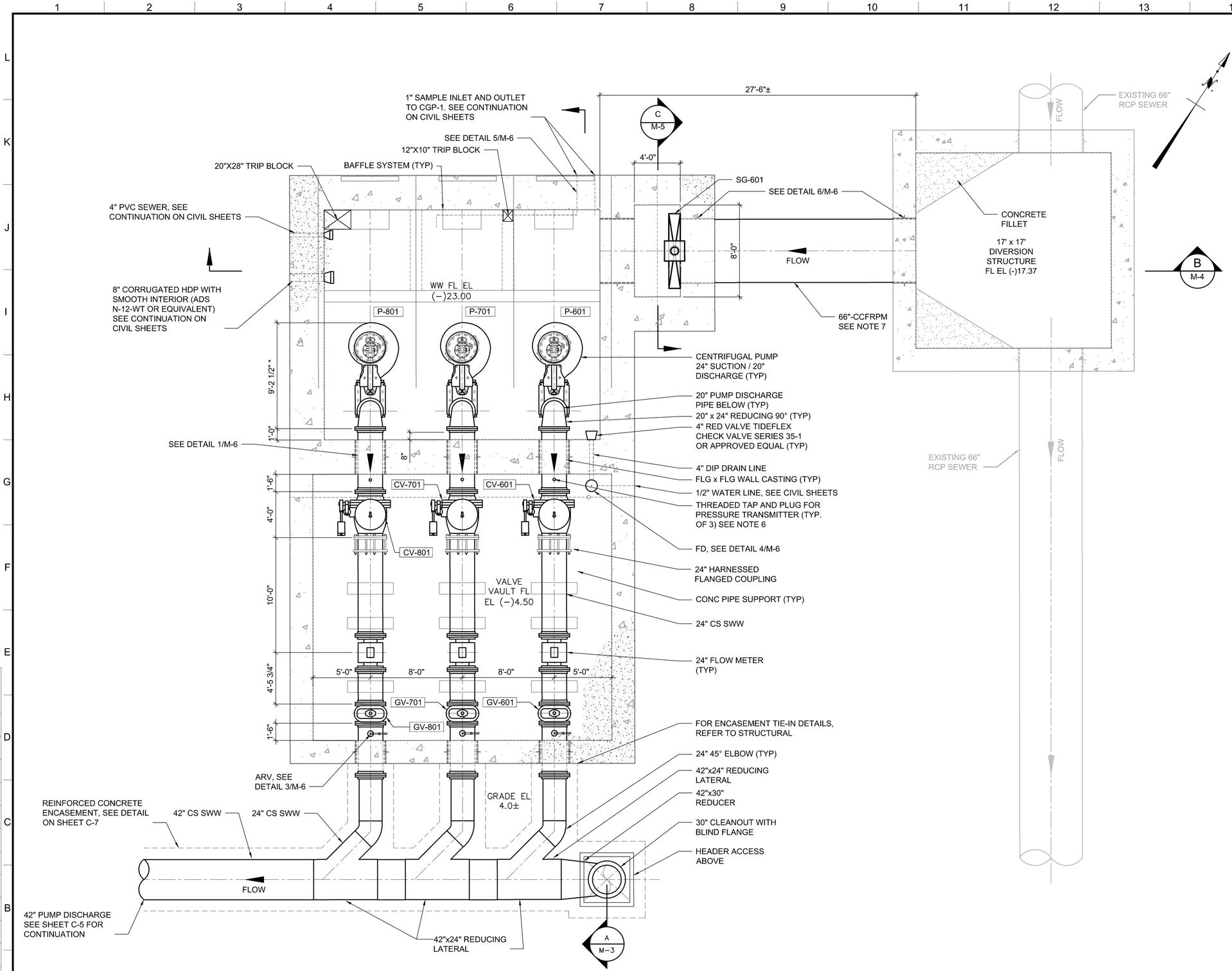

PLAN
SCALE: 1/4" = 1'-0"

GENERAL SHEET NOTES

1. APPROACH PIPE LENGTH NEEDS TO BE 5xDIA OF INLET PIPE ≈ 27.5'.
2. SEE STRUCTURAL DRAWING FOR WET WELL AND VALVE VAULT DIMENSIONS
3. ALIGN WET WELL OPENING OVER THE PUMPS FOR REMOVAL.
4. PIPING INSIDE TAKE WET WELL AND VALVE VAULT SHALL BE FLANGED.
5. BURIED STEEL PIPE OUT SIDE OF VALVE VAULT SHALL BE WELDED.
6. SEE INSTRUMENTATION INSTALLATION DETAILS ON DRAWING I-8.
7. CUT PIPE TO FIT IN FIELD.

* NOTE:
DIMENSION IS BASED ON FLYGT PUMP SIZE. CONTRACTOR SHALL COORDINATE PUMP DIMENSION WHEN SELECTING A MANUFACTURER.

SCALE: 1/4" = 1'-0"

FOR PERMITTING PURPOSE ONLY NOT FOR CONSTRUCTION

ARCADIS
LEGAL ENTITY:
ARCADIS U.S., INC.
333 S. HOPE STREET
SUITE C200
LOS ANGELES,
CA 90071

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING

ENGINEERING
CITY OF LOS ANGELES

NO.	REVISIONS:	DATE:	BY:
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CIP NO. C922

INDEX NO. D-31898

THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED

TED ALLEN, P.E. CITY ENGINEER

		DATE:
ENGINEER:	AARON COLLINS LIC. NO. CA-69143	06/2025
DESIGNED BY:	LUDWING PEREZ	06/2025
DRAWN BY:	JEFF RAY	06/2025
CHECKED BY:	LUDWING PEREZ	06/2025
APPROVED BY:	HECTOR ARIAS	06/2025

DESIGN GROUP

VERTICAL CONTROL: NAVD 88 (2000)
HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

SHEET TITLE: PLAN

PROJECT: VENICE AUXILIARY PUMPING PLANT

ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923

DRAWING NO. M-2

SHEET OF SHEETS

REVISION DATES (DESIGN STAGE ONLY)

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Sheet Version 3.0

CPC-2024-2010-GPA-ZC-CU3-SPPC

Exhibit C: Environmental Clearance

C.1 – Environment Impact Report SCH 2015111038

VAPP Final EIR
Chapter 1 Introduction
Chapter 2 Response to Comments
Chapter 3 Modifications to Draft EIR
Appendix L: Public Hearing Transcript
Appendix M: Updated Geotechnical Report
Findings of Overriding Considerations
Mitigation Monitoring and Reporting Program

CPC-2024-2010-GPA-ZC-CU3-SPPC

Exhibit C: Environmental Clearance

C.2 – Addendum dated October 29, 2021

VENICE AUXILIARY PUMPING PLANT (VAPP)

(SCH #2015111038)

ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT

For the VAPP – 128 Hurricane St. Lot Oilwell Abandonment

v. October 29, 2021

City of Los Angeles
Department of Public Works, Bureau of Engineering
Contact: Eileen Schoetzow
Email: Eileen.schoetzow@lacity.org

ENGINEERING
CITY OF LOS ANGELES

TABLE OF CONTENTS

1.0	Introduction	3
2.0	Project Overview	4
3.0	Project Background	5
4.0	Purpose for Addendum	5
5.0	Proposed Project Modifications	6
6.0	Environmental Impact Analysis	6
	6.1 Biological Resources	6
	6.2 Hazards and Hazardous Materials	15
	6.3 Cumulative Impacts	41
7.0	Summary of Environmental Effects	42
8.0	Determination	42
9.0	Appendices	43
10.0	Bibliography	44
11.0	Errata	45

1.0 Introduction

Section 15160 of the CEQA Guidelines explains that there are a number of examples of variations in EIRs, because the documents are tailored to different situations and intended uses. The variations are not exclusive. Lead Agencies may use variations consistent with the guidelines to meet the needs of other circumstances. (State of California, 2020)

The CEQA process allows for an Addendum EIR when the lead agency finds and identifies information about additional impacts of a proposed project that was not included in the original Project EIR. Specifically, Section 15164 Addendum to an EIR of the CEQA Guidelines states (State of California, 2020):

> (a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
>
> (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
>
> (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
>
> (d) The decision-making body shall consider the addendum with the final EIR prior to making a decision on the project.
>
> (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

Section 15162 of the CEQA Guidelines provides the criteria for preparing a Subsequent EIR or Negative Declaration. However, this project does not include substantial changes that involve any new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

No substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions of the previously approved EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

There is new information of substantial importance, which was not known and could not have been known with reasonable diligence at the time the previous EIR was certified; however, there are no additional severe significant effects, new mitigation measures, or new available but not adopted Alternatives. Here, the City has opted to prepare an Addendum to assess the minor modifications of the Project that have transpired since preparation of the EIR (State of California, 2020).

The CEQA process allows for an Addendum EIR when the lead agency finds and identifies information about additional impacts of a proposed project that were not included in the original Project EIR. The lead agency can prepare a Draft Addendum EIR to add these new environmental impacts of the Proposed Project.

The addition of the VAPP Project's oil well abandonment and remediation of the 128 Hurricane St. lot; and the new designation of the adjacent Venice Grand Canal and Ballona Lagoon waters as a U.S. Essential Fisheries Habitat area were not analyzed or included in the VAPP EIR. The VAPP EIR did not address Hazards or Hazardous Materials.

Therefore, the City of Los Angeles has decided to prepare a Draft Addendum EIR. to the previously certified EIR because some changes or additions are necessary, but none are any of the conditions described in CEQA Section 15162 calling for preparation of a subsequent EIR have occurred. The Addendum of the EIR need not be circulated for public review but can be included in or attached to the Final EIR. The decision making body shall consider the addendum with the Final EIR prior to making a decision on the project. A brief explanation of the decision not to prepare a subsequent EIR pursuant to CEQA § 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. Also, the explanation must be supported by substantial evidence. (State of California, 2016)

2.0 Project Overview

The purpose of this Addendum EIR is to update the VAPP DRAFT EIR and FINAL EIR with new and additional information about the project site that do not cause new significant impacts.

This addendum includes: the new designation of the Venice Grand Canal and Ballona Lagoon as an U. S. National Marine Fisheries Service (NMFS) Essential Fisheries Habitat; the 128 Hurricane St lot oil well abandonment, including soil removal and soil remediation (See *Figure 4 - 128 Hurricane St. Lot Site Plan* and *Figure 5 - VAPP Site Plan)*.

Then the following 128 Hurricane St lot construction:

- Impervious area, including seven parking spaces and four bicycle spaces; and sidewalk, is approximately 3,031 square feet or 0.07 acres.
- Pervious area, including landscaped and open space area, is approximately 1,199 square feet or 0.03 acres.

Additionally, proposed improvements will include installation of a public art on the Site to comply with the City of LA Public Works Improvement Arts Program. The three-dimensional public art will be in the landscaped and open space on the south side of the Site. This area will be open to public access.

The Site will serve as the Laydown Area 1 for Stage 1 of the redevelopment. Access to the Site during construction will be from Hurricane Street.

3.0 Project Background

This Addendum to the previously certified Final Environmental Impact Report for the Venice Auxiliary Pumping Plant (State Clearinghouse #2015111038) has been prepared by the City of Los Angeles to evaluate the environmental effects of the new U.S. NOAA Essential Fish Habitat designation, the oil well abandonment, soil removal, soil remediation, and the construction of the 128 Hurricane St. lot of the Venice Auxiliary Pumping Plant Project.

The Proposed Project is located at 128 Hurricane St., Venice, CA 90292 (Proposed Project) as part of the Venice Auxiliary Pumping Plant (VAPP) Project. The 128 Hurricane St lot is one of three vacant lots that make up the VAPP Project. It is the westerly lot of the three.

The Site is approximately 4,230 square feet and is assigned to the Los Angeles County Assessor's Parcel Number 422-5010-016. The Site is bordered to the north and west by residences; to the east by the City of LA Department of Public Works Venice Pumping Plant, and to the south by a CA Coastal Access Trail and Ballona Lagoon Grand Canal *Figure 3-Prcject Location Map*. The site is currently a vacant pervious lot and was recently used for the storage of vehicles and other miscellaneous items during the various public construction projects (Ninyo & Moore, 2016)

3.1 Previous Environmental Document

The Draft EIR was circulated for review and comments from the public and other interested parties, agencies, and organizations for over 45 calendar days, beginning on October 27, 2016, and closing on December 15, 2016.

The Final Environmental Impact Report for the Venice Auxiliary Pumping Plant (hereinafter referenced as the VAPP Final EIR) was certified by the City of Los Angeles City Council on August 9, 2017. It evaluated the potential environmental impacts resulting from construction of the VAPP.

4.0 Purpose for Addendum

The purpose of this Addendum to the EIR is to add the new information and analysis contained in the new Essential Fish Habitat Assessment for the VAPP (Ninyo & Moore, 2016) (AECOM, 2019); the Phase II ESA, Phase II ESA amendment; and the Remediation Action Plan. The analysis contained in the VAPP EIR did not include the Phase II ESA, Phase II ESA amendment; the Remediation Action Plan; and the new U. S. National Marine Fisheries Service (NMFS) Essential Fish Habitat Assessment's designation.

This Addendum EIR includes additional information the following environmental impact areas:

- Biological Resources – Essential Fish Habitat Assessment
- Hazards and Hazardous Materials – Soil removal, soil remediation and transport, and oil well abandonment

It should be noted, however, that the additional required sections and analysis that were not in the approved VAPP EIR, per CEQA are included in this Addendum EIR.

The focus of this Addendum EIR is specifically for:

- The Phase II ESA + Amendment for a limited subsurface soil and groundwater sampling and analysis; the exact location and abandonment of the oil well
- The Remediation Action Plan for soil removal and remediation of the 128 Hurricane St. lot
- The new Essential Fish Habitat Assessment for the VAPP U. S. National Marine Fisheries Service waterway designation of the adjacent waters Grand Canal and Ballona Lagoon as US Fisheries areas.

5.0 Proposed Project Modifications

1. Designate the waterways adjacent to the Project Site a U. S. National Marine Fisheries Service Essential Fisheries Habitat;
2. Phase II ESA soil removal plan for the 128 Hurricane St. lot for lead and TPH-d-impacted soil where the concentrations exceed residential screening level;
3. Remediation Action Plan with soil removal and remediation plans for the 128 Hurricane St. lot for lead and TPH-d-impacted soil where the concentrations exceed residential screening level; this includes agency oversight;
4. Abandon oil production well based on current CalGEM requirements, using the new Remediation Action Plan (RAP) oil well abandonment plan

6.0 Environmental Impact Analysis

This addendum environmental impact analysis provides new evidence, as required in CEQA Section 15162(e) that supports the City's decision not to prepare a Subsequent EIR pursuant to CEQA Guidelines Section 15162.

6.1 Biological Resources

This section describes the affected environment and regulatory setting for the biological resources and jurisdictional areas of the Project Site and associated study area *(see Figure 2 – Study Area Map)*. It also describes the potential impacts that would result from implementation of the Venice Auxiliary Pumping Plant Project, including the 128 Hurricane St. lot on these resources and where necessary, to reduce or avoid such impacts.

Environmental Setting

The environmental setting information and analysis in this section is summarized from the *Biological Resources and Habitat Assessment* and *Jurisdictional Delineation Report* (ICF, 2016) (Appendix F).

Within this section, the term "study area" refers to the Project Site plus an additional 500-foot buffer area surrounding the Project Site. Special-status species referred to in this section include those plants and wildlife species listed as threatened or endangered under federal or state endangered species acts (California Department of Fish and Wildlife [CDFW] 2015a),

plant species designated by the California Native Plant Society (CNPS) with a California Rare Plant Rank (CRPR) or other plants of local concern (CNPS 2015), and wildlife that is designated as a California Species of Special Concern, as defined by CDFW (CDFW 2015a).

The biological resources and jurisdictional delineation were conducted to provide recommendations for design and construction of the VAPP at the Project Site. Thus, the recommendations presented address biological resources and jurisdictional issues, including the newly designated essential fish habitat, and jurisdictional areas, including waters of the United States and California and wetlands.

Ballona Lagoon and the Grand Canal lie within the neighborhood of Venice in Los Angeles, California, and are muted tidal, nearshore estuarine waters connected to Marina del Rey near its terminus in Santa Monica Bay *(Figure 1 – Prcject Vicinity Map)*. The community of Venice experiences a mean annual temperature of 63 degrees Fahrenheit (°F; 17.2 Celsius [°C]), with a mean annual precipitation of approximately 13 inches. (U.S. Climate Data, 2019). Elevations in the study area, where Ballona Lagoon, Grand Canal, and Hurricane Street approximately come together, ranges from just below sea level to 3-feet above sea level. Although surrounded by development, aquatic features and their margin in the study area are primarily preserved open space with minimal-impact infrastructure.

The Project is approximately 0.75 mile upstream (north-northwest) of the Marina del Rey Channel and is at Grand Canal, just beyond where Ballona Lagoon transitions into the canal *(Figure 3 – Prcject Location Map)*. Tidal exchange into Ballona Lagoon and Grand Canal occurs through three tide gates that pass underneath Via Marina and link the lagoon and the canal to the Pacific Ocean via the Marina Del Rey Channel. According to an older document from the State of California's Natural Resources Agency that is available online, one of the three gates is maintained in the open position, and the average tidal regime is restricted, and ranges from approximately -2 feet to+2.5 feet National Geodetic Vertical Datum (State of California, 2007). Debris racks with an approximately 2-inch grid on the inside and outside of the gate facility protect it from debris, effectively preventing larger fish from passing through. All of the fresh water entering Ballona Lagoon and Grand Canal is urban run-off; these features have been isolated from Ballona Creek.

The debris racks that control tidal flow to the Project Site were inspected on March 7, 2019, and found to have considerable potential to limit the movement of fishes. On the Marina Channel (Pacific Ocean) side of the gate facility, the debris rack spans all three tide gates. Two of the gates are slide gates, and one is a flap gate. On the Ballona Lagoon side of the facility, only the flap gate is protected by a debris rack, and the two bays leading to the slide gates are unprotected, open culverts. When the facility was observed, on an outgoing tide, substantial flow was traveling out of the lagoon through the flap gate, and there was a drop at the interior debris rack between the water surface in the lagoon and that in the Marina Channel. In addition to the 2-inch grid, depending on gate operation, fish movement through this facility could also be limited by water velocities, water surface drops (or jump heights), and passage through the flap gate, if that is the gate primarily used.

South of the Project, Ballona Lagoon ranges in width between 95 and 275-feet, and is about 4,000-feet in length, and includes approximately 14.5 acres of open water habitat and approximately 1.5 acre of intertidal habitat (State of California, 2007). Grand Canal, at the Project and to the north, is a narrower channel that, due to its uniform width and banks, appears

artificially excavated. It links the Venice Canals with the Pacific Ocean via Ballona Lagoon, and then the Marina del Rey Channel. The lagoon and canal floors are composed of soft mud and varying amounts of sand and gravel (Jones, 2012). In the Ballona Lagoon-Grand Canal transition, the waterway substrate is characterized by sandy silts mixed with clay (State of California, 2007). The Grand Canal channel itself is 48 feet (14.6 meters) in width at its floor, and between 0 and 3.5 feet (1.7 meters) in depth (Jones, 2012).

The Ballona Lagoon ecosystem supports narrow bands of coastal strand and coastal salt marsh vegetation communities and intertidal and subtidal soft-bottom communities. Residential development with heavy nearby commercial activity is the predominant land use type adjacent to the Grand Canal and Ballona Lagoon. The wetlands and tidal ecosystem of Ballona Lagoon is a valuable stopover for migratory birds, and possesses potential rearing grounds for smaller fish.

Regulatory Setting

Another review of the various federal, state, regional, and local government regulatory requirements was conducted to identify regulations that provide protection to essential fish habitats and their biological resources. This section summarizes the various regulatory requirements that are relevant to the Proposed VAPP Project, in including the 128 Hurricane St. lot.

Federal Laws

Endangered Species Act of 1973 (16 U.S.C. Sections 1531 to 1543)

The Endangered Species Act of *1973* (ESA) and subsequent amendments provide guidance for the conservation of federally listed species and the habitats upon which they depend.

Interagency Consultation and Biological Assessments (ESA Section 7)

ESA Section 7 provides a means for authorizing take of threatened or endangered species by federal agencies and applies to actions that are conducted, permitted, or funded by a federal agency. It requires federal agencies to consult with the U.S. Fish and Wildlife Service (USFWS) or National Marine Fisheries Service (NMFS), as appropriate, to ensure that actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of threatened or endangered species or result in the destruction or adverse modification of critical habitat for these species. If a Proposed Project "may affect" a listed species or destroy or modify critical habitat, the lead agency is required to prepare a biological assessment evaluating the nature and severity of the potential effect.

Section 404 of the Clean Water Act of 1977 (33 U.S.C. Sections 1251 to 1376)

The Clean Water Act of 1977 (CWA) serves as the primary federal law protecting the quality of the nation's surface waters, including wetlands. Under Section 404, the U.S. Army Corps of Engineers (USACE) and the U.S. Environmental Protection Agency (EPA) regulate the discharge of dredged and fill materials into the waters of the United States. These waters are

primarily defined as navigable waterways or water features (including wetlands) that have a significant nexus to navigable waters. Project sponsors must obtain authorization from USACE for all discharges of dredged or fill materials into waters of the United States before proceeding with a proposed activity. Individual Section 404 permits may only be issued for a least environmentally damaging practicable alternative. Compliance with CWA Section 404 requires compliance with several other environmental laws and regulations. The USACE cannot issue an individual permit or verify the use of a general permit until the requirements of National Environmental Policy Act of 1969 (NEPA), ESA, the Coastal Zone Management Act (CZMA) and the National Historic Preservation Act (NHPA) have been met. Additionally, no permit can be issued or verified until a water quality certification, or waiver of certification, has been issued pursuant to CWA Section 401.

State Laws

California Coastal Act (Public Resource Code Division 20, Section 30000 et seq.)

The California Coastal Act is the state's Coastal Zone Management Program, as referenced under the CZMA, above. The California Coastal Act defines the "coastal zone" of California as extending generally 1,000 feet (305 meters) inland from the coast and 3 miles (5 kilometers) seaward. In certain areas, the inland boundary can extend up to 5 miles (8 kilometers). The California Coastal Act requires a Coastal Development Permit (CDP) from either the Coastal Commission or the City Engineer, as a local permit issuing agency. For this project, the work within the Grand Canal will require a state CDP, while work outside of the canal will require both state and local CDPs.

Porter-Cologne Water Quality Control Act (California Water Code Division 7)

The Porter-Cologne Water Quality Control Act (Porter-Cologne) established nine Regional Water Quality Control Boards (RWQCBs). These boards oversee water quality on a day-to-day basis at the local and/or regional level, and prepare and update water quality control plans. The RWQCBs also issue Section 401 water quality certifications under the federal Clean Water Act. Porter-Cologne also grants ultimate authority to the State Water Resources Control Board (SWRCB) over state water rights and water quality policy.

Additional Biological Reports

Essential Fish Habitat Assessment

Essential fish habitat, also known as EFH, includes all types of aquatic habitat and, in practice, specifies where a certain fish species lives and reproduces. Congress established the EFH mandate in 1996 to improve the nation's main fisheries law—the Magnuson-Stevens Fishery Conservation and Management Act—highlighting the importance of healthy habitat for commercial and recreational fisheries.

Essential fish habitat covers federally managed fish and invertebrates, but it does not apply to strictly freshwater species. These areas provide the habitats that shelter and sustain marine fish. Depending on the fish species, EFH could include the deep sea, coral reefs, kelp forests,

bays, wetlands, and rivers that connect to the ocean. Essential fish habitat includes all types of aquatic habitat where fish spawn, breed, feed, or grow to maturity (NOAA Fisheries, 2019).

Ballona Lagoon and the Grand Canal has been newly considered an Essential Fish Habitat for *Pacific Coast Groundfish and Coastal Pelagic* Species (Appendix C).

The extent of EFH for these commercially important species is designated in the Pacific Coast Groundfish Fishery Management Plan (FMP) and the Coastal Pelagic Species FMP, and defined as follows:

1. The overall extent of Pacific Coast Groundfish EFH is identified as all waters and substrate within the following areas:
    a. Depths less than or equal to 1,914 fathoms (3,500 meters) to MHHW or the upriver extent of saltwater intrusion, defined as upstream and landward to where ocean-derived salts measure less than 0.5 part per thousand during the period of average annual low flow.
    b. Seamounts in depths greater than 3,500 meters as mapped in the EFH assessment GIS.

Areas designated as Habitat Areas of Particular Concern (HAPCs) not already identified by the above criteria.

2. The overall extent of Coastal Pelagic Species EFH is tied to sea surface water temperatures within the Economic Exclusion Zone (EEZ) of U.S. Waters. The east-west geographic boundary of EFH for each individual coastal pelagic finfish and market squid is defined to be all marine and estuarine waters from the shoreline along the coasts of California, Oregon, and Washington offshore to the limits of the EEZ, and above the thermocline where sea surface temperatures range between 50°F to 79°F (10°C to 26°C).

Potential EFH in the project study area is shown in *Figure 2 – Study Area Map*. The extent of the project study area was determined in part based on the linear distance over which in-water construction noise may propagate. Grand Canal and Ballona Lagoon are tidal, predominantly saline, and may be accessible to some life stages of species managed under the Pacific Coast Groundfish and Coastal Pelagic FMPs. The potential EFH in the project study area includes all areas below MHHW, and is characterized as having predominantly sandy and silty substrates, although in some areas hardened, manmade surfaces are present. Ballona Lagoon and Grand Canal do not have any substantial inputs from freshwater tributaries, except urban runoff during storms. Water in the system is predominantly marine in origin, which presumably maintains the salinity at an average level that is close to seawater.

During the site visit, there were abundant California horn snails (*Cerithidea californica*), diverse foraging shorebirds and ducks, and disturbances at the water surface likely to have been made by fishes, which may be indicators of productive benthic habitat in Ballona Lagoon and Grand Canal. We did not observe eelgrass or other submerged aquatic vegetation. These species may use the estuarine waters of the Action Area during at least one life stage; engaging in rearing, foraging, and growth in these tidal channels. Estuarine areas are also considered to be HAPCs, as identified in EFH for Pacific Coast Groundfish (Pacific Fishery Management Council, 2016).

Environmental Impacts

Methodology

Potential significant impacts associated with the Proposed Project were identified from the *Biological Resources and Habitat Assessment* and *Jurisdictional Delineation Report,* Appendix F. These reports presented findings, conclusions, and recommendations concerning development of the Project Site that were based on an analysis of the existing biological resources and jurisdictional areas contained within the study area and which could be affected by the Proposed Project during construction and operation. The VAPP Habitat Mitigation and Monitoring Plan (HMMP) was prepared in anticipation of permit requirements of the U.S. Army Corps of Engineers (USACE), Regional WaterQuality Control Board (RWQCB), and California Coastal Commission (CCC). Once permits have been issued, this HMMP will be updated in accordance with applicable permit conditions.

The biological resources and jurisdictional delineation were conducted to provide recommendations for design and construction of the VAPP at the Project Site. Thus, the recommendations are incorporated into project design and construction plans and specifications, and address biological resources and jurisdictional issues, including special-status plants and wildlife, threatened and endangered plants and wildlife, sensitive plant communities, essential fish habitat, non-listed special-status animals, nesting birds, raptor foraging, wildlife corridors, environmentally sensitive habitat areas, and jurisdictional areas, including waters of the United States and California and wetlands.

Direct impacts occur when sensitive biological resources are altered through project implementation, such as through vegetation removal, habitat modifications, and injury or death of wildlife species. Indirect impacts may occur from elevated levels of noise or lighting, changes in surface water hydrology, or increased erosion or sedimentation. These types of indirect impacts can affect vegetation communities or their potential use by sensitive wildlife species.

Checklist Questions:

The criteria used to determine the significance of an impact on biological resources are based on *L.A. CEQA Thresholds Guide*. A project would normally have a significant impact on biological resources if it could result in:

BIO-1 Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

BIO-2 Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

BIO-3 Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Construction Impact Analysis

The analysis below describes the temporary and permanent short-term and long-term direct and indirect impacts on the newly designated essential fish habitat area as a result of the Proposed Project during construction.

BIO-1 Would the project result in the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, or candidate species, or a Species of Special Concern or federally listed critical habitat?

BIO-2 Would the project result in the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community?

BIO-3 Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The analyses below address additional potential impacts that could occur to biological resources and the newly designated essential fish habitat during construction related to the loss or reduction of critical habitat, federally designated natural habitat, and sensitive species.

Potential Effects to Essential Fish Habitat

The Proposed Project, with respect to potential effects to EFH, can be described in four phases: in-water cofferdam installation; dewatering and excavation in the cofferdam; installation of below-grade structures; and cofferdam removal and site restoration. The VAPP Habitat Mitigation and Monitoring Plan (HMMP) will address any direct or indirect impacts to biological resources in the Ballona Lagoon and the Grand Canal. The purpose of the VAPP HMMP is to outline the implementation, maintenance, monitoring and management of waters and habitats provided as mitigation to offset temporary construction impacts associated with the project. Construction activities in upland areas would not have appreciable effects on EFH because implementation of the SWPPP would protect EFH from contaminated runoff or siltation.

Cofferdam Installation

Installation of the cofferdam would produce the majority of the Project effects on EFH, although said effects are mostly minimal and temporary. Activities expected to affect EFH during the cofferdam installation are pile driving of soldier piles and sheet piles into the substrate, and dewatering of the area in the cofferdam. The footprint of the cofferdam contains 0.92 acre of tidal waters and 0.012 acre of tidal wetland. Pile driving would disturb the sediment in Grand Canal, increase turbidity; and produce underwater noise, temporarily affecting EFH outside of the cofferdam area. These effects are expected to occur for less than 1 week. This area is approximately 3.8 acres in size.

Increased turbidity from pile placement may temporarily impact fish foraging and reduce algal photosynthesis, but suspended particulates would settle soon after completion of the cofferdam. Water quality monitoring would be conducted during construction to maintain turbidity within parameters established by the Regional Water Quality Control Board (RWQCB) in their Section 401 Certification. Localized turbidity may temporarily deter fish from foraging in the project study area *(Figure 2 –Study Area Map)* until the cessation of cofferdam construction.

Piles for cofferdam construction would be installed using a vibratory driver or hydraulic push methods. Hydraulic push methods do not generate intense underwater noise, vibratory drivers produce less intense underwater noise than impact drivers, and noise from vibratory drivers are not expected to cause barotrauma to fish (CALTRANS, 2015). However, underwater noise from pile driving may still cause temporary hearing shifts or behavioral changes in fish. During vibratory pile driving, the areas of Grand Canal and Ballona Lagoon that are exposed to pile driving noise may be used by fish at a lower rate, or abandoned altogether as fish move away from the noise source. When considering underwater noise impacts, the areas affected are typically limited to the areas where the sound can propagate in a straight line from the source. Because there is a corner in the waterway where the Grand Canal meets Ballona Lagoon, underwater noise would not effectively propagate much south of the pile-driving location. In Grand Canal, a series of slight bends would limit noise propagation to the area extending approximately 1,600 feet (500 meters) to the north. Following the completion of pile-driving activity, fish are expected to resume use of the area affected by pile-driving noise emissions.

Minor hydrological changes to the constricted channel outside of the cofferdam are expected. With the width of the Grand Canal reduced by the cofferdam, flow velocity in the remaining channel width is likely to increase. Should the velocity increase enough, the eastern bank may experience cutting and erosion, causing sediment deposition into the canal. However, the tide gate at the mouth of Ballona Lagoon restricts tidal flows through the Action Area; and based on observations made during the site visit, Grand Canal and Ballona Lagoon typically do not flow fast enough to re-suspend sediments, even with some constriction of the channel. Upstream and downstream flows in the Canal would pass through the half of the waterway's width not obstructed by the cofferdam, and therefore still allow the movement of fish, transport of nutrients, and persistence of hydrological parameters, such as temperature, salinity, and tidal flows.

Dewatering and Excavation

Following completion of the cofferdam, any impounded water would be pumped out, and the substrate in the cofferdam excavated. During this process, any fish or invertebrates in the cofferdam area would likely be rescued. Water pumped from the cofferdam impoundment would most likely be discharged into the sanitary sewer system as permitted though an industrial waste permit from the City. If there are any discharges to surface waters, they would occur in accordance with the requirements of RWQCB permitting, and therefore would not adversely affect EFH.

Dewatering and excavation would cause benthic macroinvertebrate losses in the cofferdam (0.092 acre of tidal waters and 0.012 acre of tidal wetland), but because the area is very small in relation to the overall tidal waters of Grand Canal and Ballona Lagoon (approximately 30 acres), this loss would not significantly affect forage for Pacific Coast

Groundfish or Coastal Pelagic Species. Excavation into the EFH substrate would further cause macroinvertebrate mortality; however, these impacts, like those of the dewatering, would be temporary.

Installation of Below Grade Structures

Once the excavated pit is dewatered, concrete grout may be jetted into the soil at the bottom of the pit to reduce groundwater percolation and to create a stable surface capable of supporting the new diversion structures, if needed. The new diversion structure would then be installed, along with the 66-inch connector, and the new diversion structure would be tied into the existing CIS. Because these concrete structures would be buried under 18 feet or more of sediment, they would have no direct interaction with the waters of Grand Canal or Ballona Lagoon, and would not affect water quality or EFH.

Cofferdam Removal and Site Restoration

Prior to removal of the cofferdam, stockpiled material would be returned to the excavation. During the removal of the cofferdam, during which the piles are expected to be direct-pulled with a crane from upland areas and surface flows restored to the dewatered area, some resuspension of sediment and temporary increases in turbidity may occur. The magnitude of these effects is expected to be no greater than those discussed for cofferdam installation, and would be more limited in duration, because removal of the cofferdam would only take 1 or 2 days.

Following removal of the cofferdam, the benthic macroinvertebrate community prey base would recolonize and stabilize in the affected area. Although this prey base would take time to recolonize, the area is very small, and prey base in the remainder of Grand Canal and Ballona Lagoon would continue to support EFH. Because the completed diversion structure would not protrude above the grade of the canal, and would be deep enough to avoid any long-term change to the substrate, there is no permanent alteration of EFH associated with the Proposed Project.

Restoration of the project study area would be supported by revegetation and re-contouring the grade of the western bank. Therefore, the Proposed Project's minimal lasting effects would be ameliorated by natural and facilitated restoration.

The project would not result in the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, or candidate species, or a Species of Special Concern or federally listed critical habitat. Also, the project would not result in the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community. There will be no interference with essential fish habitat such that normal species behaviors are disturbed from the introduction of temporary construction noise and vibration to a degree that may diminish the chances for long-term survival of a sensitive species. Therefore, with the implementation of previously approved mitigation measures, including the Project's Habitat Management and Mitigation Plan (HMMP), impacts associated with biological resources and to jurisdictional areas during construction would be **less than significant.**

Operational Impacts

There are no operational effects to estuarine waters or EFH expected. The new wastewater facility is a closed system that would be better suited to handle increased wastewater surges than the current system. Therefore, its installation represents the most responsible measure to prevent future wastewater discharges into Grand Canal and Ballona Lagoon. Therefore; **no impacts** associated with biological resources would occur during operation; no mitigation is required.

6.2 Hazards and Hazardous Materials

This section describes the applicable laws and regulations for hazards and hazardous materials, and assesses how the construction and operation of the 128 Hurricane St. lot (the Hurricane St. lot) would alter them.

This chapter describes the environmental and regulatory setting for hazards and hazardous materials and characterizes new findings for the oil well abandonment implementation within the 128 Hurricane St. lot. *(see Figure 4 – 128 Hurricane St. Lot Site Plan)*

A hazardous material is any substance that, because of its quantity, concentration, or physical or chemical properties, may pose a hazard to human health and the environment. Under *California Code of Regulations* (CCR) Title 22, the term "hazardous substance" refers to both hazardous materials and hazardous wastes. Both of these are classified according to four properties: (1) toxicity, (2) ignitability, (3) corrosiveness, and (4) reactivity (CCR Title 22, Chapter 11). A hazardous material is defined in CCR Title 22 as:

> [a] substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed (CCR Title 22 Section 66260.10).

Hazardous materials in various forms can cause death, serious injury, long-lasting health effects, and damage to buildings, homes, and other property. Hazards to human health and the environment can occur during production, storage, transportation, use, or disposal of hazardous materials.

Hazardous materials information in this chapter is based in part on the *Preliminary Geologic Hazards Evaluation City of Los Angeles Los Angeles, California*, prepared by Ninyo & Moore in February of 2018.

Environmental Setting

The 128 Hurricane Street parcel is located on the alluvial plain of Ballona Creek, at the northwest edge of the Peninsular Ranges Geomorphic Province of California. The Hurricane St. lot has not been developed with structures from at least 1928. Surrounding the Hurricane Street. Lot, the area has been developed with various oil production facilities from at least 1938

through 1952, and with residential properties from at least 1963 onward. The adjacent, Venice Pumping Plant was constructed in 1963 (Ninyo & Moore, 2016)

The upper 2-feet of soil beneath the Hurricane St. lot appears to be fill material consisting of light brown silty and sand. Underlying the fill material, soil is predominantly brown to gray fine sand and silty sand from the surface to maximum depth explored, which was 20 feet below ground surface (bgs). A sandy clay layer was encountered in some borings, the variable depth between 3.5 and 4 feet bgs. Concrete debris was also encountered in some of the borings.

The Project Site is within the Santa Monica Sub-basin of the Coastal Plain of Los Angeles Groundwater Basin. Groundwater was encountered at approximately 5 feet bgs. Reportedly, groundwater is expected to flow toward the southwest, to the Pacific Ocean (McAlister GeoScience, 2016). The site lies to the west of the hydrologic barrier, the water is not considered potable.

A former oil production well on site is referred to as of the *McDonald 2* (API 03713842) well, according to the CalGEM/DOGGR well finder website. The exact location of the well was recently discerned on the northwest portion of the lot. It has a total depth of 5,860 feet bgs (*Figure 8 – Amended Proposed Excavation Area)*. The *McDonald 2* oil well was reported abandoned in 1932. A permit to re-abandon the well was issued in 2002 and renewed annually from 2004 to 2008.

The Project Site is located in a designated methane zone and is within the Playa del Rey Oilfield. (City of Los Angeles, 2020) The nearby area has had oil pipelines, storage tanks and vaults. According to the CalGEM/DOGGR well finder website, numerous other historical oil production wells are also located within the Site vicinity.

Regulatory Setting

Hazardous materials are substances that have the potential to cause a health hazard or harm to the environment with improper management or disposal. Hazardous substances are typically toxic, corrosive, ignitable, explosive, or chemically reactive, and may occur at a given location naturally, as a result of recent industrial or construction activities, or from historical uses.

Federal, state, and local laws regulate the use and management of hazardous or potentially hazardous or explosive substances. Hazardous substances are defined in the Federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 101(14), and also in the California Code of Regulations (CCR), Title 22, Chapter 11, Article 2, Section 66261. Hazardous waste is the by-product of processes and/or activities that can pose a substantial or potential hazard to human health or the environment from improper management or disposal.

For this analysis, soil that is excavated from a site containing hazardous materials would be considered a hazardous waste if it exceeded specific CCR Title 22 criteria. Remediation (cleanup and safe removal/disposal) of hazardous wastes found at a site is required if excavation of these materials is performed; it may also be required if certain other activities are proposed. Even if soil or groundwater at a contaminated site does not have the characteristics

required to be defined as hazardous wastes, remediation of the site is subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking lead jurisdiction.

Federal

Federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976

The Federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA) established a program administered by the U.S. Environmental Protection Agency (EPA) for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. Hazardous waste in California is regulated primarily under the authority of the RCRA (United States Code [USC] Title 42, Section 6901 et seq.). RCRA was amended in 1984 by the Hazardous and Solid Waste Act (HSWA), which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. The use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by HSWA.

Comprehensive Environmental Response, Compensation, and Liability Act

CERCLA, commonly known as Superfund, was enacted by Congress on December 11, 1980. This law provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the National Priorities List (NPL). CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) on October 17, 1986.

The Emergency Planning and Community-Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986 was created to help communities plan for chemical emergencies and to respond to concerns regarding environmental and safety hazards resulting from the storage and handling of toxic chemicals. EPCRA requires the reporting of storage, use, and releases of hazardous substances to the federal, state, and local governments.

Department of Transportation Hazardous Materials Regulations (49 CFR 100–185)

U.S. Department of Transportation (DOT) Hazardous Materials Regulations cover all aspects of hazardous materials packaging, handling, and transportation such as Parts 107 (Hazard Materials Program), 130 (Oil Spill Prevention and Response), 172 (Emergency Response),

173 (Packaging Requirements), 177 (Highway Transportation), 178 (Packaging Specifications), and 180 (Packaging Maintenance). Enforcement of these DOT regulations is shared by administrations under delegations from the Secretary of the DOT including the Federal Highway Administration that enforces all regulations pertaining to motor carriers.

State

California Environmental Protection Agency

The California Environmental Protection Agency (CalEPA) was created in 1991. It unified California's environmental authority in a single cabinet-level agency and brought the California Air Resources Board, State Water Resources Control Board (SWRCB), RWQCB, CalRecycle, Department of Toxic Substances Control (DTSC), Office of Environmental Health Hazard Assessment, and Department of Pesticide Regulation under one agency. These agencies were placed under the CalEPA "umbrella" for the protection of human health and the environment to ensure the coordinated deployment of state resources. Their mission is to restore, protect, and enhance the environment and ensure public health, environmental quality, and economic vitality.

Department of Toxic Substances Control

DTSC, a department of CalEPA, is the primary agency in California for regulating hazardous waste, cleaning up existing contamination, and finding ways to reduce the amount of hazardous waste produced in California. DTSC regulates hazardous waste primarily under the authority of the federal RCRA and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and CCR Title 22, Division 4.5). Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Title 22, Article 3 highlights the procedures of identifying hazardous waste into these 4 categories: ignitable, corrosive, reactive, and toxic. Article 5 categorizes hazardous waste into acutely hazardous waste, extremely hazardous waste, non-RCRA hazardous waste, RCRA hazardous waste, special waste, and universal waste. Title 22 of the CCR also underscores the guidelines for managing hazardous waste, which includes storing, housekeeping, record keeping, and inspecting waste (State of Calfornia, 2002)

The DTSC Environmental Health Standards for the Management of Hazardous Waste is included in CCR, Title 22, Division 4.5. All hazardous waste generators must comply with the guidelines, which are enforced by DTSC, for identifying, labeling, accumulating, preparing, and preventing outcomes related to hazardous waste.

Cortese List

Government Code 65962.5 requires CalEPA to develop a hazardous waste and substances site list (Cortese List), which includes: hazardous waste sites according to DTSC and the Health and Safety Code; contaminated public drinking water wells sites listed by the State Department of Health Services; Underground Storage Tank (UST) leaks, solid waste facilities, and hazardous waste sites listed by the SWRCB; and other sites as designated by various other state and local governments. Section 6592.5 requires that the Cortese list be at least annually updated. The Cortese List complies with the CEQA requirements in providing information about the location of hazardous materials release sites.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act restricts disposal of wastes or any other activity that may degrade waters of the state. The Act requires cleanup of wastes that are below hazardous concentrations but could impact ground and surface water quality (Section 13002). The Act established nine Region and State Water Boards, which are primarily responsible for protecting water quality in California. The Regional Water Boards regulate discharges by issuing permits through NPDES for waste discharge requirements for non-point source discharges. Anyone discharging materials or proposing to discharge materials that could affect water quality must file a report of waste discharge, unless the discharge would be into a community sewer system (California Water Board, 2014).

California Hazardous Waste Control Law

The California Hazardous Waste Control Law (HWCL) is administered by the California Environmental Protection Agency (CAL/EPA) to regulate hazardous wastes. The HWCL lists 791 chemicals and about 300 common materials that may be hazardous.

The HWCL also:

- Establishes criteria for identifying, packaging and labeling hazardous wastes;
- Prescribes management controls;
- Establishes permit requirements for treatment, storage, disposal and transportation; and
- Identifies some wastes that cannot be disposed of in landfills.

Hazardous substances are defined by state and federal regulations to protect public health and the environment. Hazardous wastes are hazardous substances that no longer have a practical use. Hazardous materials have certain chemical, physical, or infectious properties that cause them to be considered hazardous. According to CCR, Title 22, Chapter 11, Article 3, substances having a characteristic of toxicity, ignitability, corrosivity, or reactivity are considered to be hazardous. Examples of hazardous wastes include material that has been abandoned, discarded, spilled, contaminated, or is being stored prior to proper disposal. (State of California, 2016)

Toxic substances may cause short-term or long-lasting health effects, ranging from temporary effects to permanent disability, or death. For example, toxic substances can cause eye or skin irritation, disorientation, headache, nausea, allergic reactions, acute poisoning, chronic illness, or other adverse health effects if human exposure exceeds certain levels (the level depends on the substance involved). Carcinogens (substances known to cause cancer) are a special class of toxic substance. Examples of toxic substances include most heavy metals, pesticides, and benzene (a carcinogenic component of gasoline). Ignitable substances are hazardous because of their flammable properties. Gasoline, hexane, and natural gas are examples of ignitable substances. Corrosive substances are chemically active and can damage other materials or cause severe burns upon contact. Examples of corrosive substances include strong acids and bases such as sulfuric (battery) acid or lye. Reactive substances may cause explosions or generate gases or fumes. Explosives, pressurized canisters, and pure sodium metal (reacts violently with water) are examples of reactive materials.

Other types of hazardous materials include radioactive and biohazardous materials. Radioactive materials and wastes contain radioisotopes, which are atoms with unstable nuclei that emit ionizing radiation to increase their stability. Radioactive waste mixed with chemical hazardous wastes is referred to as "mixed wastes." Biohazardous materials and wastes include anything derived from living organisms. They may be contaminated with disease-causing agents, such as bacteria or viruses.

Environmental Health Standards for the Management of Hazardous Waste (22 CCR Div. 4.5, Section 66001 et seq.)

These standards establish requirements for the management and disposal of hazardous waste in accordance with the provisions of the California Hazardous Waste Control Act and Federal RCRA.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

Senate Bill 1082 (1993) established the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program). The Unified Program consolidates, coordinates, and makes consistent the following hazardous materials and hazardous waste program elements:

- Hazardous Waste Generation, Including On-Site Treatment under Tiered Permitting – This program regulates businesses that generate any amount of a hazardous waste. Proper handling, recycling, treating, storing, and disposing of hazardous waste are key elements to this program. Tiered permitting regulates the onsite treatment of hazardous waste.
- Aboveground Petroleum Storage Tank (APST) Spill Prevention, Control, and Countermeasure Planning (SPCCP) – Facilities with a single tank or cumulative aboveground storage capacities of 1,320 gallons or greater of petroleum-based liquid product (gasoline, diesel, lubricants, etc.) must develop an SPCC plan. An SPCC plan must be prepared in accordance with the oil pollution prevention guidelines in 40 CFR 112. This plan must include procedures, methods, and equipment at the facility to prevent discharges of petroleum from reaching navigable waters. A Registered Professional Engineer must certify an SPCC plan, and a complete copy of the plan must be maintained on site.
- Underground Storage Tanks (USTs) – This program regulates the construction, operation, repair, and removal of UST systems used to store hazardous materials and/or waste.
- California Accidental Release Prevention Program (CalARP) – This program requires any business that handles more than threshold quantities of an extremely hazardous substance to develop a Risk Management Plan (RMP). The RMP is implemented by the business to prevent or mitigate releases of regulated substances that could have offsite consequences through hazard identification, planning, source reduction, maintenance, training, and engineering controls.
- Hazardous Material Release Response Plans and Inventories (Business Plans) – Hazardous Materials Business Plans HMBPs contain basic information on the location, type, quantity, and health risks of hazardous materials and/or waste. Each business must prepare

a HMBP if that business uses, handles, or stores a hazardous material and/or waste or an extremely hazardous material in quantities greater than or equal to the following:

- 55 gallons for a liquid,
- 500 pounds of a solid,
- 200 cubic feet for any compressed gas, and
- Threshold planning quantities of an extremely hazardous substance.

Uniform Fire Code Hazardous Materials Management Plans and Inventories

Hazardous Materials Management Plans/Hazardous Materials Inventory Statements HMMP/HMIS and the Business Plan provide vital facility chemical and emergency response information to regulators, first responders, and the public with respect to community-right-to-know laws and emergency response preparedness. A fire chief may also require submission of the HMMP/HMIS below the state Business Plan reporting threshold quantity amounts for building occupancy type and fire code permits.

A Certified Unified Program Agency (CUPA) is a county, city, or joint powers agency that is approved and designated by Cal-EPA to implement the Unified Program and responsible for all six program elements of the Unified Program within its jurisdiction. Los Angeles Fire Department is the CUPA for the City.

California Code of Regulations, Title 8—Industrial Relations

Occupational safety standards exist in federal and state laws to minimize worker safety risks from both physical and chemical hazards in the workplace.

The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency responsible for developing and enforcing standards for safe workplaces and work practices. They assume primary responsibility for worker safety in the handling and use of chemicals in the workplace, as delegated by the federal Occupational Safety and Health Act. Cal/OSHA standards are generally more stringent than federal regulations.

The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (State of California, 2016) The regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings. These standards would apply to construction activities.

California Labor Code (Division 5, Parts 1, 6, 7, and 7.5)

The *California Labor Code* is a collection of regulations that include regulation of the workplace to ensure appropriate training on the use and handling of hazardous materials and operation of equipment and machines that use, store, transport, or dispose of hazardous materials. Division 5, Part 1, Chapter 2.5, ensures that employees who are in charge of handling hazardous materials are appropriately trained and informed with respect to the materials they handle.

Division 5, Part 7, ensures that employees who work with volatile flammable liquids are outfitted with appropriate safety gear and clothing.

Regional

SCAQMD Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil

Rule 1166 was adopted by the SCAQMD on August 5, 1988 and subsequently amended in 1995 and 2001. The rule sets requirements to control the emission of Volatile Organic Compounds (VOC) during the excavating, grading, handling, and/or treating of VOC-contaminated soil. Prior to these activities, an approved mitigation plan must be obtained from SCAQMD.

SCAQMD Rule 1403

The purpose of this rule is to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM), such as underground utility pipes, which may be applicable in some instances on the Project site. The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials (ACWM). All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings. Applicability of this rule, in whole or in part, is applicable to owners and operators of any demolition or renovation activity, and the associated disturbance of asbestos.

Local

City of Los Angeles

City of Los Angeles Fire Code

The Los Angeles City Fire Code prescribes laws for hazardous material storage and handling, and safeguarding of life and property from fire, explosion, panic, or other hazardous conditions may arise in the use of buildings, structures, or other premises. City of Los Angeles Municipal Code Chapter 5, Article 7, City of Los Angeles Fire Department Hazardous Materials Section. (City of Los Angeles, 2017)

The City of Los Angeles Fire Department Hazardous Materials Section is the administrative agent for the California Health and Safety Code, California Code of Regulations related to emergency planning and community right to know laws, and federal SARA Title III. There are three units within this department that process information related to hazardous materials. The Disclosure Unit is responsible for enforcing the disclosure law, which requires all establishments storing, producing, or utilizing hazardous substances to inventory on-site; this includes new businesses, as well as existing businesses. The Business Plan Unit ensures that businesses take the right measures to mitigate any dangers. The Risk Management and Prevention Program (RMPP) Unit is responsible for evaluating RMPP's that businesses have to submit. An

RMPP is intended to reduce risks associated with the handling of acutely hazardous materials and is required of businesses that handle 55 gallons, 500 pounds, or 200 cubic feet or more of such materials.

City of Los Angeles Fire Department Haz Mat Program

The City LAFD provides emergency response and guidance to hazardous materials incidents within the City. The City LAFD Haz Mat Program utilizes a unified approach with allied agencies (i.e. Los Angeles County Fire Department or County LAFD) and many stakeholders to provide preparedness, prevention, response, mitigation and resiliency to hazardous materials emergencies. The City LAFD is an all-hazards response organization, and the Haz Mat Program is designed to address the natural, technological, or purposeful response challenges, including chemical, biological, radiological, nuclear and explosive (CBRNE) threats to our community and national security.

In compliance with California state guidelines, each governmental agency designated by the State of California as a CUPA is authorized to apply statewide standards to each facility within its jurisdiction that treats hazardous waste on site or generates hazardous waste, USTs, or stores hazardous materials. In May of 2008, DTSC delegated corrective action oversight authority under Chapter 6.5 of Division 20 of California Health and Safety Code to implement corrective action under consent agreement at CUPA facilities within its jurisdiction. CUPA's are mandated by the State to establish a single billing statement process for the collection of the fees and surcharges associated with the practices of each of the regulated businesses. The City LAFD is concerned with public safety and the environment as it relates to the management of hazardous materials and hazardous waste.

City LAFD and the Police Department (LAPD) are first responders if a hazardous-materials or a hazardous-waste release incident is reported via 911. They work with many partnering and supportive agencies. A step by step notification, the *Hazardous Materials Incident Contingency Plan* protocol is published by the California Office of Emergency Services (OES). (State of California, 2020). The notification process begins with calling 911 whereby City LAFD is notified of all releases and includes other agency notifications, as necessary. Some of the key partnering and supportive agencies are described further below.

City Department of Public Works, Bureau of Sanitation (LASAN), Watershed Protection Division assists the City LAFD in ensuring that the quality of surface water and the watershed are protected during any hazardous materials incidents and response, including chemical and biological releases, such as biological waste from homeless occupancies.

Other partnering support comes from the County LAFD. In 1991, the responsibility for the Los Angeles County Hazardous Materials Control Program was transferred from the LA County Health Department to Deputy Health Officers at the County LAFD.1 The County LAFD Deputy Health Officers assist the City 1 Guidelines of Director of Health Services and Forester and Fire Warden in Performance of Hazardous Materials Control Program Activities, February 17, 1998, as supplied by Deputy Fire Chief Fernando Florez, County LAFD, Health & Hazardous Materials Division, Emergency Operations Unit, July 12, 2019.

LAFD in matters regarding public health and hazardous materials and waste release per a 1997 Memorandum of Understanding (MOU) between the City LAFD and the County LAFD. Various

CUPA responsibilities are outlined in this MOU; the County LAFD is identified as a CUPA Partnering Agency, in the areas of site mitigation, criminal investigations, and emergency response. (Florez, 2019) In addition, the LA County Public Health Department continues to provide the City with expertise in other areas of public health such as communicable diseases, pathogens, vector and rodent control, severe biological and toxicological threats (e.g., anthrax, etc. (Florez F. , 2019)). The LA County Public Health Department has been "Health Officer" for the City since 1964. In addition, the County LAFD, Health and Hazardous Materials Division provides Tier 2 hazardous waste assessment and mitigation services. (County of Los Angeles Fire Department, 2008)

City of Los Angeles General Plan Safety Element

Goal 1

A city where potential injury, loss of life, property damage and disruption of the social and economic life of the city due to fire, water related hazard, seismic event, geologic conditions or release of hazardous materials disasters is minimized.

Policy 1.1.4

Health/environmental protection. Protect the public and workers from the release of hazardous materials and protect City water supplies and resources from contamination resulting from accidental release or intrusion resulting from a disaster event, including protection of the environment and public from potential health and safety hazards associated with program implementation. (City of Los Angeles, 2020)

City of Los Angeles Emergency Operations Organization and Hazard Mitigation Plan

The Department of Emergency Operations Organization (EOO) within the City is responsible for the City's emergency preparations (planning, training and mitigation), response and recovery operations. The EOO is comprised of all agencies of the City's government and centralizes command and information coordination to enable its unified chain-of-command to operate efficiently and effectively in managing the City's resources.

The 2018 Hazard Mitigation Plan (HMP) is prepared to lessen the vulnerability to disasters and to reduce risks from natural hazards. An HMP serves as a guide for decision makers as they commit City resources to minimize the effects of natural hazards. The HMP integrates with existing planning mechanisms such as building and zoning regulations, long-range planning mechanisms, and environmental planning. The planning process includes conducting a thorough hazard vulnerability analysis, creating community disaster mitigation priorities, and developing subsequent mitigation strategies and projects. (City of Los Angeles, 2020)

Los Angeles City Building Code

Division 71 of the Los Angeles Building Code sets forth regulations for the control of methane intrusion emanating from geologic formations. The methane seepage regulations specify site

testing requirements and methane mitigation standards for all new buildings and paved areas (i.e., 5,000 square feet of paved area within 15 feet of an exterior wall of a commercial, industrial, institutional, or residential building) within designated methane zones or methane buffer zones. (City of Los Angeles, 2020)

Additional Geotechnical Studies

Phase II ESA

In August 2018, a Phase II ESA (Appendix A) which included a limited subsurface soil and groundwater sampling and analysis was conducted. The Phase II ESA report concluded:

- A buried flat concrete structure was observed and a nearby magnetic peak during the geophysical survey. The magnetic peak is believed to be the location of the former oil production well. The concrete feature may require removal and additional investigation and sampling.
- Soil samples exhibited lead and total petroleum hydrocarbons (TPH; primarily weathered diesel and oil fractions). The results indicated that past on-site activities related to oil production may have impacted the Site.
    1. Lead concentrations ranged from 3.4 milligrams per kilogram (mg/kg) (SB-4-5) to 160 mg/kg (SO-2-5).
    2. TPH as diesel (TPH-d) concentrations ranged from 6.4 mg/kg (SO-7-5) to 4,600 mg/kg (SO-9-2.5) TPH as oil (TPH-o) concentrations ranged from 5.0 mg/kg (SO-8-5) to 8,200 mg/kg (SO-9-2.5).
- Multiple shallow soil samples (2 and 4 feet bgs) exceeded commercial and/or residential screening levels for TPH-d and TPH as gasoline (TPH-g).
- Shallow soil samples (2 and 5 feet bgs) in the western portion of the Site exhibited elevated levels of lead that exceeded the commercial screening level, but not the residential screening level.
- Groundwater was encountered between 4 and 6 feet bgs. Groundwater quality is poor and not suited for beneficial uses. All groundwater concentrations were below non-drinking water screening levels.
- Methane was not detected from shallow gas probes,
- Site is classified as a Level I Site Design Level.
- No venting is required for hardscaping, but a passive ventilation system would be required for all future building construction.

Phase II ESA Amendment

In May 2019, an Amendment to Phase II ESA (Appendix B) updated the range of soil that could be tested onsite (AECOM 2018). The City of LA recently proposed the current development plan after the Phase II ESA had been submitted. The Phase II ESA was

amended according to the City of LA's current development plan and was submitted to the City on April 30, 2020. The following recommendations have been amended:

- The extent of the soil excavation and removal was determined by the amount of soil that exceeds residential screening levels due to proposed use as a parking lot and open space area.
- Total soil to be removed is 260 cubic yards (350 tons) as shown in *Table 1 - Excavation Areas and Total Soil Removal*.
- Three areas of excavation were identified and are estimated to produce approximately 160 cubic yards (215 tons) of impacted soil.
- Contingency soil removal due to confirmation sampling in the field is proposed to be 100 cubic yards (135 tons).
- Incomplete records of proper abandonment of the former production well necessitates uncovering the well casing and conducting a leak test under CalGEM supervision.
- Depending on leak testing results, CalGEM could require a complete re-abandonment of the production well or allow development over the well casing.
- A passive ventilation system will not be required due to the Site being developed as a hardscape parking lot less than 5,000 square feet and landscaped open space.

Remediation Action Plan

CalGEM requires the re-abandonment of the oil well, since it is deemed a Recognized Environmental Condition (REC), at the Project Site (Ninyo & Moore, 2016) A Remediation Action Plan (RAP) (Appendix B), dated July 2020, implements a course of action for the 128 Hurricane St. lot to abandon the active oil well, excavate and remove the soil that is contaminated around the oil well, backfill the site with new soil, and then design the proposed parking lot and open space project with Methane Building Standards.

The RAP considers the remediation threshold of this Site to be at the residential screening level. There are five locations that exceed residential screening levels. Soil excavation and removal are the best-selected remedies for remediation of TPH and Title 22 metals contamination considering the size, nature, and level of contamination at the site.

The volume of impacted soil to be removed is estimated to be 160 cubic yards or 215 tons. The total of impacted soil plus contingency to be removed is 260 cubic yard or 350 tons. Total volume and weight of excavated soil is summarized on *Table 1 - Excavation Areas and Total Soil Removal*.

This RAP was submitted to the oversight agencies, including the County of Los Angeles Fire Department-Health Hazardous Materials Division (LACFD-HHMD), The City of LA Fire Department, the California Department of Toxic Substances Control (DTSC), the Los Angeles Regional Water Quality Control Board (LARWQCB), and possibly the California Geologic Energy Management Division (CalGEM), for their review and approval to excavate and dispose of shallow residual hydrocarbon-impacted soil, provide a status update on a former on-site oil production well, and to address the methane issues in the soil vadose zone.

Agencies Notification Records

There are no records on GeoTracker or Envirostar for the Site and therefore there is no specific oversight agencies assigned. The City communicated with relevant regulatory agencies regarding voluntary oversight and additional requirements for the soil removal workplan. The City of LA and LACFD declined voluntary oversight and did not state additional requirements. (State of California, 2020) (State of California, 2020)

The DTSC and LARWQCB require an application for voluntary oversight to be submitted with the RAP. The application is included in Appendix E. Both agencies will review the application to determine which agency will be the lead regulator.

The South Coast Air Quality Management District (SCAQMD) requires implementing Rules 1166 and 1466 for air monitoring during soil removal, which includes site-specific plans, notification prior to field work, and dust control measures. The City of LA Department of Building Safety (LADBS) will not require methane mitigation or permitting for the soil removal work plan.

Oil Well Abandonment

There is an on-site abandoned former oil production well, as shown in *Figure 3 - Prcject Location Map and Figure 5 - VAPP Site Plan*. According to the CalGEM/DOGGR well finder website, a historical oil production well is present on the site (McDonald 2, API 03713842). According to CalGEM, this historical oil production well has a total depth of 5,860 feet bgs. The well went dry and was abandoned in May 1932. The bottom of the hole was plugged at 2,018 feet bgs. Various cement plugs were placed in the hole from 1,996 to 1,929 feet and 729 to 675 feet bgs. All other spaces were filled with heavy mud. The hole had been cemented at deeper depths prior to this final abandonment.

Based on a review of documents, a permit to re-abandon the well was issued in 2002 and renewed annually from 2004 to 2008. CalGEM requires the re-abandonment of the oil well at the Project Site in the Playa Del Rey oil field. (State of California, 2020)

Soil Removal Work Plan

Soil removal and remediation was chosen as the best cleanup alternatives due to the shallow depth and small volume of the lead and TPH-d-impacted residual soil.

The volume of impacted soil to be removed is estimated to be 160 cubic yards or 215 tons. The total of impacted soil plus contingency to be removed is 260 cubic yard or 350 tons. *(Figure 8 - Amended Proposed Excavation Area)* Total volume and weight of excavated soil is summarized on *Table 1 - Excavation Areas and Total Soil Removal*.

Pre-field Activities

Prior to conducting excavation of impacted soils, the following tasks will be completed:

- Schedule site access for required field activities.
- All proposed excavation areas will be clearly marked with white paint as required by Underground Service Alert (USA)
    - USA will be contacted at least 48 hours in advance to identify the location of on-site utilities.

- The location of the utilities from the previous Phase II ESA geophysical survey will be marked.

- Health and Safety Plan (HASP) - update with site-specific plan requirements prior to field activities.
- Los Angeles County Department of Public Works Building Safety Department - obtain a temporary grading permit
- The State of California, Division of Occupational Safety and Health – notify for the Annual T-1 Trench Permit requirement for the excavation/trenching activities
- A Waste Management Plan will be made with the qualified subcontractor to store, transport, and dispose of the hazardous and non-hazardous waste off site.
- SCAQMD – notify for Rule 1166 and 1466 requirement of site-specific plans to be submitted prior to field work implementation

Health and Safety Plan

A Site-specific and Project-specific HASP will be updated to cover field staff health and safety associated with the RAP implementation activities. All field personnel are required to implement the procedures presented in the HASP while conducting on-site field work.

Site Clearing and Debris Removal

Buried concrete and wood debris in excavation areas EA-1 and EA-2 should be broken up and removed using a drill attachment on an excavator. Construction debris will be stockpiled separately. Any vegetation will be cleared as necessary.

Soil Remediation Work Plan

Excavation Methodology

Soil will be excavated using a blade attachment on an excavator to prevent mixing of soils during excavation. Soil will be stockpiled in an area outside of the excavation areas. Each excavation area will have its own soil stockpile. If odor or staining is encountered, the soil will be segregated. During excavation, a Photoionization Detector (PID) will be used to monitor the presence and level of organic vapors from the excavation area.

Each excavation area will be excavated to the proposed extent and depth as summarized in the following sections.

Soil Excavation Work Plan

Each excavation area will be excavated to the proposed extent and depth as summarized in the following sections.

Soil Excavation Activities including Estimate Quantities

There are three proposed Excavation Areas (EA). See *Figure 8 - Amended Proposed Excavation Area* for Excavation Area Site Map. The volume of impacted soil to be removed is in five locations and is estimated to be 160 cubic yards or 215 tons:

Table 1 *Excavation Areas and Total Soil Removal*	
EA-1	60 cy/82 tons
EA-1-1	22 cy/30 tons
EA-2	15 cy/20 tons
EA-2-1	19 cy/25 tons
EA-3	43 cy/58 tons

The total of impacted soil plus contingency to be removed is 260 cubic yard or 350 tons. Total volume and weight of excavated soil is in *Table 1 - Excavation Areas and Total Soil Removal.* Provided below is a rationale for each EA and a proposed extent of excavation. The locations of the proposed excavation areas and historical sample locations are shown on *Figure 8 - Amended Proposed Excavation Area* and *Figure 9 - Proposed Excavation Area and Confirmation Sampling Locations.*

Excavation Area-1 (EA-1)

EA-1 is centered around the location of the abandoned oil production well as shown in *Figures 8 - Amended Proposed Excavation Area*. Part of the excavation may include buried concrete and debris removal. The excavation area was chosen due to the borings exceeding residential screening levels for lead and TPH-d. Approximately 60 cubic yards of soil (82 tons) are estimated to be removed and stockpiled from EA-1.

- Boring SO-2 concentrations exceeded the California residential screening level for lead of 80 mg/kg;
- Borings SO-2 and SO-13 concentrations exceeded California residential screening level of 230 mg/kg for TPH-d.

The depth of the proposed excavation is estimated to be 3.5 feet bgs, The lateral extent of the excavation area was chosen as approximately 5 feet in all directions based on the nearest sampling location. The excavation was extended to the northwestern and southwestern parcel boundaries of the Site to ensure removal of impacted soil. One boring (SO-2) within EA-1 will require greater depth for excavation.

Excavation Sub-Area-1-1 (EA-1-1)

EA-1-1 is a sub-area of EA-1, centered around the location of the abandoned oil production well as shown in *Figure 8 - Amended Proposed Excavation Area*. Part of the excavation may include buried concrete and debris removal. The excavation area was chosen due to the borings exceeding residential screening levels for lead and TPH-d. Approximately 22-cubic yards of soil (30 tons) are estimated to be removed and stockpiled from EA-1-1.

- Boring SO-2 lead concentration of 160 mg/kg at 5 feet bgs exceeds California residential screening level of 80 mg/kg

EA-1-1 requires deeper excavation to 1 foot below the impacted soil sample for a total of 6 feet bgs. Excavation extends to the western site boundary and approximately 5 feet to the northwest, northeast, and southeast.

Excavation Area-2 (EA-2)

EA-2 is centered around soil boring SB-4 and extends to boring SO-4 to connect with EA-1 (*Figure 8 - Amended Proposed Excavation Area*). The excavation area was chosen due to the borings exceeding residential screening levels for lead and TPH-d. Approximately 15 cubic yards of soil (20 tons) are estimated to be removed and stockpiled from EA-2. Part of the excavation may include buried concrete and debris removal.

- Boring SB-4 concentrations exceeding California residential screening level of 230 mg/kg for TPH-d (with a concentration of 670 mg/kg at 3.5 feet bgs).
- Boring SO-4, between SO-1 and SB-4, has detectable concentrations of TPH-d.

EA-2 requires that the depth of the proposed excavation is estimated to be 3.5 feet bgs. The lateral extent was chosen to connect EA-1 and EA-2, because boring SO-4, between SO-1 and SB-4, has detectable concentrations of TPH-d. One boring (SB-4) within EA-2 will require greater depth and is mentioned in the following subsection for Excavation Sub-Area-2-1 (EA-2-1).

Excavation Sub-Area-2-1 (EA-2-1)

EA-2-1 is a Subarea of EA-2. The excavation area was chosen due to the borings exceeding residential screening levels for lead and TPH-d. Approximately 19 cubic yards of soil (25 tons) are estimated to be removed and stockpiled from EA-2-1.

- Boring SB-4's TPH-d concentration of 670 mg/kg at 3.5 feet bgs exceeds the California residential screening level of 230 mg/kg

EA-2-1 requires deeper excavation to 1 foot below the impacted soil sample for a depth of 4.5 feet bgs. The excavation extends 5 feet on either side of the boring.

Excavation Area-3 (EA-3)

EA-3 bounds the southwestern Site boundary and goes just beyond SO-11 to the northwest. The excavation area was chosen due to the borings exceeding residential screening levels for lead and TPH-d. Approximately 43 cubic yards of soil (58 tons) are estimated to be removed and stockpiled from EA-3.

- Boring SO-9 concentration exceeding the California residential lead screening level of 80 mg/kg and
- Borings SB-6, SO-8, SO-9, and SO-11 concentrations exceeding California residential screening level of 230 mg/kg for TPH-d *(Figure 5 - Amended Proposed Excavation Area).*

EA-3 lateral extent is approximately 5 to 10 feet based on the nearest boring. The depth of the proposed excavation is estimated to be 3.5 feet bgs

Excavation Area Confirmation Sampling

Forty-six primary soil confirmation samples will be collected, prior to backfilling, to show that no lead or TPH-d impacted soils remain within the newly excavated areas. Five duplicates will be sampled for a total of 51 soil confirmation samples.

Samples Locations and Depth by Areas

Provided below is a proposed confirmation sampling plan for each excavation area and shown on *Figure 9 - Proposed Excavation Area and Confirmation Sampling Locations.* DTSC recommends sampling on every sidewall and every 50 square feet at the bottom of the excavation.

EA-1

In EA-1, soil samples were collected from all four sidewalls at a depth of approximately 0.5 feet bgs and 13 excavation floor samples per 7-foot by 7-foot grid at a depth of 3.5 feet. The total number of confirmation samples for EA-1 is 18 samples.

EA-1-1

In EA-1-1, soil samples were collected from all four sidewalls at a depth of approximately 0.5 feet bgs and two excavation floor samples per 7-foot by 7-foot grid at a depth of 6 feet. The total number of confirmation samples for EA-1-1 is seven samples.

EA-2

In EA-2, soil samples were collected from all four sidewalls at a depth of approximately 0.5 feet bgs and three excavation floor samples per 7-foot by 7-foot grid at a depth of 3.5 feet. The total number of confirmation samples for EA-2 is eight samples.

EA-2-1

In EA-2-1, soil samples were collected from all four sidewalls at a depth of approximately 0.5 feet bgs and two excavation floor samples per 7-foot by 7-foot grid at a depth of 5 feet. The total number of confirmation samples for EA-2-1 is seven samples.

EA-3

In excavation area EA-3, soil samples were collected from all four sidewalls at a depth of approximately 0.5 feet bgs and six excavation floor samples per -foot 7 by 7-foot grid at a depth of 3.5 feet. The total number of confirmation samples for EA-3 is 11 samples.

Soil Sample Sampling and Analysis

All soil samples will be collected in eight-ounce jars from the bucket of the excavator. Samples will be labeled, capped, and stored on ice and submitted to a California-certified laboratory. All samples will be analyzed for TPH-d by United States Environmental Protection Agency (EPA) Method 8015 (M) and total lead by EPA Method 6010B. The laboratory will hold all samples and analyze for Soluble Threshold Limit Concentration (STLC) if the total lead results exceed 10 times the STLC and for Toxicity Characteristic Leaching Procedure (TCLP) if the total lead results exceeds 20 times the STLC.

The excavated areas will be widened and/or deepened, if the soil confirmation sampling data results show elevated TPH-d and/or lead concentrations exceeding residential screening levels.

Contingency for Proposed Remedial Excavation

A contingency of 100-cubic yards (cy) requiring further excavation is included. This contingency would be approximately 100-cubic yards (135-tons) of additional soil for confirmation sampling and proposed remedial excavation areas. The volume of impacted soil to be removed is estimated to be 160-cubic yards or 215-tons. The total of impacted soil plus contingency to be removed is 260-cubic yard or 350-tons. Total volume and weight of excavated soil is summarized on *Table 1 - Excavation Areas and Total Soil Removal*.

Backfilling

Grading will consist of approved imported fill graded to previous levels according to LA County's temporary guidelines. There will be approximately up to 35 new, additional truck trips.

Soil Profiling and Disposal

All excavated soils will be stockpiled (each EA will have its own soil stockpile) and will be profiled by analyzing a composite sample prior to disposal. A composite waste sample will be analyzed for VOCs by EPA method 8260B, TPH-g, -d, and -o by modified EPA method 8015 (M), and Title 22 Metals by EPA method 6010. If a metal concentration exceeds 10 times the Total Threshold Limit Concentration (TTLC), STLC will be run on the sample. If metal concentrations exceed 20 times the TTLC, and/or STLC exceeds the TTLC, TCLP will be run on the sample. Soil will be segregated if it has an odor or stain.

Upon receiving soil profile analytical results for each stockpile, soil and construction debris will be loaded into trucks and transported and disposed of properly. Soil with acceptable concentrations will be classified and disposed as non-hazardous waste. Non-hazardous waste shall be transported by a licensed hauler to a permitted waste disposal facility. The hazardous waste shall be transported by a licensed hauler to a permitted hazardous waste disposal facility. Prior to leaving the Site, trucks will be inspected to ensure the load is properly covered and clean. A manifest or bill of lading will be prepared for each truck leaving the Site. Due to the small size of all the excavations and the vacancy of the lot, traffic control is not needed for this soil removal work plan.

Methane zone

The Site is in a designated methane zone and is within the Playa del Rey Oilfield. The nearby area has had oil pipelines, storage tanks and vaults. According to the CalGEM/DOGGR well finder website, numerous other historical oil production wells are located in the Hurricane St. lot

vicinity. (State of California, 2020). The project is subject to City of Los Angeles Department of Building and Safety Methane Ordinance. (City of Los Angeles, 2010-2020) Only Methane Building Standards are necessary for the development of the parking lot and landscaping due to the size of the lot (less than 5,000 square feet) and the non-detects of methane in soil vapor probe samples.

Sites with Hazardous Materials Identified in Environmental Databases

There are no records on GeoTracker or Envirostar for the 128 Hurricane St. lot and therefore there is no specific oversight agencies assigned. According to the CalGEM/DOGGR well finder website, the McDonald 2 well, API 03713842, the former oil production well on site, as shown on *Figure 8 – Amended Proposed Excavation Area*.

The McDonald 2 well has a total depth of 5,860 feet below ground surface (bgs) and was abandoned in 1932. A permit to re-abandon the well was issued in 2002 and renewed annually from 2004 to 2008. According to CalGEM/DOGGR, the well has not been re-abandoned, and the permit to re-abandon was cancelled. CalGEM requires the re-abandonment of the oil well, since it, is deemed a Recognized Environmental Condition (REC).

The 128 Hurricane St lot has not been developed with structures from at least 1928, up through the time of this report. The area surrounding the site was developed with oil production facilities from at least 1938 through 1952, and with residential properties from at least 1963 through the time of this report. The Venice Pumping Plant appeared east of the 128 Hurricane St. lot from at least 1963. (Ninyo & Moore, 2016)

Proximity to Schools and Childcare Facilities

The project is located .4 miles south of the closest school Anchorage Street School located on Pacific Ave. The Proposed Project is not within one-quarter mile of an existing or proposed school. Therefore, the project will have no impact to hazards pertaining to the proximity to schools and childcare facilities.

Proximity to Airports and Airstrips

The project is located 7 miles northwest of the Los Angeles International Airport. The project is not located within an airport land use plan or where such a plan has not been adopted, is not within the vicinity of a private airstrip, is not within two miles of a public airport or public use airport, and the project will not result in a safety hazard for people residing or working in the project area. Therefore, the project will have no impact to hazards pertaining to airports or private airstrips.

Emergency Response Plan

The City LAFD is responsible for emergency medical services and fire protection in Los Angeles. In the event of an emergency, the City LAFD along with other City agencies would implement all appropriate emergency procedures outlined in the Hazard Mitigation Plan (City of Los Angeles, 2020) The plan was implemented to reduce risks from disasters to the people, property, economy, and environment within the City.

Wildfire

There are no designated, potential wildfire areas near the Proposed Project site. Therefore, the Proposed Project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires. Therefore, the project will have no impact to wildfire.

Environmental Impacts

Methodology

This section evaluates the potential hazards and hazardous materials impacts that would result from the implementation of the Proposed Project. The hazards and hazardous materials analysis is based on the review of additional technical reports and federal, state, and local agency documents including the City of Los Angeles General Plan Safety Element and the United States Geological Survey and State Department of Conservation seismic hazard zone and hazards reports and maps. (State of California, 2020) (City of Los Angeles, 2020)

Checklist Questions

The *L.A. CEQA Thresholds Guide* (2006) states that, the determination of significance of impacts with respect to hazards (risk of upset/emergency preparedness), health hazards, or hazardous materials, shall be made on a case-by-case basis, considering several factors as follows: In accordance with Appendix G of the CEQA Guidelines, the Proposed Project would have a significant effect on hazards and hazardous materials if it would:

HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

HAZ-2: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

HAZ-3: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and as a result, would it create a significant hazard to the public or the environment?

HAZ-4: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The analyses below address additional potential impacts that could occur due to hazards and hazardous materials and the oil well abandonment during construction and operation.

Construction Impact Analysis

The construction impacts discussion below identifies and considers applicable regulations for the Proposed Project, thereby taking into account the regulatory framework factor in the analysis where appropriate.

HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

HAZ-2: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

There will be a **less than significant construction impact** and **no impact during operations.**

Oil Well Abandonment

The scope consists the following:

1. Pre-field activities and preparation of site-specific HASP.
2. Obtain permit from CalGEM.
3. Excavate around the well and make it safe for the welder and backhoe to install the wellhead to the casing and install the cellar ring around the well.
4. Install wellhead and cellar ring.
5. Mobilize the rig and all drilling equipment.
6. Remedial Action Plan Including Soil Removal Workplan 128 Hurricane Street, Venice, California
7. Prepared for: City of Los Angeles Bureau of Engineering AECOM 11
8. Install blowout preventer equipment approved by CalGEM.
9. Drill out old cement and cleanout the well to a total re-abandon depth.
10. Cement and perforating well per CalGEM Permit to surface.
11. Demobilize rig and equipment.
12. Remove cellar ring, cut casing to a final depth.
13. Gas test install I.D. plate and backfill with compaction wheel.
14. Schedule all required CalGEM inspections.
15. Dispose of waste generated from wells re-abandonment.
16. Complete reporting.

It takes approximately **four to six months** to perform re-abandonment of an oil production well depending on CalGEM inspections and approval.

Routine Transport, Disposal, and Handling of Hazardous Materials

The Project construction activities would involve the transport, and disposal of hazardous materials that include contaminated soil and debris from an abandoned oil well that are typically used in oil well abandonment remediation projects.

The total of impacted soil plus contingency to be removed is 260 cubic yard or 350 tons. The haul trucks will be no larger than

Soil and construction debris will be loaded into trucks and transported and disposed of properly. Soil with acceptable concentrations will be classified and disposed as non-hazardous waste. Non-hazardous waste shall be transported by a licensed hauler to a permitted waste disposal facility.

The hazardous waste shall be transported by a licensed hauler to a permitted hazardous waste disposal facility. Prior to leaving the Site, trucks will be inspected to ensure the load is properly covered and clean. A manifest or bill of lading will be prepared for each truck leaving the Site.

Due to the small size of all the excavations and the vacancy of the lot, traffic control is not needed for this soil removal work plan.

Buried concrete and wood debris in excavation areas EA-1 and EA-2 will be broken up and removed using a drill attachment on an excavator. Construction debris will be stockpiled separately. Any vegetation will be cleared as necessary.

Such transport and disposal would be compliant with applicable regulations such as those under RCRA, OSHA, DOT, California Labor Code, and the CCR. Moreover, the hazardous materials in the soil and debris are in small amounts, and any spills that may occur would be contained and cleaned according to the Materials Safety Data Sheet in the appropriate manner. The City LAFD is the designated enforcement agency for the City that regulates hazardous materials identified by U.S. EPA and CalEPA. Any potential construction-related hazardous releases would be from contaminated soil and oil and would not include substances listed in 40 CFR 355 Appendix A: Extremely Hazardous Substances and Their Threshold Planning Quantities. Any such releases would be small and localized. Any spills that may occur would be contained and cleaned according to the Materials Safety Data Sheet (MSDS)/Globally Harmonized System (GHS) in the appropriate manner.

Other Releases of Hazardous Materials

During excavation related to the soil removal, soil remediation and oil well abandonment construction under the Project, contaminated soil may be encountered, which may involve a release of hazardous materials into the environment. There is a possibility that contingency soil amounts of up to 100 cubic yards could also be excavated and analyzed for contamination on site. The probability of encountering contamination during construction work is very low based on the prior soil sampling.

Groundwater was encountered at the site at approximately 5 feet bgs. EA-1-1 requires deeper excavation to 1 foot below the impacted soil sample for a total of 6 feet bgs. Excavation extends to the western site boundary and approximately 5 feet to the northwest, northeast, and southeast. If groundwater is encountered, its risk to the environment, including sensitive receptors, would be evaluated and applicable law and regulations would be implemented as required. Handling of hazardous materials and hazardous waste, in the City, for the Project, would follow all applicable federal, state and local regulations.

Specifically, if ground water is encountered as part of deep excavation and construction, then dewatering procedures and permit requirements of the National Pollutant Discharge Elimination System (NPDES) would be applicable. Discharges of treated or untreated groundwater generated from dewatering operations or other applicable wastewater discharges not specifically covered in other general or individual NPDES permits are currently regulated under a regional general permit, General Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

Furthermore, in the event of storm water discharges during construction, it would be covered under Phase 1 Los Angeles County Municipal Stormwater NPDES Permit (MS4 Permit) for the City. Section 402 of the CWA establishes the NPDES permit, which is applicable to all discharges to waters of the United States, including stormwater associated with construction activities, industrial operations, municipal drainage systems, and point sources, to protect surface water quality. Under the current Phase 1 MS4 permit for Los Angeles County (Order No. R4-2012-175), MS4 Permit (State of California, 2012). MS4 permits require that cities and counties develop and implement programs and measures, including BMPs, control techniques, system design and engineering methods, and other measures, as appropriate, to reduce the discharge of pollutants in stormwater to the maximum extent practicable (MEP) and achieve water quality standards. The MS4 permit also includes construction requirements for implementation of minimum construction site BMPs, for erosion, sediment, non-stormwater management, and waste management on all construction sites that are less than 1 acre.

Contaminated soils are considered hazardous waste under the California Health and Safety Code. Therefore, BOE Standard Specifications Section 02310, Subsection 3.3, Contaminated Soil would be implemented for routine construction activities. This includes, and is not limited to, a site-specific Health and Safety Plan, OSHA Trainings, and soils testing per the SCAQMD Rule 1166 permit, and required procedures in the CCR, Title 22.

Actions and procedures for handling unknown substances as those required in CCR Title 8, Section 5192, Subsection G, enforced by the California Department of Industrial Relations specifies mandatory regulations to assist employees and employers in certain grave circumstances for the training and use of Level A and Level B of Personal Protective Equipment and gear for worker safety would be applicable.

The type and extent of the contamination will dictate the appropriate response and remediation appropriate for the site and the agencies to be notified. When the presence of VOCs from contaminated soil is suspected, which would generally be detected initially by strong odor per SCAQMD Rule 1166 for petroleum hydrocarbons, SCAQMD would be notified. Under Rule 1166 samples would be taken to measure the level of contamination in the soil before identifying the site as contaminated. If the VOC levels exceed 50 parts per million (ppm), a site mitigation plan, pursuant to Rule 1166, would be prepared, which may include use of soil vapor suppressants, covers over and below the soil, containerization, or removal of the contaminated material. Offsite disposal of hydrocarbon contaminated waste would be pursuant under EPA's Title 40, Environment and Title 49 Transportation Code of Federal Regulation Section 172.704 as enforced by the DOT.

Applicable Existing Law and Hazardous Material Releases

To further support the no impact determination for the Project, potential scenarios are outlined below. These scenarios demonstrate that adequate local response and regulations, understandings and practices are in place to avoid significant impact should a hazardous materials or hazardous waste release potentially occur or be discovered during the continuation of construction activities from the Project.

Scenario A: Immediate Threat to Public Safety and/or Public Health and the Environment **–** Generally, the City LAFD CUPA Section investigates spills of hazardous materials and enforces the cases through either an administrative penalty or through the Office of the City Attorney Environmental Justice Unit. The City LAFD and LAPD are first responders to any hazardous materials or hazardous waste releases that qualify as an immediate threat to public safety or the environment. As stated above, such a scenario that would constitute an immediate threat to public safety or the environment is not anticipated and would be rare, since applicable law and standard design features would address construction-related releases, and any construction-related releases are expected to be small and localized.

Regardless, State law requires spills of hazardous materials from construction-related activities as stated above to be reported to the City LAFD, CUPA, and OES. These first responders are trained to ensure public safety and the proper management of hazardous materials, hazardous waste, and emergency response within the City. In addition, the City's LASAN is an assisting agency, if there is an imminent threat to the watershed or surface water quality from sidewalks that might drain to street, from curb-side to curb side and storm drain runoff ways. Depending on the type of release, partnering responders may also include the County LAFD, U.S. Coast Guard, State Office of Emergency Services, National Response Center, Highway Patrol, etc.). The Deputy Health Officers of the County LAFD, Health and Hazardous Materials Division respond to incidents within the City and support the City LAFD, as a partnering CUPA agency, to fully evaluate imminent threats to public health, including those originating from biological and chemical releases, such as hazardous materials spills, release and abandonment. The notification protocol is detailed in Appendix E1, with a summary of associated scenarios, regulations, and participating response agencies.

Scenario B: Non-Immediate Threat and No Equipment Involved - This scenario can result in several different outcomes. The release case can be referred from the City LAFD, as CUPA lead, to any of the below agencies or directly reported to the below agencies from the responsible party.

- County LAFD, Health and Hazardous Materials Division, Site Mitigation Unit – A regulated business owner, public party or private party that would be responsible for release and/or cleanup, could request assistance. They are typically low to medium risk release, and the agreement for oversight of cleanup is voluntary and reimbursed to the County LAFD. In addition, the County LAFD is tasked with assessment and enforcement for Tier 2 hazardous waste facilities. Tier 2 infers Conditional Authorization for onsite treatment of most hazardous waste streams with only one hazardous characteristic and quantities.
- Los Angeles County Department of Public Health – Assists with pathogenic public health risks, communicable diseases, and/or terrorist public health risks such as anthrax

threats, etc. Other related long-term public health inspection and control programs are also operated by the County within the City.

- LARWQCB, Site Cleanup Unit – If no equipment leaks are associated with the release or the source is unknown under this scenario and there is a perceived threat to surface water or groundwater quality, the case may be referred to this unit of the LARWQCB for cleanup oversite.
- DTSC and U.S. EPA – See Scenario B.

Conclusion

The release, routine transport and disposal of hazardous materials from construction activities from the Project would involve small amounts and be addressed through applicable law. Releases from existing groundwater and soil contamination is not expected, but would be addressed through standard City BOE conditions and applicable law that address the proper handling and disposal of contaminated material. As a result, the Project would not create a significant hazard through the routine transport, use, or disposal of hazardous materials; therefore, there is a **less than significant impact, no further mitigation is required.**

Therefore, the project does not add any impacts.

HAZ-3: *Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and as a result, would it create a significant hazard to the public or the environment?*

There will be no impact.

According to the CalGEM/DOGGR well finder website, the *McDonald 2* well, API 03713842, the former oil production well on site, as shown on *Figure 8 - Amended Proposed Excavation Area,* is deemed a Recognized Environmental Condition (REC) (Ninyo & Moore, 2016) CalGEM requires the re-abandonment of the oil well.

The *McDonald 2* well has a total depth of 5,860 feet below ground surface (bgs) and was abandoned in 1932. A permit to re-abandon the well was issued in 2002 and renewed annually from 2004 to 2008. According to CalGEM/DOGGR, the well has not been re-abandoned, and the permit to re-abandon was cancelled.

This project will re-abandon the oil well, which includes the removal and remediation of the lead and TPH-d-impacted residual soil. All necessary Project design Standards and Specifications will be incorporated into project's construction drawings.

The volume of impacted soil to be removed is estimated to be approximately 160-cubic yards or 215 tons. The total of impacted soil plus contingency to be removed is approximately 260-cubic yards or 350 tons. The Project construction would add up to 35 more truck trips over an approximately six-month period. Mitigation measures that have been previously approved in the Draft EIR apply to these additional haul trips. This increase will not introduce any new transportation impacts. Total volume and weight of excavated soil is summarized on *Table 1 - Excavation Areas and Total Soil Removal*.

Conclusion
The Project would not create a significant hazard to the public or the environment because the oil well will be abandoned, and the contaminated soil will be removed and remediated, then replaced with new soil. The site will no longer be a REC.

Releases from existing groundwater and soil contamination is not expected, but would be addressed through standard City BOE conditions and applicable laws that address the proper handling and disposal of contaminated material. Also, the Project's additional haul truck trips, with the use and implementation of the previously approved Draft EIR Mitigation Measures, will not create new transportation impacts. As a result, the Project would not create a significant hazard through the routine transport, use, or disposal of hazardous materials; therefore there is **no impact.**

HAZ-4: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

There will be no impact.

Project construction activity could occur near emergency service facilities (e.g., fire stations and hospital) and along roadways used by emergency service providers. Per standard procedures, adequate emergency access would be maintained during lane closures along secondary highways and collector streets. Where feasible, for construction staging, traffic control would be employed to reroute pedestrians around the sidewalk construction area and signage would be posted to direct pedestrians and drivers. Construction managers and personnel would follow Work Area Traffic Control Handbook (WATCH) and/or Manual on Uniform Traffic Control Devices (MUTCD) guidelines to ensure the safety of vehicle, pedestrian, and bicycle traffic during re-routing. Compliance with such existing standard industry practices such as traffic control and signage, and requirements such as with those in the WATCH manual and "most recent of edition of the SSPWC Greenbook adopted by the Bureau of Engineering" would provide adequate emergency access. Access roads would be available for emergency personnel as required in the most recent copy of the BOE Brownbook; and traffic control, signage, and coordination with Los Angeles Department of Transportation (as appropriate) would occur. (City of Los Angeles, 2012)

Furthermore, in the unforeseen event of any hazardous material emergencies, the California Hazardous Material Incident Contingency Plan (HMICP), developed by the State's Office of Emergency Services (OES), includes several different scenarios of emergency responses to reduce confusion, improve safety, organize and coordinate actions in case of major unforeseen circumstances. The HMICP would be utilized by local governments to clarify agency roles and relationships concerning hazardous material emergencies.

Conclusion

As a result, the Project would not hinder or impair an adopted emergency response or evacuation plan or route because of the standard procedures and compliance with standard industry practices and there is **no impact.**

Operational Impacts

There will be no operational impacts. The proposed uses of a parking lot, open space, and coastal access does not add any operational impacts to hazards and hazardous materials for the Project; therefore, there is **no impact.**

Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to hazards and hazardous materials.

6.3 Cumulative Impacts

The VAPP project, either individually or cumulatively, will not result in significant impacts to biological resources in the newly designated Essential Fish Habitat in the Grand Canal and Ballona Lagoon. No significant effects would occur on biological resources and no other known projects in the vicinity of the Proposed Project that, when considered together, would result in significant adverse impacts to the wildlife and habitats in the vicinity of the Project Site. Therefore, cumulative impacts related to biological resources would be: **less than significant**.

As identified in the Draft EIR, cumulative noise and vibration impacts are significant and unavoidable. There are related projects proposed in relatively close proximity to the Project Site (within 0 to 0.5 miles). The following sections discuss the cumulative impacts that could occur if construction of these related projects occurs simultaneously with the 128 Hurricane St. lot Project. There are no additional construction or operation cumulative impacts from the Draft EIR.

Related projects, including some portions of the projects in Marina del Rey could still be occurring and overlap with the VAPP 128 Hurricane St. lot construction period. This would bring additional construction activity into the immediate vicinity of the Project Site.

Because the 128 Hurricane St. lot project construction noise and vibration impacts are predicted to have no additional impact to the VAPP Project, and no new mitigation measures required, the cumulative impact would also have no impact beyond what was already analyzed as **significant and unavoidable** in the Draft EIR.

Vibration from construction activities is assessed based on distinct single events using the instantaneous vibration (PPV) from a single piece of equipment. Therefore, the vibration levels experienced at any specific time at a given receptor are typically dominated by a single piece of construction equipment, and the cumulative increase due to additional pieces of equipment is minimal.

Because the 128 Hurricane St. lot project construction vibration impacts are predicted to have no additional impact to the VAPP Project, with no new mitigation measures required, the cumulative impact would also have no impact beyond what was already analyzed as **significant and unavoidable** in the Draft EIR.

7.0 Summary of Environmental Effects

Biology

Regarding the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to biological resources. The project would not result in the loss of individual resources or the permanent reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, or candidate species, or a Species of Special Concern or federally listed critical habitat. Also, the project would not result in the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community. There will be no interference with essential fish habitat such that normal species behaviors are disturbed from the introduction of construction noise and vibration to a degree that may diminish the chances for long-term survival of a sensitive species; therefore; **less than significant impacts** would occur during construction and no mitigation is required. Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to biological resources.

Hazards and Hazardous Materials

Regarding the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to hazards and hazardous materials. The Project would not create new significant hazard to the public or the environment because the oil well will be abandoned, and the contaminated soil will be removed and remediated, then replaced with new soil. Releases from existing groundwater and soil contamination is not expected, but would be addressed through standard City BOE conditions and applicable laws and regulations that address the proper handling and disposal of contaminated material. Upon remediation, the site will no longer be a REC. The Project would not create a significant hazard through the routine transport, use, or disposal of hazardous materials. Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to hazards and hazardous materials.

Cumulative

Because the 128 Hurricane St. lot project construction noise and vibration impacts are predicted to have no additional impact to the VAPP Project, with no new mitigation measures required, the cumulative impact would also have no impact beyond what was already analyzed as **significant and unavoidable** in the Draft EIR. Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to cumulative impacts.

8.0 Determination

The analysis of the Project modifications supports the determination that the proposed changes are relatively minor and would not involve new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects which would call

for, as provided in Section 15162(b) of the State CEQA Guidelines, the preparation of a Subsequent EIR or Negative Declaration. Therefore, the City has elected to prepare this variation of an Addendum to the approved EIR as the appropriate form of documentation to meet the statutory requirements of CEQA.

This Addendum to the EIR environmental analysis evaluates the potential impacts of the proposed modifications in relation to the current environmental conditions, and in consideration of the environmental findings for the Project. The analysis contained herein demonstrates that all of the impact issues previously examined in the approved EIR would remain unchanged with the proposed modifications.

9.0 Appendices

A. VAPP Phase II ESA

B. VAPP 128 Hurricane St. - Phase II ESA Amendment with Removal Action Workplan

C. Essential Fish Habitat Assessment

D. Habitat Management Mitigation Plan (HMMP)

E. VAPP 128 Hurricane St. Voluntary Oversight Application

F. Venice Wetlands Jurisdictional Delineation Report

G. Sea Level Rise Report

F. VAPP 128 Hurricane St. Site Plan

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Phase II Environmental Site Assessment

128 Hurricane Street
Los Angeles, California

Prepared for:
City of Los Angeles
Bureau of Engineering
Department of Public Works

Project number: 60553849

October 2, 2018

Prepared for:

City of Los Angeles Bureau of Engineering
1149 S. Broadway St.
Los Angeles, CA 90015

Prepared by:

Kaleena Johnson, MPH
Senior Scientist
T: 213-996-2295
E: kaleena.johnson@aecom.com

Alexis M. Bahou, PE
Principal Engineer
T: 213-996-2448
E: alexis.bahou@aecom.com

AECOM
One California Plaza
300 South Grand Avenue
Los Angeles, CA 90071

T: +1 (213) 593 8100
F: +1 (213) 593 8178
aecom.com

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Table of Contents

1. INTRODUCTION AND BACKGROUND 1
1.1 Investigation Objectives 1
1.2 Site Location and Description 1
1.3 Geological and Hydrogeological Summary 2
1.4 Summary of Previous Investigations 2
2. INVESTIGATION ACTIVITIES 4
2.1 Prefield Activities 4
2.2 Summary of Geophysical Investigation 5
2.3 Soil and Groundwater Sampling Activities 5
2.3.1 Drilling Methods 5
2.3.2 Soil Lithology Logging Procedures 6
2.3.3 Soil Sample Collection and Analysis 6
2.3.4 Equipment Decontamination 7
2.4 Test Pit Sampling Activities 7
2.5 Groundwater Sampling Activities 7
2.5.1 Groundwater Sample Collection 8
2.5.2 Groundwater Sample Analysis 8
2.6 Methane Sampling Activities 8
2.6.1 Soil Gas Probe Construction 8
2.6.2 Soil Gas Sample Collection and Analysis 9
2.7 Waste Disposal 9
3. INVESTIGATION RESULTS 10
3.1 Subsurface Observations 10
3.2 Soil Analysis 10
3.3 Groundwater Analysis 11
3.3.1 General Minerals 11
3.3.2 Groundwater Chemical Results 12
3.4 Soil Gas Analysis 13
4. ENGINEERING COST ESTIMATE 14
5. CONCLUSIONS AND RECOMMENDATIONS 17
6. REFERENCES 19

Figures

Figure 1 – Site Location Map

Figure 2 – Site Features

Figure 3 – Sample Locations

Figure 4A – TPH-d in Soil (0 – 2 feet bgs)

Figure 4B – TPH-d in Soil (2 – 4 feet bgs)

Figure 4C – TPH-d in Soil (>4 feet bgs)

Figure 5A – Lead in Soil (0 – 2 feet bgs)

Figure 5B – Lead in Soil (2 – 5 feet bgs)

Figure 5C – Lead in Soil (>5 feet bgs)

Figure 6 – Proposed Excavation Area

Tables

Table 1 – Investigation Summary

Table 2 – Soil Analytical Results

Table 3 – Groundwater Analytical Results

Appendices

Appendix A – Spectrum Geophysical Report

Appendix B – Soil Borings Permits

Appendix C – Soil Boring Logs

Appendix D – Waste Manifest Documentation

Appendix E – Soil and Groundwater Analytical Laboratory Reports

Appendix F – Soil Gas Analytical Laboratory Reports and LADBS Form 1

1. INTRODUCTION AND BACKGROUND

This Phase II environmental site assessment (ESA) report, prepared by AECOM, provides a summary of the investigation that was conducted at the property located at 128 Hurricane Street in Los Angeles, California (the Site; see **Figure 1**). The investigation consisted of sampling and testing soil and groundwater for various potential chemical impacts. Soil gas samples were also collected and tested for methane due to the Site being categorized in the methane zone by the City of Los Angeles Department of Building and Safety (LADBS). All investigation activities were conducted in accordance with local, state, and federal regulatory requirements.

This section presents the objective of the investigation and summarizes the Site background information, including previous environmental investigations and chemicals of concern detected at the Site.

1.1 Investigation Objectives

The objective of this Phase II ESA was to evaluate the subsurface for the presence of hazardous materials associated with former oil production activities. This information will be used to support the City of Los Angeles Bureau of Engineering (City of LA BOE) with the proposed purchase and redevelopment of the subject property.

1.2 Site Location and Description

The Site is approximately 3,400 square feet and is assigned the Los Angeles County Assessor's Parcel Number (APN) 422-5010-016. The Site is bordered to the north and west by residences; to the east by the City of Los Angeles Department of Public Works Venice Pumping Plant, and to the south by a walking trail and Ballona Lagoon Grand Canal. The site is currently a vacant, dirt lot, and was recently used for storage of vehicles and miscellaneous items during the construction of various public construction projects (Ninyo&Moore, 2016). Final plans for future development are not currently available; however, a paved parking lot with hardscape is proposed.

According to the State of California, Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) well finder website, a historical oil production well is present on the Site (McDonald 2, API 03713842), with a total depth of 5,860 feet below ground surface (bgs). The location of the former oil production well was discovered during the geophysical investigation and is shown on **Figure 2**. Reportedly, the "McDonald 2" well was abandoned in 1932. A permit to re-abandon the well was issued in 2002 and renewed annually from 2004 to 2008. According to DOGGR, the well has not been re-abandoned, and the permit to re-abandon was cancelled. The Phase I ESA indicated that DOGGR will require that the well be re-abandoned to present-day standards if the Site is to be used for purposes other than a laydown area (Ninyo&Moore, 2016).

The Site has not been developed with structures from at least 1928 through the time of this report. The area surrounding the Site was developed with oil production facilities from at least 1938 through 1952, and with residential properties from at least 1963 through the

time of this report. The Venice Pumping Plant appeared adjacent to the east of the site by at least 1963 (Ninyo&Moore, 2016). According to a survey of the Site provided by the property owner, two electrical cabinets/concrete vaults were present in the southern portion of the Site, which were later removed by the City of Los Angeles. The purpose of the electrical cabinets/concrete vaults was not stated. The approximate locations of the electrical cabinets/concrete vaults are shown on **Figure 2**.

The site is located in a Methane Zone, and is within the Playa del Rey Oilfield. The nearby area has had oil pipelines, storage tanks and vaults. According to the DOGGR well finder website, numerous other historical oil production wells are located in the Site vicinity.

1.3 Geological and Hydrogeological Summary

The Site is located at the northwest edge of the Peninsular Ranges Geomorphic Province of California. Landmarks in the vicinity of the Site include the Los Angeles Basin to the east, the Santa Monica Bay to the southwest, and the Santa Monica Mountains to the northwest.

The upper 2 feet of soil beneath the Site appears to be fill material consisting of light brown silt and sand. Underlying the fill material, soil is predominantly brown to gray fine sand and silty sand from the surface to maximum depth explored, which was 20 feet bgs. A sandy clay layer was encountered in some borings between 3.5 and 4 feet bgs. Concrete debris was also encountered in some borings.

The Ballona Lagoon lies south and adjacent to the site. The Pacific Ocean is approximately 0.22 miles south and west of the Site. The Site is within the Santa Monica Sub-basin of the Coastal Plain of Los Angeles Groundwater Basin. Groundwater was encountered at approximately 5 feet bgs during the Phase II ESA. Reportedly, groundwater is expected to flow to the southwest, toward the Pacific Ocean (McAlister GeoScience, 2016).

1.4 Summary of Previous Investigations

Reportedly, a geotechnical investigation was conducted by the City of LA BOE, Geotechnical Services Division (GSD), in 2006; the results of the investigation were documented in a report dated July 24, 2006. During the geotechnical investigation, two hand auger borings (B-1 and B-2) were advanced within the vicinity of the onsite electrical cabinets/concrete vaults to evaluate the condition of nearby soils. The borings encountered fill consisting of brown silty sand with some fragments of broken glass up to the maximum depth explored of 2 feet bgs. Soil samples were analyzed for petroleum hydrocarbons, polychlorinated biphenyls (PCBs), volatile organic compounds (VOCs), and Title 22 Metals. The sample from B-1 was found to contain concentrations of petroleum hydrocarbons at 6,500 parts per million (ppm), and the sample from B-2 was found to contain concentrations of petroleum hydrocarbons at 100 ppm (Ninyo&Moore, 2016). Records indicating that removal of the impacted soil were not found.

In 2016, Ninyo & Moore of Irvine, California, conducted a Phase I ESA on behalf of the City of LA BOE. Ninyo & Moore reported the following Recognized Environmental Conditions (RECs) in connection with the property:

- Abandoned former oil production well (McDonald 2, API 03713842) on the Site.

- Subject property is located within a methane zone.
- The results of geotechnical investigation in 2006 indicated high concentrations of petroleum hydrocarbons in soil on site.
- The results of the vapor encroachment screening (VES) indicated that a possible vapor encroachment concern (VEC) currently exists beneath the site.

Ninyo & Moore recommended a limited subsurface investigation to evaluate the RECs and VEC.

2. INVESTIGATION ACTIVITIES

This section presents a summary of the activities conducted during the Phase II ESA at the Site, including pre-field activities, drilling and sampling activities, soil gas probe construction, sample analysis, and management of investigation derived waste disposal. The soil boring locations are shown on **Figure 3**. A summary of the sample depths and analytical methods used during the Phase II ESA is provided in **Table 1**.

The investigation occurred in the following four phases.

- The initial investigation conducted on June 20, 2018 consisted of advancing and sampling six shallow soil borings (SB-1 through SB-6), setting a temporary well in soil boring SB-4 for groundwater sampling, and installing soil gas probes in soil borings SB-1 and SB-3 for methane testing.
- Test Pits 1 and 2 were excavated and sampled on June 21, 2018.
- Methane samples were collected and tested on June 26 and 27, 2018, in accordance with LADBS Site Testing Standards for Methane (LADBS standards).
- A step-out investigation was conducted on June 28, 2018, which included drilling and sampling of 13 soil borings SO-1 through SO-13 to further delineate impacted areas of the Site where initial concentrations of total petroleum hydrocarbons (TPH) and lead exceeded regulatory screening levels. Temporary wells were set in three soil borings (SO-3, SO-8, and SO-13) to further evaluate TPH impacts in groundwater.

All soil borings were hand augered to 5 feet bgs or to refusal. Soil gas probes were set approximately 12 inches above the water table. The temporary groundwater wells were set at approximately 10 feet bgs.

2.1 Prefield Activities

Prior to conducting the drilling and sampling field activities, the following pre-field activities were conducted:

- A Site-specific Health & Safety Plan (HASP) was prepared to cover field staff health and safety associated with the field activities. All field personnel were required to implement the procedures presented in the HASP while conducting onsite field work.
- Underground Service Alert (USA) of Southern California was notified of the intent to conduct subsurface investigations at least 48 hours in advance of drilling.
- A geophysical survey of the Site was conducted by Spectrum Geophysics (Spectrum) of Chatsworth, California, on June 13, 2018, to screen the entire Site for utilities and other metallic and non-metallic buried objects (oil wells, conduits, utilities, etc.). Geophysical techniques used during this investigation included various electromagnetic (EM) methods, magnetic methods, and ground penetrating radar (GPR). Before conducting the survey, a 5-foot by 5-foot survey grid was laid over the entire Site and marked with surveyors paint. The field equipment and procedures used to perform the survey and the interpretation of the results are described in detail in the Spectrum report included in **Appendix A**.

- Soil borings permits were obtained from the County of Los Angeles Environmental Health Division for both the initial and step-out phases of the Phase II ESA. Copies of the permits are presented in **Appendix B**.

2.2 Summary of Geophysical Investigation

Three primary subsurface anomalies were identified during the geophysical investigation, including a magnetic peak at one location, buried metal at six locations, and conduit at two locations, that required further investigation. The magnetic peak is believed to be location of the former oil production well. Further information of each anomaly is presented in **Appendix A**. The anomalies are also shown on **Figure 2**.

2.3 Soil and Groundwater Sampling Activities

A total of 19 borings were advanced at the Site during the Phase II ESA. The initial six soil borings (SB-1 through SB-6) primarily targeted the anomalies identified during the geophysical investigation. Thirteen step out soil borings (SO-1 through SO-13) were later advanced to further delineate soil and groundwater impacts identified from the initial investigation. The locations of the soil borings are presented on **Figure 3**. Soil sampling activities conducted during the Phase II ESA are described below.

2.3.1 Drilling Methods

The following drilling methods were utilized during the investigation:

Hand-Auger/Slide Hammer Sampler: The hand-auger method utilized for this investigation included a 3-inch diameter sand bucket attached to 4-foot long extensions with a T-bar or handle which is turned by hand. As the depth of the boring increased, additional hand auger extensions were attached, as applicable. For collection of soil samples, the auger was removed from the borehole and samples were placed into new re-sealable plastic bags and labeled. Following decontamination of the sampling equipment, the hand auger bucket was lowered back down the borehole and advanced via rotation to the target sampling depth. Soil samples were homogenized in the bag and subsampled into laboratory provided glass jars and labeled. Samples designated for VOCs analysis were collected using the downhole slide hammer, which collects a relatively undisturbed sample within a stainless steel sleeve. Soil samples tested for VOC analysis were subcored and collected using Terracore sampling kits provided by the analytical laboratory in accordance with United States Environmental Protection Agency (USEPA) Method 5035. Borings SB-1 through SB-6 and SO-1 through SO-13 were advanced and sampled using a hand auger/slide hammer sampler to depths up to 5 feet bgs. Some borings were then advanced to deeper depths using a direct push drilling rig or a hollow stem auger drilling rig, as described below.

Direct Push Drilling: A Geoprobe 6600 truck mounted direct push drilling rig was used to advance the dual tube sampling and core barrels. The dual tube system included a core barrel with a 1 ¾-inch diameter internal acetate sleeves (or similar). With the dual tube Geoprobe system, the inner rods and acetate sleeves are removed from the core barrel at the bottom of the borehole. Following retrieval, the section of the sleeve selected for laboratory analysis was cut away from the rest of the sleeve, and the exposed soil at each end was covered with Teflon sheeting and fitted with plastic end caps. Step-out borings

SO-3, SO-8, and SO-13 were advanced and sampled using a direct push drilling rig at depths between 5 feet bgs and 10 feet bgs.

Hollow Stem Auger Drilling: During hollow stem auger drilling activities, soil samples were collected at the designated intervals using a split spoon sampler. Upon reaching the desired sample depth, the modified split soon sampler was driven 18 inches into the center of the drill auger flight using a 140-pound hammer over a 30-inch drop. Hammer blow counts were recorded every six inches over the 18-inch sampling interval; blow counts give an indication of the density of the formation. Soil samples were collected using 2.5-inch diameter, 6-inch long stainless steel rings fitted inside the split-spoon sampler. Following retrieval, a sleeve was selected for laboratory analysis and the exposed soil at each end was covered with Teflon sheeting and fitted with plastic end caps. Soil samples tested for VOC analysis were subcored and collected using Terracore sampling kits provided by the analytical laboratory in accordance with USEPA Method 5035. Boring SB-4 was advanced and sampled using a hollow stem auger drilling rig at depths between 5 feet bgs and 20 feet bgs.

Worker breathing zones were routinely monitored with a photoionization detector (PID) and a four-gas meter as a health and safety measure.

2.3.2 Soil Lithology Logging Procedures

A qualified field geologist logged the lithologic descriptions of soil borings and samples in general accordance with the Unified Soil Classification System (USCS). Soil boring logs for borings SB-1 through SB-6 are included in **Appendix C**. The following sampling information was recorded on soil boring logs: date and time; sample depth, soil type, lithology description, color (using the Munsell soil color chart), and moisture content. Other relevant visible evidence of soil contamination or olfactory observations (i.e., staining, odor) was also documented on the boring logs.

Soil samples were field screened for organic compounds using a PID. Headspace analyses of the soils encountered were conducted by placing soil collected from each sampling depth into a re-sealable plastic bag. Soil within the sealed plastic bag was then shaken in the sealed bag to volatilize any VOCs that may be present. The probe of the PID was then inserted into the bag to measure detectable concentrations of total organic vapors. The PID was calibrated using a 100 parts per million (ppm) isobutylene gas standard at the beginning of each workday.

2.3.3 Soil Sample Collection and Analysis

A total of 63 primary soil samples were collected from the six initial and 13 step out soil borings. Soil samples were generally collected from each boring at depths of 0.5, 1, 2.5, 3.5, 5, 10, and 15 feet bgs, where applicable (see **Table 1**). Following collection, the samples were labeled and temporarily stored within an ice filled cooler prior to delivery to the analytical laboratory under chain-of-custody procedures. Duplicate samples were generally collected at a frequency of 10 percent to ensure the reliability and comparability of all data generated during the investigation.

TPH in the gasoline range (TPH-g), TPH in the diesel range (TPH-d), and TPH in the motor oil range (TPH-o) using USEPA Method 8015M was the most requested analysis (tested on 65 primary and six duplicate samples) in an effort to identify areas of elevated

TPH concentrations identified in the 2006 investigation and/or releases from the former oil production well or other historical site activities. Title 22 Metals using USEPA Method 6010B was the second most requested analysis, tested on 61 primary and four duplicate samples, followed by VOCs using USEPA Method 8260B, tested on 13 primary and two duplicate samples. Next, four primary samples were analyzed for organochlorine pesticides (OCPs) using USEPA Method 8081A. Finally, two primary samples were analyzed for semi-volatile organic compounds (SVOCs) using USEPA Method 8270C, herbicides using USEPA Method 8151A, and PCBs using USEPA Method 8082. Samples and analytical methods were selected based on Site history and expected chemical uses.

Laboratory analysis was completed by American Analytics, Inc. of Chatsworth, California, a state-certified fixed analytical laboratory (American Analytics). See **Table 1** for a summary of the analytical program.

2.3.4 Equipment Decontamination

Sampling equipment was washed in a non-phosphate cleaning solution and rinsed with tap water and final rinsed with deionized water. The investigation derived waste (IDW) rinseate generated during decontamination activities was placed in a Department of Transportation rated 55-gallon drum.

2.4 Test Pit Sampling Activities

Two test pits with the approximate dimensions of 3 feet × 3 feet × 3 feet were excavated using a mini-excavator on-Site. Test Pit 1 was located on the northern portion of the Site, south of the former oil well. Test Pit 1 was initially placed closer to the former oil well, but a flat, concrete pad was encountered at approximately 2 feet bgs. The test pit was relocated approximately 3 feet south, toward boring SB-4. The target depth of 3 feet bgs was reached at this location. Test Pit 2 was located on the southern portion of the Site, adjacent to the former electrical boxes/concrete vaults. The locations of the test pits are shown on **Figure 3**.

Excavated soil was placed next to each excavation on Visqueen or similar plastic barrier. A PID and four-gas meter were deployed during the excavation to monitor the breathing zone for organic vapor, methane, and hydrogen sulfide.

Soil from each test pit was logged for soil type, lithology description, color, and moisture content. Other relevant visible evidence of soil contamination or olfactory observations (i.e., staining, odor) was also documented in field notes. Based on field observations, two soil samples were collected from each test pit for analysis of TPH-g, TPH-d, and TPH-o by USEPA Method 8015M and Title 22 Metals by USEPA Method 6010B.

Following sample collection, the excavated soil was returned to a rough backfill at each excavation location.

2.5 Groundwater Sampling Activities

Grab groundwater samples were collected to evaluate the presence of contaminants in groundwater associated with former oil production activities at the Site. Grab groundwater samples were collected in borings shown on **Figure 3**. Sample locations were selected to assess conditions downgradient of the former oil production well (boring SB-4), beneath

areas with high TPH detected in soil (boring SO-8), and general site conditions (borings SO-3 and SO-13).

2.5.1 Groundwater Sample Collection

Boring SB-4 was advanced to 20 feet bgs using a combination of hand auger and hollow stem auger drilling equipment. A temporary PVC well with slotted screen covered with a filter sock was placed between 5 and 10 feet bgs. Solid casing was extended to approximately 1 foot above ground surface.

Borings SO-3, SO-8, and SO-13 were advanced to 10 feet bgs using a combination of hand auger and direct push drilling equipment. The Geoprobe milled slotted rod was placed inside the boring to a depth of 10 feet bgs, with the slotted screen present between 5 and 10 feet bgs.

Groundwater was collected from all temporary wells using standard grab techniques such as a bailer (boring SB-4) or tubing with a check valve attached (borings SO-3, SO-8, and SO-13). Sampled groundwater was transferred to sampling containers for analysis. The sampling containers were then labeled and temporarily stored within an ice filled cooler prior to delivery to the analytical laboratory under chain-of-custody procedures.

2.5.2 Groundwater Sample Analysis

Groundwater samples were selectively analyzed for general minerals using USEPA Method 300.0 and Standard Methods 2510B, 2240C, 4500H+, 2520, and 2540C; VOCs by USEPA Method 8260B; TPH-g, TPH-d, and TPH-o by USEPA Method 8015M; and Title 22 Metals by USEPA Method 6010B. Laboratory analysis was completed by American Analytics. See **Table 1** for a summary of the analytical program.

2.6 Methane Sampling Activities

The Site was previously identified as being in a methane zone. Therefore, a methane assessment was included in the Phase II ESA to evaluate potential methane concentrations for the future design and installation of a methane mitigation system. Methane testing was conducted at the site on June 26 and 27, 2018, in general accordance with LADBS standards for Sites where groundwater is encountered at 5 feet bgs.

2.6.1 Soil Gas Probe Construction

Groundwater was encountered at or above 5 feet bgs; therefore, the shallow soil gas test was completed in lieu of the gas probe set test, as specified by LADBS. After collecting the appropriate soil samples, soil gas probes were constructed in borings SB-1 and SB-3 at approximately 3.5 and 4 feet bgs, respectively, which are at least 12 inches above the groundwater table, in accordance with LADBS standards.

Each probe consisted of ⅜-inch diameter by 6-inch long stainless-steel mesh screen attached to ¼-inch diameter Teflon tubing which was inserted into the borehole and the annulus was backfilled with #3 Monterey sand approximately six inches above and below the mesh screen (a total sand pack thickness of 1 to 1.5 feet). Approximately 1 foot of dry granular bentonite was added to the top of the sand pack to prevent water infiltration

during seal construction. Granular bentonite was hydrated above the dry granular bentonite seal to the ground surface elevation. Sample valves were installed at the ends of the tubing, which were then allowed to equilibrate for at least 48 hours.

2.6.2 Soil Gas Sample Collection and Analysis

Soil gas samples were collected in accordance with LADBS standards. Two sequential sampling events were conducted, a minimum of 24 hours apart. Prior to sample collection, a static pressure reading from the probes was obtained and recorded. Atmospheric pressure was also recorded to verify that sample collection was not occurring during a pre-frontal weather condition. Soil gas was withdrawn from the soil gas wells using a vacuum pump and Teflon tubing. Soil gas samples were then collected into a Tedlar bag, which was labeled, and submitted to American Analytics under chain-of-custody procedures.

Soil vapor samples were analyzed for fixed gases, including methane, oxygen, and carbon dioxide, by ASTM Method D1946M.

2.7 Waste Disposal

Waste generated during sampling and drilling activities was collected, labeled, and stored in 55-gallon drums onsite. Two drums of waste soil were generated from drilling activities, and one drum of waste water was generated during decontamination activities. A composite waste sample was collected and analyzed for TPH by USEPA Method 8015M, Title 22 Metals by USEPA Method 6010B, and VOCs by USEPA Method 8260B. All waste was classified as non-hazardous waste and transported by Belshire of Foothill Ranch, California, to Soil Safe in Adelanto, California, on July 13, 2018.

Waste manifest documentation is provided in **Appendix D**.

3. INVESTIGATION RESULTS

The following section describes the Phase II ESA results, including the observed lithology and soil, groundwater, and soil gas analytical results. Where applicable, results were compared to residential and commercial screening levels accepted in California: 1) California Department of Toxic Substances Control (DTSC) Human and Ecological Risk Office (HERO) Human Health Risk Assessment (HHRA) Note Number 3 DTSC-modified Screening Levels (DTSC SLs; June 2018); 2) USEPA Regional Screening Levels (RSLs; May 2018); and 3) San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) Environmental Screening Levels (ESLs; February 2016).

3.1 Subsurface Observations

The upper 2 feet of soil beneath the Site appears to be fill material consisting of light brown, moist, loose, silt and sand with abundant live organic material (i.e., root/rootlet mass). Underlying the fill material, soil is predominantly brown to gray fine sand and silty sand to maximum depth explored which was 20 feet bgs. Fine sand with little to no fine material dominated the soil column below the water table to a depth of approximately 16 feet bgs.

Refusal at 2.5 feet bgs was encountered during the environmental investigation at various locations in the northern portion of the site. A test pit excavation confirmed the presence of a buried feature that was solid, flat, and composed of resistant concrete. The buried concrete pad appeared to be surrounding the former oil well, and may have been used as a platform and buried in place at the time of well abandonment.

A sandy clay layer was encountered in some borings between 3.5 and 4 feet bgs. Concrete and wood debris was also encountered in some borings within the upper few feet. Hydrocarbon like odor and staining was observed in borings SB-4, SO-12, SO-9 at approximately 3.5, 3, and 2.5 feet bgs, respectively. Other observations include an odor of decay noted in soil below water table elevation, which is indicative and common for soils at intertidal depositional environments, including this Site. Groundwater was encountered between 4 and 6 feet bgs during the Phase II ESA.

Boring logs from borings SB-1 through SB-6 are provided in **Appendix B**.

3.2 Soil Analysis

The analytical results for the detected compounds in soil are summarized in **Table 2**. Applicable screening levels are also presented for comparison purposes. Copies of the laboratory analytical reports and chains of custody for soil samples are presented in **Appendix E**. A summary of the analytical results is provided below.

- TPH compounds are present in soil at varying concentrations, and predominantly consist of weathered diesel and oil fractions in the western portion of the site between 2.5 and 3.5 feet bgs. TPH-g was detected in two of the 65 primary samples submitted for TPH analysis. None of the detections was above the residential ESL for TPH-g of 740 milligrams per kilogram (mg/kg). TPH-d was detected in 23 of the 65 samples submitted for TPH analysis. Eight of the samples exceeded the residential ESL for TPH-d of 230 mg/kg; four samples exceeded the commercial ESL for TPH-d of 1,100 mg/kg. All exceedances occurred in samples collected from either 2.5 feet bgs or 3.5

feet bgs. TPH-o was detected in 54 of the 65 samples submitted for TPH analysis; none of the detections was above the residential ESL for TPH-o of 11,000 mg/kg.

Based on the screening level comparison, **Figures 4A through 4C** show the spatial distribution of TPH-d concentrations in soil at depths between 0 and 2 feet bgs, 2 and 4 feet bgs, and deeper than 4 feet bgs, respectively. The maximum TPH concentrations are reported between 2 and 4 feet bgs (see **Figure 4B**). Concentrations decreased with depth, and in many cases are not detected below 4 feet bgs (see **Figure 4C**).

- Arsenic, barium, chromium, cobalt copper, lead, mercury, nickel, vanadium and zinc were detected in the 61 primary samples submitted for metals analysis. None exceeded their respective screening levels and/or accepted background levels, except for lead. Three samples contained lead concentrations exceeding the residential screening level of 80 mg/kg. All three samples were collected between 2.5 and 5 feet bgs and were limited to the western portion of the Site. Deeper soil samples collected from four locations at 10 feet bgs did not contain lead above the reporting limit (see **Table 2**). None of the soil samples contained lead exceeding the commercial screening level of 320 mg/kg. Reported lead detections in soil are shown on **Figures 5A though 5C** at depths between 0 and 2 feet bgs, 2 and 5 feet bgs, and deeper than 5 feet bgs, respectively. Lead impacts appear to be limited in extent, both laterally and vertically.
- Acetone and carbon disulfide were the only VOCs detected in the 13 primary samples submitted for VOCs analysis. Acetone was detected only once at a trace concentration of 0.056 mg/kg at SB-4-3.5. Carbon disulfide was detected three times at trace concentrations ranging from 0.005 mg/kg to 0.01 mg/kg with the maximum concentration reported in sample SB-6-1. Neither acetone nor carbon disulfide were detected at levels exceeding either of their respective residential and commercial screening levels.
- Chlordane, dieldrin, endosulfan II, alpha-chlordane, 4,4-DDD, 4,4-DDE, and 4,4-DDT were detected in the four primary samples submitted for pesticide analysis, indicating the former use of pesticide chemicals at the Site. All samples were collected at the surface (i.e., depth of 0.5 feet bgs) in borings generally spaced evenly throughout the Site. None of the detected pesticide compounds exceeded their respective screening levels for residential or commercial soil.
- Two surficial soil samples (i.e., depth of 0.5 feet bgs) were submitted for herbicide analysis. No compounds were detected at or above laboratory reporting limits.
- Two surficial soil samples (i.e., depth of 0.5 feet bgs) were submitted for PCB analysis. No compounds were detected at or above laboratory reporting limits.

3.3 Groundwater Analysis

The analytical results for the detected compounds in groundwater are summarized in **Table 3**. Applicable screening levels are also presented for comparison purposes. Copies of the laboratory analytical reports and chains of custody for groundwater samples are presented in **Appendix E**. A summary of analytical results is provided below.

3.3.1 General Minerals

Groundwater was encountered at approximately 5 feet bgs. General water quality parameters were analyzed for groundwater samples collected from borings SO-3, SO-8,

and SO-13; the results are summarized in **Table 3** and below. General minerals concentrations were compared to maximum contaminant levels (MCLs).

- Chloride ranged from 1,300 m/L to 3,800 mg/L, which exceed the MCL of 500 milligrams per liter (mg/L).
- Total dissolved solids (TDS) ranged from 3,300 mg/L to 8,600 mg/L, which exceed the MCL of 1,000 mg/L.
- Specific Conductance ranged from 5,200 micromhos per centimeter (µmhos/cm) to 14,000 µmhos/cm, which exceed the MCL of 1,600 µmhos/cm.
- Sulfate ranged from 140 mg/L to 560 mg/L, which exceed the MCL of 500 mg/L.
- pH ranged from 6.5 to 7.0.

In general, the groundwater quality at the site is poor. General chemistry constituents that exceed drinking water MCLs include chloride, sulfate, specific conductance, and TDS.

Per the State Water Resources Control Board's (SWRCB's) Resolution No. 88-63, "Sources of Drinking Water Policy," all surface and groundwaters of the state are considered to be suitable, or potentially suitable, for municipal or domestic water supply and should be so designated by the Regional Water Quality Control Board (RWQCB) with several exceptions, including waters where TDS exceeds 3,000 mg/L and it is not reasonably expected by the RWQCB to supply a public water system.

Based on the general minerals data collected at the Site, shallow groundwater at the Site would not be designated as suitable or potentially suitable for municipal or domestic water supply because TDS concentrations exceeded 3,000 mg/L in all groundwater samples analyzed. The presence of salinity in groundwater samples indicates the Site may be brackish and impacted from saltwater intrusion. Additionally, it is highly unlikely that drinking water wells will be installed on-Site for future use because of the availability of municipal drinking water sources supplied to nearby buildings. Therefore it is not anticipated that the shallow groundwater directly beneath the Site would ever be used for drinking water.

3.3.2 Groundwater Chemical Results

Groundwater samples were analyzed for TPH, metals, and VOCs. Groundwater concentrations were compared to both MCLs, which are drinking water standards, and nondrinking water ESLs published by the SFBRWQCB. Based on the results of the general minerals analysis and the above discussion, the nondrinking water ESLs are more applicable to this Site; therefore, only comparisons to the nondrinking water ESLs are summarized here.

- TPH-d and TPH-o were detected at low concentrations in all four of the groundwater samples collected. Concentrations of TPH-d ranged from 190 micrograms per liter (µg/L) to 420 µg/L, which are well below the nondrinking water ESL of 2,500 µg/L. Concentrations of TPH-o ranged from 170 µg/L to 560 µg/L, which is also well below the nondrinking water ESL of 50,000 µg/L. In general, it appears that concentrations of TPH in shallow groundwater are relatively consistent across the Site. Because of the historical oil operations that were present in the surrounding Site vicinity, shallow groundwater may be regionally impacted.
- Arsenic, barium, total chromium, cobalt, copper, lead, molybdenum, nickel, vanadium, and zinc were detected in groundwater. All concentrations were well below their non-drinking water ESLs.

- No VOCs were detected in groundwater.

3.4 Soil Gas Analysis

Methane was not detected at or above the laboratory reporting limit of 0.10 percent in either of the two soil gas probes. Static pressure was measured at 0 inches of water in both probes at the start of both sampling events. Methane does not appear to be present in the subsurface at the Site. These results classify the Site as a Level I design level, according to LADBS. Soil gas laboratory analytical reports and LADBS Form 1 are presented in **Appendix F**.

4. ENGINEERING COST ESTIMATE

As requested by the City of Los Angeles BOE, this section presents an engineering cost estimate to support redevelopment of the property assuming a future residential land use scenario. Based on previous Site investigations, the Site is known to be impacted with petroleum hydrocarbons and lead in soil associated with historic Site operations. Site remediation will likely be required prior to the proposed redevelopment of the 3,400 square foot property. This cost estimate will be used by the City of Los Angeles BOE to develop a fair purchase price for the property.

This engineering cost estimate has been prepared based on readily available Site information, typical agency requirements and guidance documents, industry knowledge, and related project experience. Remedial technologies most likely required for this Site include leak testing of the former oil production well, soil excavation to remove the localized TPH and lead impacts, possible re-abandonment of the oil production well, and installation of a passive ventilation system below future construction.

The cost estimate described below consists of two options, which are contingent on the results of a DOGGR inspection of the former oil production well head and a leak test. If the DOGGR inspection and leak test results are determined to be inadequate, the former oil production well will need to be re-abandoned and a riser pipe will be attached to the remaining casing and vented above grade. If the inspection and leak test are determined to be adequate, then only a riser pipe will be attached to the existing casing and vented above grade. A description of each of these proposed technologies and associated costs for each option is presented below.

Remedial Option 1

This option assumes the results of the DOGGR leak test will be determined to be inadequate, and complete well re-abandonment will be required. Therefore, this option includes five primary tasks, including a DOGGR file review, coordination with DOGGR to complete a production well inspection and leak test, excavation of TPH and lead impacted soil, re-abandonment of the former production oil well and installation of a vent at grade, and installation of a passive venting system for future construction. Each task is further described below.

- DOGGR File Review: After an update to DOGGR regulations in 2016, the owners of many older oil production wells received letters in 2017 to re-abandon the wells on their properties. If the former oil production well present at the Site received a directive letter in response to the regulatory update, it would not have been discovered in the Phase I ESA, which was completed in 2016; therefore, this task includes conducting an extensive review of all DOGGR records associated with the former oil production well on the Site.
- Expose the Well and Conduct Leak Testing: Following the sale and purchase of the property, the City will be required to notify DOGGR that the property is under new ownership and being redeveloped. With any new construction, DOGGR requires submittal of a Construction Site Plan Review Packet. Next, it is likely that DOGGR will require the casing of the well be exposed and a leak test conducted, which will be overseen by DOGGR inspectors. This task includes coordination with DOGGR and on-site oversight activities.
- Excavation of TPH and Lead Impacted Soil: TPH and lead impacted soil identified during the Phase II ESA and encountered during the DOGGR leak test will be

excavated and hauled off-site for disposal as non-hazardous waste. This cost estimate assumes approximately 300 tons of impacted soil will be removed from the Site at the areas shown on **Figure 6**. Impacted soil would be excavated to 4 feet bgs in the western portion of the Site to residential standards, eliminating potential risks associated with direct exposure to soil. Site construction or excavation activities would be conducted in accordance with a soil management plan to prevent Site workers from coming in contact with chemical impacts in the soil. Following excavation, sampling activities, and collection of confirmation soil samples, clean fill would be imported from an off-site location and backfilled, compacted, and graded to meet the requirements of the City of Los Angeles. This task includes preparing a work plan, conducting soil removal, collecting soil confirmation samples, conducting air monitoring activities, profiling and disposing of impacted soil, and documenting field activities in a removal action completion report.

- Production Well Abandonment and Vent Installation: This option assumes that after the former oil production well is uncovered and inspected, DOGGR will require a complete re-abandonment. Re-abandonment requirements are well-specific and are specified in a directive letter from DOGGR. Following abandonment activities, the remaining well casing will be vented to grade surface. This task includes coordination with DOGGR and the City of LA BOE, work plan preparation, field work scheduling and oversight, and associated reporting.
- Passive Methane Ventilation System: LADBS standards state that properties less than 5,000 square feet do not require a venting system if the intended use remains a laydown area/parking lot. If the City of LA BOE proposes to develop the property with a structure in the future, the results of the methane investigation indicate that a passive ventilation system will be required, in accordance with LADBS standards. The cost for this task includes design plans, coordination with LADBS and the City of LA BOE, work plan preparation, system installation, inspections, and documentation.

The engineering cost estimates provided below includes a summary of the five remedial items including a range of +50% to -30% to account for potential design revisions, changes in site requirements based on future information, and market pricing. As shown below, the engineering cost estimate for Option 1 is $551,500 with a range of $386,100 to $827,300.

Item	Task	Engineering Cost Estimate – Remedial Option 1		
		Estimated Amount	50%	-30%
1	DOGGR File Review	$ 1,500.0	$ 2,300.0	$ 1,100.0
2	Expose Well and Conduct Leak Testing	$ 15,000.0	$ 22,500.0	$ 10,500.0
3	Shallow Soil Excavation Field Work and Reporting	$ 160,000.0	$ 240,000.0	$ 112,000.0
4	Well Abandonment and Venting	$ 350,000.0	$ 525,000.0	$ 245,000.0
5	Methane Passive Ventilation System	$ 25,000.0	$ 37,500.0	$ 17,500.0
Total Engineering Cost Estimate		***$ 551,500.0***	***$ 827,300.0***	***$ 386,100.0***

Remedial Option 2

This option assumes the results of the DOGGR leak test will be determined to be adequate and well re-abandonment will not be required. Therefore, this option includes the same five primary tasks listed above in Option 1, but only a well vent will need to be installed on the existing well casing rather than re-abandoning the well.

As shown below, the engineering cost estimate for Option 2 is $186,500 with a range of $279,800 to $130,600.

Item	Task	Engineering Cost Estimate – Remedial Option 2		
		Estimated Amount	50%	-30%
1	DOGGR File Review	$ 1,500.0	$ 2,300.0	$ 1,100.0
2	Expose Well and Conduct Leak Testing	$ 10,000.0	$ 15,000.0	$ 7,000.0
3	Shallow Soil Excavation Field Work and Reporting	$ 120,000.0	$ 180,000.0	$ 84,000.0
4	Well Venting	$ 30,000.0	$ 45,000.0	$ 21,000.0
5	Methane Passive Ventilation System	$ 25,000.0	$ 37,500.0	$ 17,500.0
Total Engineering Cost Estimate		***$ 186,500.0***	***$ 279,800.0***	***$ 130,600.0***

For the purposes of developing a fair purchase price for the property, Remedial Option 1 listed above should be used in the negotiations with the current property owner.

5. CONCLUSIONS AND RECOMMENDATIONS

Soil, groundwater, and soil gas conditions were evaluated during this Phase II ESA to support the City of LA BOE with the proposed purchase and redevelopment of the subject property.

The results of the Phase II ESA showed the following:

- During the field work, a flat concrete feature buried at a depth of approximately 2 feet bgs was observed. Other relevant features detected during the geophysical survey included a magnetic peak at one location, buried metal at six locations, and conduit at two locations. The magnetic peak is believed to be the location of the former oil production well (see **Figure 2**). The concrete feature may require removal prior to Site redevelopment when the oil well casing is exposed. Once the concrete feature is removed, additional investigation and/or excavation may be required.
- Chemical detections in soil and groundwater, including lead, TPH (primarily weathered diesel and oil fractions), and trace detections of other compounds, indicate that past on-site activities related to oil-production activities may have impacted the site subsurface.
- Elevated TPH concentrations were detected in the northwestern and southwestern portion of the Site, which coincide with the location of the former oil well, the subsurface conduits identified during the geophysical survey, and the location of the former electrical boxes/concrete vaults as identified by the property owner. Eight samples exceeded the residential TPH-d screening level, and four samples exceeded the commercial TPH-d screening level. The elevated TPH-d concentrations were limited in extent, and found between depths of 2 and 4 feet bgs. TPH concentrations in soil samples collected at 5 and 10 feet bgs were significantly less or non-detect, and did not exceed applicable screening levels.
- Elevated concentrations of lead appear to be localized and limited in the western portion of the Site between 2 and 5 feet bgs. The maximum lead concentration of 160 mg/kg exceeded the residential screening level of 80 mg/kg, but was well below the commercial screening level of 320 mg/kg.
- There were no screening level exceedances of any compounds on the eastern portion of the Site.
- Groundwater data suggest that the groundwater quality at the Site is poor and is not suited for beneficial uses; it is unlikely that shallow groundwater would be used as a drinking water source. All concentrations were below non-drinking water screening levels.
- The lack of methane in the samples collected from the shallow soil gas probes indicates that methane is not present in the subsurface at the site. Because the Site is located in a methane zone, the soil gas results indicated the Site would be classified at a Level I Site Design Level. According to LADBS standards, hardscape parking lots less than 5,000 square feet do not require venting; however, future building construction would require installation of a passive ventilation system.

Based on the information obtained during the Phase II ESA and the results of the DOGGR administered leak test for the former oil production well, two remedial cost options were presented. The cost estimate ranges between $551,500 (including complete well re-abandonment) to $186,500 (without complete well re-abandonment). For the purposes of

developing a fair purchase price for the property, Remedial Option No. 1 should be used in the negotiations with the current property owner.

6. REFERENCES

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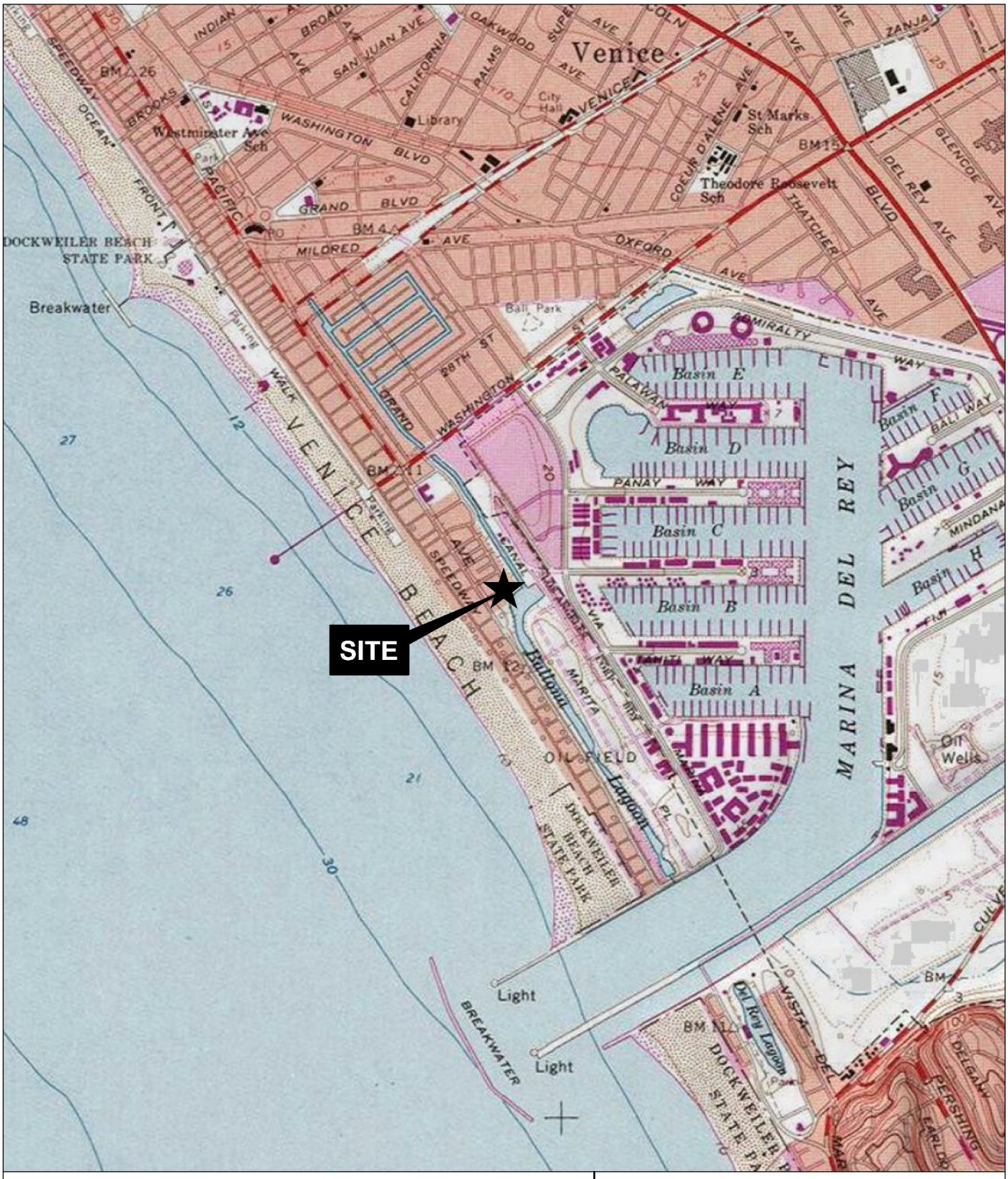
Figures



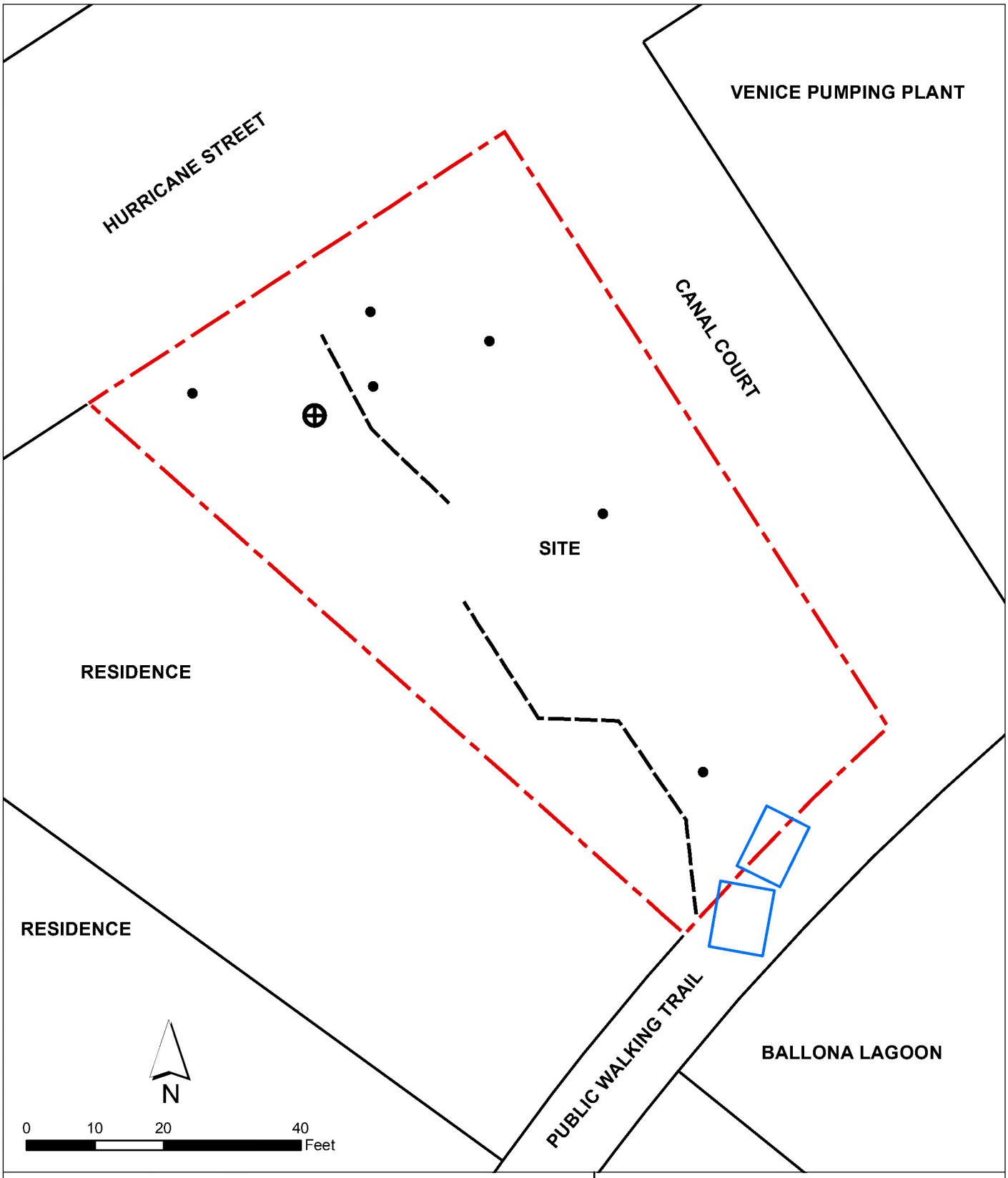
Reference: Topo 2013 National Geographic USGS Map

AECOM

SITE LOCATION MAP

Site:	Figure:
128 Hurricane St. Los Angeles, CA	1
Project: 60553849	Date: 8/6/2018

Path: R:\Projects\ENV\City of LA BOE\60553849_TO5SewerEn\900-CAD-GIS\920-GIS or Graphics\Figure 1 - Site Vicinity.mxd



Legend

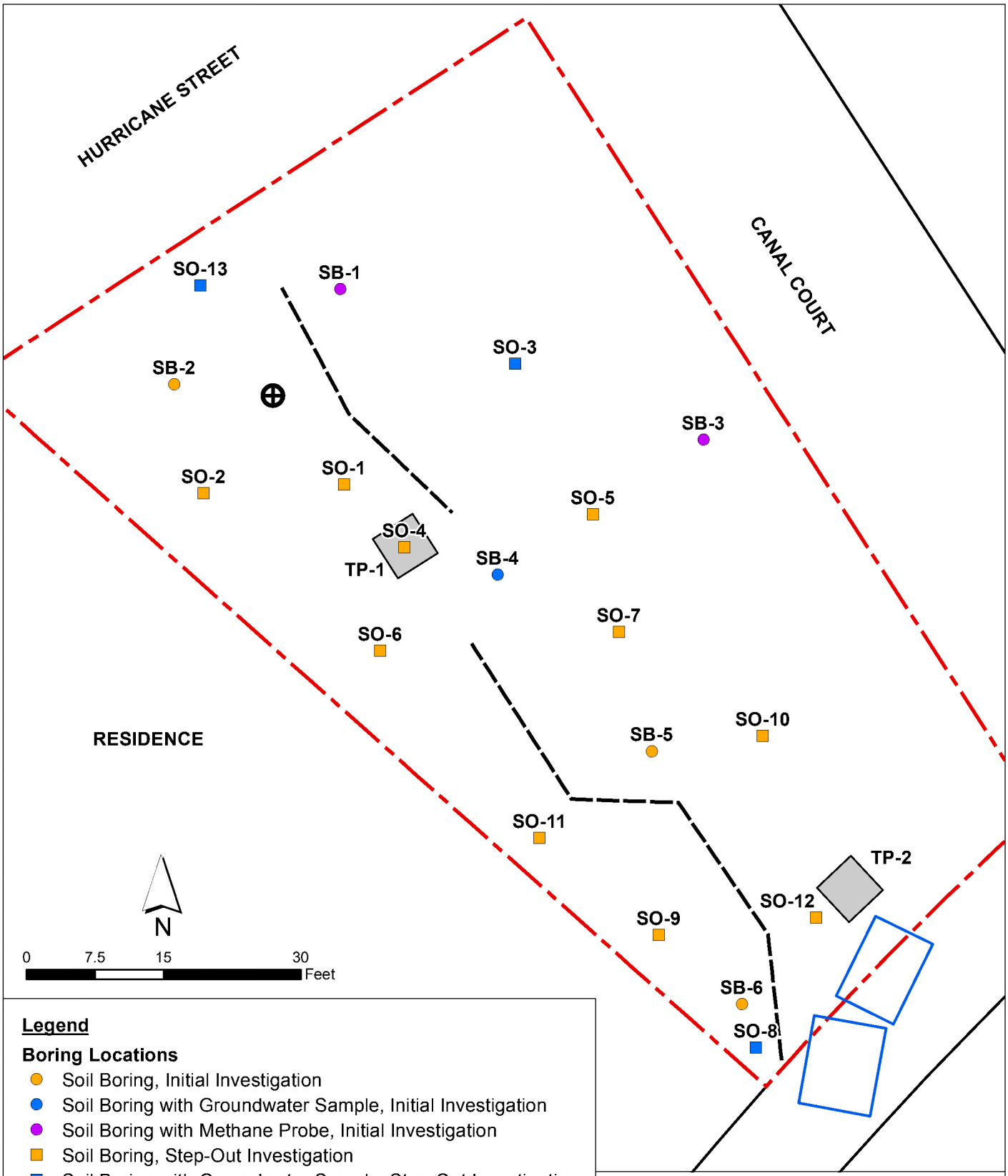
- Former Oil Well/Magnetic Peak (Approximate)
- Buried Metal (Approximate)
- Former Electrical Cabinets/Concrete Vaults (Approximate)
- Subsurface Conduits (Approximate)
- Site Boundary
- County Parcels

AECOM

SITE FEATURES

Site:	Figure:
128 Hurricane St. Los Angeles, CA	2
Project: 60553849	Date: 8/29/2018

Path: \\172.28.218.25\LosAngeles\Projects\ENV\City of LA BOE\60553849_TO5SewerEn\900-CAD-GIS\920-GIS or Graphics\Figure 2 - Site Features.mxd



Legend

Boring Locations

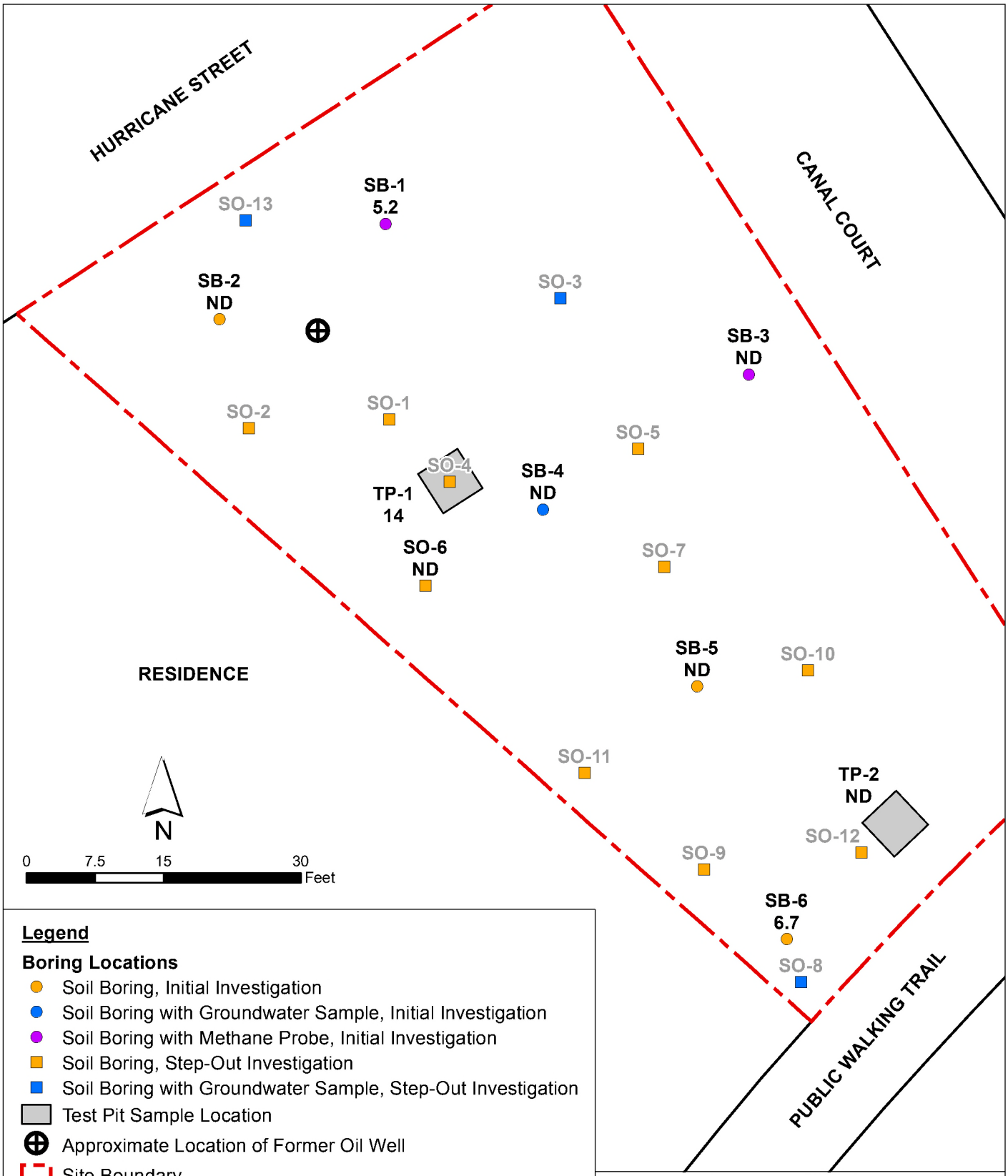
- Soil Boring, Initial Investigation
- Soil Boring with Groundwater Sample, Initial Investigation
- Soil Boring with Methane Probe, Initial Investigation
- Soil Boring, Step-Out Investigation
- Soil Boring with Groundwater Sample, Step-Out Investigation
- Test Pit Sample Location
- Former Oil Well (Approximate)
- Former Electrical Cabinets/Concrete Vaults (Approximate)
- Subsurface Conduits (Approximate)
- Site Boundary
- County Parcels

AECOM

SAMPLE LOCATIONS

Site: 128 Hurricane St. Los Angeles, CA	Figure: 3
Project: 60553849	Date: 8/31/2018

Path: \\172.28.218.25\LosAngeles\Projects\ENV\City of LA BOE\60553849_TO5SewerEn\900-CAD-GIS\920-GIS or Graphics\Figure 3 - Sample Locations.mxd



Legend

Boring Locations

- Soil Boring, Initial Investigation
- Soil Boring with Groundwater Sample, Initial Investigation
- Soil Boring with Methane Probe, Initial Investigation
- Soil Boring, Step-Out Investigation
- Soil Boring with Groundwater Sample, Step-Out Investigation
- Test Pit Sample Location
- Approximate Location of Former Oil Well
- Site Boundary

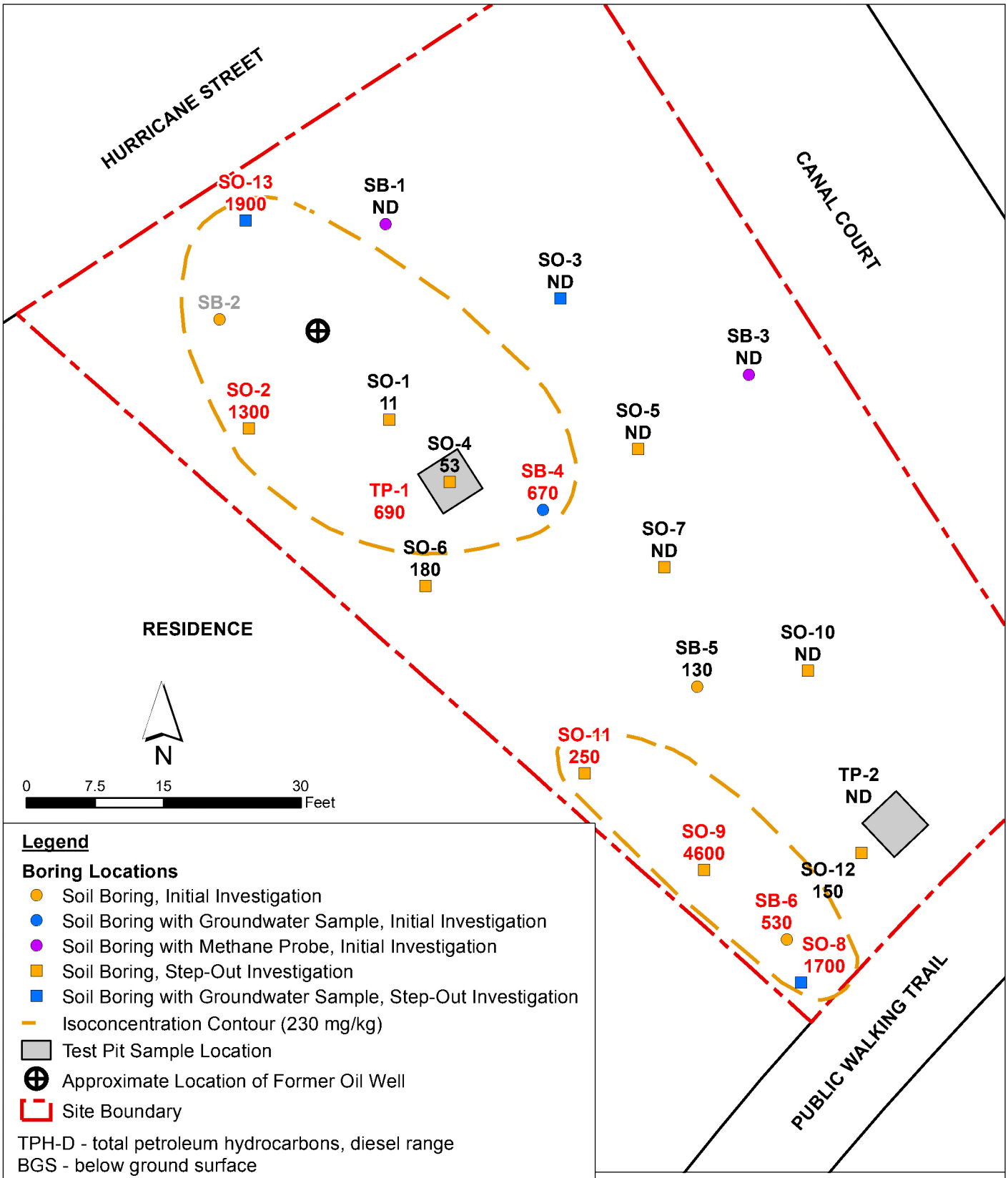
TPH-D - total petroleum hydrocarbons, diesel range
BGS - below ground surface
ND - not detected above the reporting limit
Concentrations shown in milligrams per kilogram (mg/kg)
Gray labels indicate TPH-D was not sampled at this depth interval at that location
If more than one sample was collected within the selected depth interval, the maximum concentration between the samples is shown

AECOM

TPH-D IN SOIL, 0-2 FEET BGS

Site: 128 Hurricane St. Los Angeles, CA	Figure: 4A
Project: 60553849	Date: 8/28/2018

Path: \\172.28.218.25\LosAngeles\Projects\ENV\City of LA BOE\60553849_TO5SewerEn\900-CAD-GIS\920-GIS or Graphics\Figure 4A - TPHd 0-2 ft.mxd



Legend

Boring Locations

- Soil Boring, Initial Investigation
- Soil Boring with Groundwater Sample, Initial Investigation
- Soil Boring with Methane Probe, Initial Investigation
- Soil Boring, Step-Out Investigation
- Soil Boring with Groundwater Sample, Step-Out Investigation
- Isoconcentration Contour (230 mg/kg)
- Test Pit Sample Location
- Approximate Location of Former Oil Well
- Site Boundary

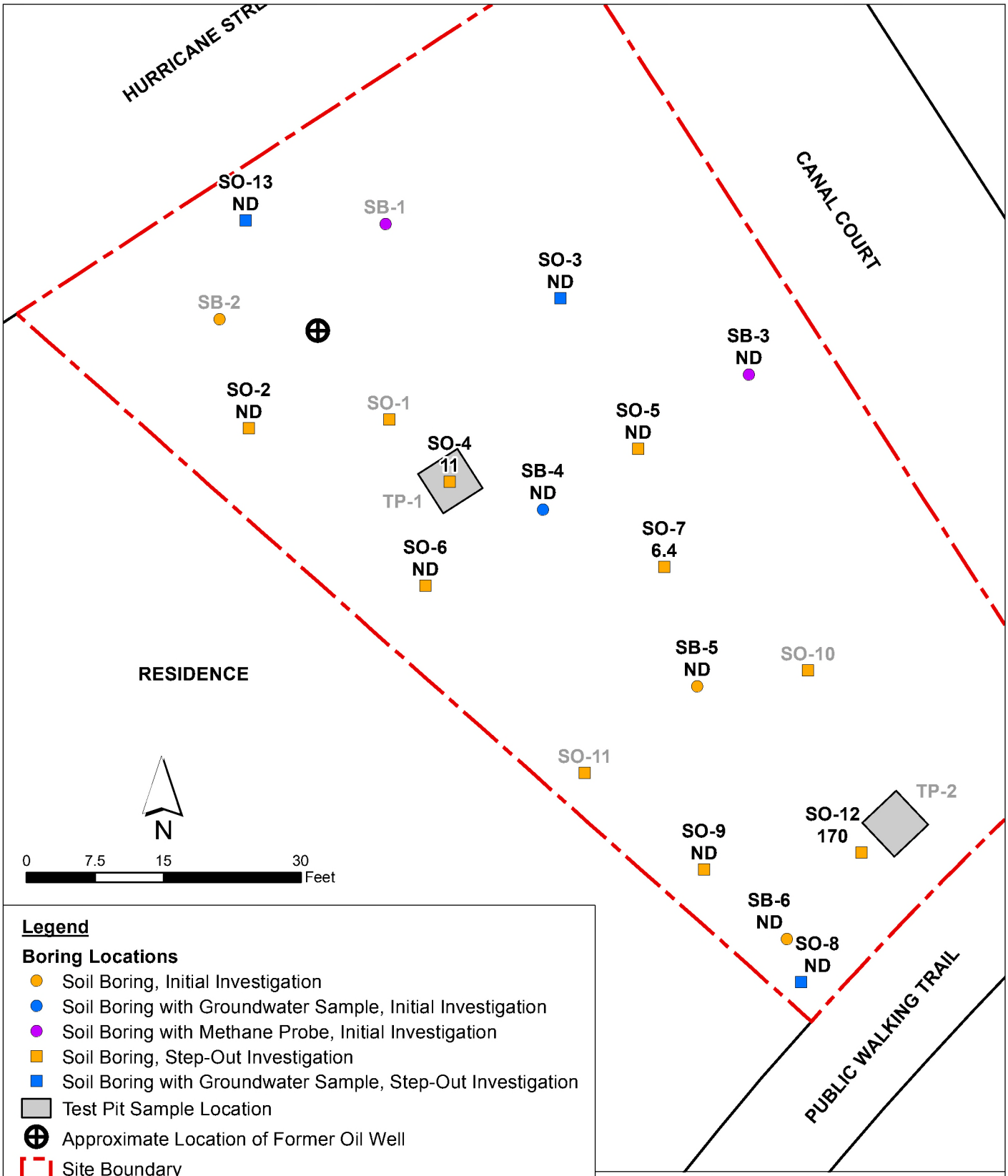
TPH-D - total petroleum hydrocarbons, diesel range
BGS - below ground surface
ND - not detected above the reporting limit
Concentrations shown in milligrams per kilogram (mg/kg)
Gray labels indicate TPH-D was not sampled at this depth interval at that location
Red labels indicate exceedance of residential screening level (230 mg/kg)
If more than one sample was collected within the selected depth interval, the maximum concentration between the samples is shown
Borings SO-1 and SO-4 were not included in the contour

AECOM

TPH-D IN SOIL, 2-4 FEET BGS

Site:	Figure:
128 Hurricane St. Los Angeles, CA	4B
Project: 60553849	Date: 8/28/2018

Path: \\172.28.218.25\LosAngeles\Projects\ENV\City of LA BOE\60553849_TO5SewerEn\900-CAD-GIS\920-GIS or Graphics\Figure 4B - TPHd 2-4 ft.mxd



Legend

Boring Locations

- Soil Boring, Initial Investigation
- Soil Boring with Groundwater Sample, Initial Investigation
- Soil Boring with Methane Probe, Initial Investigation
- Soil Boring, Step-Out Investigation
- Soil Boring with Groundwater Sample, Step-Out Investigation
- Test Pit Sample Location
- Approximate Location of Former Oil Well
- Site Boundary

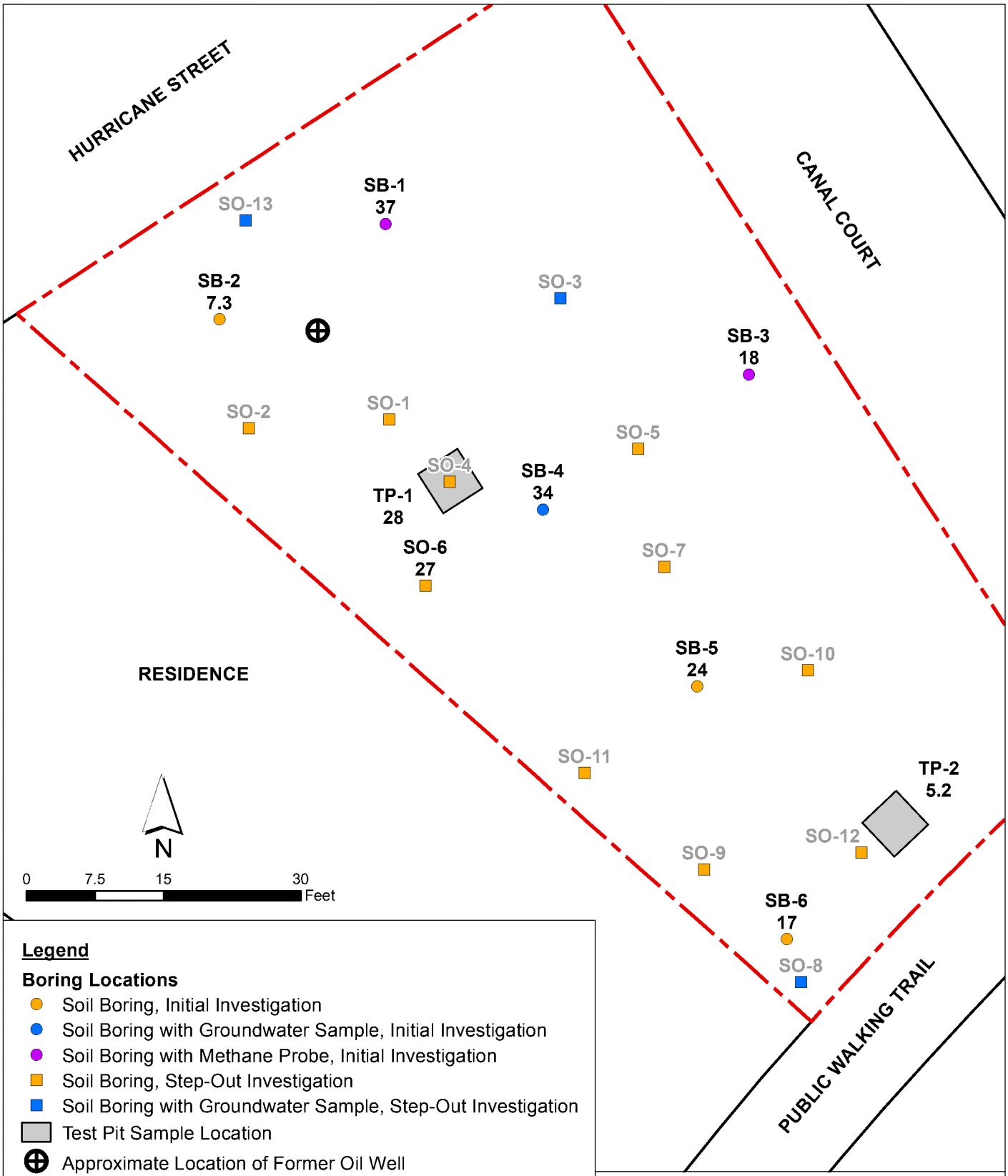
TPH-D - total petroleum hydrocarbons, diesel range
BGS - below ground surface
ND - not detected above the reporting limit
Concentrations shown in milligrams per kilogram (mg/kg)
Gray labels indicate TPH-D was not sampled at this depth interval at that location
If more than one sample was collected within the selected depth interval, the maximum concentration between the samples is shown

AECOM

TPH-D IN SOIL, >4 FEET BGS

Site: 128 Hurricane St. Los Angeles, CA	Figure: 4C
Project: 60553849	Date: 8/28/2018

Path: \\172.28.218.25\LosAngeles\Projects\ENV\City of LA BOE\60553849_TO5SewerEn\900-CAD-GIS\920-GIS or Graphics\Figure 4C - TPHd 4 ft.mxd



Legend

Boring Locations

- Soil Boring, Initial Investigation
- Soil Boring with Groundwater Sample, Initial Investigation
- Soil Boring with Methane Probe, Initial Investigation
- Soil Boring, Step-Out Investigation
- Soil Boring with Groundwater Sample, Step-Out Investigation
- Test Pit Sample Location
- Approximate Location of Former Oil Well
- Site Boundary

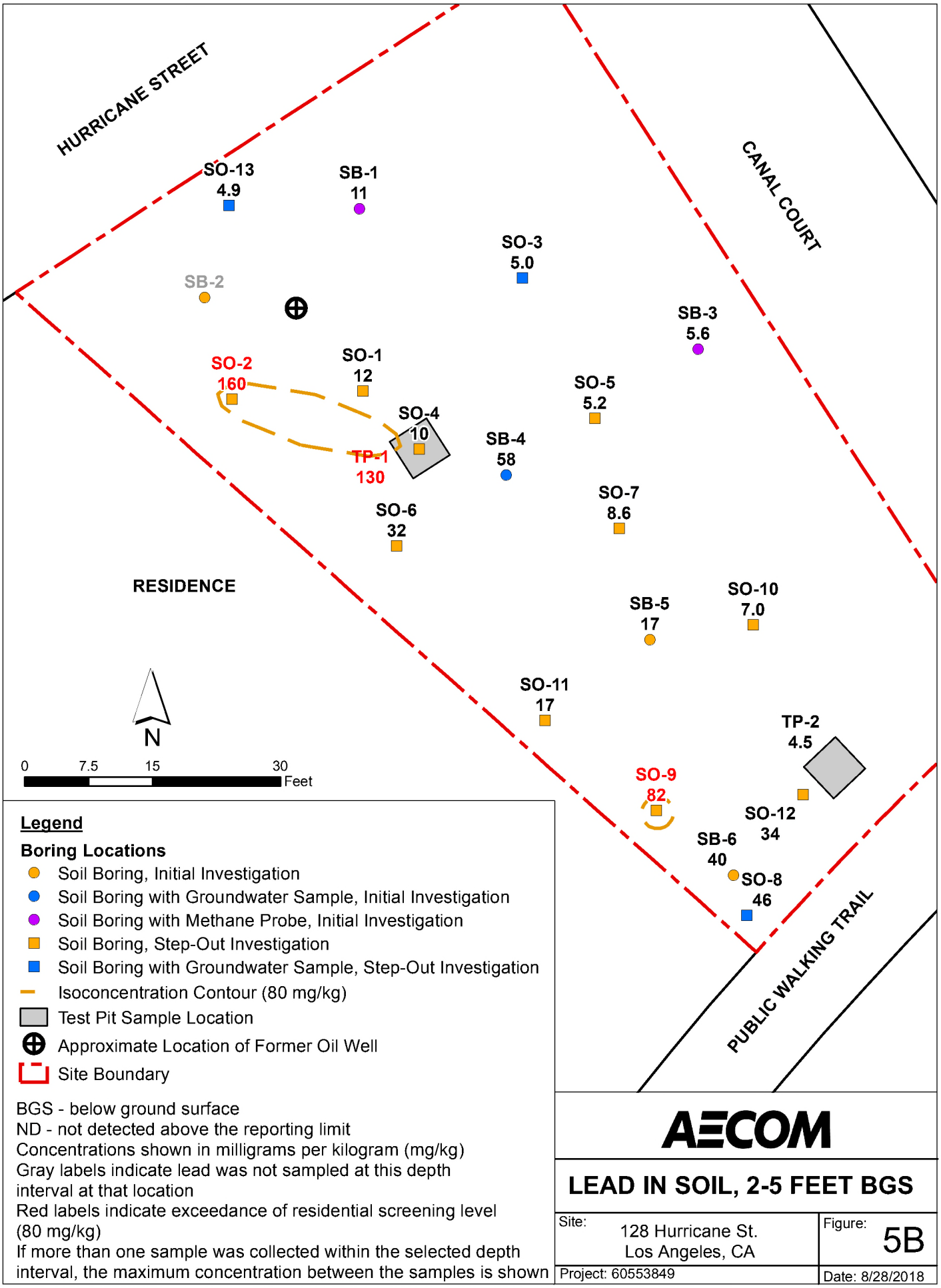
BGS - below ground surface
ND - not detected above the reporting limit
Concentrations shown in milligrams per kilogram (mg/kg)
Gray labels indicate lead was not sampled at this depth interval at that location
If more than one sample was collected within the selected depth interval, the maximum concentration between the samples is shown

AECOM

LEAD IN SOIL, 0-2 FEET BGS

Site: 128 Hurricane St. Los Angeles, CA	Figure: 5A
Project: 60553849	Date: 8/28/2018

Path: \\172.28.218.25\LosAngeles\Projects\ENV\City of LA BOE\60553849_TO5SewerEn\900-CAD-GIS\920-GIS or Graphics\Figure 5A - Lead 0-2 ft.mxd



Legend

Boring Locations

- Soil Boring, Initial Investigation
- Soil Boring with Groundwater Sample, Initial Investigation
- Soil Boring with Methane Probe, Initial Investigation
- Soil Boring, Step-Out Investigation
- Soil Boring with Groundwater Sample, Step-Out Investigation
- Isoconcentration Contour (80 mg/kg)
- Test Pit Sample Location
- Approximate Location of Former Oil Well
- Site Boundary

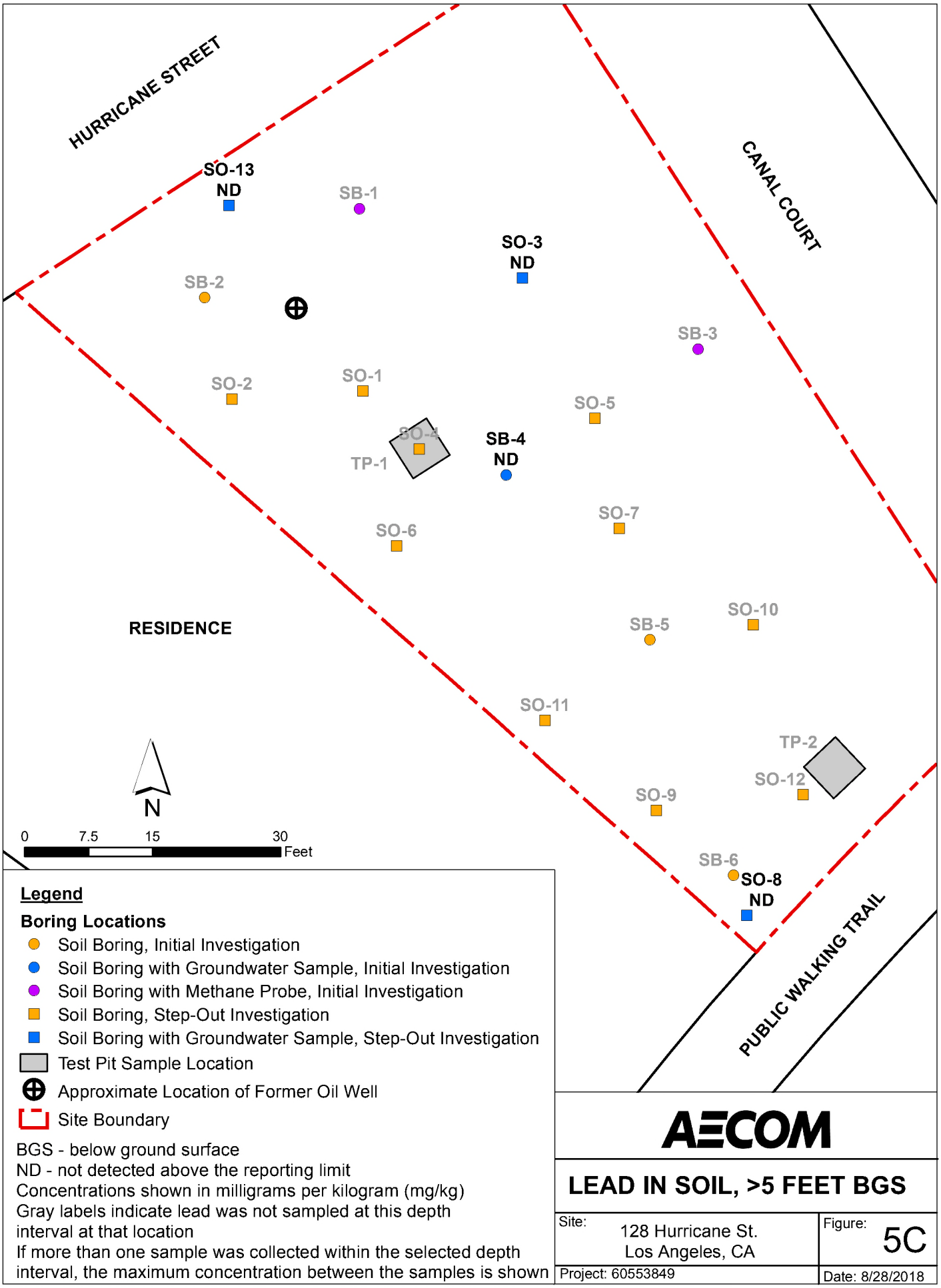
BGS - below ground surface
ND - not detected above the reporting limit
Concentrations shown in milligrams per kilogram (mg/kg)
Gray labels indicate lead was not sampled at this depth interval at that location
Red labels indicate exceedance of residential screening level (80 mg/kg)
If more than one sample was collected within the selected depth interval, the maximum concentration between the samples is shown

AECOM

LEAD IN SOIL, 2-5 FEET BGS

Site: 128 Hurricane St. Los Angeles, CA	Figure: 5B
Project: 60553849	Date: 8/28/2018

Path: \\172.28.218.25\LosAngeles\Projects\ENV\City of LA BOE\60553849_TO5SewerEn\900-CAD-GIS\920-GIS or Graphics\Figure 5B - Lead 2-5 ft.mxd



Legend

Boring Locations

- Soil Boring, Initial Investigation
- Soil Boring with Groundwater Sample, Initial Investigation
- Soil Boring with Methane Probe, Initial Investigation
- Soil Boring, Step-Out Investigation
- Soil Boring with Groundwater Sample, Step-Out Investigation
- Test Pit Sample Location
- Approximate Location of Former Oil Well
- Site Boundary

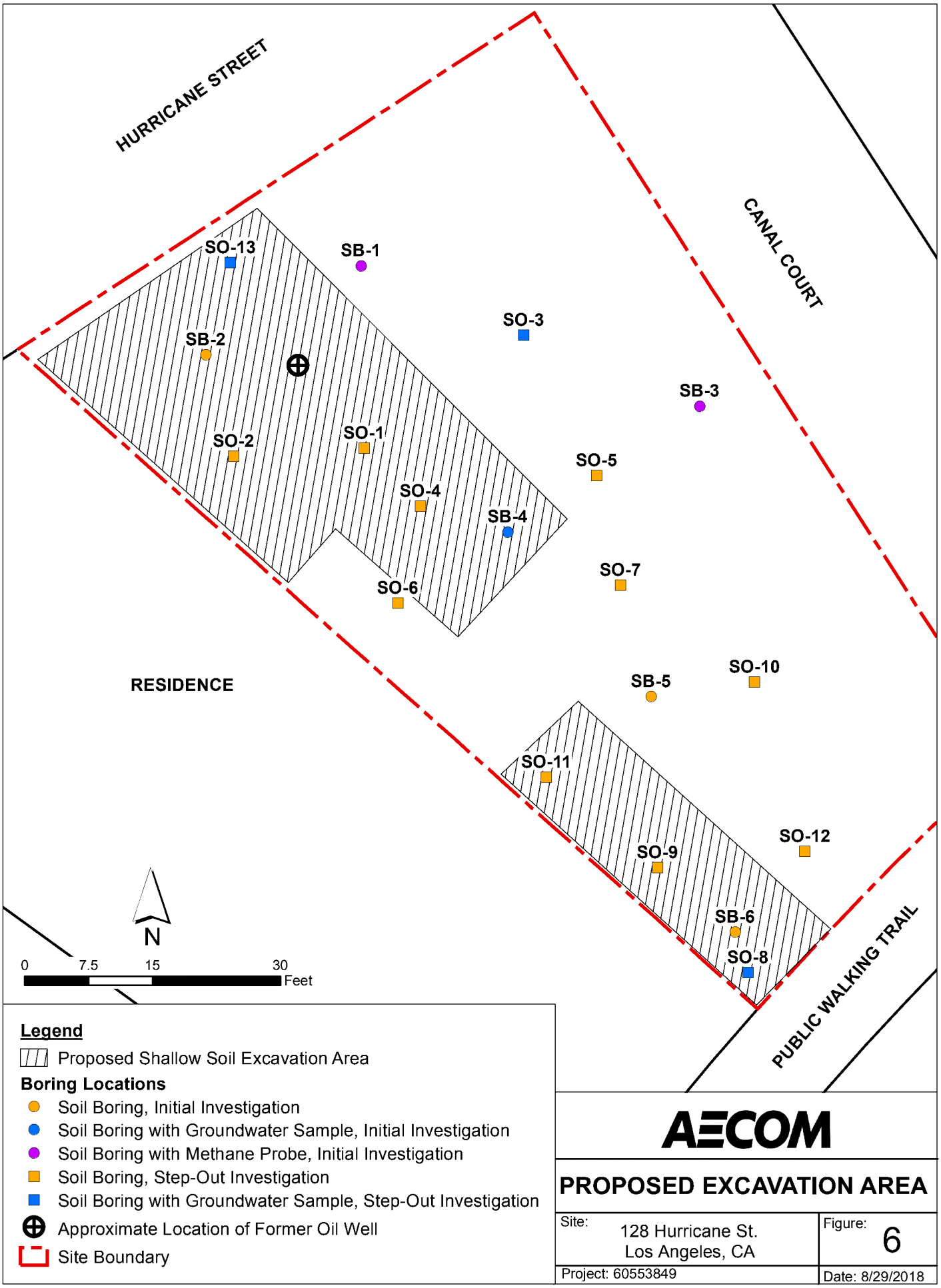
BGS - below ground surface
ND - not detected above the reporting limit
Concentrations shown in milligrams per kilogram (mg/kg)
Gray labels indicate lead was not sampled at this depth interval at that location
If more than one sample was collected within the selected depth interval, the maximum concentration between the samples is shown

AECOM

LEAD IN SOIL, >5 FEET BGS

Site: 128 Hurricane St. Los Angeles, CA	Figure: 5C
Project: 60553849	Date: 8/28/2018

Path: \\172.28.218.25\LosAngeles\Projects\ENV\City of LA BOE\60553849_TO5SewerEn\900-CAD-GIS\920-GIS or Graphics\Figure 5C - Lead 5 ft.mxd



Legend

- Proposed Shallow Soil Excavation Area

Boring Locations

- Soil Boring, Initial Investigation
- Soil Boring with Groundwater Sample, Initial Investigation
- Soil Boring with Methane Probe, Initial Investigation
- Soil Boring, Step-Out Investigation
- Soil Boring with Groundwater Sample, Step-Out Investigation
- Approximate Location of Former Oil Well
- Site Boundary

AECOM

PROPOSED EXCAVATION AREA

Site:	Figure:
128 Hurricane St. Los Angeles, CA	6
Project: 60553849	Date: 8/29/2018

Path: \\172.28.218.25\LosAngeles\Projects\ENV\City of LA BOE\60553849_TO5SewerEn\900-CAD-GIS\920-GIS or Graphics\Figure 6 - Proposed Excavation.mxd

Tables

TABLE 1
INVESTIGATION SUMMARY
128 Hurricane Street
Los Angeles, California

Boring ID	Total Depth	Boring Refusal	Encountered Groundwater	Methane Probe	Sample Depths	Analytical Methods
SB-1	4.5	4.5 feet - Gravel and concrete debris	No	Yes; probe set at 4 feet bgs	0.5	TPH, Pesticides, PCBs, Metals, Herbicides
					1	VOCs, TPH
					2.5	TPH, Metals
SB-2	2.5	2.5 feet - hard surface	No	No	0.5	TPH, Metals
					1	VOCs, TPH
SB-3	6	6 feet - heaving sands	Yes; Encountered at 6 feet bgs; static groundwater at 4 feet bgs	Yes; probe set at 3.5 feet bgs	0.5	Pesticides, Metals
					1	VOCs, TPH
					2.5	TPH, Metals
					5	VOCs, TPH, Metals
SB-4	20	No	Yes; Encountered at 5 feet bgs; static at 5.5 feet bgs	No	0.5	TPH, Pesticides, Metals
					1	VOCs, TPH, Metals
					2.5	TPH, Metals
					3.5	VOCs, TPH, SVOC, Metals
					5	VOCs, TPH, SVOC, Metals
					10	VOCs, TPH, Metals
					15	VOCs, TPH
					GW	VOCs, TPH, Metals
SB-5	5	5 feet - heaving sands	Yes, Encountered at 5 feet bgs	No	0.5	Metals
					1	VOCs, TPH, Metals
					2.5	TPH, Metals
					5	VOCs, TPH
SB-6	5	5 feet - heaving sands	Yes, Encountered at 4 feet bgs	No	0.5	TPH, Pesticides, PCBs, Metals, Herbicides
					1	VOCs, TPH
					2.5	TPH, Metals
					5	VOCs, TPH, Metals
SO-1	3	3 feet - hard, flat surface	No	No	2.5	TPH, Lead
SO-2	5	No	No	No	2.5	TPH, Lead
					3.5	TPH, Lead
					5	TPH, Lead
SO-3	10	No	Yes, Encountered at 6 feet bgs	No	2.5	TPH, Lead
					3.5	TPH, Lead
					5	TPH, Lead
					10	TPH, Lead
					GW	TPH, General Minerals
SO-4	5.5	No	No	No	2.5	TPH, Lead
					3.5	TPH, Lead
					5	TPH, Lead
SO-5	5	No	Yes, Encountered at 5 feet bgs	No	2.5	TPH, Lead
					3.5	TPH, Lead
					5	TPH, Lead
SO-6	5	No	No	No	0.5	TPH, Lead
					2.5	TPH, Lead
					3.5	TPH, Lead
					5	TPH, Lead

TABLE 1
INVESTIGATION SUMMARY
128 Hurricane Street
Los Angeles, California

Boring ID	Total Depth	Boring Refusal	Encountered Groundwater	Methane Probe	Sample Depths	Analytical Methods
SO-7	5	No	No	No	2.5	TPH, Lead
					3.5	TPH, Lead
					5	TPH, Lead
SO-8	10	No	Yes, Encountered at 5 feet bgs	No	2.5	TPH, Lead
					3.5	TPH, Lead
					5	TPH, Lead
					10	TPH, Lead
					GW	TPH, General Minerals
SO-9	5	No	No	No	2.5	TPH, Lead
					3.5	TPH, Lead
					5	TPH, Lead
SO-10	3.5	No	No	No	2.5	TPH, Lead
					3.5	TPH, Lead
SO-11	3.5	No	No	No	2.5	TPH, Lead
					3.5	TPH, Lead
SO-12	5	No	No	No	2.5	TPH, Lead
					3.5	TPH, Lead
					5	TPH, Lead
SO-13	10	No	Yes, Encountered at 5.5 feet bgs	No	2.5	TPH, Lead
					3.5	TPH, Lead
					5	TPH, Lead
					10	TPH, Lead
					GW	TPH, General Minerals
TP-1	3	No	No	No	1.5	TPH, Lead
					2.5	TPH, Lead
TP-2	3	No	No	No	0.5	TPH, Lead
					2.5	TPH, Lead

Notes
bgs - below ground surface
Total petroleum hydrocarbons (TPH) were analyzed using USEPA Method 8015M
Pesticides were analyzed using USEPA Method 8081A
Polychlorinated biphenyls (PCBS) were analyzed using USEPA Method 8082
Metals were analyzed using USEPA Method 6010B
Herbicides were analyzed using USEPA Method 8151A
Volatile organic compounds (VOCs) were analyzed using USEPA Method 8260B/5035
General Minerals were analyzed using
Semivolatile organic compounds (SVOCs) were analyzed using USEPA 8270C

TABLE 2
SOIL ANALYTICAL RESULTS
128 Hurricane Street
Los Angeles, California

Detected Analytes	California Screening Level Residential	California Screening Level Commercial	Boring ID:	TP-01	TP-01	TP-02	TP-02	TP-02	SB-01	SB-01	SB-01	SB-02	SB-02	SB-02	SB-03	SB-03	SB-03	SB-03	SB-03
			Sample ID:	TP-1-1.5	TP-1-2.5	TP-2-0.5	TP-2-2.5	TP-2-2.5 DUP	SB-1-0.5	SB-1-1	SB-1-2.5	SB-2-0.5	SB-2-1	SB-2-1 DUP	SB-3-0.5	SB-3-1	SB-3-2.5	SB-3-5	SB-3-5 DUP
			Sample Date:	06/21/18	06/21/18	06/21/18	06/21/18	06/21/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18
			Sample Depth:	1.5	2.5	0.5	2.5	2.5	0.5	1.0	2.5	0.5	1.0	1.0	0.5	1.0	2.5	5.0	5.0
Metals																			
Arsenic	12*	12*	mg/kg	**2.8**	**4.3**	**4.3**	**2.4**	**2.2**	**2.2**	-	**2.8**	**2.7**	-	-	**2.4**	-	**2.2**	-	-
Barium	15000	220000	mg/kg	**42**	**81**	**57**	**35**	**51**	**50**	-	**39**	**39**	-	-	**69**	-	**83**	-	-
Chromium	36000	170000	mg/kg	**12**	**15**	**12**	**11**	**16**	**13**	-	**14**	**11**	-	-	**17**	-	**13**	-	-
Cobalt	23	350	mg/kg	**3.6**	**5.4**	**3.8**	ND (<3.0)	**4.4**	**3.3**	-	**3.5**	**3.3**	-	-	**5.3**	-	**3.8**	-	-
Copper	3100	47000	mg/kg	**3.1**	**11**	**3.8**	ND (<3.0)	**3.4**	**6.1**	-	ND (<3.0)	ND (<3.0)	-	-	**3.6**	-	ND (<3.0)	-	-
Lead	80	320	mg/kg	**28**	**130**	**5.2**	**4.5**	ND (<3.0)	**37**	-	**11**	**7.3**	-	-	**18**	-	**5.6**	**3.8**	-
Mercury	1	4.4	mg/kg	**0.079**	**0.078**	**0.36**	**0.027**	**0.022**	**0.13**	-	**0.068**	**0.080**	-	-	**0.066**	-	**0.63**	-	-
Nickel	490	3100	mg/kg	**10**	**26**	**8.5**	**8.8**	**13**	**10**	-	**10**	**9.4**	-	-	**10**	-	**8.9**	-	-
Vanadium	390	1000	mg/kg	**26**	**51**	**25**	**21**	**30**	**28**	-	**26**	**23**	-	-	**36**	-	**24**	-	-
Zinc	23000	350000	mg/kg	**57**	**160**	**20**	**18**	**23**	**73**	-	**38**	**23**	-	-	**42**	-	**22**	-	-
Organochlorine Pesticides																			
alpha-Chlordane*	0.44	1.5	mg/kg	-	-	-	-	-	**0.0069**	-	-	-	-	-	ND (<0.004)	-	-	-	-
Chlordane	0.44	1.5	mg/kg	-	-	-	-	-	**0.035**	-	-	-	-	-	ND (<0.02)	-	-	-	-
4,4´-DDD	1.9	9.6	mg/kg	-	-	-	-	-	**0.004**	-	-	-	-	-	ND (<0.004)	-	-	-	-
4,4´-DDE	2	9.3	mg/kg	-	-	-	-	-	ND (<0.004)	-	-	-	-	-	ND (<0.004)	-	-	-	-
4,4´-DDT	1.9	8.5	mg/kg	-	-	-	-	-	ND (<0.004)	-	-	-	-	-	ND (<0.004)	-	-	-	-
Dieldrin	0.034	0.14	mg/kg	-	-	-	-	-	**0.0062**	-	-	-	-	-	**0.0055**	-	-	-	-
Endosulfan II**	470	7000	mg/kg	-	-	-	-	-	ND (<0.004)	-	-	-	-	-	ND (<0.004)	-	-	-	-
gamma-Chlordane**	0.44	1.5	mg/kg	-	-	-	-	-	ND (<0.004)	-	-	-	-	-	ND (<0.004)	-	-	-	-
Total Petroleum Hydrocarbons																			
Gasoline Range Organics (C6-C10)	740	3900	mg/kg	ND (<5.0)	ND (<50)	ND (<25)	ND (<25)	ND (<25)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	-	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)
Diesel Range Organics (C10-C23)	230	1100	mg/kg	**14**	**690**	ND (<25)	ND (<25)	ND (<25)	**5.2**	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	-	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)
Oil Range Organics (C23-C44)	11000	140000	mg/kg	**220**	**4300**	ND (<25)	ND (<25)	ND (<25)	**58**	**100**	**63**	**21**	**23**	**23**	-	**20**	**33**	**12**	**8.7**
Volatile Organic Compounds																			
Acetone	61000	670000	mg/kg	-	-	-	-	-	-	ND (<0.05)	-	-	ND (<0.05)	ND (<0.05)	-	ND (<0.05)	-	ND (<0.05)	ND (<0.05)
Carbon Disulfide	770	3500	mg/kg	-	-	-	-	-	-	ND (<0.005)	-	-	**0.005**	ND (<0.005)	-	ND (<0.005)	-	ND (<0.005)	ND (<0.005)

Notes

Hierarchy of sources for California screening levels:

1. Department of Toxic Substances Control, Human and Ecological Risk Office, Human Health Risk Assessment Note 3, June 2018
2. United States Environmental Protection Agency Regional Screening Level, May 2018
3. Direct exposure human health environmental screening levels, San Francisco Bay Regional Water Quality Control Board, 2016

* Background concentration for arsenic in Southern California shown for comparison

** Endosulfan and chlordane screening levels used as surrogates for endosulfan II and gamma-chlordane, respectively

Exceeds residential screening level

Exceeds commercial screening level

mg/kg - milligrams per kilogram

ND - not detected

- Not Analyzed

Sample depth in feet below ground surface

TABLE 2
SOIL ANALYTICAL RESULTS
128 Hurricane Street
Los Angeles, California

Detected Analytes	California Screening Level Residential	California Screening Level Commercial	Boring ID:	SB-04	SB-04	SB-04	SB-04	SB-04	SB-04	SB-04	SB-05	SB-05	SB-05	SB-05	SB-06	SB-06	SB-06	SB-06	SO-01
			Sample ID:	SB-4-0.5	SB-4-1	SB-4-2.5	SB-4-3.5	SB-4-5	SB-4-10	SB-4-15	SB-5-0.5	SB-5-1	SB-5-2.5	SB-5-5	SB-6-0.5	SB-6-1	SB-6-2.5	SB-6-5	SO-1-2.5
			Sample Date:	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/28/18
			Sample Depth:	0.5	1.0	2.5	3.5	5.0	10.0	15.0	0.5	1.0	2.5	5.0	0.5	1.0	2.5	5.0	2.5
Metals																			
Arsenic	12*	12*	mg/kg	**3**	-	-	**3.5**	**2**	**4.1**	-	**2.8**	**3.3**	**4.3**	-	**2.7**	-	**2.9**	-	-
Barium	15000	220000	mg/kg	**54**	-	-	**62**	**10**	**21**	-	**54**	**56**	**92**	-	**60**	-	**81**	-	-
Chromium	36000	170000	mg/kg	**13**	-	-	**13**	**11**	**10**	-	**10**	**11**	**15**	-	**13**	-	**12**	-	-
Cobalt	23	350	mg/kg	**3.2**	-	-	**4.0**	ND (<3.0)	ND (<3.0)	-	**3.1**	**3.3**	**3.4**	-	**3.8**	-	**4.0**	-	-
Copper	3100	47000	mg/kg	**10**	-	-	**15**	ND (<3.0)	ND (<3.0)	-	**7.2**	**16**	**5.4**	-	**5.4**	-	**14**	-	-
Lead	80	320	mg/kg	**34**	**6.7**	**6.8**	**58**	**3.4**	ND (<3.0)	-	**12**	**24**	**17**	-	**17**	-	**40**	**5.1**	**12**
Mercury	1	4.4	mg/kg	**0.25**	-	-	**0.090**	**0.030**	ND (<0.020)	-	**0.42**	**2.4**	**0.038**	-	**0.19**	-	**0.084**	-	-
Nickel	490	3100	mg/kg	**9.2**	-	-	**14**	**7.2**	**6.8**	-	**7.5**	**8.9**	**13**	-	**10**	-	**13**	-	-
Vanadium	390	1000	mg/kg	**25**	-	-	**30**	**25**	**23**	-	**22**	**27**	**29**	-	**27**	-	**34**	-	-
Zinc	23000	350000	mg/kg	**74**	-	-	**99**	**7.2**	**8.4**	-	**30**	**51**	**100**	-	**62**	-	**120**	-	-
Organochlorine Pesticides																			
alpha-Chlordane*	0.44	1.5	mg/kg	**0.018**	-	-	-	-	-	-	-	-	-	-	**0.012**	-	-	-	-
Chlordane	0.44	1.5	mg/kg	**0.078**	-	-	-	-	-	-	-	-	-	-	**0.086**	-	-	-	-
4,4′-DDD	1.9	9.6	mg/kg	ND (<0.004)	-	-	-	-	-	-	-	-	-	-	ND (<0.004)	-	-	-	-
4,4′-DDE	2	9.3	mg/kg	ND (<0.004)	-	-	-	-	-	-	-	-	-	-	**0.022**	-	-	-	-
4,4′-DDT	1.9	8.5	mg/kg	**0.0043**	-	-	-	-	-	-	-	-	-	-	**0.018**	-	-	-	-
Dieldrin	0.034	0.14	mg/kg	**0.031**	-	-	-	-	-	-	-	-	-	-	ND (<0.002)	-	-	-	-
Endosulfan II**	470	7000	mg/kg	ND (<0.004)	-	-	-	-	-	-	-	-	-	-	**0.0063**	-	-	-	-
gamma-Chlordane**	0.44	1.5	mg/kg	**0.0092**	-	-	-	-	-	-	-	-	-	-	**0.0058**	-	-	-	-
Total Petroleum Hydrocarbons																			
Gasoline Range Organics (C6-C10)	740	3900	mg/kg	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<25)	ND (<5.0)	ND (<5.0)	ND (<5.0)	-	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<25)	ND (<5.0)	ND (<5.0)
Diesel Range Organics (C10-C23)	230	1100	mg/kg	ND (<5.0)	ND (<5.0)	ND (<5.0)	**670**	ND (<5.0)	ND (<5.0)	ND (<5.0)	-	ND (<5.0)	**130**	ND (<5.0)	ND (<5.0)	**6.7**	**530**	ND (<5.0)	**11**
Oil Range Organics (C23-C44)	11000	140000	mg/kg	**98**	**28**	**47**	**2000**	**40**	**11**	**11**	-	**80**	**840**	**30**	**61**	**86**	**2600**	**82**	**150**
Volatile Organic Compounds																			
Acetone	61000	670000	mg/kg	-	ND (<0.05)	-	**0.056**	ND (<0.05)	ND (<0.05)	ND (<0.05)	-	ND (<0.05)	-	ND (<0.05)	-	ND (<0.05)	-	ND (<0.05)	-
Carbon Disulfide	770	3500	mg/kg	-	**0.0062**	-	ND (<0.005)	ND (<0.005)	ND (<0.005)	ND (<0.005)	-	ND (<0.005)	-	ND (<0.005)	-	**0.01**	-	ND (<0.005)	-

Notes

Hierarchy of sources for California screening levels:

1. Department of Toxic Substances Control, Human and Ecological Risk Office, Human Health Risk Assessment Note 3, June 2018
2. United States Environmental Protection Agency Regional Screening Level, May 2018
3. Direct exposure human health environmental screening levels, San Francisco Bay Regional Water Quality Control Board, 2016

* Background concentration for arsenic in Southern California shown for comparison

** Endosulfan and chlordane screening levels used as surrogates for endosulfan II and gamma-chlordane, respectively

Exceeds residential screening level

Exceeds commercial screening level

mg/kg - milligrams per kilogram

ND - not detected

- Not Analyzed

Sample depth in feet below ground surface

TABLE 2
SOIL ANALYTICAL RESULTS
128 Hurricane Street
Los Angeles, California
Page 3 of 5

Detected Analytes	California Screening Level Residential	California Screening Level Commercial		Boring ID:	SO-02	SO-02	SO-02	SO-03	SO-03	SO-03	SO-03	SO-04	SO-04	SO-04	SO-04	SO-05	SO-05	SO-05	SO-06	SO-06	SO-06	SO-06
				Sample ID:	SO-2-2.5	SO-2-3.5	SO-2-5	SO-3-2.5	SO-3-3.5	SO-3-5	SO-3-10	SO-4-2.5	SO-4-3.5	SO-4-5	SO-4-5DUP	SO-5-2.5	SO-5-3.5	SO-5-5	SO-6-0.5	SO-6-2.5	SO-6-3.5	SO-6-5
				Sample Date:	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18
				Sample Depth:	2.5	3.5	5.0	2.5	3.5	5.0	10.0	2.5	3.5	5.0	5.0	2.5	3.5	5.0	0.5	2.5	3.5	5.0
Metals																						
Arsenic	12*	12*	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Barium	15000	220000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Chromium	36000	170000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Cobalt	23	350	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Copper	3100	47000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Lead	80	320	mg/kg	**29**	ND (<3.0)	**160**	**5.0**	ND (<3.0)	**3.6**	ND (<3.0)	ND (<3.0)	ND (<3.0)	**10**	**7.1**	**5.2**	**3.5**	**3.5**	**27**	**32**	**8.0**	ND (<3.0)
Mercury	1	4.4	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nickel	490	3100	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Vanadium	390	1000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Zinc	23000	350000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Organochlorine Pesticides																						
alpha-Chlordane*	0.44	1.5	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Chlordane	0.44	1.5	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4,4´-DDD	1.9	9.6	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4,4´-DDE	2	9.3	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4,4´-DDT	1.9	8.5	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Dieldrin	0.034	0.14	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Endosulfan II**	470	7000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
gamma-Chlordane**	0.44	1.5	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Petroleum Hydrocarbons																						
Gasoline Range Organics (C6-C10)	740	3900	mg/kg	ND (<50)	ND (<50)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<50)	ND (<5.0)	ND (<5.0)
Diesel Range Organics (C10-C23)	230	1100	mg/kg	**99**	**1300**	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	**53**	ND (<5.0)	**11**	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	**180**	ND (<5.0)	ND (<5.0)
Oil Range Organics (C23-C44)	11000	140000	mg/kg	**1300**	**1900**	**6.6**	**20**	ND (<5.0)	ND (<5.0)	ND (<5.0)	**370**	ND (<5.0)	**330**	**7.5**	ND (<5.0)	ND (<5.0)	ND (<5.0)	**78**	**1100**	ND (<5.0)	ND (<5.0)
Volatile Organic Compounds																						
Acetone	61000	670000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Carbon Disulfide	770	3500	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Notes
Hierarchy of sources for California screening levels:
1. Department of Toxic Substances Control, Human and Ecological Risk Office, Human Health Risk Assessment Note 3, June 2018
2. United States Environmental Protection Agency Regional Screening Level, May 2018
3. Direct exposure human health environmental screening levels, San Francisco Bay Regional Water Quality Control Board, 2016

* Background concentration for arsenic in Southern California shown for comparison
** Endosulfan and chlordane screening levels used as surrogates for endosulfan II and gamma-chlordane, respectively
Exceeds residential screening level
Exceeds commercial screening level
mg/kg - milligrams per kilogram
ND - not detected
- Not Analyzed
Sample depth in feet below ground surface

TABLE 2
SOIL ANALYTICAL RESULTS
128 Hurricane Street
Los Angeles, California
Page 4 of 5

Detected Analytes	California Screening Level Residential	California Screening Level Commercial																			
			Boring ID:	**SO-07**	**SO-07**	**SO-07**	**SO-07**	**SO-08**	**SO-08**	**SO-08**	**SO-08**	**SO-09**	**SO-09**	**SO-09**	**SO-10**	**SO-10**	**SO-11**	**SO-11**	**SO-12**	**SO-12**	**SO-12**
			Sample ID:	**SO-7-2.5**	**SO-7-3.5**	**SO-7-5**	**SO-7-5DUP**	**SO-8-2.5**	**SO-8-3.5**	**SO-8-5**	**SO-8-10**	**SO-9-2.5**	**SO-9-3.5**	**SO-9-5**	**SO-10-2.5**	**SO-10-3.5**	**SO-11-2.5**	**SO-11-3.5**	**SO-12-2.5**	**SO-12-3.5**	**SO-12-5**
			Sample Date:	**06/28/18**	**06/28/18**	**06/28/18**	**06/28/18**	**06/28/18**	**06/28/18**	**06/28/18**	**06/28/18**	**06/28/18**	**06/28/18**	**06/28/18**	**06/28/18**	**06/28/18**	**06/28/18**	**06/28/18**	**06/28/18**	**06/28/18**	**06/28/18**
			Sample Depth:	**2.5**	**3.5**	**5.0**	**5.0**	**2.5**	**3.5**	**5.0**	**10.0**	**2.5**	**3.5**	**5.0**	**2.5**	**3.5**	**2.5**	**3.5**	**2.5**	**3.5**	**5.0**
Metals																					
Arsenic	12*	12*	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Barium	15000	220000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Chromium	36000	170000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Cobalt	23	350	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Copper	3100	47000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Lead	80	320	mg/kg	**7.0**	**7.8**	**6.7**	**8.6**	**46**	ND (<3.0)	ND (<3.0)	ND (<3.0)	**82**	ND (<3.0)	ND (<3.0)	**6.2**	**7.0**	**17**	**8.6**	**5.9**	**9.2**	**34**
Mercury	1	4.4	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nickel	490	3100	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Vanadium	390	1000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Zinc	23000	350000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Organochlorine Pesticides																					
alpha-Chlordane*	0.44	1.5	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Chlordane	0.44	1.5	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4,4´-DDD	1.9	9.6	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4,4´-DDE	2	9.3	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4,4´-DDT	1.9	8.5	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Dieldrin	0.034	0.14	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Endosulfan II**	470	7000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
gamma-Chlordane**	0.44	1.5	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Petroleum Hydrocarbons																					
Gasoline Range Organics (C6-C10)	740	3900	mg/kg	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<50)	ND (<5.0)	ND (<5.0)	ND (<5.0)	**58**	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<50)	ND (<5.0)	ND (<5.0)	**7.4**	ND (<5.0)
Diesel Range Organics (C10-C23)	230	1100	mg/kg	ND (<5.0)	ND (<5.0)	**6.4**	ND (<5.0)	**1700**	ND (<5.0)	ND (<5.0)	ND (<5.0)	**4600**	**61**	ND (<5.0)	ND (<5.0)	ND (<5.0)	**250**	**7.0**	**33**	**150**	**170**
Oil Range Organics (C23-C44)	11000	140000	mg/kg	**6.5**	**9.0**	**39**	**24**	**5100**	**19**	**5.0**	ND (<5.0)	**8200**	**240**	**8.2**	**32**	**7.5**	**1300**	**120**	**890**	**420**	**1600**
Volatile Organic Compounds																					
Acetone	61000	670000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Carbon Disulfide	770	3500	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Notes
Hierarchy of sources for California screening levels:
1. Department of Toxic Substances Control, Human and Ecological Risk Office, Human Health Risk Assessment Note 3, June 2018
2. United States Environmental Protection Agency Regional Screening Level, May 2018
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* Background concentration for arsenic in Southern California shown for comparison
** Endosulfan and chlordane screening levels used as surrogates for endosulfan II and gamma-chlordane, respectively
Exceeds residential screening level
Exceeds commercial screening level
mg/kg - milligrams per kilogram
ND - not detected
- Not Analyzed
Sample depth in feet below ground surface

TABLE 2
SOIL ANALYTICAL RESULTS
128 Hurricane Street
Los Angeles, California

Detected Analytes	California Screening Level Residential	California Screening Level Commercial	Boring ID:	SO-13	SO-13	SO-13	SO-13	SO-13
			Sample ID:	SO-13-2.5	SO-13-3.5	SO-13-5	SO-13-5DUP	SO-13-10
			Sample Date:	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18
			Sample Depth:	2.5	3.5	5.0	5.0	10.0
Metals								
Arsenic	12*	12*	mg/kg	-	-	-	-	-
Barium	15000	220000	mg/kg	-	-	-	-	-
Chromium	36000	170000	mg/kg	-	-	-	-	-
Cobalt	23	350	mg/kg	-	-	-	-	-
Copper	3100	47000	mg/kg	-	-	-	-	-
Lead	80	320	mg/kg	**4.9**	ND (<3.0)	ND (<3.0)	ND (<3.0)	ND (<3.0)
Mercury	1	4.4	mg/kg	-	-	-	-	-
Nickel	490	3100	mg/kg	-	-	-	-	-
Vanadium	390	1000	mg/kg	-	-	-	-	-
Zinc	23000	350000	mg/kg	-	-	-	-	-
Organochlorine Pesticides								
alpha-Chlordane*	0.44	1.5	mg/kg	-	-	-	-	-
Chlordane	0.44	1.5	mg/kg	-	-	-	-	-
4,4´-DDD	1.9	9.6	mg/kg	-	-	-	-	-
4,4´-DDE	2	9.3	mg/kg	-	-	-	-	-
4,4´-DDT	1.9	8.5	mg/kg	-	-	-	-	-
Dieldrin	0.034	0.14	mg/kg	-	-	-	-	-
Endosulfan II**	470	7000	mg/kg	-	-	-	-	-
gamma-Chlordane**	0.44	1.5	mg/kg	-	-	-	-	-
Total Petroleum Hydrocarbons								
Gasoline Range Organics (C6-C10)	740	3900	mg/kg	ND (<50)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)
Diesel Range Organics (C10-C23)	230	1100	mg/kg	**1900**	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)
Oil Range Organics (C23-C44)	11000	140000	mg/kg	**3700**	**9.7**	**6.6**	ND (<5.0)	ND (<5.0)
Volatile Organic Compounds								
Acetone	61000	670000	mg/kg	-	-	-	-	-
Carbon Disulfide	770	3500	mg/kg	-	-	-	-	-

Notes

Hierarchy of sources for California screening levels:

1. Department of Toxic Substances Control, Human and Ecological Risk Office, Human Health Risk Assessment Note 3, June 2018
2. United States Environmental Protection Agency Regional Screening Level, May 2018
3. Direct exposure human health environmental screening levels, San Francisco Bay Regional Water Quality Control Board, 2016

* Background concentration for arsenic in Southern California shown for comparison

** Endosulfan and chlordane screening levels used as surrogates for endosulfan II and gamma-chlordane, respectively

Exceeds residential screening level

Exceeds commercial screening level

mg/kg - milligrams per kilogram

ND - not detected

- Not Analyzed

Sample depth in feet below ground surface

TABLE 3
GROUNDWATER ANALYTICAL RESULTS
128 Hurricane Street
Los Angeles, California
Page 1 of 1

Detected Analytes	MCL	Gross Contamination ESL	Boring ID:	SB-04	SO-03	SO-08	SO-13
			Sample ID:	SB-4	SO-3	SO-8	SO-13
			Sample Date:	06/20/18	06/28/18	06/28/18	06/28/18
General Minerals							
Chloride	250	NA	mg/l	-	**1300**	**3800**	**1400**
Hardness	NA	NA	mg/l	-	**680**	**1600**	**730**
Nitrate as N	10	NA	mg/l	-	**0.56**	**0.60**	**0.37**
pH	NA	NA	ph units	-	**6.5**	**6.5**	**7.0**
Salinity	NA	NA	salinity u	-	**2.8**	**8.1**	**2.8**
Specific Conductance (EC)	900	NA	umhos/cm	-	**5200**	**14000**	**5200**
Sulfate	250	NA	mg/l	-	**140**	**560**	**160**
Total Dissolved Solids	500	NA	mg/l	-	**3300**	**8600**	**3300**
Metals							
Arsenic	0.01	50	mg/l	**0.1**	-	-	-
Barium	1	50	mg/l	**0.3**	-	-	-
Chromium	0.05	50	mg/l	**0.026**	-	-	-
Cobalt	NA	50	mg/l	**0.006**	-	-	-
Copper	1	50	mg/l	**0.017**	-	-	-
Lead	0.015	50	mg/l	**0.011**	-	-	-
Molybdenum	NA	50	mg/l	**0.06**	-	-	-
Nickel	0.1	50	mg/l	**0.049**	-	-	-
Vanadium	NA	50	mg/l	**0.035**	-	-	-
Zinc	5	50	mg/l	**0.046**	-	-	-
Total Petroleum Hydrocarbons							
Diesel Range Organics (C10-C23)	NA	2500	ug/l	**190**	**420**	**420**	**250**
Oil Range Organics (C23-C44)	NA	50000	ug/l	**170**	**560**	**230**	**340**

Notes
MCL - Maximum Contaminant Level (primary or secondary)
Gross contamination environmental screening level (ESL), San Francisco Bay Regional Water Quality Control Board, 2016
NA - Not published
- Not analyzed
mg/l - milligrams per liter
ug/l - micrograms per liter
umhos/cm - micromhos per centimeter
Exceeds MCL

Appendix A – Spectrum Geophysical Report

Geophysical Investigation

AECOM

Vacant Lot
128 Hurricane Street
Marina Del Rey, California
Project #1806131C

spectrum geophysics
REVEALING THE SUBSURFACE
20434 Corisco Street
Chatsworth, California 91311
1-877-565-3595

Geophysical Investigation
Vacant Lot
128 Hurricane Street
Marina Del Rey, California

Prepared For:
AECOM
300 South Grand Avenue, 8th Floor
Los Angeles, CA 90071

Prepared By:
Spectrum Geophysics
20434 Corisco Street
Chatsworth, CA 91311

June 28, 2018



Charles Carter
California Professional Geophysicist, P.Gp. 1051

spectrum geophysics
Revealing the Subsurface

TABLE OF CONTENTS **Page**

1.0 INTRODUCTION 3
2.0 EQUIPMENT 3
3.0 METHODS AND FIELD PROCEDURES 3
3.1 EM-61 High Sensitivity Metal Detector 4
3.2 Total Field Magnetics 4
3.3 Ground Penetrating Radar 5
3.4 Electromagnetic Utility Location 6
4.0 RESULTS 6
4.1 Total Field Magnetics 7
4.2 EM-61 7
4.3 GPR 7
5.0 LIMITATIONS 8
5.1 Total Field Magnetics 8
5.2 EM-61 8
5.3 GPR 8



LIST OF FIGURES

FIGURE	TITLE
1	Geophysical Interpretation Map
2	Contour Map of Total Magnetic Field Intensity
3	Contour Map of EM-61 Differential Data
4	Contour Map of GPR Signal Intensity (12-25ns)



1.0 INTRODUCTION

Spectrum Geophysics conducted a geophysical investigation on June 13, 2018 at the vacant lot located at 128 Hurricane Street in Marina Del Rey, California. The purpose of the investigation was to delineate the surface trace of detectable buried structures such as abandonded oil wells , steel underground storage tanks (USTs), drums or vaults. The area of investigation, as designated by the Kaleena Johnson of AECOM, was a soil covered lot with approximate dimensions of 45 feet by 85 feet.

The expected surficial geology in the upper 10 feet of the survey area (maximum depth of geophysical investigation) was Quaternary beach deposits consisting of unconsolidated, well-sorted fine- and medium-grained sand. There may also be artificial fill overlaying the Quaternary sediments within the survey area. The depth to the water table may be below the maximum depth of investigation, but moisture in the upper five feet of soil can contribute to corrosion of metallic survey targets and signal attenuation in ground penetrating radar data. Site interferences included the construction fence surrounding the survey area as well as the building and parked cars outside the fence.
Based on information provided by DOGGR, an oil well with API number 03713842 may be located within the survey area.

2.0 EQUIPMENT

The equipment used during this investigation consisted of a Geometrics G-858 cesium-vapor magnetometer (G-858), a CST Magna-Trak 100 fluxgate magnetic gradiometer, a Geonics EM-61 high-sensitivity metal detector (EM-61) linked to a Juniper Systems Allegro CX field computer (Allegro), a Sensors & Software “Noggin Smart Cart” ground penetrating radar (GPR) unit coupled to a 250 MHz antenna, a Fisher TW-6 M-Scope shallow-focus metal detector (M-Scope) and the RadioDetection RD4000 electromagnetic utility locator (RD4000).

3.0 METHODS AND FIELD PROCEDURES

Prior to data acquisition the geophysics grew established a grid with 5-foot stations on 10-foot survey lines parallel and perpendicular Hurricane Street. A survey chain with 5-foot markers was used to establish the survey lines and stations. Survey paint was used to mark the locations of each survey station on the ground.
Before the EM-61 survey begun the following instrument checks were performed. While the EM-61 was warming up, the battery level was checked and found to be greater than 12.5 volts. The EM-61 was then nulled at a base station with more than four meters of separation between the coils and any known metallic objects. A cable-shake test was performed to assure the cables were in good working condition and the connectors were fastened properly. Finally, a static test was run in which the instrument response to the soil and a metal bolt was monitored for amplitude and consistency of the readings. The EM-61 used in this survey was found to be working as expected.
Before acquiring any magnetics data, the G-858 was allowed to warm up for approximately five minutes while a system test was run and the sensor gained sufficient signal strength. The

battery level and memory space were also checked and found to be within acceptable levels. Significant anomalies identified in the contoured data were relocated with the G-858 in search mode and the fluxgate magnetometer to confirm the locations.

3.1 EM-61 High Sensitivity Metal Detector

The EM-61 high-sensitivity metal detector was used in an effort to delineate areas where metallic objects (such as steel underground storage tanks) may be buried. The EM-61 transmitter generates short pulses of a primary magnetic field that induces electromagnetic currents in nearby metallic objects. Between pulses, the two receiver coils measure the decay of these electromagnetic currents in millivolts (mV). The measured values are proportional to the metal content (ferrous and non-ferrous) of the nearby objects.



EM-61 data static test

During this investigation, EM-61 readings were collected along parallel northwest-southeast lines spaced 5 feet apart within the area of the investigation. EM-61 measurements were recorded every 2.5 feet along survey lines and stored in the Allegro field computer. It should be noted that the EM-61 data were collected within the blue dashed boundary identified in Figure 1. Top or bottom coil data can be useful for identifying buried metallic objects; although, the top coil generally has a greater response than the bottom coil to deeply buried objects. The differential data (top coil data minus the bottom coil data) were used during this survey to distinguish deeper targets such as metallic USTs or metallic piping from shallow ones such as scrap metal. Utilization of the differential data allows for the suppression of some near surface targets that could mask the response from deeper targets of interest. Data from the bottom coil were processed to locate shallow targets such as metallic pipes that could get filtered out in the differential data.

3.2 Total Field Magnetics

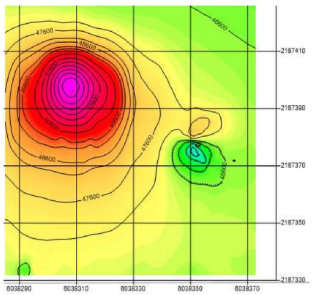


G-858 Magnetometer

A Geometrics G-858 Cesium-vapor magnetometer was used in an effort to identify significant magnetic anomalies that might be associated with massive buried ferromagnetic features, such as the steel casing from an abandoned oil well. The magnetometer used in this survey measures the earth's total magnetic field intensity in nanoteslas (nT). A very gradual change in the natural magnetic field is usually observed over small areas (a few acres) unless there are massive ferrous objects present. The shape and amplitude of a magnetic anomaly from a ferromagnetic object is dependent upon the geometry, mass, magnetic susceptibility of the object, depth to the object and the inclination of the earth's magnetic field in the survey area. Most magnetic anomalies from buried ferrous infrastructure like underground

storage tanks (USTs) or pipes are dipolar with the positive portion of the dipole centered over the southern extent of the ferrous metal and the negative portion located to the north of the object. Buried vertical structures like metallic well casing generally produce broad positive monopolar anomalies.

During this investigation, readings of the earth's total magnetic field were collected and stored in the G-858 console at 0.3-second intervals along the same northwest-southeast survey lines used for the EM-61 survey. The magnetic survey lines were spaced 5 feet apart within the grid. A marker button was pressed when the sensor passed each 5-foot grid point and the data were interpolated between these points. This resulted in a 1-foot station spacing on average. These data were processed in the field and used to generate contour maps to assist in identifying anomalies that may be caused by buried ferromagnetic features of interest.



Typical anomaly associated with a steel-cased well.

A magnetic anomaly, typical of a steel cased well, is characterized by a broad monopolar magnetic high with a magnitude ranging from 100's to 1000's of nanoteslas above the background magnetic field. These circular monopoles can have a radius of 10 feet or more depending on several factors like total mass of the casing and depth to the well head.

3.3 Ground Penetrating Radar

GPR was used to investigate anomalies detected with the EM-61. Because there were several EM-61 anomalies, GPR survey lines were tied to the established grid and covered the entire survey area. The GPR survey lines were spaced 5 feet apart. During the GPR survey, an antenna containing both a transmitter and a receiver was pushed along the ground surface. The transmitter emitted short pulses of high-frequency electromagnetic energy into the ground (with a center frequency of 250 MHz for this survey). When GPR waves encounter an interface of two materials having different electrical conduction properties, a portion of the energy is reflected back to the surface and received at the antenna at a time (in nanoseconds) that is related to the depth of the reflecting interface, where later times generally represent greater depths of investigation. A large contrast in GPR wave velocity between two mediums (soil and air for example) typically corresponds to a high amplitude reflection. A small contrast in GPR wave velocity between two mediums (concrete and sand for example) usually results in a low amplitude reflection which may not be detectable.



GPR Data Collection

The reflected signals were received at the antenna, transmitted to a control unit (the Smart Cart) and displayed on the computer screen as the data were being acquired. The data may be stored electronically, and subsequently processed with various software packages.

GPR data collected during this investigation were processed using GPR-Slice™ V7.0 by Dean Goodman. GPR-Slice™ allows the user to combine 2D radargrams to generate a 3D volume or a series of map view time slices. A series of 13 nanosecond time slices were generated and contoured based on GPR signal strength (absolute amplitude of reflected GPR scans). A total of 4 time slices were generated from the 2D radargrams acquired within the survey area. Each 13 nanosecond time slice represents approximately 1.5 vertical feet. The contour maps were used to identify GPR anomalies with lateral extents similar to a UST or backfilled UST pit. GPR profiles were reviewed in order to distinguish between horizontal GPR reflectors which may be the result of a utility or conductive soil layer, broad parabolic reflectors that may be the result of a UST or dipping GPR reflectors which may be the result of a sloped edge of a backfilled excavation. All GPR profiles and time slices were reviewed, and Figure 4 is presented as a representative time slice.

3.4 Electromagnetic Utility Location

During this investigation, both passive and active electromagnetic (EM) utility-locating methods were used in order to identify possible sources of EM-61 anomalies and to delineate the surface trace of detectable underground utilities.

Passive locating was used to find electrically conductive conduits energized by ambient radio frequencies (RF) produced by 50/60 cycle electrical, radio, audio, television, and communication transmissions. A receiver tuned to these frequencies was used to locate the re-radiated signal emitted by the conductor (i.e., conduit).

Active locating was initiated by conducting an EM signal at a known frequency (8 and 33 kHz for this site) on a conduit exposed at the surface. A receiver, tuned to these frequencies, was then used to locate the signal maxima (or surface trace) of the applied signal.

The Fisher M-Scope metal detector was used to relocate shallow buried metallic features identified in the EM-61 data. The M-Scope has a transmitter and a receiver at the ends of a short boom. The transmitter emits a radio-frequency source signal that induces a secondary magnetic field in metallic material in its immediate vicinity. The receiver measures the signal strength of this secondary magnetic field and emits an audible response, the volume and pitch of which increase in the presence of metallic material. The sensitivity of the M-Scope allows the operator to locate the lateral boundaries of a metallic object.

4.0 RESULTS

A geophysical interpretation map is presented in Figure 1, a contour map of the total magnetic field intensity is presented in Figure 2, a contour map of EM-61 differential data is presented in Figure 3 and contour map showing lateral changes in the GPR signal intensity is presented in Figure 4.

4.1 Total Field Magnetics

The colors in the contour map represent changes in the measured values of the total magnetic field. Green to deep blue colors on the color scale represent magnetic readings below background for this site. Background is set to yellow and light green colors (background at this site is approximately 47,000 nT which is common for this part of California). Orange to pink colors represent measured values that are increasingly above background. Surface metal, especially objects that extend beyond the height of the magnetometer sensor, generally produce moderate to high-amplitude "negative" magnetic anomalies with readings below background.

There are several moderate-amplitude negative anomalies in the magnetic data around the perimeter of the survey area at this site. These magnetic lows are the result of surface metal like the fence surrounding the site as well as the vehicles and apartment building located adjacent to the fence. There is one high-amplitude monopole with a radius of over 20 feet and a peak reading of over 90,000 nanoteslas. This is a common magnetic response to an abandoned oil well with 100's to 1000's of feet of steel casing. The magnetic peak was relocated with the cesium-vapor magnetometer in search mode and the fluxgate magnetometer and found to be located at 13E, 72N. A vertically oriented ferromagnetic object is expected to be buried at this location. It is very likely that the top of this object is less than 5 feet below the ground surface, especially considering that an EM-61 anomaly was also located at this approximate location. Considering DOGGR has a record of an abandoned oil well within the survey area it is very likely that an abandoned oil well is the source of the magnetic anomaly.

4.2 EM-61

The color scale in the contour map of the EM-61 differential data shows the magnitudes of the measured EM-61 values where yellow colors represent background readings, deep green to blue colors represent measured values below background (indicative of surface metal), while orange to pink represent increasing values above background. Due to the sensitivity of the EM-61, anomalies are usually exaggerated compared to the actual dimensions of the source metal. It is common for a sheared fence post to produce a 7-foot by 7-foot EM-61 anomaly while a 1000-gallon UST buried 4 feet below ground surface can produce an EM-61 anomaly with dimensions of 15 feet by 15 feet. The findings of the survey are discussed below.

There are several moderate-amplitude linear EM-61 anomalies along the perimeter of the survey area. These anomalies are the result of surface metal such as the fence. No anomalies with dimensions expected for a UST were located in the EM-61 data.

4.3 GPR

Several shallow high-amplitude GPR reflectors were imaged at this site, however no clear examples of an excavation or UST were identified in the GPR data. The changes in GPR reflector amplitudes may be from changes in the fill, animal burrows or small pieces of buried debris.

5.0 LIMITATIONS

The detection of subsurface objects and utilities is dependent upon acquiring reliable data with geophysical instruments above ground. These data may be interpreted as representative of subsurface objects. The EM waves or fields being measured, however, may be attenuated and/or distorted by a number of factors including soil moisture, corrosion, and proximity to other surface and subsurface structures. A discussion of the limitations of each method follows.

5.1 Total Field Magnetics

Metallic survey targets that are severely corroded may not be detectable with the magnetic method especially near massive objects like buildings or vehicles. When oil wells are the targets of a magnetics survey the casing may not be detectable if the distance between top of casing and the magnetometer sensor is too great, but 1000's of feet of casing can be detected with magnetics even if the well head is 25 feet below grade provided that there is not too much interference from surface metal. Total field magnetics surveys are subject to interference by induced magnetic fields associated with surface and subsurface cultural features that contain ferrous materials.

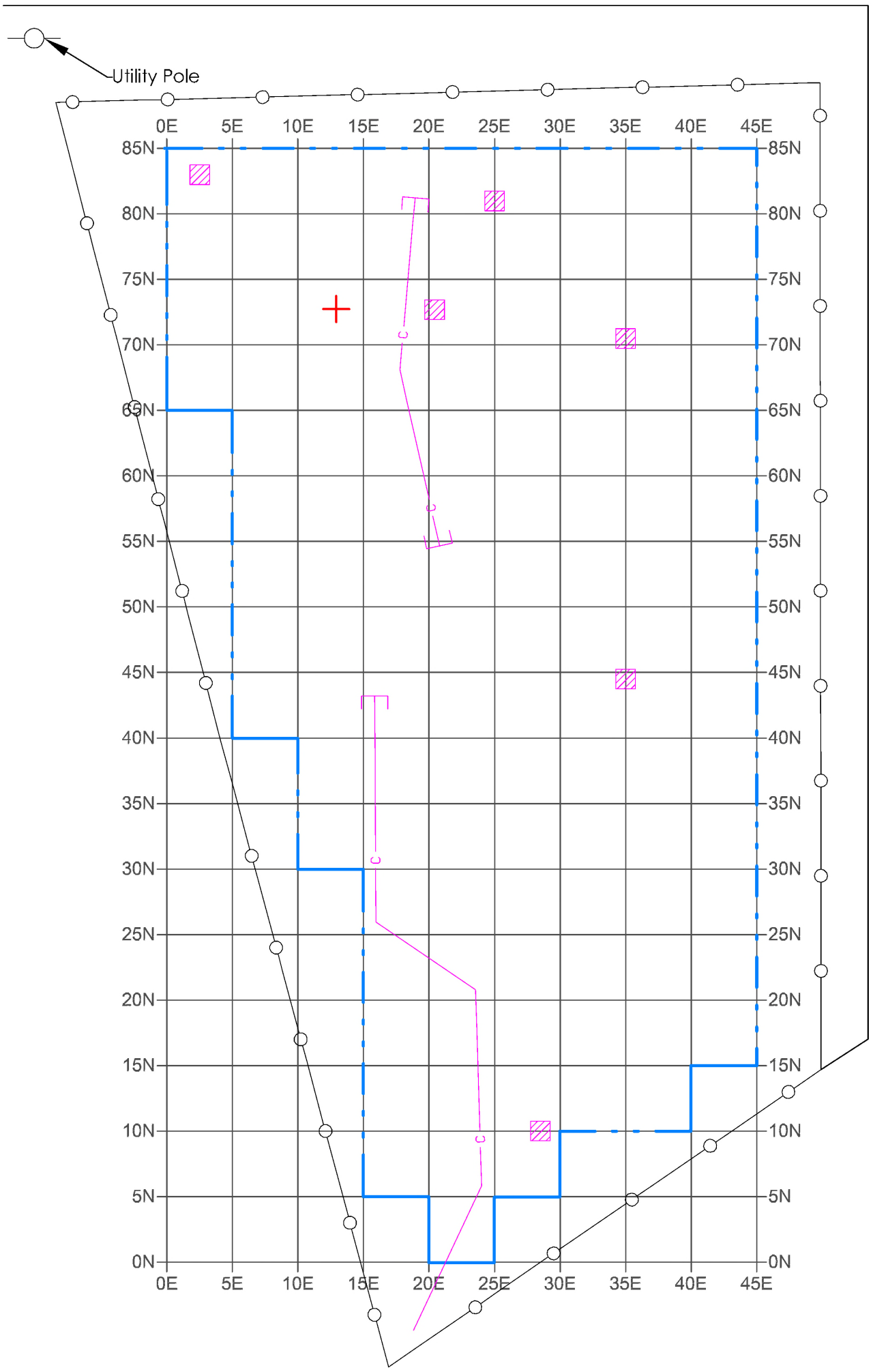
5.2 EM-61

The EM-61 is capable of detecting a 55-gallon drum up to a depth of 3 meters under favorable conditions. We recommend a minimum 10-foot buffer between the survey area and any metallic or metal bearing surface cultural features such as buildings, vehicles or aboveground piping which could severely compromise the quality of the data. The EM-61 data collected within 4 to 7 feet of surface metal such as the fence influenced the EM-61 response adversely. As a result, Spectrum cannot guarantee that all metallic objects present beneath the perimeter fence were identified.

5.3 GPR

The performance capability of GPR is dependent on the electrical conductivity of the soil at the site. If the soil conductivity is high, attenuation of the radar signal in the soil can severely restrict the maximum penetration depth of the radar signal. Under favorable conditions depth of penetration can be greater than 10 feet; however, average depths of GPR penetration in Southern California tend to range between 2-5 feet. Soil moisture, especially in clay rich soils, only increases the radar signal attenuation, further limiting the radar performance. The penetration depth of the GPR signal was approximately 3 feet in the area of investigation. As a consequence, some subsurface utilities may not have been detected, and USTs present at depths greater than 3 feet in the areas adjacent to significant metallic objects may not have been detected due to the shallow penetration of the GPR. Because of this limitation, Spectrum cannot guarantee that all non-metallic conduits, such as sewers and PVC water lines, have been identified within the area of investigation.

Hurricane Street



Canal Court

Area of Investigation

Magnetic Peak

C — Conduit

Chain Link Fence

Buried Metal

Trend Not Determined

N
W
E
S
North

Scale: (Feet)

0 5 10 20

***Note: Not all below ground utilities or features may be represented on this map

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20434 CORISCO STREET
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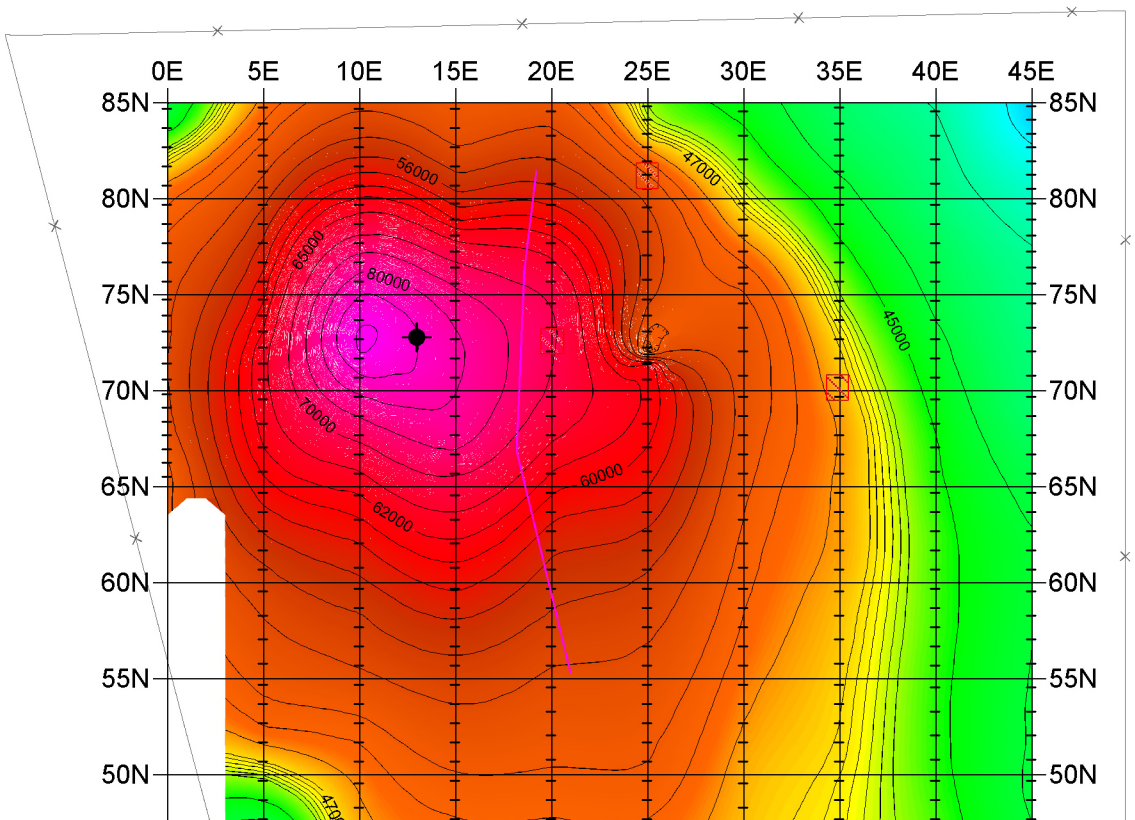
Phone: (818) 886-4500
www.spectrum-geophysics.com

MAP: Geophysical Interpretation Map				FIGURE NO.: 1
PROJECT: Vacant Lot, 128 Hurricane Street, Marina Del Rey, California				
PREPARED FOR: AECOM, Los Angeles, California				PROJECT NO.: 1806131C
SCALE: 1 inch = 10 feet	DWG BY: RJW	REVIEWED BY: CC	DATE: 6/28/2018	



LEGEND

- \+ Magnetics Survey Station
- Magnetic Peak- Expected location of oil well
- Buried Metal
- Unknown Line
- Fence

0 5 10
(feet)

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Chatsworth, California 91311
(818) 886-4500
www.spectrum-geophysics.com

Contour Map of Total Magnetic Field Intensity

FIGURE 2

PROJECT: Vacant Lot
128 Hurricane Street
Marina Del Rey, California

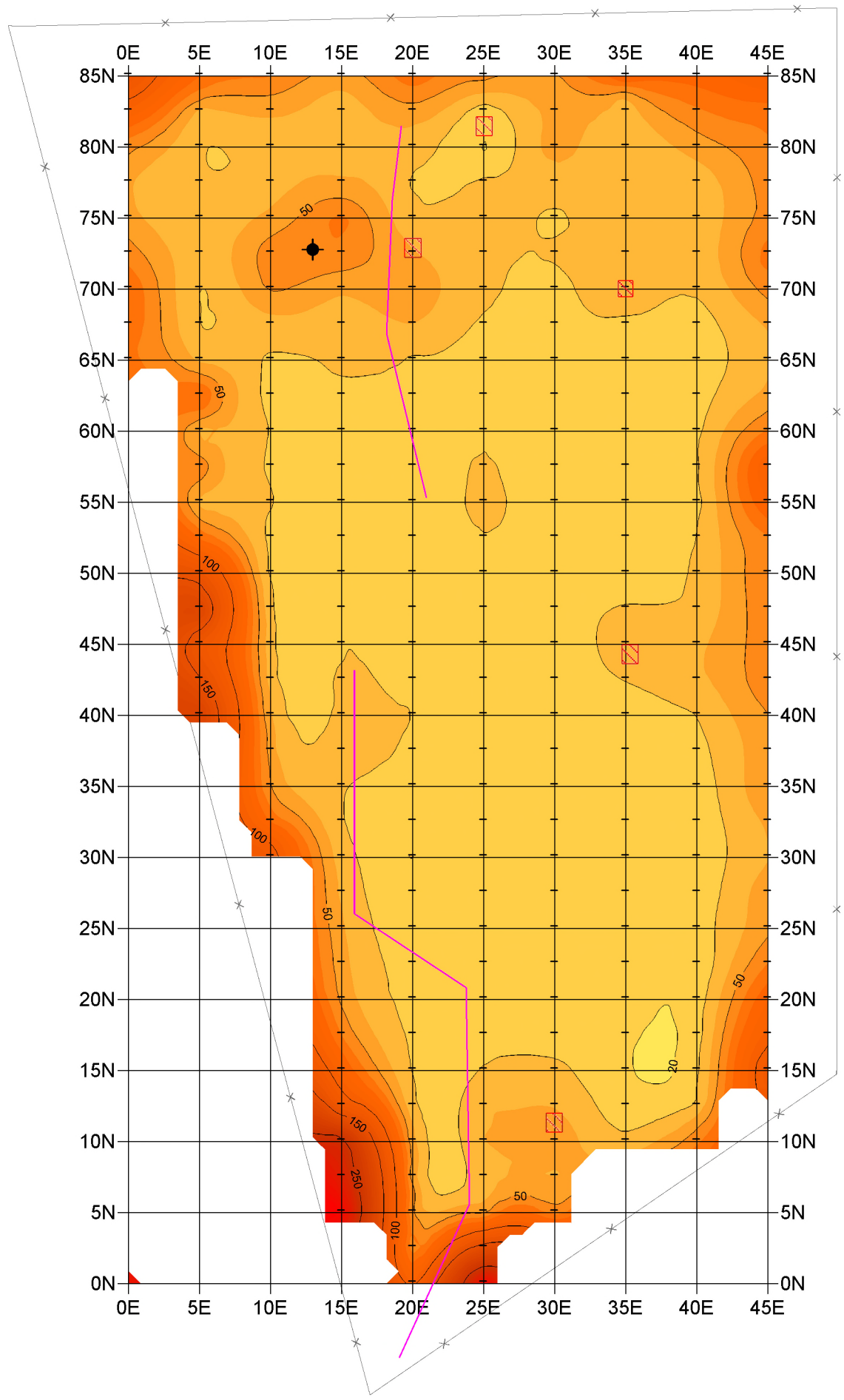
PREPARED FOR: AECOM
Los Angeles, California

PROJECT NO. 1806131C

SCALE: 1 inch = 10 feet

FIGURE BY: C. Carter

DATE: 06/28/18



EM-61 Differential Response (mV)

360
340
320
300
280
260
240
220
200
180
160
140
120
100
80
60
40
20
0

LEGEND

+ EM-61 Survey Station

Magnetic Peak- Expected location of oil well

Buried Metal

Unknown Line

Fence

0 5 10
(feet)

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www.spectrum-geophysics.com

Contour Map of EM-61 Differential Data

FIGURE 3

PROJECT
Vacant Lot
128 Hurricane Street
Marina Del Rey, California

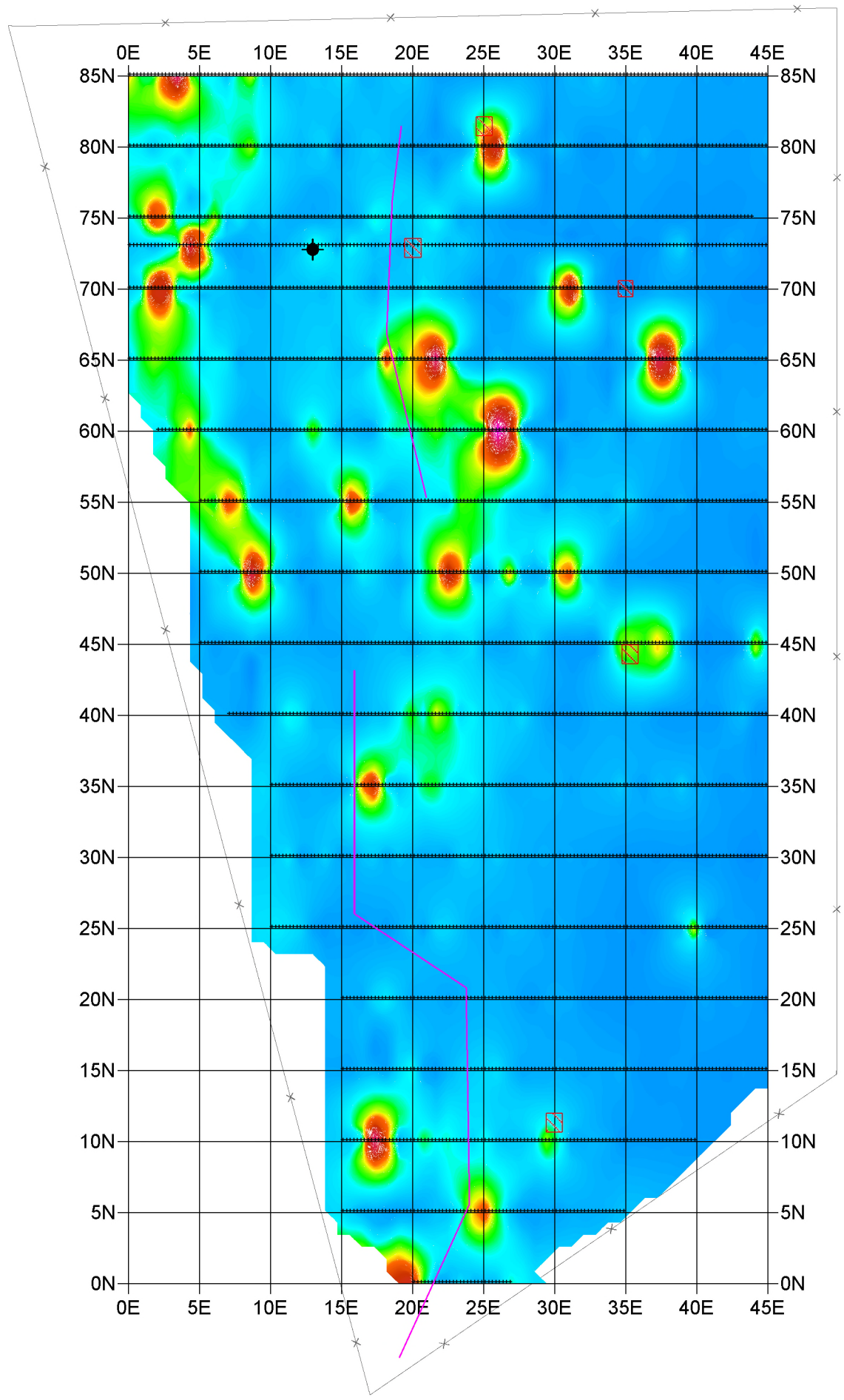
PREPARED FOR
AECOM
Los Angeles, California

PROJECT NO. 1806131C

SCALE 1 inch = 10 feet

FIGURE BY C. Carter

DATE 06/28/18



LEGEND

- GPR Survey Line
- Magnetic Peak- Expected location of oil well
- Buried Metal
- Unknown Line
- Fence

0 5 10
(feet)

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Contour Map of GPR Signal Intensity (12-25ns)

FIGURE 4

PROJECT: Vacant Lot, 128 Hurricane Street, Marina Del Rey, California

PREPARED FOR: AECOM, Los Angeles, California

PROJECT NO. 1806131C

SCALE: 1 inch = 10 feet

FIGURE BY: C. Carter

DATE: 06/28/18

Appendix B – Soil Borings Permits

ENVIRONMENTAL HEALTH

Drinking Water Program

5050 Commerce Drive, Baldwin Park, CA 91706
Telephone: (626) 430-5420 • Facsimile: (626) 813-3013 • Email: waterquality@ph.lacounty.gov
http://publichealth.lacounty.gov/eh/ep/dw/dw_main.htm

SR0120040
128 Hurricane Street, Marina Del Rey, CA 90292
Work Plan Approval

TO BE COMPLETED BY APPLICANT:

WORK SITE ADDRESS	CITY	ZIP	EMAIL ADDRESS FOR WELL PERMIT APPROVAL
128 Hurricane Street	Marina Del Rey	90292	carole.ostensen@aecom.com

NOTICE:

- WORK PLAN APPROVALS ARE VALID FOR 180 DAYS. 30 DAY EXTENSIONS OF WORK PLAN APPROVALS ARE CONSIDERED ON AN INDIVIDUAL (CASE-BY-CASE) BASIS AND MAY BE SUBJECT TO ADDITIONAL PLAN REVIEW FEES (HOURLY RATE AS APPLICABLE).
- WORK PLAN MODIFICATIONS MAY BE REQUIRED IF WELL AND GEOLOGIC CONDITIONS ENCOUNTERED AT THE SITE INSPECTION ARE FOUND TO DIFFER FROM THE SCOPE OF WORK PRESENTED TO THE DEPARTMENT OF PUBLIC HEALTH—DRINKING WATER PROGRAM.
- WORK PLAN APPROVALS ARE LIMITED TO COMPLIANCE WITH THE CALIFORNIA WELL STANDARDS AND THE LOS ANGELES COUNTY CODE AND DOES NOT GRANT ANY RIGHTS TO CONSTRUCT, RENOVATE, OR DECOMMISSION ANY WELL. THE APPLICANT IS RESPONSIBLE FOR SECURING ALL OTHER NECESSARY PERMITS SUCH AS WATER RIGHTS, PROPERTY RIGHTS, COASTAL COMMISSION APPROVALS, USE COVENANTS, ENCROACHMENT PERMISSIONS, UTILITY LINE SETBACKS, CITY/COUNTY PUBLIC WORKS RIGHTS OF WAY, ETC.
- ALL FIELD WORK MUST BE CONDUCTED UNDER THE DIRECT SUPERVISION OF A PROFESSIONAL GEOLOGIST LICENSED IN THE STATE OF CALIFORNIA.
- THIS PERMIT IS NOT COMPLETE UNTIL ALL OF THE FOLLOWING REQUIREMENTS ARE SIGNED BY THE DEPUTY HEALTH OFFICER. WORK SHALL NOT BE INITIATED WITHOUT A WORK PLAN APPROVAL STAMPED BY THE DEPARTMENT OF PUBLIC HEALTH—DRINKING WATER PROGRAM.
- ***ONCE APPROVED NOTIFY INSPECTOR AT ytaye@ph.lacounty.gov PREFERABLY 3 BUSINESS DAYS BEFORE WORK IS SCHEDULED TO BEGIN.***

TO BE COMPLETED BY DEPARTMENT OF PUBLIC HEALTH—DRINKING WATER PROGRAM:

X WORK PLAN APPROVED (6 soil borings) **DATE: September 26, 2017**

ADDITIONAL APPROVAL CONDITIONS:

- Provide the start of project date and time via my email listed above.
- Ensure to backfill using a tremie pipe or equivalent, proceeding upward from the bottom of the boring.
- Exploration holes must comply with all applicable requirements published in the California Well Standards (Bulletins 74-81 and 74-90).

REHS NO: 7115

Yonas Taye, REHS

□ ANNULAR SEAL FINAL INSPECTION REQUIRED

DATE ACCEPTED:	REHS signature

□ WELL COMPLETION LOG REQUIRED

DATE ACCEPTED:	REHS signature

□ WATER QUALITY—BACTERIOLOGICAL STANDARDS REQUIRED

DATE ACCEPTED:	REHS signature

□ WATER QUALITY—CHEMICAL STANDARDS REQUIRED

DATE ACCEPTED:	REHS signature

□ WATER SUPPLY YIELD REQUIRED

DATE ACCEPTED:	REHS signature

□ OTHER REQUIREMENT

DATE ACCEPTED:	REHS signature

ENVIRONMENTAL HEALTH

Drinking Water Program

5050 Commerce Drive, Baldwin Park, CA 91706
Telephone: (626) 430-5420 • Facsimile: (626) 813-3013 • Email: waterquality@ph.lacounty.gov
http://publichealth.lacounty.gov/eh/ep/dw/dw_main.htm

SR0149848
128 Hurricane Street, Marina Del Rey, CA 90292
Work Plan Approval

TO BE COMPLETED BY APPLICANT:

WORK SITE ADDRESS	CITY	ZIP	EMAIL ADDRESS FOR WELL PERMIT APPROVAL
128 Hurricane Street	Marina Del Rey	90292	Kaleena.Johnson@aecom.com

NOTICE:

- WORK PLAN APPROVALS ARE VALID FOR 180 DAYS. 30 DAY EXTENSIONS OF WORK PLAN APPROVALS ARE CONSIDERED ON AN INDIVIDUAL (CASE-BY-CASE) BASIS AND MAY BE SUBJECT TO ADDITIONAL PLAN REVIEW FEES (HOURLY RATE AS APPLICABLE).
- WORK PLAN MODIFICATIONS MAY BE REQUIRED IF WELL AND GEOLOGIC CONDITIONS ENCOUNTERED AT THE SITE INSPECTION ARE FOUND TO DIFFER FROM THE SCOPE OF WORK PRESENTED TO THE DEPARTMENT OF PUBLIC HEALTH—DRINKING WATER PROGRAM.
- WORK PLAN APPROVALS ARE LIMITED TO COMPLIANCE WITH THE CALIFORNIA WELL STANDARDS AND THE LOS ANGELES COUNTY CODE AND DOES NOT GRANT ANY RIGHTS TO CONSTRUCT, RENOVATE, OR DECOMMISSION ANY WELL. THE APPLICANT IS RESPONSIBLE FOR SECURING ALL OTHER NECESSARY PERMITS SUCH AS WATER RIGHTS, PROPERTY RIGHTS, COASTAL COMMISSION APPROVALS, USE COVENANTS, ENCROACHMENT PERMISSIONS, UTILITY LINE SETBACKS, CITY/COUNTY PUBLIC WORKS RIGHTS OF WAY, ETC.
- ALL FIELD WORK MUST BE CONDUCTED UNDER THE DIRECT SUPERVISION OF A PROFESSIONAL GEOLOGIST LICENSED IN THE STATE OF CALIFORNIA.
- THIS PERMIT IS NOT COMPLETE UNTIL ALL OF THE FOLLOWING REQUIREMENTS ARE SIGNED BY THE DEPUTY HEALTH OFFICER. WORK SHALL NOT BE INITIATED WITHOUT A WORK PLAN APPROVAL STAMPED BY THE DEPARTMENT OF PUBLIC HEALTH—DRINKING WATER PROGRAM.
- ***ONCE APPROVED NOTIFY INSPECTOR AT ytaye@ph.lacounty.gov PREFERABLY 3 BUSINESS DAYS BEFORE WORK IS SCHEDULED TO BEGIN.***

TO BE COMPLETED BY DEPARTMENT OF PUBLIC HEALTH—DRINKING WATER PROGRAM:

X WORK PLAN APPROVED (18 soil borings) **DATE: June 27, 2018**

ADDITIONAL APPROVAL CONDITIONS:

- Provide the start of project date and time via my email listed above.
- Ensure to backfill using a tremie pipe or equivalent, proceeding upward from the bottom of the boring.
- Exploration holes must comply with all applicable requirements published in the California Well Standards (Bulletins 74-81 and 74-90).

REHS NO: 7115

Yonas Taye, REHS

□ ANNULAR SEAL FINAL INSPECTION REQUIRED		□ WELL COMPLETION LOG REQUIRED	
DATE ACCEPTED:	REHS signature	DATE ACCEPTED:	REHS signature
□ WATER QUALITY—BACTERIOLOGICAL STANDARDS REQUIRED		□ WATER QUALITY—CHEMICAL STANDARDS REQUIRED	
DATE ACCEPTED:	REHS signature	DATE ACCEPTED:	REHS signature
□ WATER SUPPLY YIELD REQUIRED		□ OTHER REQUIREMENT	
DATE ACCEPTED:	REHS signature	DATE ACCEPTED:	REHS signature

Appendix C – Soil Boring Logs

Project: City of Los Angeles Sanitation
Project Location: 128 Hurricane Street
Project Number: 60553849

Log of SB-1

Sheet 1 of 1

Date(s) Drilled	6/20/18	Logged By	A. Vigna	Checked By	
Drilling Method	Hand Auger	Drilling Contractor	ABC	Total Depth of Borehole	4.5 feet bgs
Drill Rig Type	NA	Drill Bit Size/Type	3" Hand Auger Bucket	Surface Elevation (ft-msl)	7.20
Groundwater Level (feet bgs)	Not Encountered	Sampling Method(s)	Hand Auger Bucket	Top of PVC Elevation	NA
Diameter of Hole (inches)	3	Diameter of Well (inches)	1/4	Type of Well Casing	1/4 inch Teflon tubing	Screen Perforation	6" SS probe
Type of Sand Pack	No. 3 SAND	Type/Thickness of Seal(s)	Hydrated No. 8 bentonite (0 to 2.5 ft bgs), dry No. 8 bentonite (2.5 to 3 ft bgs).		
Comments	Refusal at 4.5 feet bgs.				

Elevation, feet	Depth, feet	SAMPLES Type	SAMPLES Number	Blows/6"	Graphic Log	MATERIAL DESCRIPTION	Well Completion Log	PID Headspace (ppm)	PID Background (ppm)	Sample Time	REMARKS
	0										
			SB-1-0.5	NA		Brown (10YR 5/3), silty fine SAND (SM), moist; rootlets; concrete debris.		2.7	0.1	1415	
			SB-1-1			Becomes dark brown (10YR 5/3).		1.4	0.1	1430	
-5	2		SB-1-2.5			Becomes silty SAND with Gravel (SM).		2.0	0.1	1445	
	4					Brown (10YR 5/3), sandy GRAVEL, moist; concrete debris.					
	6					Refusal at 4.5 feet bgs (three step outs attempted). Groundwater not encountered.					
0	8										
	10										
-5	12										
	14										
	16										
-10	18										
	20										
-15	22										

Project: City of Los Angeles Sanitation
Project Location: 128 Hurricane Street
Project Number: 60553849

Log of SB-2

Sheet 1 of 1

Date(s) Drilled	6/20/18	Logged By	A. Vigna	Checked By	
Drilling Method	Hand Auger	Drilling Contractor	ABC	Total Depth of Borehole	2.5 feet bgs
Drill Rig Type	NA	Drill Bit Size/Type	3" Hand Auger Bucket	Surface Elevation (ft-msl)	7.20
Groundwater Level (feet bgs)	Not Encountered	Sampling Method(s)	Hand Auger Bucket	Top of PVC Elevation	NA
Diameter of Hole (inches)	3	Diameter of Well (inches) NA	Type of Well Casing NA	Screen Perforation	NA
Type of Sand Pack	NA	Type/Thickness of Seal(s)	NA		
Comments	Refusal at 2.5 feet bgs.				

Elevation, feet	Depth, feet	SAMPLES Type	Number	Blows/6 in.	Inches Recovered	Graphic Log	MATERIAL DESCRIPTION	PID Headspace (ppm)	PID Background (ppm)	Sample Time	REMARKS
	0										
			SB-2-0.5	NA	6/6		Brown (10YR 5/3), silty fine SAND (SM), moist; rootlets; concrete debris.	1.2	0.1	1455	
			SB-2-1		6/6			0.6	0.1	1500	
			SB-2-1DUP		6/6					1500	
-5	2										
	4						Refusal at 2.5 feet bgs. Three step out borings attempted. Backfilled with hydrated bentonite.				
	6										
0	8										
	10										
-5	12										
	14										
	16										
-10	18										
	20										
-15	22										

Project: City of Los Angeles Sanitation
Project Location: 128 Hurricane Street
Project Number: 60553849

Log of SB-3

Sheet 1 of 1

Date(s) Drilled	6/20/18	Logged By	A. Vigna	Checked By	
Drilling Method	Hand Auger	Drilling Contractor	ABC	Total Depth of Borehole	6.0 feet bgs
Drill Rig Type	NA	Drill Bit Size/Type	3" Hand Auger Bucket	Surface Elevation (ft-msl)	7.20
Groundwater Level (feet bgs)	4.5	Sampling Method(s)	Hand Auger Bucket	Top of PVC Elevation	NA
Diameter of Hole (inches)	3	Diameter of Well (inches)	1/4	Type of Well Casing	1/4 inch Teflon tubing	Screen Perforation	6" SS probe
Type of Sand Pack	No. 3 SAND	Type/Thickness of Seal(s)	Hydrated No. 8 bentonite (0 to 2.5 & 4 to 6 ft bgs), dry No. 8 bentonite (2.5 to 3 ft bgs).		
Comments	Refusal at 6 feet bgs.				

Elevation, feet	Depth, feet	SAMPLES Type	SAMPLES Number	Blows/6"	Graphic Log	MATERIAL DESCRIPTION	Well Completion Log	PID Headspace (ppm)	PID Background (ppm)	Sample Time	REMARKS
	0										
			SB-3-0.5	NA		Brown (10YR 5/3), silty SAND (SM), moist; rootlets and gravel present.		0.2	0.0	1330	
			SB-3-1			Becomes dark brown (10YR 3/3).		1.1	0.0	1340	
-5	2		SB-3-2.5			Becomes silty SAND with gravel (SM).		1.7	0.1	1350	
	4		SB-3-5			Very dark gray (10YR 3/1), SAND with silt (SP-SM), moist. ▼		2.3	0.0	1400	
			SB-5-5DUP								
	6					Becomes wet. ▽					
-0						Refusal at 6 feet bgs. Groundwater encountered at 6 feet, then rose to 4.5 feet bgs.					
	8										
	10										
-5	12										
	14										
	16										
-10	18										
	20										
-15	22										

Project: City of Los Angeles Sanitation
Project Location: 128 Hurricane Street
Project Number: 60553849

Log of SB-4

Sheet 1 of 1

Date(s) Drilled	6/20/18	Logged By	A. Vigna	Checked By	
Drilling Method	Hand Auger and HSA	Drilling Contractor	ABC	Total Depth of Borehole	20.0 feet bgs
Drill Rig Type	CME 75	Drill Bit Size/Type	3" Hand Auger Bucket and 8" Hollow Stem bit	Surface Elevation (ft-msl)	7.20
Groundwater Level (feet bgs)	5.5	Sampling Method(s)	Hand Auger Bucket and Split Spoon	Top of PVC Elevation	NA
Diameter of Hole (inches)	8	Diameter of Well (inches) NA	Type of Well Casing NA	Screen Perforation	NA
Type of Sand Pack	NA	Type/Thickness of Seal(s)	NA		
Comments	Hand augered 0 to 5 feet bgs. Total depth at 20 feet bgs. Temporary well set 5 feet into groundwater for grab groundwater sample collection.				

Elevation, feet	Depth, feet	SAMPLES Type	Number	Blows/6 in.	Inches Recovered	Graphic Log	MATERIAL DESCRIPTION	PID Headspace (ppm)	PID Background (ppm)	Sample Time	REMARKS
	0						Light brown (10YR 6/3), sandy SILT (ML), moist; rootlets; concrete debris.	-	-	0900	
			SB-4-0.5	NA	6/6						
			SB-4-1	NA	6/6		Light brown (10YR 6/3), fine SAND with silt (SP-SM), moist.	1.8	0.0	0905	
-5	2		SB-4-2.5	NA	6/6			3.1	0.0	0912	
	4		SB-4-3.5	NA	6/6		Grayish brown (10YR 5/2), sandy CLAY (CL), moist; odor and staining.	7.5	0.0	0918	
			SB-4-5	NA	6/6		Very dark gray (10YR 3/1), SAND with silt (SP-SM), wet; odor.	4.2	0.1	0930	
0	6										
	8						Very dark gray (10YR 3/1), fine SAND (SP), wet; odor.				
	10		SB-4-10	6 9 10	12/18			3.1	0.1	1002	
-5	12										
	14										
	16		SB-4-15	-	12/18			3.4	0.0	1020	
-10							Very dark gray (10YR 3/1), SILT with sand (ML), wet; odor.				
	18										
	20						Total depth at 20 feet bgs. Groundwater encountered at 5 feet bgs; static at 5.5 feet bgs. Backfilled with 95% cement/5% bentonite grout.				
-15	22										

Project: City of Los Angeles Sanitation
Project Location: 128 Hurricane Street
Project Number: 60553849

Log of SB-5

Sheet 1 of 1

Date(s) Drilled	6/20/18	Logged By	A. Vigna	Checked By	
Drilling Method	Hand Auger	Drilling Contractor	ABC	Total Depth of Borehole	5.0 feet bgs
Drill Rig Type	NA	Drill Bit Size/Type	3" Hand Auger Bucket	Surface Elevation (ft-msl)	7.20
Groundwater Level (feet bgs)	5	Sampling Method(s)	Hand Auger Bucket	Top of PVC Elevation	NA
Diameter of Hole (inches)	3	Diameter of Well (inches) NA	Type of Well Casing NA	Screen Perforation	NA
Type of Sand Pack	NA	Type/Thickness of Seal(s)	NA		
Comments					

Elevation, feet	Depth, feet	SAMPLES Type	Number	Blows/6 in.	Inches Recovered	Graphic Log	MATERIAL DESCRIPTION	PID Headspace (ppm)	PID Background (ppm)	Sample Time	REMARKS
	0										
			SB-5-0.5	NA	6/6		Brown (10YR 5/3), silty SAND (SM), moist; rootlets; concrete debris.	0.8	0.1	1140	
			SB-5-1	NA	6/6			0.1	0.0	1150	
-5	2		SB-5-2.5	NA	6/6		Becomes light yellowish brown (10YR 6/4) to dark brown (10YR 3/3).	1.0	0.0	1225	Wood debris present. Step out 5 feet northeast.
	4		SB-5-5	NA	6/6		Very dark gray (10YR 3/1), sand CLAY (CL), wet.	1.4	0.0	1225	
	6						Refusal at 5 feet bgs due to heaving sands. Groundwater encountered at 5 feet bgs. Backfill with hydrated bentonite.				
-0	8										
	10										
-5	12										
	14										
	16										
-10	18										
	20										
-15	22										

Project: City of Los Angeles Sanitation
Project Location: 128 Hurricane Street
Project Number: 60553849

Log of SB-6

Sheet 1 of 1

Date(s) Drilled	6/20/18	Logged By	A. Vigna	Checked By	
Drilling Method	Hand Auger	Drilling Contractor	ABC	Total Depth of Borehole	5.0 feet bgs
Drill Rig Type	NA	Drill Bit Size/Type	3" Hand Auger Bucket	Surface Elevation (ft-msl)	7.20
Groundwater Level (feet bgs)	5	Sampling Method(s)	Hand Auger Bucket	Top of PVC Elevation	NA
Diameter of Hole (inches)	3	Diameter of Well (inches) NA	Type of Well Casing NA	Screen Perforation	NA
Type of Sand Pack	NA	Type/Thickness of Seal(s)	NA		
Comments					

Elevation, feet	Depth, feet	SAMPLES Type	Number	Blows/6 in.	Inches Recovered	Graphic Log	MATERIAL DESCRIPTION	PID Headspace (ppm)	PID Background (ppm)	Sample Time	REMARKS
	0										
			SB-6-0.5	NA	6/6		Light brown (10YR 6/3), sandy SILT (ML), moist; rootlets.	1.2	0.1	1100	
			SB-6-1	NA	6/6		Light brown (10YR 6/3), fine to medium SAND with silt, moist.	1.2	0.1	1105	
-5	2						Dark brown (10YR 3/3), silty SAND, moist.				
			SB-6-2.5	NA	6/6			3.4	0.0	1120	
	4						Becomes wet.				
			SB-6-5	NA	6/6		Very dark gray (10YR 3/1), fat CLAY (CH), wet.	0.6	0.1	1130	
	6						Refusal at 5 feet bgs due to heaving sands. Groundwater encountered at 4 feet bgs. Backfill with hydrated bentonite.				
-0	8										
	10										
-5	12										
	14										
	16										
-10	18										
	20										
-15	22										

Appendix D – Waste Manifest Documentation

Manifest

SOIL SAFE OF CA – TPST
Non-Hazardous Soils

↓ Manifest # ↓

Date of Shipment:	Responsible for Payment:	Transport Truck #:	Facility #:	Approval Number:	Load #
7 /			A07	49072	

Generator and/or Consultant

Generator's Name and Billing Address: CITY OF LOS ANGELES, BUREAU OF ENGINEERING, WASTEWATER CONVEYANCE ENGINEERING DIVISION 1149 S. BROADWAY, SUITE 600 LOS ANGELES, CA 90015	Generator's Phone #: 213-847-0323 Person to Contact: FAX#:	 Customer Account Number
Consultant's Name and Billing Address:	Consultant's Phone #: Person to Contact: FAX#:	 Customer Account Number
Generation Site (Transport from): *(name & address)* LOT AT 128 HURRICANE STREET 128 HURRICANE STREET MARINA DEL REY, CA 90292	Site Phone #: Person to Contact: FAX#:	
Designated Facility (Transport to): *(name & address)* SOIL SAFE 12328 HIBISCUS AVENUE ADELANTO, CA 92301	Facility Phone #: (800) 862-8001 Person to Contact: JOE PROVANSAL FAX#: (760) 246-8004	
Transporter Name and Mailing Address: BELSHIRE 25971 TOWNE CENTRE DRIVE FOOTHILL RANCH, CA 92610 BESI: 296040	Transporter's Phone #: 949-460-5200 Person to Contact: LARRY MOOTHART FAX#: 949-460-5210	CAR000183913 450647 Customer Account Number

Description of Soil	Moisture Content	Contaminated by:	Approx. Qty:	Description of Delivery	Gross Weight	Tare Weight	Net Weight
Sand ☐ Organic ☐ Clay ☐ Other ☐	0 - 10% ☐ 10 - 20% ☐ 20% - over ☐	Gas ☐ Diesel ☐ Other ☐	002 DM	Soil			
Sand ☐ Organic ☐ Clay ☐ Other ☐	0 - 10% ☐ 10 - 20% ☐ 20% - over ☐	Gas ☐ Diesel ☐ Other ☐					

List any exception to items listed above: Scale Ticket #

Generator's and/or consultant's certification: I/We certify that the soil referenced herein is taken entirely from those soils descried in the Soil Data Sheet completed and certified by me/us for the Generation Site shown above and nothing has been added or done to such soil that would alter it in any way.

Print or Type Name: Generator ☐ Consultant ☐	Signature and date:	Month	Day	Year
Larry Moothart of BESI on behalf of generator		7	13	18

Transporter

Transporter's certification: I/We acknowledge receipt of the soil referenced above and certify that such soil is being delivered in exactly the same condition as when received. I/We further certify that the soil is being directly transported from the Generation Site to the Designated Facility without off-loading, adding to, subtracting from or in any way delaying delivery to such site.

Print or Type Name:	Signature and date:	Month	Day	Year
Frank Torres	Frank Torres	7	13	18

Recycling Facility

Discrepancies:

Recycling Facility certifies the receipt of the soil covered by this manifest except as noted above:

Print or Type Name:	Signature and date:
J. PROVANSAL	

Please print or type.

GENERATOR/CONSULTANTS COPY

NO. 742718

NON-HAZARDOUS WASTE DATA FORM

BESI # 296040

GENERATOR

Generator's Name and Mailing Address

CITY OF LOS ANGELES, BUREAU OF ENGINEERING,
WASTEWATER CONVEYANCE ENGINEERING DIVISION
1149 S. BROADWAY, SUITE 600
LOS ANGELES, CA 90015

Generator's Site Address (if different than mailing address)

LOT AT 128 HURRICANE STREET
128 HURRICANE STREET
MARINA DEL REY, CA 90292

Generator's Phone: 213-847-0323

Container type removed from site:

☒ Drums ☐ Vacuum Truck ☐ Roll-off Truck ☐ Dump Truck

☐ Other _____

Quantity 001

Container type transported to receiving facility:

☐ Drums ☒ Vacuum Truck ☐ Roll-off Truck ☐ Dump Truck

☐ Other _____

Quantity 001 Volume 020 gal

WASTE DESCRIPTION NON-HAZARDOUS WATER

GENERATING PROCESS DECON WATER

COMPONENTS OF WASTE	PPM	%
1. WATER		99-100%
2. TPH		<1%

COMPONENTS OF WASTE	PPM	%
3.		
4.		

Waste Profile _____ PROPERTIES: pH 7-10 ☐ SOLID ☒ LIQUID ☐ SLUDGE ☐ SLURRY ☐ OTHER _____

HANDLING INSTRUCTIONS: WEAR ALL APPROPRIATE PERSONAL PROTECTIVE CLOTHING.

Generator Printed/Typed Name: Larry Moothart of BESI on behalf of generator | Signature | Month 7 | Day 13 | Year 18

The Generator certifies that the waste as described is 100% non-hazardous

TRANSPORTER

Transporter 1 Company Name: BELSHIRE | Phone#: 949-460-5200

Transporter 1 Printed/Typed Name: Frank Torres | Signature | Month 7 | Day 13 | Year 18

Transporter Acknowledgment of Receipt of Materials

Transporter 2 Company Name: NIETO & SONS TRUCKING, INC. | Phone#: 714-990-6855

Transporter 2 Printed/Typed Name | Signature | Month | Day | Year

Transporter Acknowledgment of Receipt of Materials

RECEIVING FACILITY

Designated Facility Name and Site Address

DEMENNO KERDOON
2000 N. ALAMEDA ST.
COMPTON, CA 90222

Phone#: 310-537-7100

Printed/Typed Name | Signature | Month | Day | Year

Designated Facility Owner or Operator: Certification of receipt of materials covered by this data form.

Appendix E – Soil and Groundwater Analytical Laboratory Reports and Chains of Custody

AMERICAN ANALYTICS

9765 Eton Avenue
Chatsworth
California 91311
Tel: (818) 998-5547
Fax: (818) 998-7258

June 29, 2018

Kaleena Johnson

AECOM (LA)

300 S. Grand Ave., Suite 800

Los Angeles, CA 90017

Re : 128 Hurricane - Soil & GW

A94898 / 8F20019

Enclosed is an analytical report for the above-referenced project. The samples included in this report were received on 06/20/18 18:22 and analyzed in accordance with the attached chain-of-custody.

Unless otherwise noted, all analytical testing was accomplished in accordance with the guidelines established in our Quality Assurance Program Manual, applicable standard operating procedures, and other related documentation. The results in this analytical report are limited to the samples tested and any reproduction thereof must be made in its entirety.

If you have any questions regarding this report or require additional information please call me at American Analytics.

Sincerely,



Viorel Vasile

Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Sample ID	Laboratory ID	Matrix	TAT	Date Sampled	Date Received
8081A OCPs					
SB-4-0.5	8F20019-01	Soil	2	06/20/18 09:00	06/20/18 18:22
SB-6-0.5	8F20019-08	Soil	2	06/20/18 11:00	06/20/18 18:22
SB-3-0.5	8F20019-16	Soil	2	06/20/18 13:30	06/20/18 18:22
SB-1-0.5	8F20019-20	Soil	2	06/20/18 14:15	06/20/18 18:22
8082 PCBs					
SB-6-0.5	8F20019-08	Soil	2	06/20/18 11:00	06/20/18 18:22
SB-1-0.5	8F20019-20	Soil	2	06/20/18 14:15	06/20/18 18:22
8151A Herbicides					
SB-6-0.5	8F20019-08	Soil	2	06/20/18 11:00	06/20/18 18:22
SB-1-0.5	8F20019-20	Soil	2	06/20/18 14:15	06/20/18 18:22
8260B/5035 +OXYGENATES					
SB-4-1	8F20019-02	Soil	2	06/20/18 09:05	06/20/18 18:22
SB-4-3.5	8F20019-04	Soil	2	06/20/18 09:18	06/20/18 18:22
SB-4-5	8F20019-05	Soil	2	06/20/18 09:30	06/20/18 18:22
SB-4-10	8F20019-06	Soil	2	06/20/18 10:02	06/20/18 18:22
SB-4-15	8F20019-07	Soil	2	06/20/18 10:20	06/20/18 18:22
SB-6-1	8F20019-09	Soil	2	06/20/18 11:05	06/20/18 18:22

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Sample ID	Laboratory ID	Matrix	TAT	Date Sampled	Date Received
SB-6-5	8F20019-11	Soil	2	06/20/18 11:30	06/20/18 18:22
SB-5-1	8F20019-13	Soil	2	06/20/18 11:50	06/20/18 18:22
SB-5-5	8F20019-15	Soil	2	06/20/18 12:25	06/20/18 18:22
SB-3-1	8F20019-17	Soil	2	06/20/18 13:40	06/20/18 18:22
SB-3-5	8F20019-19	Soil	2	06/20/18 14:00	06/20/18 18:22
SB-1-1	8F20019-21	Soil	2	06/20/18 14:30	06/20/18 18:22
SB-2-1	8F20019-24	Soil	2	06/20/18 15:00	06/20/18 18:22
SB-2-1 DUP	8F20019-27	Soil	2	06/20/18 15:00	06/20/18 18:22
SB-3-5 DUP	8F20019-28	Soil	2	06/20/18 14:00	06/20/18 18:22
8260B+OXYGENATES					
TB-062018	8F20019-25	Water	2	06/20/18 08:00	06/20/18 18:22
SB-4	8F20019-26	Water	2	06/20/18 15:20	06/20/18 18:22
8270C					
SB-4-3.5	8F20019-04	Soil	2	06/20/18 09:18	06/20/18 18:22
SB-4-5	8F20019-05	Soil	2	06/20/18 09:30	06/20/18 18:22
CAM Metals Less Hg 6000/7000					
SB-4-0.5	8F20019-01	Soil	2	06/20/18 09:00	06/20/18 18:22
SB-4-3.5	8F20019-04	Soil	2	06/20/18 09:18	06/20/18 18:22
SB-4-5	8F20019-05	Soil	2	06/20/18 09:30	06/20/18 18:22

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Sample ID	Laboratory ID	Matrix	TAT	Date Sampled	Date Received
SB-4-10	8F20019-06	Soil	2	06/20/18 10:02	06/20/18 18:22
SB-6-0.5	8F20019-08	Soil	2	06/20/18 11:00	06/20/18 18:22
SB-6-2.5	8F20019-10	Soil	2	06/20/18 11:20	06/20/18 18:22
SB-5-0.5	8F20019-12	Soil	2	06/20/18 11:40	06/20/18 18:22
SB-5-1	8F20019-13	Soil	2	06/20/18 11:50	06/20/18 18:22
SB-5-2.5	8F20019-14	Soil	2	06/20/18 12:00	06/20/18 18:22
SB-3-0.5	8F20019-16	Soil	2	06/20/18 13:30	06/20/18 18:22
SB-3-2.5	8F20019-18	Soil	2	06/20/18 13:50	06/20/18 18:22
SB-1-0.5	8F20019-20	Soil	2	06/20/18 14:15	06/20/18 18:22
SB-1-2.5	8F20019-22	Soil	2	06/20/18 14:45	06/20/18 18:22
SB-2-0.5	8F20019-23	Soil	2	06/20/18 14:55	06/20/18 18:22

Carbon Chain Characterization 8015M

SB-4-0.5	8F20019-01	Soil	2	06/20/18 09:00	06/20/18 18:22
SB-4-1	8F20019-02	Soil	2	06/20/18 09:05	06/20/18 18:22
SB-4-2.5	8F20019-03	Soil	2	06/20/18 09:12	06/20/18 18:22
SB-4-3.5	8F20019-04	Soil	2	06/20/18 09:18	06/20/18 18:22
SB-4-5	8F20019-05	Soil	2	06/20/18 09:30	06/20/18 18:22
SB-4-10	8F20019-06	Soil	2	06/20/18 10:02	06/20/18 18:22
SB-4-15	8F20019-07	Soil	2	06/20/18 10:20	06/20/18 18:22
SB-6-0.5	8F20019-08	Soil	2	06/20/18 11:00	06/20/18 18:22

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Sample ID	Laboratory ID	Matrix	TAT	Date Sampled	Date Received
SB-6-1	8F20019-09	Soil	2	06/20/18 11:05	06/20/18 18:22
SB-6-2.5	8F20019-10	Soil	2	06/20/18 11:20	06/20/18 18:22
SB-6-5	8F20019-11	Soil	2	06/20/18 11:30	06/20/18 18:22
SB-5-1	8F20019-13	Soil	2	06/20/18 11:50	06/20/18 18:22
SB-5-2.5	8F20019-14	Soil	2	06/20/18 12:00	06/20/18 18:22
SB-5-5	8F20019-15	Soil	2	06/20/18 12:25	06/20/18 18:22
SB-3-1	8F20019-17	Soil	2	06/20/18 13:40	06/20/18 18:22
SB-3-2.5	8F20019-18	Soil	2	06/20/18 13:50	06/20/18 18:22
SB-3-5	8F20019-19	Soil	2	06/20/18 14:00	06/20/18 18:22
SB-1-0.5	8F20019-20	Soil	2	06/20/18 14:15	06/20/18 18:22
SB-1-1	8F20019-21	Soil	2	06/20/18 14:30	06/20/18 18:22
SB-1-2.5	8F20019-22	Soil	2	06/20/18 14:45	06/20/18 18:22
SB-2-0.5	8F20019-23	Soil	2	06/20/18 14:55	06/20/18 18:22
SB-2-1	8F20019-24	Soil	2	06/20/18 15:00	06/20/18 18:22
SB-4	8F20019-26	Water	2	06/20/18 15:20	06/20/18 18:22
SB-2-1 DUP	8F20019-27	Soil	2	06/20/18 15:00	06/20/18 18:22
SB-3-5 DUP	8F20019-28	Soil	2	06/20/18 14:00	06/20/18 18:22
Lead Total EPA 6010B					
SB-4-1	8F20019-02	Soil	2	06/20/18 09:05	06/20/18 18:22
SB-4-2.5	8F20019-03	Soil	2	06/20/18 09:12	06/20/18 18:22



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Sample ID	Laboratory ID	Matrix	TAT	Date Sampled	Date Received
SB-6-5	8F20019-11	Soil	2	06/20/18 11:30	06/20/18 18:22
SB-3-5	8F20019-19	Soil	2	06/20/18 14:00	06/20/18 18:22
Mercury Total EPA 7470A/7471A					
SB-4-0.5	8F20019-01	Soil	2	06/20/18 09:00	06/20/18 18:22
SB-4-3.5	8F20019-04	Soil	2	06/20/18 09:18	06/20/18 18:22
SB-4-5	8F20019-05	Soil	2	06/20/18 09:30	06/20/18 18:22
SB-4-10	8F20019-06	Soil	2	06/20/18 10:02	06/20/18 18:22
SB-6-0.5	8F20019-08	Soil	2	06/20/18 11:00	06/20/18 18:22
SB-6-2.5	8F20019-10	Soil	2	06/20/18 11:20	06/20/18 18:22
SB-5-0.5	8F20019-12	Soil	2	06/20/18 11:40	06/20/18 18:22
SB-5-1	8F20019-13	Soil	2	06/20/18 11:50	06/20/18 18:22
SB-5-2.5	8F20019-14	Soil	2	06/20/18 12:00	06/20/18 18:22
SB-3-0.5	8F20019-16	Soil	2	06/20/18 13:30	06/20/18 18:22
SB-3-2.5	8F20019-18	Soil	2	06/20/18 13:50	06/20/18 18:22
SB-1-0.5	8F20019-20	Soil	2	06/20/18 14:15	06/20/18 18:22
SB-1-2.5	8F20019-22	Soil	2	06/20/18 14:45	06/20/18 18:22
SB-2-0.5	8F20019-23	Soil	2	06/20/18 14:55	06/20/18 18:22
SB-4	8F20019-26	Water	2	06/20/18 15:20	06/20/18 18:22
Metals Total 6020B					

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Sample ID	Laboratory ID	Matrix	TAT	Date Sampled	Date Received
SB-4	8F20019-26	Water	2	06/20/18 15:20	06/20/18 18:22

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Carbon Chain by GC/FID

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: mg/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/22/18	06/28/18	06/22/18	
Date Analyzed:	06/23/18	06/23/18	06/29/18	06/26/18	
AA ID No:	8F20019-01	8F20019-02	8F20019-03	8F20019-04	
Client ID No:	SB-4-0.5	SB-4-1	SB-4-2.5	SB-4-3.5	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	5	MRL
Carbon Chain Characterization 8015M (EPA 8015M)					
C6-C8	<1.0	<1.0	<1.0	<5.0	1.0
C8-C10	<1.0	<1.0	<1.0	<5.0	1.0
C10-C12	<1.0	<1.0	<1.0	<5.0	1.0
C12-C14	<1.0	<1.0	<1.0	**13**	1.0
C14-C16	<1.0	<1.0	<1.0	**51**	1.0
C16-C18	<1.0	<1.0	<1.0	**120**	1.0
C18-C20	<1.0	<1.0	<1.0	**160**	1.0
C20-C22	**2.2**	<1.0	**1.7**	**190**	1.0
C22-C24	**5.0**	<1.0	**3.9**	**270**	1.0
C24-C26	**6.5**	**1.1**	**4.6**	**220**	1.0
C26-C28	**11**	**2.6**	**8.5**	**350**	1.0
C28-C32	**30**	**9.5**	**18**	**620**	1.0
C32-C34	**14**	**3.7**	**4.8**	**200**	1.0
C34-C36	**11**	**3.3**	**2.5**	**120**	1.0
C36-C40	**13**	**5.6**	**3.6**	**270**	1.0
C40-C44	**9.8**	**2.5**	**2.3**	**91**	1.0
TPH (C6-C44)	**100**	**28**	**50**	**2700**	10
Gasoline Range Organics (C6-C10)	<5.0	<5.0	<5.0	<25	5.0
Diesel Range Organics (C10-C23)	<5.0	<5.0	<5.0	**670**	5.0
Oil Range Organics (C23-C44)	**98**	**28**	**47**	**2000**	5.0
Surrogates					**%REC Limits**
o-Terphenyl	81%	79%	78%	76%	50-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Carbon Chain by GC/FID

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: mg/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/22/18	06/22/18	06/22/18	
Date Analyzed:	06/23/18	06/23/18	06/23/18	06/23/18	
AA ID No:	8F20019-05	8F20019-06	8F20019-07	8F20019-08	
Client ID No:	SB-4-5	SB-4-10	SB-4-15	SB-6-0.5	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
Carbon Chain Characterization 8015M (EPA 8015M)					
C6-C8	<1.0	<1.0	<1.0	<1.0	1.0
C8-C10	<1.0	<1.0	<1.0	<1.0	1.0
C10-C12	<1.0	<1.0	<1.0	<1.0	1.0
C12-C14	<1.0	<1.0	<1.0	<1.0	1.0
C14-C16	<1.0	<1.0	<1.0	<1.0	1.0
C16-C18	<1.0	<1.0	<1.0	<1.0	1.0
C18-C20	<1.0	<1.0	<1.0	<1.0	1.0
C20-C22	<1.0	<1.0	<1.0	<1.0	1.0
C22-C24	<1.0	<1.0	<1.0	**9.3**	1.0
C24-C26	<1.0	<1.0	<1.0	**3.9**	1.0
C26-C28	<1.0	<1.0	<1.0	**5.1**	1.0
C28-C32	**2.0**	<1.0	<1.0	**14**	1.0
C32-C34	**2.2**	<1.0	<1.0	**6.2**	1.0
C34-C36	**4.0**	<1.0	<1.0	**5.7**	1.0
C36-C40	**13**	**3.2**	**3.3**	**8.2**	1.0
C40-C44	**19**	**8.0**	**8.0**	**13**	1.0
TPH (C6-C44)	**40**	**11**	**11**	**66**	10
Gasoline Range Organics (C6-C10)	<5.0	<5.0	<5.0	<5.0	5.0
Diesel Range Organics (C10-C23)	<5.0	<5.0	<5.0	<5.0	5.0
Oil Range Organics (C23-C44)	**40**	**11**	**11**	**61**	5.0
Surrogates					**%REC Limits**
o-Terphenyl	90%	90%	88%	86%	50-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Carbon Chain by GC/FID

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: mg/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/22/18	06/22/18	06/28/18	
Date Analyzed:	06/23/18	06/26/18	06/23/18	06/29/18	
AA ID No:	8F20019-09	8F20019-10	8F20019-11	8F20019-13	
Client ID No:	SB-6-1	SB-6-2.5	SB-6-5	SB-5-1	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	5	1	1	MRL
Carbon Chain Characterization 8015M (EPA 8015M)					
C6-C8	<1.0	<5.0	<1.0	<1.0	1.0
C8-C10	<1.0	<5.0	<1.0	<1.0	1.0
C10-C12	<1.0	<5.0	<1.0	<1.0	1.0
C12-C14	<1.0	**6.1**	<1.0	<1.0	1.0
C14-C16	<1.0	**30**	<1.0	<1.0	1.0
C16-C18	<1.0	**73**	<1.0	<1.0	1.0
C18-C20	<1.0	**120**	<1.0	<1.0	1.0
C20-C22	**1.3**	**170**	<1.0	**1.0**	1.0
C22-C24	**11**	**260**	<1.0	**2.4**	1.0
C24-C26	**6.4**	**250**	<1.0	**3.2**	1.0
C26-C28	**8.9**	**390**	<1.0	**8.6**	1.0
C28-C32	**24**	**880**	**4.5**	**25**	1.0
C32-C34	**8.2**	**240**	**4.1**	**8.2**	1.0
C34-C36	**7.2**	**190**	**6.3**	**8.3**	1.0
C36-C40	**12**	**290**	**27**	**15**	1.0
C40-C44	**14**	**210**	**40**	**11**	1.0
TPH (C6-C44)	**93**	**3100**	**82**	**83**	10
Gasoline Range Organics (C6-C10)	<5.0	<25	<5.0	<5.0	5.0
Diesel Range Organics (C10-C23)	**6.7**	**530**	<5.0	<5.0	5.0
Oil Range Organics (C23-C44)	**86**	**2600**	**82**	**80**	5.0
Surrogates					**%REC Limits**
o-Terphenyl	76%	71%	58%	88%	50-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Carbon Chain by GC/FID

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: mg/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/28/18	06/22/18	06/22/18	06/28/18	
Date Analyzed:	06/29/18	06/23/18	06/23/18	06/29/18	
AA ID No:	8F20019-14	8F20019-15	8F20019-17	8F20019-18	
Client ID No:	SB-5-2.5	SB-5-5	SB-3-1	SB-3-2.5	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
Carbon Chain Characterization 8015M (EPA 8015M)					
C6-C8	<1.0	<1.0	<1.0	<1.0	1.0
C8-C10	<1.0	<1.0	<1.0	<1.0	1.0
C10-C12	<1.0	<1.0	<1.0	<1.0	1.0
C12-C14	<1.0	<1.0	<1.0	<1.0	1.0
C14-C16	**2.2**	<1.0	<1.0	<1.0	1.0
C16-C18	**16**	<1.0	<1.0	<1.0	1.0
C18-C20	**29**	<1.0	<1.0	<1.0	1.0
C20-C22	**44**	<1.0	<1.0	<1.0	1.0
C22-C24	**75**	<1.0	<1.0	<1.0	1.0
C24-C26	**71**	<1.0	<1.0	<1.0	1.0
C26-C28	**120**	<1.0	<1.0	**1.3**	1.0
C28-C32	**290**	**3.4**	**4.4**	**5.9**	1.0
C32-C34	**84**	<1.0	**2.1**	**2.8**	1.0
C34-C36	**64**	**1.1**	**2.2**	**2.9**	1.0
C36-C40	**120**	**7.2**	**7.0**	**9.1**	1.0
C40-C44	**57**	**19**	**4.7**	**11**	1.0
TPH (C6-C44)	**970**	**30**	**20**	**33**	10
Gasoline Range Organics (C6-C10)	<5.0	<5.0	<5.0	<5.0	5.0
Diesel Range Organics (C10-C23)	**130**	<5.0	<5.0	<5.0	5.0
Oil Range Organics (C23-C44)	**840**	**30**	**20**	**33**	5.0
Surrogates					**%REC Limits**
o-Terphenyl	87%	79%	93%	90%	50-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A94898
Project No:	NA	**Date Received:**	06/20/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	06/29/18
Method:	Carbon Chain by GC/FID	**Units:**	mg/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/22/18	06/22/18	06/22/18	
Date Analyzed:	06/23/18	06/23/18	06/23/18	06/23/18	
AA ID No:	8F20019-19	8F20019-20	8F20019-21	8F20019-22	
Client ID No:	SB-3-5	SB-1-0.5	SB-1-1	SB-1-2.5	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
Carbon Chain Characterization 8015M (EPA 8015M)					
C6-C8	<1.0	<1.0	<1.0	<1.0	1.0
C8-C10	<1.0	<1.0	<1.0	<1.0	1.0
C10-C12	<1.0	<1.0	<1.0	<1.0	1.0
C12-C14	<1.0	<1.0	<1.0	<1.0	1.0
C14-C16	<1.0	<1.0	<1.0	<1.0	1.0
C16-C18	<1.0	**2.2**	<1.0	<1.0	1.0
C18-C20	<1.0	<1.0	<1.0	<1.0	1.0
C20-C22	<1.0	**1.8**	**1.5**	<1.0	1.0
C22-C24	<1.0	**2.5**	**3.8**	**1.7**	1.0
C24-C26	<1.0	**5.5**	**4.8**	**1.5**	1.0
C26-C28	<1.0	**5.3**	**9.3**	**6.7**	1.0
C28-C32	<1.0	**16**	**30**	**22**	1.0
C32-C34	<1.0	**6.6**	**13**	**7.2**	1.0
C34-C36	<1.0	**5.9**	**9.6**	**5.5**	1.0
C36-C40	**3.3**	**7.1**	**19**	**12**	1.0
C40-C44	**9.2**	**10**	**16**	**8.4**	1.0
TPH (C6-C44)	**12**	**63**	**110**	**64**	10
Gasoline Range Organics (C6-C10)	<5.0	<5.0	<5.0	<5.0	5.0
Diesel Range Organics (C10-C23)	<5.0	**5.2**	<5.0	<5.0	5.0
Oil Range Organics (C23-C44)	**12**	**58**	**100**	**63**	5.0
Surrogates					**%REC Limits**
o-Terphenyl	90%	87%	95%	85%	50-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Carbon Chain by GC/FID

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: mg/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/22/18	06/22/18	06/22/18	
Date Analyzed:	06/23/18	06/23/18	06/23/18	06/23/18	
AA ID No:	8F20019-23	8F20019-24	8F20019-27	8F20019-28	
Client ID No:	SB-2-0.5	SB-2-1	SB-2-1 DUP	SB-3-5 DUP	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
Carbon Chain Characterization 8015M (EPA 8015M)					
C6-C8	<1.0	<1.0	<1.0	<1.0	1.0
C8-C10	<1.0	<1.0	<1.0	<1.0	1.0
C10-C12	<1.0	<1.0	<1.0	<1.0	1.0
C12-C14	<1.0	<1.0	<1.0	<1.0	1.0
C14-C16	<1.0	<1.0	<1.0	<1.0	1.0
C16-C18	<1.0	<1.0	<1.0	<1.0	1.0
C18-C20	<1.0	<1.0	<1.0	<1.0	1.0
C20-C22	<1.0	<1.0	<1.0	<1.0	1.0
C22-C24	<1.0	<1.0	<1.0	<1.0	1.0
C24-C26	<1.0	<1.0	<1.0	<1.0	1.0
C26-C28	**1.2**	**1.5**	**1.6**	<1.0	1.0
C28-C32	**5.1**	**5.4**	**6.1**	<1.0	1.0
C32-C34	**1.8**	**1.2**	**1.7**	<1.0	1.0
C34-C36	**1.8**	**1.4**	**1.7**	<1.0	1.0
C36-C40	**5.1**	**3.8**	**4.4**	**2.0**	1.0
C40-C44	**5.8**	**9.3**	**7.4**	**6.7**	1.0
TPH (C6-C44)	**21**	**23**	**23**	<10	10
Gasoline Range Organics (C6-C10)	<5.0	<5.0	<5.0	<5.0	5.0
Diesel Range Organics (C10-C23)	<5.0	<5.0	<5.0	<5.0	5.0
Oil Range Organics (C23-C44)	**21**	**23**	**23**	**8.7**	5.0
Surrogates					**%REC Limits**
o-Terphenyl	93%	87%	93%	87%	50-150



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A94898
Project No:	NA	**Date Received:**	06/20/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	06/29/18
Method:	Carbon Chain by GC/FID	**Units:**	mg/L

Date Sampled:	06/20/18	
Date Prepared:	06/25/18	
Date Analyzed:	06/25/18	
AA ID No:	8F20019-26	
Client ID No:	SB-4	
Matrix:	Water	
Dilution Factor:	1	MRL

Carbon Chain Characterization 8015M (EPA 8015M)

C6-C8	<0.010	0.010
C8-C10	<0.010	0.010
C10-C12	<0.010	0.010
C12-C14	**0.013**	0.010
C14-C16	**0.013**	0.010
C16-C18	**0.041**	0.010
C18-C20	**0.039**	0.010
C20-C22	**0.050**	0.010
C22-C24	**0.054**	0.010
C24-C26	**0.057**	0.010
C26-C28	**0.018**	0.010
C28-C32	**0.052**	0.010
C32-C34	<0.010	0.010
C34-C36	<0.010	0.010
C36-C40	<0.010	0.010
C40-C44	<0.010	0.010
TPH (C6-C44)	**0.40**	0.10
Gasoline Range Organics (C6-C10)	<0.10	0.10
Diesel Range Organics (C10-C23)	**0.19**	0.10
Oil Range Organics (C23-C44)	**0.17**	0.10

Surrogates		**%REC Limits**
o-Terphenyl	93%	50-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Semivolatile Organics by GC/MS

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: mg/kg

Date Sampled:	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/22/18	
Date Analyzed:	06/25/18	06/25/18	
AA ID No:	8F20019-04	8F20019-05	
Client ID No:	SB-4-3.5	SB-4-5	
Matrix:	Soil	Soil	
Dilution Factor:	2	1	MRL
8270C (EPA 8270C)			
3,3´-Dichlorobenzidine	<0.80	<0.40	0.40
Acenaphthene	<0.20	<0.10	0.10
Acenaphthylene	<0.20	<0.10	0.10
Aniline	<0.40	<0.20	0.20
Anthracene	<0.20	<0.10	0.10
Azobenzene	<0.20	<0.10	0.10
Benzidine	<0.80	<0.40	0.40
Benzo(a)anthracene	<0.20	<0.10	0.10
Benzo(a)pyrene	<0.20	<0.10	0.10
Benzo(b)fluoranthene	<0.20	<0.10	0.10
Benzo(g,h,i)perylene	<0.20	<0.10	0.10
Benzoic acid	<2.0	<1.0	1.0
Benzo(k)fluoranthene	<0.20	<0.10	0.10
Benzyl alcohol	<0.20	<0.10	0.10
4-Bromophenyl phenyl ether	<0.20	<0.10	0.10
Butyl benzyl phthalate	<1.0	<0.50	0.50
4-Chloro-3-methylphenol	<0.40	<0.20	0.20
4-Chloroaniline	<0.80	<0.40	0.40
Bis(2-chloroethoxy)methane	<0.20	<0.10	0.10
Bis(2-chloroethyl)ether	<0.20	<0.10	0.10
Bis(2-chloroisopropyl)ether	<0.20	<0.10	0.10
2-Chloronaphthalene	<0.20	<0.10	0.10
2-Chlorophenol	<0.20	<0.10	0.10
4-Chlorophenyl phenyl ether	<0.20	<0.10	0.10
Chrysene	<0.20	<0.10	0.10
Dibenzo(a,h)anthracene	<0.20	<0.10	0.10
Dibenzofuran	<0.20	<0.10	0.10

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Semivolatile Organics by GC/MS

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: mg/kg

Date Sampled:	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/22/18	
Date Analyzed:	06/25/18	06/25/18	
AA ID No:	8F20019-04	8F20019-05	
Client ID No:	SB-4-3.5	SB-4-5	
Matrix:	Soil	Soil	
Dilution Factor:	2	1	MRL
8270C (EPA 8270C) (continued)			
Di-n-butyl phthalate	<4.0	<2.0	2.0
1,2-Dichlorobenzene	<0.20	<0.10	0.10
1,3-Dichlorobenzene	<0.20	<0.10	0.10
1,4-Dichlorobenzene	<0.20	<0.10	0.10
2,4-Dichlorophenol	<0.20	<0.10	0.10
Diethyl phthalate	<1.6	<0.80	0.80
2,4-Dimethylphenol	<0.20	<0.10	0.10
Dimethyl phthalate	<0.40	<0.20	0.20
4,6-Dinitro-2-methylphenol	<0.40	<0.20	0.20
2,4-Dinitrophenol	<0.80	<0.40	0.40
2,6-Dinitrotoluene	<0.20	<0.10	0.10
2,4-Dinitrotoluene	<0.20	<0.10	0.10
Di-n-octyl phthalate	<0.20	<0.10	0.10
1,2-Diphenylhydrazine	<0.20	<0.10	0.10
Bis(2-ethylhexyl)phthalate	<0.40	<0.20	0.20
Fluoranthene	<0.20	<0.10	0.10
Fluorene	<0.20	<0.10	0.10
Hexachlorobenzene	<0.20	<0.10	0.10
Hexachlorobutadiene	<0.20	<0.10	0.10
Hexachlorocyclopentadiene	<0.20	<0.10	0.10
Hexachloroethane	<0.20	<0.10	0.10
Indeno (1,2,3-cd) pyrene	<0.80	<0.40	0.40
Isophorone	<0.20	<0.10	0.10
2-Methylnaphthalene	<0.20	<0.10	0.10
2-Methylphenol	<0.40	<0.20	0.20
3-Methylphenol	<0.40	<0.20	0.20
4-Methylphenol	<0.40	<0.20	0.20

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Semivolatile Organics by GC/MS

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: mg/kg

Date Sampled:	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/22/18	
Date Analyzed:	06/25/18	06/25/18	
AA ID No:	8F20019-04	8F20019-05	
Client ID No:	SB-4-3.5	SB-4-5	
Matrix:	Soil	Soil	
Dilution Factor:	2	1	MRL
8270C (EPA 8270C) (continued)			
Naphthalene	<0.20	<0.10	0.10
4-Nitroaniline	<1.0	<0.50	0.50
3-Nitroaniline	<0.80	<0.40	0.40
2-Nitroaniline	<0.20	<0.10	0.10
Nitrobenzene	<0.20	<0.10	0.10
2-Nitrophenol	<0.40	<0.20	0.20
4-Nitrophenol	<0.40	<0.20	0.20
N-Nitrosodimethylamine	<0.20	<0.10	0.10
N-Nitrosodiphenylamine	<0.20	<0.10	0.10
N-Nitrosodi-n-propylamine	<0.20	<0.10	0.10
Pentachlorophenol	<0.20	<0.10	0.10
Phenanthrene	<0.20	<0.10	0.10
Phenol	<0.20	<0.10	0.10
Pyrene	<0.20	<0.10	0.10
1,2,4-Trichlorobenzene	<0.20	<0.10	0.10
2,4,5-Trichlorophenol	<0.40	<0.20	0.20
2,4,6-Trichlorophenol	<0.40	<0.20	0.20
Surrogates			**%REC Limits**
2-Fluorobiphenyl	9.3% [6]	56%	43-145
2-Fluorophenol	6.2% [6]	45%	21-143
Nitrobenzene-d5	5.7% [6]	47%	35-142
Phenol-d6	6.4% [6]	44%	10-135
Terphenyl-dl4	11% [6]	52%	33-148
2,4,6-Tribromophenol	4.4% [6]	45%	10-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Polychlorinated Biphenyls by GC

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: ug/kg

Date Sampled:	06/20/18	06/20/18	
Date Prepared:	06/25/18	06/25/18	
Date Analyzed:	06/25/18	06/25/18	
AA ID No:	8F20019-08	8F20019-20	
Client ID No:	SB-6-0.5	SB-1-0.5	
Matrix:	Soil	Soil	
Dilution Factor:	1	1	MRL
8082 PCBs (EPA 8082)			
Aroclor-1016	<20	<20	20
Aroclor-1221	<20	<20	20
Aroclor-1232	<20	<20	20
Aroclor-1242	<20	<20	20
Aroclor-1248	<20	<20	20
Aroclor-1254	<20	<20	20
Aroclor-1260	<20	<20	20
Surrogates			**%REC Limits**
Decachlorobiphenyl	61%	51%	50-150
Tetrachloro-meta-xylene	80%	57%	50-150

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Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Organochlorine Pesticides by GC EPA 8081A

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: ug/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/28/18	06/25/18	06/28/18	06/25/18	
Date Analyzed:	06/28/18	06/25/18	06/28/18	06/25/18	
AA ID No:	8F20019-01	8F20019-08	8F20019-16	8F20019-20	
Client ID No:	SB-4-0.5	SB-6-0.5	SB-3-0.5	SB-1-0.5	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
8081A OCPs (EPA 8081A)					
4,4´-DDD	<4.0	<4.0	<4.0	**4.0**	4.0
4,4´-DDE	<4.0	**22**	<4.0	<4.0	4.0
4,4´-DDT	**4.3**	**18**	<4.0	<4.0	4.0
Aldrin	<2.0	<2.0	<2.0	<2.0	2.0
beta-BHC	<2.0	<2.0	<2.0	<2.0	2.0
delta-BHC	<2.0	<2.0	<2.0	<2.0	2.0
alpha-BHC	<2.0	<2.0	<2.0	<2.0	2.0
gamma-BHC (Lindane)	<4.0	<4.0	<4.0	<4.0	4.0
gamma-Chlordane	**9.2**	**5.8**	<4.0	<4.0	4.0
alpha-Chlordane	**18**	**12**	<4.0	**6.9**	4.0
Chlordane	**78**	**86**	<20	**35**	20
Dieldrin	**31**	<2.0	**5.5**	**6.2**	2.0
Endosulfan I	<2.0	<2.0	<2.0	<2.0	2.0
Endosulfan II	<4.0	**6.3**	<4.0	<4.0	4.0
Endosulfan sulfate	<4.0	<4.0	<4.0	<4.0	4.0
Endrin	<4.0	<4.0	<4.0	<4.0	4.0
Endrin aldehyde	<4.0	<4.0	<4.0	<4.0	4.0
Endrin ketone	<4.0	<4.0	<4.0	<4.0	4.0
Heptachlor	<2.0	<2.0	<2.0	<2.0	2.0
Heptachlor epoxide	<2.0	<2.0	<2.0	<2.0	2.0
Methoxychlor	<20	<20	<20	<20	20
Toxaphene	<100	<100	<100	<100	100
Surrogates					**%REC Limits**
Decachlorobiphenyl	66%	61%	75%	51%	50-150
Tetrachloro-meta-xylene	60%	80%	64%	57%	50-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Herbicides by EPA 8151A

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: ug/kg

Date Sampled:	06/20/18	06/20/18	
Date Prepared:	06/25/18	06/25/18	
Date Analyzed:	06/25/18	06/25/18	
AA ID No:	8F20019-08	8F20019-20	
Client ID No:	SB-6-0.5	SB-1-0.5	
Matrix:	Soil	Soil	
Dilution Factor:	1	1	MRL
8151A Herbicides (EPA 8151A)			
Acifluorfen	<20 [1]	<20 [1]	20
Bentazon	<10 [1]	<10 [1]	10
Chloramben	<10 [1]	<10 [1]	10
2,4-D	<10 [1]	<10 [1]	10
Dalapon	<20 [1]	<20 [1]	20
2,4-DB	<10 [1]	<10 [1]	10
DCPA Diacid	<20 [1]	<20 [1]	20
Dicamba	<10 [1]	<10 [1]	10
3,5-Dichlorobenzoic acid	<10 [1]	<10 [1]	10
Dichloroprop	<10 [1]	<10 [1]	10
Dinoseb	<20 [1]	<20 [1]	20
MCPA	<2000 [1]	<2000 [1]	2000
MCPP	<2000 [1]	<2000 [1]	2000
4-Nitrophenol	<10 [1]	<10 [1]	10
Pentachlorophenol	<10 [1]	<10 [1]	10
Picloram	<10 [1]	<10 [1]	10
2,4,5-T	<10 [1]	<10 [1]	10
2,4,5-TP (Silvex)	<10 [1]	<10 [1]	10
Surrogates			**%REC Limits**
DCAA	49% [1]	71% [1]	40-150

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Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Total Metals CAM 17

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: mg/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/25/18	06/25/18	06/25/18	06/25/18	
Date Analyzed:	06/25/18	06/25/18	06/25/18	06/25/18	
AA ID No:	8F20019-01	8F20019-04	8F20019-05	8F20019-06	
Client ID No:	SB-4-0.5	SB-4-3.5	SB-4-5	SB-4-10	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
Mercury Total EPA 7470A/7471A (EPA 7471A)					
Mercury	**0.25**	**0.090**	**0.030**	<0.020	0.020

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Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Total Metals CAM 17

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: mg/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/25/18	06/25/18	06/25/18	06/25/18	
Date Analyzed:	06/25/18	06/25/18	06/25/18	06/25/18	
AA ID No:	8F20019-08	8F20019-10	8F20019-12	8F20019-13	
Client ID No:	SB-6-0.5	SB-6-2.5	SB-5-0.5	SB-5-1	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	5	MRL
Mercury Total EPA 7470A/7471A (EPA 7471A)					
Mercury	**0.19**	**0.084**	**0.42**	**2.4**	0.020

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Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Total Metals CAM 17

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: mg/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/25/18	06/25/18	06/25/18	06/25/18	
Date Analyzed:	06/25/18	06/25/18	06/25/18	06/25/18	
AA ID No:	8F20019-14	8F20019-16	8F20019-18	8F20019-20	
Client ID No:	SB-5-2.5	SB-3-0.5	SB-3-2.5	SB-1-0.5	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
Mercury Total EPA 7470A/7471A (EPA 7471A)					
Mercury	**0.038**	**0.066**	**0.63**	**0.13**	0.020

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Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A94898
Project No:	NA	**Date Received:**	06/20/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	06/29/18
Method:	Total Metals CAM 17	**Units:**	mg/kg

Date Sampled:	06/20/18	06/20/18	
Date Prepared:	06/25/18	06/25/18	
Date Analyzed:	06/25/18	06/25/18	
AA ID No:	8F20019-22	8F20019-23	
Client ID No:	SB-1-2.5	SB-2-0.5	
Matrix:	Soil	Soil	
Dilution Factor:	1	1	MRL
Mercury Total EPA 7470A/7471A (EPA 7471A)			
Mercury	**0.068**	**0.080**	0.020

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Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A94898
Project No:	NA	**Date Received:**	06/20/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	06/29/18
Method:	Total Metals CAM 17	**Units:**	mg/L

Date Sampled:	06/20/18	
Date Prepared:	06/21/18	
Date Analyzed:	06/22/18	
AA ID No:	8F20019-26	
Client ID No:	SB-4	
Matrix:	Water	
Dilution Factor:	1	MRL

Mercury Total EPA 7470A/7471A (EPA 7470A)

Mercury	<0.00050	0.00050

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LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Total Metals by ICP Atomic Emission Spectroscopy

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

AA I.D. No.	Client I.D. No.	Sampled	Prepared	Analyzed	Dilution	Result	Units	MRL
Lead Total EPA 6010B (EPA 6010B)								
8F20019-02	SB-4-1	06/20/18	06/28/18	06/29/18	1	**6.7**	mg/kg	3
8F20019-03	SB-4-2.5	06/20/18	06/28/18	06/29/18	1	**6.8**	mg/kg	3
8F20019-11	SB-6-5	06/20/18	06/28/18	06/29/18	1	**5.1**	mg/kg	3
8F20019-19	SB-3-5	06/20/18	06/28/18	06/29/18	1	**3.8**	mg/kg	3

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LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A94898
Project No:	NA	**Date Received:**	06/20/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	06/29/18
Method:	Total Metals by ICP/MS EPA 6020B	**Units:**	ug/L

Date Sampled:	06/20/18	
Date Prepared:	06/22/18	
Date Analyzed:	06/25/18	
AA ID No:	8F20019-26	
Client ID No:	SB-4	
Matrix:	Water	
Dilution Factor:	1	MRL

Metals Total 6020B (EPA 6020B)

Antimony	<5.0	5.0
Arsenic	**100**	5.0
Barium	**300**	5.0
Beryllium	<5.0	5.0
Cadmium	<5.0	5.0
Chromium	**26**	5.0
Cobalt	**6.0**	5.0
Copper	**17**	5.0
Lead	**11**	5.0
Molybdenum	**60**	5.0
Nickel	**49**	5.0
Selenium	<20	20
Silver	<5.0	5.0
Thallium	<5.0	5.0
Vanadium	**35**	20
Zinc	**46**	20

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LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Total Metals CAM 17

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: mg/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/22/18	06/22/18	06/22/18	
Date Analyzed:	06/25/18	06/25/18	06/25/18	06/25/18	
AA ID No:	8F20019-01	8F20019-04	8F20019-05	8F20019-06	
Client ID No:	SB-4-0.5	SB-4-3.5	SB-4-5	SB-4-10	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
CAM Metals Less Hg 6000/7000 (EPA 6010B/7000)					
Antimony	<10	<10	<10	<10	10
Arsenic	**3.0**	**3.5**	**2.0**	**4.1**	0.50
Barium	**54**	**62**	**10**	**21**	10
Beryllium	<1.0	<1.0	<1.0	<1.0	1.0
Cadmium	<1.0	<1.0	<1.0	<1.0	1.0
Chromium	**13**	**13**	**11**	**10**	3.0
Cobalt	**3.2**	**4.0**	<3.0	<3.0	3.0
Copper	**10**	**15**	<3.0	<3.0	3.0
Lead	**34**	**58**	**3.4**	<3.0	3.0
Molybdenum	<5.0	<5.0	<5.0	<5.0	5.0
Nickel	**9.2**	**14**	**7.2**	**6.8**	3.0
Selenium	<0.50	<0.50	<0.50	<0.50	0.50
Silver	<1.0	<1.0	<1.0	<1.0	1.0
Thallium	<5.0	<5.0	<5.0	<5.0	5.0
Vanadium	**25**	**30**	**25**	**23**	10
Zinc	**74**	**99**	**7.2**	**8.4**	3.0

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Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A94898
Project No:	NA	**Date Received:**	06/20/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	06/29/18
Method:	Total Metals CAM 17	**Units:**	mg/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/22/18	06/22/18	06/22/18	
Date Analyzed:	06/25/18	06/25/18	06/25/18	06/25/18	
AA ID No:	8F20019-08	8F20019-10	8F20019-12	8F20019-13	
Client ID No:	SB-6-0.5	SB-6-2.5	SB-5-0.5	SB-5-1	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
CAM Metals Less Hg 6000/7000 (EPA 6010B/7000)					
Antimony	<10	<10	<10	<10	10
Arsenic	**2.7**	**2.9**	**2.8**	**3.3**	0.50
Barium	**60**	**81**	**54**	**56**	10
Beryllium	<1.0	<1.0	<1.0	<1.0	1.0
Cadmium	<1.0	<1.0	<1.0	<1.0	1.0
Chromium	**13**	**12**	**10**	**11**	3.0
Cobalt	**3.8**	**4.0**	**3.1**	**3.3**	3.0
Copper	**5.4**	**14**	**7.2**	**16**	3.0
Lead	**17**	**40**	**12**	**24**	3.0
Molybdenum	<5.0	<5.0	<5.0	<5.0	5.0
Nickel	**10**	**13**	**7.5**	**8.9**	3.0
Selenium	<0.50	<0.50	<0.50	<0.50	0.50
Silver	<1.0	<1.0	<1.0	<1.0	1.0
Thallium	<5.0	<5.0	<5.0	<5.0	5.0
Vanadium	**27**	**34**	**22**	**27**	10
Zinc	**62**	**120**	**30**	**51**	3.0

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Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Total Metals CAM 17

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: mg/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/22/18	06/22/18	06/22/18	
Date Analyzed:	06/25/18	06/25/18	06/25/18	06/25/18	
AA ID No:	8F20019-14	8F20019-16	8F20019-18	8F20019-20	
Client ID No:	SB-5-2.5	SB-3-0.5	SB-3-2.5	SB-1-0.5	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
CAM Metals Less Hg 6000/7000 (EPA 6010B/7000)					
Antimony	<10	<10	<10	<10	10
Arsenic	**4.3**	**2.4**	**2.2**	**2.2**	0.50
Barium	**92**	**69**	**83**	**50**	10
Beryllium	<1.0	<1.0	<1.0	<1.0	1.0
Cadmium	<1.0	<1.0	<1.0	<1.0	1.0
Chromium	**15**	**17**	**13**	**13**	3.0
Cobalt	**3.4**	**5.3**	**3.8**	**3.3**	3.0
Copper	**5.4**	**3.6**	<3.0	**6.1**	3.0
Lead	**17**	**18**	**5.6**	**37**	3.0
Molybdenum	<5.0	<5.0	<5.0	<5.0	5.0
Nickel	**13**	**10**	**8.9**	**10**	3.0
Selenium	<0.50	<0.50	<0.50	<0.50	0.50
Silver	<1.0	<1.0	<1.0	<1.0	1.0
Thallium	<5.0	<5.0	<5.0	<5.0	5.0
Vanadium	**29**	**36**	**24**	**28**	10
Zinc	**100**	**42**	**22**	**73**	3.0

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Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Total Metals CAM 17

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: mg/kg

Date Sampled:	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/22/18	
Date Analyzed:	06/25/18	06/25/18	
AA ID No:	8F20019-22	8F20019-23	
Client ID No:	SB-1-2.5	SB-2-0.5	
Matrix:	Soil	Soil	
Dilution Factor:	1	1	MRL
CAM Metals Less Hg 6000/7000 (EPA 6010B/7000)			
Antimony	<10	<10	10
Arsenic	**2.8**	**2.7**	0.50
Barium	**39**	**39**	10
Beryllium	<1.0	<1.0	1.0
Cadmium	<1.0	<1.0	1.0
Chromium	**14**	**11**	3.0
Cobalt	**3.5**	**3.3**	3.0
Copper	<3.0	<3.0	3.0
Lead	**11**	**7.3**	3.0
Molybdenum	<5.0	<5.0	5.0
Nickel	**10**	**9.4**	3.0
Selenium	<0.50	<0.50	0.50
Silver	<1.0	<1.0	1.0
Thallium	<5.0	<5.0	5.0
Vanadium	**26**	**23**	10
Zinc	**38**	**23**	3.0

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Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: VOCs & OXYGENATES by GC/MS

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: ug/L

Date Sampled:	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/22/18	
Date Analyzed:	06/22/18	06/22/18	
AA ID No:	8F20019-25	8F20019-26	
Client ID No:	TB-062018	SB-4	
Matrix:	Water	Water	
Dilution Factor:	1	1	MRL
8260B+OXYGENATES (EPA 8260B)			
Acetone	<10	<10	10
tert-Amyl Methyl Ether (TAME)	<2.0	<2.0	2.0
Benzene	<0.50	<0.50	0.50
Bromobenzene	<0.50	<0.50	0.50
Bromochloromethane	<0.50	<0.50	0.50
Bromodichloromethane	<0.50	<0.50	0.50
Bromoform	<0.50	<0.50	0.50
Bromomethane	<0.50	<0.50	0.50
2-Butanone (MEK)	<10	<10	10
tert-Butyl alcohol (TBA)	<10	<10	10
sec-Butylbenzene	<0.50	<0.50	0.50
tert-Butylbenzene	<0.50	<0.50	0.50
n-Butylbenzene	<0.50	<0.50	0.50
Carbon Disulfide	<0.50	<0.50	0.50
Carbon Tetrachloride	<0.50	<0.50	0.50
Chlorobenzene	<0.50	<0.50	0.50
Chloroethane	<0.50	<0.50	0.50
Chloroform	<0.50	<0.50	0.50
Chloromethane	<0.50	<0.50	0.50
2-Chlorotoluene	<0.50	<0.50	0.50
4-Chlorotoluene	<0.50	<0.50	0.50
1,2-Dibromo-3-chloropropane	<1.0	<1.0	1.0
Dibromochloromethane	<0.50	<0.50	0.50
1,2-Dibromoethane (EDB)	<0.50	<0.50	0.50
Dibromomethane	<0.50	<0.50	0.50
1,3-Dichlorobenzene	<0.50	<0.50	0.50
1,2-Dichlorobenzene	<0.50	<0.50	0.50

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: VOCs & OXYGENATES by GC/MS

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: ug/L

Date Sampled:	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/22/18	
Date Analyzed:	06/22/18	06/22/18	
AA ID No:	8F20019-25	8F20019-26	
Client ID No:	TB-062018	SB-4	
Matrix:	Water	Water	
Dilution Factor:	1	1	MRL
8260B+OXYGENATES (EPA 8260B) (continued)			
1,4-Dichlorobenzene	<0.50	<0.50	0.50
Dichlorodifluoromethane (R12)	<0.50	<0.50	0.50
1,1-Dichloroethane	<0.50	<0.50	0.50
1,2-Dichloroethane (EDC)	<0.50	<0.50	0.50
1,1-Dichloroethylene	<0.50	<0.50	0.50
trans-1,2-Dichloroethylene	<0.50	<0.50	0.50
cis-1,2-Dichloroethylene	<0.50	<0.50	0.50
1,2-Dichloropropane	<0.50	<0.50	0.50
2,2-Dichloropropane	<0.50	<0.50	0.50
1,3-Dichloropropane	<0.50	<0.50	0.50
cis-1,3-Dichloropropylene	<0.50	<0.50	0.50
trans-1,3-Dichloropropylene	<0.50	<0.50	0.50
1,1-Dichloropropylene	<0.50	<0.50	0.50
Diisopropyl ether (DIPE)	<2.0	<2.0	2.0
Ethylbenzene	<0.50	<0.50	0.50
Ethyl-tert-Butyl Ether (ETBE)	<2.0	<2.0	2.0
Hexachlorobutadiene	<1.0	<1.0	1.0
2-Hexanone (MBK)	<10	<10	10
Isopropylbenzene	<0.50	<0.50	0.50
4-Isopropyltoluene	<1.0	<1.0	1.0
Methyl-tert-Butyl Ether (MTBE)	<2.0	<2.0	2.0
Methylene Chloride	<5.0	<5.0	5.0
4-Methyl-2-pentanone (MIBK)	<10	<10	10
Naphthalene	<2.0	<2.0	2.0
n-Propylbenzene	<0.50	<0.50	0.50
Styrene	<0.50	<0.50	0.50
1,1,1,2-Tetrachloroethane	<0.50	<0.50	0.50

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: VOCs & OXYGENATES by GC/MS

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: ug/L

Date Sampled:	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/22/18	
Date Analyzed:	06/22/18	06/22/18	
AA ID No:	8F20019-25	8F20019-26	
Client ID No:	TB-062018	SB-4	
Matrix:	Water	Water	
Dilution Factor:	1	1	MRL
8260B+OXYGENATES (EPA 8260B) (continued)			
1,1,2,2-Tetrachloroethane	<0.50	<0.50	0.50
Tetrachloroethylene (PCE)	<0.50	<0.50	0.50
Toluene	<0.50	<0.50	0.50
1,2,3-Trichlorobenzene	<0.50	<0.50	0.50
1,2,4-Trichlorobenzene	<0.50	<0.50	0.50
1,1,1-Trichloroethane	<0.50	<0.50	0.50
1,1,2-Trichloroethane	<0.50	<0.50	0.50
Trichloroethylene (TCE)	<0.50	<0.50	0.50
Trichlorofluoromethane (R11)	<0.50	<0.50	0.50
1,2,3-Trichloropropane	<0.50	<0.50	0.50
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	<0.50	<0.50	0.50
1,3,5-Trimethylbenzene	<0.50	<0.50	0.50
1,2,4-Trimethylbenzene	<0.50	<0.50	0.50
Vinyl chloride	<0.50	<0.50	0.50
o-Xylene	<0.50	<0.50	0.50
m,p-Xylenes	<1.0	<1.0	1.0
Surrogates			**%REC Limits**
4-Bromofluorobenzene	103%	103%	70-140
Dibromofluoromethane	129%	127%	70-140
Toluene-d8	102%	104%	70-140

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: VOCs & OXYGENATES by GC/MS EPA 5035

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: ug/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/25/18	06/22/18	06/22/18	
Date Analyzed:	06/22/18	06/25/18	06/22/18	06/22/18	
AA ID No:	8F20019-02	8F20019-04	8F20019-05	8F20019-06	
Client ID No:	SB-4-1	SB-4-3.5	SB-4-5	SB-4-10	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
8260B/5035 +OXYGENATES (EPA 8260B/5035)					
Acetone	<50	**56**	<50	<50	50
tert-Amyl Methyl Ether (TAME)	<5.0	<5.0	<5.0	<5.0	5.0
Benzene	<2.0	<2.0	<2.0	<2.0	2.0
Bromobenzene	<5.0	<5.0	<5.0	<5.0	5.0
Bromochloromethane	<5.0	<5.0	<5.0	<5.0	5.0
Bromodichloromethane	<5.0	<5.0	<5.0	<5.0	5.0
Bromoform	<5.0	<5.0	<5.0	<5.0	5.0
Bromomethane	<5.0	<5.0	<5.0	<5.0	5.0
2-Butanone (MEK)	<50	<50	<50	<50	50
tert-Butyl alcohol (TBA)	<20	<20	<20	<20	20
sec-Butylbenzene	<5.0	<5.0	<5.0	<5.0	5.0
tert-Butylbenzene	<5.0	<5.0	<5.0	<5.0	5.0
n-Butylbenzene	<5.0	<5.0	<5.0	<5.0	5.0
Carbon Disulfide	**6.2**	<5.0	<5.0	<5.0	5.0
Carbon Tetrachloride	<5.0	<5.0	<5.0	<5.0	5.0
Chlorobenzene	<5.0	<5.0	<5.0	<5.0	5.0
Chloroethane	<5.0	<5.0	<5.0	<5.0	5.0
Chloroform	<5.0	<5.0	<5.0	<5.0	5.0
Chloromethane	<5.0	<5.0	<5.0	<5.0	5.0
2-Chlorotoluene	<5.0	<5.0	<5.0	<5.0	5.0
4-Chlorotoluene	<5.0	<5.0	<5.0	<5.0	5.0
1,2-Dibromo-3-chloropropane	<10	<10	<10	<10	10
Dibromochloromethane	<5.0	<5.0	<5.0	<5.0	5.0
1,2-Dibromoethane (EDB)	<5.0	<5.0	<5.0	<5.0	5.0
Dibromomethane	<5.0	<5.0	<5.0	<5.0	5.0
1,4-Dichlorobenzene	<5.0	<5.0	<5.0	<5.0	5.0
1,3-Dichlorobenzene	<5.0	<5.0	<5.0	<5.0	5.0

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: VOCs & OXYGENATES by GC/MS EPA 5035

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: ug/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/25/18	06/22/18	06/22/18	
Date Analyzed:	06/22/18	06/25/18	06/22/18	06/22/18	
AA ID No:	8F20019-02	8F20019-04	8F20019-05	8F20019-06	
Client ID No:	SB-4-1	SB-4-3.5	SB-4-5	SB-4-10	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
8260B/5035 +OXYGENATES (EPA 8260B/5035) (continued)					
1,2-Dichlorobenzene	<5.0	<5.0	<5.0	<5.0	5.0
Dichlorodifluoromethane (R12)	<5.0	<5.0	<5.0	<5.0	5.0
1,1-Dichloroethane	<5.0	<5.0	<5.0	<5.0	5.0
1,2-Dichloroethane (EDC)	<5.0	<5.0	<5.0	<5.0	5.0
trans-1,2-Dichloroethylene	<5.0	<5.0	<5.0	<5.0	5.0
cis-1,2-Dichloroethylene	<5.0	<5.0	<5.0	<5.0	5.0
1,1-Dichloroethylene	<5.0	<5.0	<5.0	<5.0	5.0
2,2-Dichloropropane	<5.0	<5.0	<5.0	<5.0	5.0
1,3-Dichloropropane	<5.0	<5.0	<5.0	<5.0	5.0
1,2-Dichloropropane	<5.0	<5.0	<5.0	<5.0	5.0
trans-1,3-Dichloropropylene	<5.0	<5.0	<5.0	<5.0	5.0
1,1-Dichloropropylene	<5.0	<5.0	<5.0	<5.0	5.0
cis-1,3-Dichloropropylene	<5.0	<5.0	<5.0	<5.0	5.0
Diisopropyl ether (DIPE)	<5.0	<5.0	<5.0	<5.0	5.0
Ethylbenzene	<2.0	<2.0	<2.0	<2.0	2.0
Ethyl-tert-Butyl Ether (ETBE)	<5.0	<5.0	<5.0	<5.0	5.0
Hexachlorobutadiene	<10	<10	<10	<10	10
2-Hexanone (MBK)	<50	<50	<50	<50	50
Isopropylbenzene	<5.0	<5.0	<5.0	<5.0	5.0
4-Isopropyltoluene	<5.0	<5.0	<5.0	<5.0	5.0
Methyl-tert-Butyl Ether (MTBE)	<5.0	<5.0	<5.0	<5.0	5.0
Methylene Chloride	<50	<50	<50	<50	50
4-Methyl-2-pentanone (MIBK)	<50	<50	<50	<50	50
Naphthalene	<10	<10	<10	<10	10
n-Propylbenzene	<5.0	<5.0	<5.0	<5.0	5.0
Styrene	<5.0	<5.0	<5.0	<5.0	5.0
1,1,1,2-Tetrachloroethane	<5.0	<5.0	<5.0	<5.0	5.0

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: VOCs & OXYGENATES by GC/MS EPA 5035

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: ug/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/25/18	06/22/18	06/22/18	
Date Analyzed:	06/22/18	06/25/18	06/22/18	06/22/18	
AA ID No:	8F20019-02	8F20019-04	8F20019-05	8F20019-06	
Client ID No:	SB-4-1	SB-4-3.5	SB-4-5	SB-4-10	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
8260B/5035 +OXYGENATES (EPA 8260B/5035) (continued)					
1,1,2,2-Tetrachloroethane	<5.0	<5.0	<5.0	<5.0	5.0
Tetrachloroethylene (PCE)	<5.0	<5.0	<5.0	<5.0	5.0
Toluene	<2.0	<2.0	<2.0	<2.0	2.0
1,2,4-Trichlorobenzene	<5.0	<5.0	<5.0	<5.0	5.0
1,2,3-Trichlorobenzene	<5.0	<5.0	<5.0	<5.0	5.0
1,1,2-Trichloroethane	<5.0	<5.0	<5.0	<5.0	5.0
1,1,1-Trichloroethane	<5.0	<5.0	<5.0	<5.0	5.0
Trichloroethylene (TCE)	<5.0	<5.0	<5.0	<5.0	5.0
Trichlorofluoromethane (R11)	<5.0	<5.0	<5.0	<5.0	5.0
1,2,3-Trichloropropane	<5.0	<5.0	<5.0	<5.0	5.0
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	<5.0	<5.0	<5.0	<5.0	5.0
1,3,5-Trimethylbenzene	<5.0	<5.0	<5.0	<5.0	5.0
1,2,4-Trimethylbenzene	<5.0	<5.0	<5.0	<5.0	5.0
Vinyl chloride	<5.0	<5.0	<5.0	<5.0	5.0
o-Xylene	<2.0	<2.0	<2.0	<2.0	2.0
m,p-Xylenes	<2.0	<2.0	<2.0	<2.0	2.0
Surrogates					**%REC Limits**
4-Bromofluorobenzene	98%	116%	94%	94%	70-140
Dibromofluoromethane	123%	119%	128%	119%	70-140
Toluene-d8	98%	110%	94%	96%	70-140



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: VOCs & OXYGENATES by GC/MS EPA 5035

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: ug/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/22/18	06/25/18	06/22/18	
Date Analyzed:	06/22/18	06/22/18	06/25/18	06/22/18	
AA ID No:	8F20019-07	8F20019-09	8F20019-11	8F20019-13	
Client ID No:	SB-4-15	SB-6-1	SB-6-5	SB-5-1	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
8260B/5035 +OXYGENATES (EPA 8260B/5035)					
Acetone	<50	<50	<50	<50	50
tert-Amyl Methyl Ether (TAME)	<5.0	<5.0	<5.0	<5.0	5.0
Benzene	<2.0	<2.0	<2.0	<2.0	2.0
Bromobenzene	<5.0	<5.0	<5.0	<5.0	5.0
Bromochloromethane	<5.0	<5.0	<5.0	<5.0	5.0
Bromodichloromethane	<5.0	<5.0	<5.0	<5.0	5.0
Bromoform	<5.0	<5.0	<5.0	<5.0	5.0
Bromomethane	<5.0	<5.0	<5.0	<5.0	5.0
2-Butanone (MEK)	<50	<50	<50	<50	50
tert-Butyl alcohol (TBA)	<20	<20	<20	<20	20
sec-Butylbenzene	<5.0	<5.0	<5.0	<5.0	5.0
tert-Butylbenzene	<5.0	<5.0	<5.0	<5.0	5.0
n-Butylbenzene	<5.0	<5.0	<5.0	<5.0	5.0
Carbon Disulfide	<5.0	**10**	<5.0	<5.0	5.0
Carbon Tetrachloride	<5.0	<5.0	<5.0	<5.0	5.0
Chlorobenzene	<5.0	<5.0	<5.0	<5.0	5.0
Chloroethane	<5.0	<5.0	<5.0	<5.0	5.0
Chloroform	<5.0	<5.0	<5.0	<5.0	5.0
Chloromethane	<5.0	<5.0	<5.0	<5.0	5.0
2-Chlorotoluene	<5.0	<5.0	<5.0	<5.0	5.0
4-Chlorotoluene	<5.0	<5.0	<5.0	<5.0	5.0
1,2-Dibromo-3-chloropropane	<10	<10	<10	<10	10
Dibromochloromethane	<5.0	<5.0	<5.0	<5.0	5.0
1,2-Dibromoethane (EDB)	<5.0	<5.0	<5.0	<5.0	5.0
Dibromomethane	<5.0	<5.0	<5.0	<5.0	5.0
1,4-Dichlorobenzene	<5.0	<5.0	<5.0	<5.0	5.0
1,3-Dichlorobenzene	<5.0	<5.0	<5.0	<5.0	5.0

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: VOCs & OXYGENATES by GC/MS EPA 5035

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: ug/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/22/18	06/25/18	06/22/18	
Date Analyzed:	06/22/18	06/22/18	06/25/18	06/22/18	
AA ID No:	8F20019-07	8F20019-09	8F20019-11	8F20019-13	
Client ID No:	SB-4-15	SB-6-1	SB-6-5	SB-5-1	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
8260B/5035 +OXYGENATES (EPA 8260B/5035) (continued)					
1,2-Dichlorobenzene	<5.0	<5.0	<5.0	<5.0	5.0
Dichlorodifluoromethane (R12)	<5.0	<5.0	<5.0	<5.0	5.0
1,1-Dichloroethane	<5.0	<5.0	<5.0	<5.0	5.0
1,2-Dichloroethane (EDC)	<5.0	<5.0	<5.0	<5.0	5.0
trans-1,2-Dichloroethylene	<5.0	<5.0	<5.0	<5.0	5.0
cis-1,2-Dichloroethylene	<5.0	<5.0	<5.0	<5.0	5.0
1,1-Dichloroethylene	<5.0	<5.0	<5.0	<5.0	5.0
2,2-Dichloropropane	<5.0	<5.0	<5.0	<5.0	5.0
1,3-Dichloropropane	<5.0	<5.0	<5.0	<5.0	5.0
1,2-Dichloropropane	<5.0	<5.0	<5.0	<5.0	5.0
trans-1,3-Dichloropropylene	<5.0	<5.0	<5.0	<5.0	5.0
1,1-Dichloropropylene	<5.0	<5.0	<5.0	<5.0	5.0
cis-1,3-Dichloropropylene	<5.0	<5.0	<5.0	<5.0	5.0
Diisopropyl ether (DIPE)	<5.0	<5.0	<5.0	<5.0	5.0
Ethylbenzene	<2.0	<2.0	<2.0	<2.0	2.0
Ethyl-tert-Butyl Ether (ETBE)	<5.0	<5.0	<5.0	<5.0	5.0
Hexachlorobutadiene	<10	<10	<10	<10	10
2-Hexanone (MBK)	<50	<50	<50	<50	50
Isopropylbenzene	<5.0	<5.0	<5.0	<5.0	5.0
4-Isopropyltoluene	<5.0	<5.0	<5.0	<5.0	5.0
Methyl-tert-Butyl Ether (MTBE)	<5.0	<5.0	<5.0	<5.0	5.0
Methylene Chloride	<50	<50	<50	<50	50
4-Methyl-2-pentanone (MIBK)	<50	<50	<50	<50	50
Naphthalene	<10	<10	<10	<10	10
n-Propylbenzene	<5.0	<5.0	<5.0	<5.0	5.0
Styrene	<5.0	<5.0	<5.0	<5.0	5.0
1,1,1,2-Tetrachloroethane	<5.0	<5.0	<5.0	<5.0	5.0

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: VOCs & OXYGENATES by GC/MS EPA 5035

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: ug/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/22/18	06/25/18	06/22/18	
Date Analyzed:	06/22/18	06/22/18	06/25/18	06/22/18	
AA ID No:	8F20019-07	8F20019-09	8F20019-11	8F20019-13	
Client ID No:	SB-4-15	SB-6-1	SB-6-5	SB-5-1	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
8260B/5035 +OXYGENATES (EPA 8260B/5035) (continued)					
1,1,2,2-Tetrachloroethane	<5.0	<5.0	<5.0	<5.0	5.0
Tetrachloroethylene (PCE)	<5.0	<5.0	<5.0	<5.0	5.0
Toluene	<2.0	<2.0	<2.0	<2.0	2.0
1,2,4-Trichlorobenzene	<5.0	<5.0	<5.0	<5.0	5.0
1,2,3-Trichlorobenzene	<5.0	<5.0	<5.0	<5.0	5.0
1,1,2-Trichloroethane	<5.0	<5.0	<5.0	<5.0	5.0
1,1,1-Trichloroethane	<5.0	<5.0	<5.0	<5.0	5.0
Trichloroethylene (TCE)	<5.0	<5.0	<5.0	<5.0	5.0
Trichlorofluoromethane (R11)	<5.0	<5.0	<5.0	<5.0	5.0
1,2,3-Trichloropropane	<5.0	<5.0	<5.0	<5.0	5.0
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	<5.0	<5.0	<5.0	<5.0	5.0
1,3,5-Trimethylbenzene	<5.0	<5.0	<5.0	<5.0	5.0
1,2,4-Trimethylbenzene	<5.0	<5.0	<5.0	<5.0	5.0
Vinyl chloride	<5.0	<5.0	<5.0	<5.0	5.0
o-Xylene	<2.0	<2.0	<2.0	<2.0	2.0
m,p-Xylenes	<2.0	<2.0	<2.0	<2.0	2.0
Surrogates					**%REC Limits**
4-Bromofluorobenzene	93%	97%	102%	108%	70-140
Dibromofluoromethane	123%	124%	113%	125%	70-140
Toluene-d8	98%	96%	104%	103%	70-140

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: VOCs & OXYGENATES by GC/MS EPA 5035

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: ug/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/25/18	06/22/18	06/22/18	06/22/18	
Date Analyzed:	06/25/18	06/22/18	06/22/18	06/22/18	
AA ID No:	8F20019-15	8F20019-17	8F20019-19	8F20019-21	
Client ID No:	SB-5-5	SB-3-1	SB-3-5	SB-1-1	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
8260B/5035 +OXYGENATES (EPA 8260B/5035)					
Acetone	<50	<50	<50	<50	50
tert-Amyl Methyl Ether (TAME)	<5.0	<5.0	<5.0	<5.0	5.0
Benzene	<2.0	<2.0	<2.0	<2.0	2.0
Bromobenzene	<5.0	<5.0	<5.0	<5.0	5.0
Bromochloromethane	<5.0	<5.0	<5.0	<5.0	5.0
Bromodichloromethane	<5.0	<5.0	<5.0	<5.0	5.0
Bromoform	<5.0	<5.0	<5.0	<5.0	5.0
Bromomethane	<5.0	<5.0	<5.0	<5.0	5.0
2-Butanone (MEK)	<50	<50	<50	<50	50
tert-Butyl alcohol (TBA)	<20	<20	<20	<20	20
sec-Butylbenzene	<5.0	<5.0	<5.0	<5.0	5.0
tert-Butylbenzene	<5.0	<5.0	<5.0	<5.0	5.0
n-Butylbenzene	<5.0	<5.0	<5.0	<5.0	5.0
Carbon Disulfide	<5.0	<5.0	<5.0	<5.0	5.0
Carbon Tetrachloride	<5.0	<5.0	<5.0	<5.0	5.0
Chlorobenzene	<5.0	<5.0	<5.0	<5.0	5.0
Chloroethane	<5.0	<5.0	<5.0	<5.0	5.0
Chloroform	<5.0	<5.0	<5.0	<5.0	5.0
Chloromethane	<5.0	<5.0	<5.0	<5.0	5.0
2-Chlorotoluene	<5.0	<5.0	<5.0	<5.0	5.0
4-Chlorotoluene	<5.0	<5.0	<5.0	<5.0	5.0
1,2-Dibromo-3-chloropropane	<10	<10	<10	<10	10
Dibromochloromethane	<5.0	<5.0	<5.0	<5.0	5.0
1,2-Dibromoethane (EDB)	<5.0	<5.0	<5.0	<5.0	5.0
Dibromomethane	<5.0	<5.0	<5.0	<5.0	5.0
1,4-Dichlorobenzene	<5.0	<5.0	<5.0	<5.0	5.0
1,3-Dichlorobenzene	<5.0	<5.0	<5.0	<5.0	5.0

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: VOCs & OXYGENATES by GC/MS EPA 5035

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: ug/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/25/18	06/22/18	06/22/18	06/22/18	
Date Analyzed:	06/25/18	06/22/18	06/22/18	06/22/18	
AA ID No:	8F20019-15	8F20019-17	8F20019-19	8F20019-21	
Client ID No:	SB-5-5	SB-3-1	SB-3-5	SB-1-1	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
8260B/5035 +OXYGENATES (EPA 8260B/5035) (continued)					
1,2-Dichlorobenzene	<5.0	<5.0	<5.0	<5.0	5.0
Dichlorodifluoromethane (R12)	<5.0	<5.0	<5.0	<5.0	5.0
1,1-Dichloroethane	<5.0	<5.0	<5.0	<5.0	5.0
1,2-Dichloroethane (EDC)	<5.0	<5.0	<5.0	<5.0	5.0
trans-1,2-Dichloroethylene	<5.0	<5.0	<5.0	<5.0	5.0
cis-1,2-Dichloroethylene	<5.0	<5.0	<5.0	<5.0	5.0
1,1-Dichloroethylene	<5.0	<5.0	<5.0	<5.0	5.0
2,2-Dichloropropane	<5.0	<5.0	<5.0	<5.0	5.0
1,3-Dichloropropane	<5.0	<5.0	<5.0	<5.0	5.0
1,2-Dichloropropane	<5.0	<5.0	<5.0	<5.0	5.0
trans-1,3-Dichloropropylene	<5.0	<5.0	<5.0	<5.0	5.0
1,1-Dichloropropylene	<5.0	<5.0	<5.0	<5.0	5.0
cis-1,3-Dichloropropylene	<5.0	<5.0	<5.0	<5.0	5.0
Diisopropyl ether (DIPE)	<5.0	<5.0	<5.0	<5.0	5.0
Ethylbenzene	<2.0	<2.0	<2.0	<2.0	2.0
Ethyl-tert-Butyl Ether (ETBE)	<5.0	<5.0	<5.0	<5.0	5.0
Hexachlorobutadiene	<10	<10	<10	<10	10
2-Hexanone (MBK)	<50	<50	<50	<50	50
Isopropylbenzene	<5.0	<5.0	<5.0	<5.0	5.0
4-Isopropyltoluene	<5.0	<5.0	<5.0	<5.0	5.0
Methyl-tert-Butyl Ether (MTBE)	<5.0	<5.0	<5.0	<5.0	5.0
Methylene Chloride	<50	<50	<50	<50	50
4-Methyl-2-pentanone (MIBK)	<50	<50	<50	<50	50
Naphthalene	<10	<10	<10	<10	10
n-Propylbenzene	<5.0	<5.0	<5.0	<5.0	5.0
Styrene	<5.0	<5.0	<5.0	<5.0	5.0
1,1,1,2-Tetrachloroethane	<5.0	<5.0	<5.0	<5.0	5.0

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: VOCs & OXYGENATES by GC/MS EPA 5035

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: ug/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/25/18	06/22/18	06/22/18	06/22/18	
Date Analyzed:	06/25/18	06/22/18	06/22/18	06/22/18	
AA ID No:	8F20019-15	8F20019-17	8F20019-19	8F20019-21	
Client ID No:	SB-5-5	SB-3-1	SB-3-5	SB-1-1	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
8260B/5035 +OXYGENATES (EPA 8260B/5035) (continued)					
1,1,2,2-Tetrachloroethane	<5.0	<5.0	<5.0	<5.0	5.0
Tetrachloroethylene (PCE)	<5.0	<5.0	<5.0	<5.0	5.0
Toluene	<2.0	<2.0	<2.0	<2.0	2.0
1,2,4-Trichlorobenzene	<5.0	<5.0	<5.0	<5.0	5.0
1,2,3-Trichlorobenzene	<5.0	<5.0	<5.0	<5.0	5.0
1,1,2-Trichloroethane	<5.0	<5.0	<5.0	<5.0	5.0
1,1,1-Trichloroethane	<5.0	<5.0	<5.0	<5.0	5.0
Trichloroethylene (TCE)	<5.0	<5.0	<5.0	<5.0	5.0
Trichlorofluoromethane (R11)	<5.0	<5.0	<5.0	<5.0	5.0
1,2,3-Trichloropropane	<5.0	<5.0	<5.0	<5.0	5.0
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	<5.0	<5.0	<5.0	<5.0	5.0
1,3,5-Trimethylbenzene	<5.0	<5.0	<5.0	<5.0	5.0
1,2,4-Trimethylbenzene	<5.0	<5.0	<5.0	<5.0	5.0
Vinyl chloride	<5.0	<5.0	<5.0	<5.0	5.0
o-Xylene	<2.0	<2.0	<2.0	<2.0	2.0
m,p-Xylenes	<2.0	<2.0	<2.0	<2.0	2.0
Surrogates					**%REC Limits**
4-Bromofluorobenzene	113%	107%	126%	120%	70-140
Dibromofluoromethane	123%	127%	135%	137%	70-140
Toluene-d8	107%	97%	112%	108%	70-140

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: VOCs & OXYGENATES by GC/MS EPA 5035

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: ug/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/22/18	06/22/18	
Date Analyzed:	06/23/18	06/23/18	06/23/18	
AA ID No:	8F20019-24	8F20019-27	8F20019-28	
Client ID No:	SB-2-1	SB-2-1 DUP	SB-3-5 DUP	
Matrix:	Soil	Soil	Soil	
Dilution Factor:	1	1	1	MRL
8260B/5035 +OXYGENATES (EPA 8260B/5035)				
Acetone	<50	<50	<50	50
tert-Amyl Methyl Ether (TAME)	<5.0	<5.0	<5.0	5.0
Benzene	<2.0	<2.0	<2.0	2.0
Bromobenzene	<5.0	<5.0	<5.0	5.0
Bromochloromethane	<5.0	<5.0	<5.0	5.0
Bromodichloromethane	<5.0	<5.0	<5.0	5.0
Bromoform	<5.0	<5.0	<5.0	5.0
Bromomethane	<5.0	<5.0	<5.0	5.0
2-Butanone (MEK)	<50	<50	<50	50
tert-Butyl alcohol (TBA)	<20	<20	<20	20
sec-Butylbenzene	<5.0	<5.0	<5.0	5.0
tert-Butylbenzene	<5.0	<5.0	<5.0	5.0
n-Butylbenzene	<5.0	<5.0	<5.0	5.0
Carbon Disulfide	**5.0**	<5.0	<5.0	5.0
Carbon Tetrachloride	<5.0	<5.0	<5.0	5.0
Chlorobenzene	<5.0	<5.0	<5.0	5.0
Chloroethane	<5.0	<5.0	<5.0	5.0
Chloroform	<5.0	<5.0	<5.0	5.0
Chloromethane	<5.0	<5.0	<5.0	5.0
2-Chlorotoluene	<5.0	<5.0	<5.0	5.0
4-Chlorotoluene	<5.0	<5.0	<5.0	5.0
1,2-Dibromo-3-chloropropane	<10	<10	<10	10
Dibromochloromethane	<5.0	<5.0	<5.0	5.0
1,2-Dibromoethane (EDB)	<5.0	<5.0	<5.0	5.0
Dibromomethane	<5.0	<5.0	<5.0	5.0
1,4-Dichlorobenzene	<5.0	<5.0	<5.0	5.0
1,3-Dichlorobenzene	<5.0	<5.0	<5.0	5.0

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: VOCs & OXYGENATES by GC/MS EPA 5035

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: ug/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/22/18	06/22/18	
Date Analyzed:	06/23/18	06/23/18	06/23/18	
AA ID No:	8F20019-24	8F20019-27	8F20019-28	
Client ID No:	SB-2-1	SB-2-1 DUP	SB-3-5 DUP	
Matrix:	Soil	Soil	Soil	
Dilution Factor:	1	1	1	MRL
8260B/5035 +OXYGENATES (EPA 8260B/5035) (continued)				
1,2-Dichlorobenzene	<5.0	<5.0	<5.0	5.0
Dichlorodifluoromethane (R12)	<5.0	<5.0	<5.0	5.0
1,1-Dichloroethane	<5.0	<5.0	<5.0	5.0
1,2-Dichloroethane (EDC)	<5.0	<5.0	<5.0	5.0
trans-1,2-Dichloroethylene	<5.0	<5.0	<5.0	5.0
cis-1,2-Dichloroethylene	<5.0	<5.0	<5.0	5.0
1,1-Dichloroethylene	<5.0	<5.0	<5.0	5.0
2,2-Dichloropropane	<5.0	<5.0	<5.0	5.0
1,3-Dichloropropane	<5.0	<5.0	<5.0	5.0
1,2-Dichloropropane	<5.0	<5.0	<5.0	5.0
trans-1,3-Dichloropropylene	<5.0	<5.0	<5.0	5.0
1,1-Dichloropropylene	<5.0	<5.0	<5.0	5.0
cis-1,3-Dichloropropylene	<5.0	<5.0	<5.0	5.0
Diisopropyl ether (DIPE)	<5.0	<5.0	<5.0	5.0
Ethylbenzene	<2.0	<2.0	<2.0	2.0
Ethyl-tert-Butyl Ether (ETBE)	<5.0	<5.0	<5.0	5.0
Hexachlorobutadiene	<10	<10	<10	10
2-Hexanone (MBK)	<50	<50	<50	50
Isopropylbenzene	<5.0	<5.0	<5.0	5.0
4-Isopropyltoluene	<5.0	<5.0	<5.0	5.0
Methyl-tert-Butyl Ether (MTBE)	<5.0	<5.0	<5.0	5.0
Methylene Chloride	<50	<50	<50	50
4-Methyl-2-pentanone (MIBK)	<50	<50	<50	50
Naphthalene	<10	<10	<10	10
n-Propylbenzene	<5.0	<5.0	<5.0	5.0
Styrene	<5.0	<5.0	<5.0	5.0
1,1,1,2-Tetrachloroethane	<5.0	<5.0	<5.0	5.0

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: VOCs & OXYGENATES by GC/MS EPA 5035

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18
Units: ug/kg

Date Sampled:	06/20/18	06/20/18	06/20/18	
Date Prepared:	06/22/18	06/22/18	06/22/18	
Date Analyzed:	06/23/18	06/23/18	06/23/18	
AA ID No:	8F20019-24	8F20019-27	8F20019-28	
Client ID No:	SB-2-1	SB-2-1 DUP	SB-3-5 DUP	
Matrix:	Soil	Soil	Soil	
Dilution Factor:	1	1	1	MRL
8260B/5035 +OXYGENATES (EPA 8260B/5035) (continued)				
1,1,2,2-Tetrachloroethane	<5.0	<5.0	<5.0	5.0
Tetrachloroethylene (PCE)	<5.0	<5.0	<5.0	5.0
Toluene	<2.0	<2.0	<2.0	2.0
1,2,4-Trichlorobenzene	<5.0	<5.0	<5.0	5.0
1,2,3-Trichlorobenzene	<5.0	<5.0	<5.0	5.0
1,1,2-Trichloroethane	<5.0	<5.0	<5.0	5.0
1,1,1-Trichloroethane	<5.0	<5.0	<5.0	5.0
Trichloroethylene (TCE)	<5.0	<5.0	<5.0	5.0
Trichlorofluoromethane (R11)	<5.0	<5.0	<5.0	5.0
1,2,3-Trichloropropane	<5.0	<5.0	<5.0	5.0
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	<5.0	<5.0	<5.0	5.0
1,3,5-Trimethylbenzene	<5.0	<5.0	<5.0	5.0
1,2,4-Trimethylbenzene	<5.0	<5.0	<5.0	5.0
Vinyl chloride	<5.0	<5.0	<5.0	5.0
o-Xylene	<2.0	<2.0	<2.0	2.0
m,p-Xylenes	<2.0	<2.0	<2.0	2.0
Surrogates				**%REC Limits**
4-Bromofluorobenzene	120%	114%	122%	70-140
Dibromofluoromethane	133%	129%	136%	70-140
Toluene-d8	111%	102%	109%	70-140

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Semivolatile Organics by GC/MS - Quality Control										
Batch B8F2211 - EPA 3545 MS										
Blank (B8F2211-BLK1)				Prepared: 06/22/18 Analyzed: 06/25/18						
3,3´-Dichlorobenzidine	<0.40	0.40	mg/kg							
Acenaphthene	<0.10	0.10	mg/kg							
Acenaphthylene	<0.10	0.10	mg/kg							
Aniline	<0.20	0.20	mg/kg							
Anthracene	<0.10	0.10	mg/kg							
Azobenzene	<0.10	0.10	mg/kg							
Benzidine	<0.40	0.40	mg/kg							
Benzo(a)anthracene	<0.10	0.10	mg/kg							
Benzo(a)pyrene	<0.10	0.10	mg/kg							
Benzo(b)fluoranthene	<0.10	0.10	mg/kg							
Benzo(g,h,i)perylene	<0.10	0.10	mg/kg							
Benzoic acid	<1.0	1.0	mg/kg							
Benzo(k)fluoranthene	<0.10	0.10	mg/kg							
Benzyl alcohol	<0.10	0.10	mg/kg							
4-Bromophenyl phenyl ether	<0.10	0.10	mg/kg							
Butyl benzyl phthalate	<0.50	0.50	mg/kg							
4-Chloro-3-methylphenol	<0.20	0.20	mg/kg							
4-Chloroaniline	<0.40	0.40	mg/kg							
Bis(2-chloroethoxy)methane	<0.10	0.10	mg/kg							
Bis(2-chloroethyl)ether	<0.10	0.10	mg/kg							
Bis(2-chloroisopropyl)ether	<0.10	0.10	mg/kg							
2-Chloronaphthalene	<0.10	0.10	mg/kg							
2-Chlorophenol	<0.10	0.10	mg/kg							
4-Chlorophenyl phenyl ether	<0.10	0.10	mg/kg							
Chrysene	<0.10	0.10	mg/kg							
Dibenzo(a,h)anthracene	<0.10	0.10	mg/kg							
Dibenzofuran	<0.10	0.10	mg/kg							
Di-n-butyl phthalate	<2.0	2.0	mg/kg							
1,2-Dichlorobenzene	<0.10	0.10	mg/kg							
1,3-Dichlorobenzene	<0.10	0.10	mg/kg							
1,4-Dichlorobenzene	<0.10	0.10	mg/kg							

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Semivolatile Organics by GC/MS - Quality Control										
Batch B8F2211 - EPA 3545 MS										
Blank (B8F2211-BLK1) Continued				Prepared: 06/22/18 Analyzed: 06/25/18						
2,4-Dichlorophenol	<0.10	0.10	mg/kg							
Diethyl phthalate	<0.80	0.80	mg/kg							
2,4-Dimethylphenol	<0.10	0.10	mg/kg							
Dimethyl phthalate	<0.20	0.20	mg/kg							
4,6-Dinitro-2-methylphenol	<0.20	0.20	mg/kg							
2,4-Dinitrophenol	<0.40	0.40	mg/kg							
2,6-Dinitrotoluene	<0.10	0.10	mg/kg							
2,4-Dinitrotoluene	<0.10	0.10	mg/kg							
Di-n-octyl phthalate	<0.10	0.10	mg/kg							
1,2-Diphenylhydrazine	<0.10	0.10	mg/kg							
Bis(2-ethylhexyl)phthalate	<0.20	0.20	mg/kg							
Fluoranthene	<0.10	0.10	mg/kg							
Fluorene	<0.10	0.10	mg/kg							
Hexachlorobenzene	<0.10	0.10	mg/kg							
Hexachlorobutadiene	<0.10	0.10	mg/kg							
Hexachlorocyclopentadiene	<0.10	0.10	mg/kg							
Hexachloroethane	<0.10	0.10	mg/kg							
Indeno (1,2,3-cd) pyrene	<0.40	0.40	mg/kg							
Isophorone	<0.10	0.10	mg/kg							
2-Methylnaphthalene	<0.10	0.10	mg/kg							
2-Methylphenol	<0.20	0.20	mg/kg							
3-Methylphenol	<0.20	0.20	mg/kg							
4-Methylphenol	<0.20	0.20	mg/kg							
Naphthalene	<0.10	0.10	mg/kg							
4-Nitroaniline	<0.50	0.50	mg/kg							
3-Nitroaniline	<0.40	0.40	mg/kg							
2-Nitroaniline	<0.10	0.10	mg/kg							
Nitrobenzene	<0.10	0.10	mg/kg							
2-Nitrophenol	<0.20	0.20	mg/kg							
4-Nitrophenol	<0.20	0.20	mg/kg							
N-Nitrosodimethylamine	<0.10	0.10	mg/kg							

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Semivolatile Organics by GC/MS - Quality Control										
Batch B8F2211 - EPA 3545 MS										
Blank (B8F2211-BLK1) Continued				Prepared: 06/22/18 Analyzed: 06/25/18						
N-Nitrosodiphenylamine	<0.10	0.10	mg/kg							
N-Nitrosodi-n-propylamine	<0.10	0.10	mg/kg							
Pentachlorophenol	<0.10	0.10	mg/kg							
Phenanthrene	<0.10	0.10	mg/kg							
Phenol	<0.10	0.10	mg/kg							
Pyrene	<0.10	0.10	mg/kg							
1,2,4-Trichlorobenzene	<0.10	0.10	mg/kg							
2,4,5-Trichlorophenol	<0.20	0.20	mg/kg							
2,4,6-Trichlorophenol	<0.20	0.20	mg/kg							
Surrogate: 2-Fluorobiphenyl	*0.401*		*mg/kg*	*0.50*		*80.2*	*43-145*			
Surrogate: 2-Fluorophenol	*0.674*		*mg/kg*	*1.0*		*67.4*	*21-143*			
Surrogate: Nitrobenzene-d5	*0.340*		*mg/kg*	*0.50*		*67.9*	*35-142*			
Surrogate: Phenol-d6	*0.692*		*mg/kg*	*1.0*		*69.2*	*10-135*			
Surrogate: Terphenyl-dl4	*0.400*		*mg/kg*	*0.50*		*80.1*	*33-148*			
Surrogate: 2,4,6-Tribromophenol	*0.561*		*mg/kg*	*1.0*		*56.1*	*10-150*			
LCS (B8F2211-BS1)				Prepared: 06/22/18 Analyzed: 06/25/18						
Acenaphthene	**0.377**	0.10	mg/kg	0.60		62.8	50-121			
Acenaphthylene	**0.350**	0.10	mg/kg	0.60		58.3	50-120			
Anthracene	**0.371**	0.10	mg/kg	0.60		61.8	41-121			
Benzo(a)anthracene	**0.369**	0.10	mg/kg	0.60		61.5	57-120			
Benzo(a)pyrene	**0.399**	0.10	mg/kg	0.60		66.6	17-163			
Benzo(b)fluoranthene	**0.367**	0.10	mg/kg	0.60		61.1	25-137			
Benzo(g,h,i)perylene	**0.496**	0.10	mg/kg	0.60		82.7	52-125			
Benzo(k)fluoranthene	**0.365**	0.10	mg/kg	0.60		60.8	61-122			***
Butyl benzyl phthalate	**0.331**	0.50	mg/kg	0.60		55.2	19-139			
4-Chloro-3-methylphenol	**0.351**	0.20	mg/kg	0.60		58.5	22-147			
Bis(2-chloroethyl)ether	**0.347**	0.10	mg/kg	0.60		57.9	26-122			
2-Chloronaphthalene	**0.384**	0.10	mg/kg	0.60		64.0	60-118			
4-Chlorophenyl phenyl ether	**0.380**	0.10	mg/kg	0.60		63.3	41-128			
Chrysene	**0.383**	0.10	mg/kg	0.60		63.9	64-116			***
Dibenzo(a,h)anthracene	**0.467**	0.10	mg/kg	0.60		77.9	33-136			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Semivolatile Organics by GC/MS - Quality Control										
Batch B8F2211 - EPA 3545 MS										
LCS (B8F2211-BS1) Continued				Prepared: 06/22/18 Analyzed: 06/25/18						
Dibenzofuran	**0.373**	0.10	mg/kg	0.60		62.2	50-106			
1,4-Dichlorobenzene	**0.370**	0.10	mg/kg	0.60		61.6	26-105			
2,4-Dichlorophenol	**0.345**	0.10	mg/kg	0.60		57.5	39-135			
Di-n-octyl phthalate	**0.407**	0.10	mg/kg	0.60		67.9	4-146			
Bis(2-ethylhexyl)phthalate	**0.365**	0.20	mg/kg	0.60		60.9	30-210			
Fluoranthene	**0.377**	0.10	mg/kg	0.60		62.8	35-125			
Fluorene	**0.369**	0.10	mg/kg	0.60		61.5	50-120			
Hexachlorobenzene	**0.365**	0.10	mg/kg	0.60		60.8	2-152			
Hexachlorobutadiene	**0.378**	0.10	mg/kg	0.60		62.9	24-116			
Hexachloroethane	**0.395**	0.10	mg/kg	0.60		65.8	40-113			
Indeno (1,2,3-cd) pyrene	**0.611**	0.40	mg/kg	0.60		102	46-133			
Isophorone	**0.363**	0.10	mg/kg	0.60		60.5	21-196			
2-Methylnaphthalene	**0.350**	0.10	mg/kg	0.60		58.3	44-105			
Naphthalene	**0.383**	0.10	mg/kg	0.60		63.8	25-121			
Nitrobenzene	**0.355**	0.10	mg/kg	0.60		59.2	38-133			
2-Nitrophenol	**0.349**	0.20	mg/kg	0.60		58.1	2-163			
N-Nitrosodi-n-propylamine	**0.358**	0.10	mg/kg	0.60		59.6	2-230			
Pentachlorophenol	**0.178**	0.10	mg/kg	0.60		29.7	14-176			
Phenanthrene	**0.366**	0.10	mg/kg	0.60		61.0	58-106			
Phenol	**0.357**	0.10	mg/kg	0.60		59.5	5-112			
Pyrene	**0.354**	0.10	mg/kg	0.60		58.9	52-115			
1,2,4-Trichlorobenzene	**0.364**	0.10	mg/kg	0.60		60.6	44-142			
2,4,6-Trichlorophenol	**0.341**	0.20	mg/kg	0.60		56.9	37-144			
Surrogate: 2-Fluorobiphenyl	*0.435*		*mg/kg*	*0.50*		*87.1*	*43-145*			
Surrogate: 2-Fluorophenol	*0.775*		*mg/kg*	*1.0*		*77.5*	*21-143*			
Surrogate: Nitrobenzene-d5	*0.380*		*mg/kg*	*0.50*		*76.0*	*35-142*			
Surrogate: Phenol-d6	*0.754*		*mg/kg*	*1.0*		*75.4*	*10-135*			
Surrogate: Terphenyl-dl4	*0.401*		*mg/kg*	*0.50*		*80.3*	*33-148*			
Surrogate: 2,4,6-Tribromophenol	*0.736*		*mg/kg*	*1.0*		*73.6*	*10-150*			
LCS Dup (B8F2211-BSD1)				Prepared: 06/22/18 Analyzed: 06/25/18						
Acenaphthene	**0.379**	0.10	mg/kg	0.60		63.2	50-121	0.635	40	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Semivolatile Organics by GC/MS - Quality Control										
Batch B8F2211 - EPA 3545 MS										
LCS Dup (B8F2211-BSD1) Continued				Prepared: 06/22/18 Analyzed: 06/25/18						
Acenaphthylene	**0.358**	0.10	mg/kg	0.60		59.7	50-120	2.43	40	
Anthracene	**0.384**	0.10	mg/kg	0.60		63.9	41-121	3.39	40	
Benzo(a)anthracene	**0.398**	0.10	mg/kg	0.60		66.3	57-120	7.52	40	
Benzo(a)pyrene	**0.424**	0.10	mg/kg	0.60		70.7	17-163	6.07	40	
Benzo(b)fluoranthene	**0.393**	0.10	mg/kg	0.60		65.5	25-137	7.00	40	
Benzo(g,h,i)perylene	**0.567**	0.10	mg/kg	0.60		94.5	52-125	13.4	40	
Benzo(k)fluoranthene	**0.399**	0.10	mg/kg	0.60		66.5	61-122	8.90	40	
Butyl benzyl phthalate	**0.359**	0.50	mg/kg	0.60		59.9	19-139	8.11	40	
4-Chloro-3-methylphenol	**0.417**	0.20	mg/kg	0.60		69.5	22-147	17.2	40	
Bis(2-chloroethyl)ether	**0.384**	0.10	mg/kg	0.60		64.0	26-122	10.1	40	
2-Chloronaphthalene	**0.398**	0.10	mg/kg	0.60		66.3	60-118	3.43	40	
4-Chlorophenyl phenyl ether	**0.387**	0.10	mg/kg	0.60		64.4	41-128	1.72	40	
Chrysene	**0.419**	0.10	mg/kg	0.60		69.9	64-116	8.92	40	
Dibenzo(a,h)anthracene	**0.519**	0.10	mg/kg	0.60		86.4	33-136	10.4	40	
Dibenzofuran	**0.395**	0.10	mg/kg	0.60		65.8	50-106	5.62	40	
1,4-Dichlorobenzene	**0.384**	0.10	mg/kg	0.60		64.0	26-105	3.82	40	
2,4-Dichlorophenol	**0.408**	0.10	mg/kg	0.60		68.0	39-135	16.7	40	
Di-n-octyl phthalate	**0.445**	0.10	mg/kg	0.60		74.2	4-146	8.87	40	
Bis(2-ethylhexyl)phthalate	**0.393**	0.20	mg/kg	0.60		65.5	30-210	7.38	40	
Fluoranthene	**0.402**	0.10	mg/kg	0.60		66.9	35-125	6.43	40	
Fluorene	**0.392**	0.10	mg/kg	0.60		65.3	50-120	5.94	40	
Hexachlorobenzene	**0.402**	0.10	mg/kg	0.60		66.9	2-152	9.60	40	
Hexachlorobutadiene	**0.429**	0.10	mg/kg	0.60		71.5	24-116	12.8	40	
Hexachloroethane	**0.387**	0.10	mg/kg	0.60		64.6	40-113	1.84	40	
Indeno (1,2,3-cd) pyrene	**0.683**	0.40	mg/kg	0.60		114	46-133	11.1	40	
Isophorone	**0.396**	0.10	mg/kg	0.60		66.1	21-196	8.85	40	
2-Methylnaphthalene	**0.389**	0.10	mg/kg	0.60		64.9	44-105	10.7	40	
Naphthalene	**0.421**	0.10	mg/kg	0.60		70.1	25-121	9.46	40	
Nitrobenzene	**0.431**	0.10	mg/kg	0.60		71.9	38-133	19.4	40	
2-Nitrophenol	**0.403**	0.20	mg/kg	0.60		67.2	2-163	14.5	40	
N-Nitrosodi-n-propylamine	**0.351**	0.10	mg/kg	0.60		58.6	2-230	1.75	40	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Semivolatile Organics by GC/MS - Quality Control										
Batch B8F2211 - EPA 3545 MS										
LCS Dup (B8F2211-BSD1) Continued				Prepared: 06/22/18 Analyzed: 06/25/18						
Pentachlorophenol	**0.195**	0.10	mg/kg	0.60		32.5	14-176	9.11	40	
Phenanthrene	**0.389**	0.10	mg/kg	0.60		64.9	58-106	6.25	40	
Phenol	**0.380**	0.10	mg/kg	0.60		63.3	5-112	6.19	40	
Pyrene	**0.371**	0.10	mg/kg	0.60		61.8	52-115	4.69	40	
1,2,4-Trichlorobenzene	**0.422**	0.10	mg/kg	0.60		70.3	44-142	14.8	40	
2,4,6-Trichlorophenol	**0.372**	0.20	mg/kg	0.60		62.0	37-144	8.52	40	
Surrogate: 2-Fluorobiphenyl	*0.416*		*mg/kg*	*0.50*		*83.2*	*43-145*			
Surrogate: 2-Fluorophenol	*0.694*		*mg/kg*	*1.0*		*69.4*	*21-143*			
Surrogate: Nitrobenzene-d5	*0.392*		*mg/kg*	*0.50*		*78.4*	*35-142*			
Surrogate: Phenol-d6	*0.731*		*mg/kg*	*1.0*		*73.1*	*10-135*			
Surrogate: Terphenyl-dl4	*0.396*		*mg/kg*	*0.50*		*79.3*	*33-148*			
Surrogate: 2,4,6-Tribromophenol	*0.705*		*mg/kg*	*1.0*		*70.5*	*10-150*			
Polychlorinated Biphenyls by GC - Quality Control										
Batch B8F2526 - EPA 3550B										
Blank (B8F2526-BLK1)				Prepared & Analyzed: 06/25/18						
Aroclor-1016	<20	20	ug/kg							
Aroclor-1221	<20	20	ug/kg							
Aroclor-1232	<20	20	ug/kg							
Aroclor-1242	<20	20	ug/kg							
Aroclor-1248	<20	20	ug/kg							
Aroclor-1254	<20	20	ug/kg							
Aroclor-1260	<20	20	ug/kg							
Surrogate: Decachlorobiphenyl	*3.39*		*ug/kg*	*5.0*		*67.8*	*50-150*			
Surrogate: Tetrachloro-meta-xylene	*2.14*		*ug/kg*	*5.0*		*42.8*	*50-150*			*S-GC*
LCS (B8F2526-BS2)				Prepared: 06/25/18 Analyzed: 06/26/18						
Aroclor-1016	**54.7**	20	ug/kg	50		109	60-140			
Aroclor-1260	**49.2**	20	ug/kg	50		98.3	60-140			
Surrogate: Decachlorobiphenyl	*3.20*		*ug/kg*	*5.0*		*63.9*	*50-150*			
Surrogate: Tetrachloro-meta-xylene	*3.93*		*ug/kg*	*5.0*		*78.6*	*50-150*			
LCS Dup (B8F2526-BSD2)				Prepared: 06/25/18 Analyzed: 06/26/18						

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Polychlorinated Biphenyls by GC - Quality Control										
Batch B8F2526 - EPA 3550B										
LCS Dup (B8F2526-BSD2) Continued				Prepared: 06/25/18 Analyzed: 06/26/18						
Aroclor-1016	**55.1**	20	ug/kg	50		110	60-140	0.692	40	
Aroclor-1260	**51.2**	20	ug/kg	50		102	60-140	4.10	40	
Surrogate: Decachlorobiphenyl	*3.96*		*ug/kg*	*5.0*		*79.3*	*50-150*			
Surrogate: Tetrachloro-meta-xylene	*2.89*		*ug/kg*	*5.0*		*57.9*	*50-150*			
Organochlorine Pesticides by GC EPA 8081A - Quality Control										
Batch B8F2526 - EPA 3550B										
Blank (B8F2526-BLK1)				Prepared & Analyzed: 06/25/18						
4,4´-DDD	<4.0	4.0	ug/kg							
4,4´-DDE	<4.0	4.0	ug/kg							
4,4´-DDT	<4.0	4.0	ug/kg							
Aldrin	<2.0	2.0	ug/kg							
beta-BHC	<2.0	2.0	ug/kg							
delta-BHC	<2.0	2.0	ug/kg							
alpha-BHC	<2.0	2.0	ug/kg							
gamma-BHC (Lindane)	<4.0	4.0	ug/kg							
gamma-Chlordane	<4.0	4.0	ug/kg							
alpha-Chlordane	<4.0	4.0	ug/kg							
Chlordane	<20	20	ug/kg							
Dieldrin	<2.0	2.0	ug/kg							
Endosulfan I	<2.0	2.0	ug/kg							
Endosulfan II	<4.0	4.0	ug/kg							
Endosulfan sulfate	<4.0	4.0	ug/kg							
Endrin	<4.0	4.0	ug/kg							
Endrin aldehyde	<4.0	4.0	ug/kg							
Endrin ketone	<4.0	4.0	ug/kg							
Heptachlor	<2.0	2.0	ug/kg							
Heptachlor epoxide	<2.0	2.0	ug/kg							
Methoxychlor	<20	20	ug/kg							
Toxaphene	<100	100	ug/kg							
Surrogate: Decachlorobiphenyl	*3.39*		*ug/kg*	*5.0*		*67.8*	*50-150*			



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Organochlorine Pesticides by GC EPA 8081A - Quality Control										
Batch B8F2526 - EPA 3550B										
Blank (B8F2526-BLK1) Continued				Prepared & Analyzed: 06/25/18						
Surrogate: Tetrachloro-meta-xylene	*2.14*		*ug/kg*	*5.0*		*42.8*	*50-150*			*S-GC*
LCS (B8F2526-BS1)				Prepared: 06/25/18 Analyzed: 06/26/18						
4,4´-DDD	**4.69**	4.0	ug/kg	5.0		93.7	60-140			
4,4´-DDE	**4.70**	4.0	ug/kg	5.0		94.1	60-140			
4,4´-DDT	**2.87**	4.0	ug/kg	5.0		57.4	60-140			***
Aldrin	**3.53**	2.0	ug/kg	5.0		70.5	60-140			
beta-BHC	**4.46**	2.0	ug/kg	5.0		89.3	60-140			
delta-BHC	**4.78**	2.0	ug/kg	5.0		95.5	60-140			
alpha-BHC	**3.89**	2.0	ug/kg	5.0		77.8	60-140			
gamma-BHC (Lindane)	**4.23**	4.0	ug/kg	5.0		84.5	60-140			
gamma-Chlordane	**4.45**	4.0	ug/kg	5.0		89.1	60-140			
alpha-Chlordane	**4.47**	4.0	ug/kg	5.0		89.5	60-140			
Dieldrin	**3.92**	2.0	ug/kg	5.0		78.4	60-140			
Endosulfan I	**4.43**	2.0	ug/kg	5.0		88.6	60-140			
Endosulfan II	**4.26**	4.0	ug/kg	5.0		85.1	60-140			
Endosulfan sulfate	**4.33**	4.0	ug/kg	5.0		86.5	60-140			
Endrin	**4.52**	4.0	ug/kg	5.0		90.4	60-140			
Endrin aldehyde	**3.23**	4.0	ug/kg	5.0		64.6	60-140			
Endrin ketone	**3.70**	4.0	ug/kg	5.0		74.0	60-140			
Heptachlor	**4.37**	2.0	ug/kg	5.0		87.3	60-140			
Heptachlor epoxide	**4.34**	2.0	ug/kg	5.0		86.8	60-140			
Methoxychlor	**3.91**	20	ug/kg	5.0		78.2	60-140			
Surrogate: Decachlorobiphenyl	*3.12*		*ug/kg*	*5.0*		*62.4*	*50-150*			
Surrogate: Tetrachloro-meta-xylene	*2.06*		*ug/kg*	*5.0*		*41.3*	*50-150*			*S-GC*
LCS Dup (B8F2526-BSD1)				Prepared: 06/25/18 Analyzed: 06/26/18						
4,4´-DDD	**5.08**	4.0	ug/kg	5.0		102	60-140	7.95	40	
4,4´-DDE	**5.11**	4.0	ug/kg	5.0		102	60-140	8.38	40	
4,4´-DDT	**3.24**	4.0	ug/kg	5.0		64.7	60-140	11.9	40	
Aldrin	**4.32**	2.0	ug/kg	5.0		86.5	60-140	20.3	40	
beta-BHC	**5.09**	2.0	ug/kg	5.0		102	60-140	13.0	40	
delta-BHC	**5.28**	2.0	ug/kg	5.0		106	60-140	10.1	40	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Organochlorine Pesticides by GC EPA 8081A - Quality Control										
Batch B8F2526 - EPA 3550B										
LCS Dup (B8F2526-BSD1) Continued				Prepared: 06/25/18 Analyzed: 06/26/18						
alpha-BHC	**4.72**	2.0	ug/kg	5.0		94.3	60-140	19.2	40	
gamma-BHC (Lindane)	**4.95**	4.0	ug/kg	5.0		98.9	60-140	15.7	40	
gamma-Chlordane	**4.93**	4.0	ug/kg	5.0		98.5	60-140	10.1	40	
alpha-Chlordane	**4.96**	4.0	ug/kg	5.0		99.3	60-140	10.4	40	
Dieldrin	**4.34**	2.0	ug/kg	5.0		86.8	60-140	10.2	40	
Endosulfan I	**4.94**	2.0	ug/kg	5.0		98.7	60-140	10.8	40	
Endosulfan II	**4.61**	4.0	ug/kg	5.0		92.2	60-140	7.99	40	
Endosulfan sulfate	**4.79**	4.0	ug/kg	5.0		95.8	60-140	10.2	40	
Endrin	**4.98**	4.0	ug/kg	5.0		99.6	60-140	9.66	40	
Endrin aldehyde	**3.59**	4.0	ug/kg	5.0		71.9	60-140	10.6	40	
Endrin ketone	**4.04**	4.0	ug/kg	5.0		80.8	60-140	8.82	40	
Heptachlor	**5.19**	2.0	ug/kg	5.0		104	60-140	17.2	40	
Heptachlor epoxide	**4.87**	2.0	ug/kg	5.0		97.3	60-140	11.4	40	
Methoxychlor	**4.34**	20	ug/kg	5.0		86.9	60-140	10.5	40	
Surrogate: Decachlorobiphenyl	*3.39*		*ug/kg*	*5.0*		*67.9*	*50-150*			
Surrogate: Tetrachloro-meta-xylene	*2.93*		*ug/kg*	*5.0*		*58.6*	*50-150*			
Batch B8F2807 - EPA 3550B										
Blank (B8F2807-BLK1)				Prepared & Analyzed: 06/28/18						
4,4´-DDD	<4.0	4.0	ug/kg							
4,4´-DDE	<4.0	4.0	ug/kg							
4,4´-DDT	<4.0	4.0	ug/kg							
Aldrin	<2.0	2.0	ug/kg							
beta-BHC	<2.0	2.0	ug/kg							
delta-BHC	<2.0	2.0	ug/kg							
alpha-BHC	<2.0	2.0	ug/kg							
gamma-BHC (Lindane)	<4.0	4.0	ug/kg							
gamma-Chlordane	<4.0	4.0	ug/kg							
alpha-Chlordane	<4.0	4.0	ug/kg							
Chlordane	<20	20	ug/kg							
Dieldrin	<2.0	2.0	ug/kg							
Endosulfan I	<2.0	2.0	ug/kg							

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
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Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Organochlorine Pesticides by GC EPA 8081A - Quality Control										
Batch B8F2807 - EPA 3550B										
Blank (B8F2807-BLK1) Continued				Prepared & Analyzed: 06/28/18						
Endosulfan II	<4.0	4.0	ug/kg							
Endosulfan sulfate	<4.0	4.0	ug/kg							
Endrin	<4.0	4.0	ug/kg							
Endrin aldehyde	<4.0	4.0	ug/kg							
Endrin ketone	<4.0	4.0	ug/kg							
Heptachlor	<2.0	2.0	ug/kg							
Heptachlor epoxide	<2.0	2.0	ug/kg							
Methoxychlor	<20	20	ug/kg							
Toxaphene	<100	100	ug/kg							
Surrogate: Decachlorobiphenyl	*3.42*		*ug/kg*	*5.0*		*68.3*	*50-150*			
Surrogate: Tetrachloro-meta-xylene	*2.91*		*ug/kg*	*5.0*		*58.3*	*50-150*			
LCS (B8F2807-BS1)				Prepared & Analyzed: 06/28/18						
4,4´-DDD	**4.96**	4.0	ug/kg	5.0		99.2	60-140			
4,4´-DDE	**5.13**	4.0	ug/kg	5.0		103	60-140			
4,4´-DDT	**3.56**	4.0	ug/kg	5.0		71.1	60-140			
Aldrin	**4.47**	2.0	ug/kg	5.0		89.3	60-140			
beta-BHC	**5.08**	2.0	ug/kg	5.0		102	60-140			
delta-BHC	**5.15**	2.0	ug/kg	5.0		103	60-140			
alpha-BHC	**4.46**	2.0	ug/kg	5.0		89.2	60-140			
gamma-BHC (Lindane)	**4.68**	4.0	ug/kg	5.0		93.5	60-140			
gamma-Chlordane	**4.90**	4.0	ug/kg	5.0		98.1	60-140			
alpha-Chlordane	**4.92**	4.0	ug/kg	5.0		98.3	60-140			
Dieldrin	**4.33**	2.0	ug/kg	5.0		86.5	60-140			
Endosulfan I	**4.83**	2.0	ug/kg	5.0		96.5	60-140			
Endosulfan II	**4.83**	4.0	ug/kg	5.0		96.5	60-140			
Endosulfan sulfate	**4.87**	4.0	ug/kg	5.0		97.5	60-140			
Endrin	**5.10**	4.0	ug/kg	5.0		102	60-140			
Endrin aldehyde	**4.11**	4.0	ug/kg	5.0		82.3	60-140			
Endrin ketone	**4.22**	4.0	ug/kg	5.0		84.4	60-140			
Heptachlor	**4.90**	2.0	ug/kg	5.0		98.1	60-140			
Heptachlor epoxide	**4.82**	2.0	ug/kg	5.0		96.4	60-140			

Viorel Vasile
Operations Manager

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Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Organochlorine Pesticides by GC EPA 8081A - Quality Control										
Batch B8F2807 - EPA 3550B										
LCS (B8F2807-BS1) Continued				Prepared & Analyzed: 06/28/18						
Methoxychlor	**4.73**	20	ug/kg	5.0		94.6	60-140			
Surrogate: Decachlorobiphenyl	*3.60*		*ug/kg*	*5.0*		*71.9*	*50-150*			
Surrogate: Tetrachloro-meta-xylene	*3.34*		*ug/kg*	*5.0*		*66.8*	*50-150*			
LCS Dup (B8F2807-BSD1)				Prepared & Analyzed: 06/28/18						
4,4´-DDD	**4.84**	4.0	ug/kg	5.0		96.8	60-140	2.43	40	
4,4´-DDE	**4.96**	4.0	ug/kg	5.0		99.3	60-140	3.37	40	
4,4´-DDT	**3.51**	4.0	ug/kg	5.0		70.3	60-140	1.21	40	
Aldrin	**4.14**	2.0	ug/kg	5.0		82.9	60-140	7.45	40	
beta-BHC	**4.70**	2.0	ug/kg	5.0		94.1	60-140	7.67	40	
delta-BHC	**4.90**	2.0	ug/kg	5.0		98.1	60-140	4.91	40	
alpha-BHC	**4.13**	2.0	ug/kg	5.0		82.5	60-140	7.75	40	
gamma-BHC (Lindane)	**4.37**	4.0	ug/kg	5.0		87.4	60-140	6.85	40	
gamma-Chlordane	**4.70**	4.0	ug/kg	5.0		93.9	60-140	4.34	40	
alpha-Chlordane	**4.73**	4.0	ug/kg	5.0		94.5	60-140	3.94	40	
Dieldrin	**4.15**	2.0	ug/kg	5.0		83.0	60-140	4.09	40	
Endosulfan I	**4.60**	2.0	ug/kg	5.0		91.9	60-140	4.85	40	
Endosulfan II	**4.70**	4.0	ug/kg	5.0		94.0	60-140	2.63	40	
Endosulfan sulfate	**4.79**	4.0	ug/kg	5.0		95.9	60-140	1.69	40	
Endrin	**4.90**	4.0	ug/kg	5.0		98.0	60-140	4.02	40	
Endrin aldehyde	**3.93**	4.0	ug/kg	5.0		78.7	60-140	4.50	40	
Endrin ketone	**4.05**	4.0	ug/kg	5.0		81.0	60-140	4.10	40	
Heptachlor	**4.62**	2.0	ug/kg	5.0		92.4	60-140	5.98	40	
Heptachlor epoxide	**4.55**	2.0	ug/kg	5.0		91.0	60-140	5.80	40	
Methoxychlor	**4.74**	20	ug/kg	5.0		94.8	60-140	0.294	40	
Surrogate: Decachlorobiphenyl	*3.59*		*ug/kg*	*5.0*		*71.8*	*50-150*			
Surrogate: Tetrachloro-meta-xylene	*2.85*		*ug/kg*	*5.0*		*57.0*	*50-150*			
Herbicides by EPA 8151A - Quality Control										
Batch B8F2630 - EPA 3550B										
Blank (B8F2630-BLK1)				Prepared & Analyzed: 06/25/18						*
Acifluorfen	<20	20	ug/kg							

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

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Project No: NA
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Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Herbicides by EPA 8151A - Quality Control										
Batch B8F2630 - EPA 3550B										
Blank (B8F2630-BLK1) Continued				Prepared & Analyzed: 06/25/18						*
Bentazon	<10	10	ug/kg							
Chloramben	<10	10	ug/kg							
2,4-D	<10	10	ug/kg							
Dalapon	<20	20	ug/kg							
2,4-DB	<10	10	ug/kg							
DCPA Diacid	<20	20	ug/kg							
Dicamba	<10	10	ug/kg							
3,5-Dichlorobenzoic acid	<10	10	ug/kg							
Dichloroprop	<10	10	ug/kg							
Dinoseb	<20	20	ug/kg							
MCPA	<2000	2000	ug/kg							
MCPP	<2000	2000	ug/kg							
4-Nitrophenol	<10	10	ug/kg							
Pentachlorophenol	<10	10	ug/kg							
Picloram	<10	10	ug/kg							
2,4,5-T	<10	10	ug/kg							
2,4,5-TP (Silvex)	<10	10	ug/kg							
Surrogate: DCAA	*2.39*		*ug/kg*	*5.0*		*47.8*	*40-150*			
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
Blank (B8F2214-BLK1)				Prepared & Analyzed: 06/22/18						
Acetone	<10	10	ug/L							
tert-Amyl Methyl Ether (TAME)	<2.0	2.0	ug/L							
Benzene	<0.50	0.50	ug/L							
Bromobenzene	<0.50	0.50	ug/L							
Bromochloromethane	<0.50	0.50	ug/L							
Bromodichloromethane	<0.50	0.50	ug/L							
Bromoform	<0.50	0.50	ug/L							
Bromomethane	<0.50	0.50	ug/L							
2-Butanone (MEK)	<10	10	ug/L							
tert-Butyl alcohol (TBA)	<10	10	ug/L							



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

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Project No: NA
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Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
Blank (B8F2214-BLK1) Continued				Prepared & Analyzed: 06/22/18						
sec-Butylbenzene	<0.50	0.50	ug/L							
tert-Butylbenzene	<0.50	0.50	ug/L							
n-Butylbenzene	<0.50	0.50	ug/L							
Carbon Disulfide	<0.50	0.50	ug/L							
Carbon Tetrachloride	<0.50	0.50	ug/L							
Chlorobenzene	<0.50	0.50	ug/L							
Chloroethane	<0.50	0.50	ug/L							
Chloroform	<0.50	0.50	ug/L							
Chloromethane	<0.50	0.50	ug/L							
2-Chlorotoluene	<0.50	0.50	ug/L							
4-Chlorotoluene	<0.50	0.50	ug/L							
1,2-Dibromo-3-chloropropane	<1.0	1.0	ug/L							
Dibromochloromethane	<0.50	0.50	ug/L							
1,2-Dibromoethane (EDB)	<0.50	0.50	ug/L							
Dibromomethane	<0.50	0.50	ug/L							
1,3-Dichlorobenzene	<0.50	0.50	ug/L							
1,2-Dichlorobenzene	<0.50	0.50	ug/L							
1,4-Dichlorobenzene	<0.50	0.50	ug/L							
Dichlorodifluoromethane (R12)	<0.50	0.50	ug/L							
1,1-Dichloroethane	<0.50	0.50	ug/L							
1,2-Dichloroethane (EDC)	<0.50	0.50	ug/L							
1,1-Dichloroethylene	<0.50	0.50	ug/L							
trans-1,2-Dichloroethylene	<0.50	0.50	ug/L							
cis-1,2-Dichloroethylene	<0.50	0.50	ug/L							
1,2-Dichloropropane	<0.50	0.50	ug/L							
2,2-Dichloropropane	<0.50	0.50	ug/L							
1,3-Dichloropropane	<0.50	0.50	ug/L							
cis-1,3-Dichloropropylene	<0.50	0.50	ug/L							
trans-1,3-Dichloropropylene	<0.50	0.50	ug/L							
1,1-Dichloropropylene	<0.50	0.50	ug/L							
Diisopropyl ether (DIPE)	<2.0	2.0	ug/L							

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

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Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
Blank (B8F2214-BLK1) Continued				Prepared & Analyzed: 06/22/18						
Ethylbenzene	<0.50	0.50	ug/L							
Ethyl-tert-Butyl Ether (ETBE)	<2.0	2.0	ug/L							
Hexachlorobutadiene	<1.0	1.0	ug/L							
2-Hexanone (MBK)	<10	10	ug/L							
Isopropylbenzene	<0.50	0.50	ug/L							
4-Isopropyltoluene	<1.0	1.0	ug/L							
Methyl-tert-Butyl Ether (MTBE)	<2.0	2.0	ug/L							
Methylene Chloride	<5.0	5.0	ug/L							
4-Methyl-2-pentanone (MIBK)	<10	10	ug/L							
Naphthalene	<2.0	2.0	ug/L							
n-Propylbenzene	<0.50	0.50	ug/L							
Styrene	<0.50	0.50	ug/L							
1,1,1,2-Tetrachloroethane	<0.50	0.50	ug/L							
1,1,2,2-Tetrachloroethane	<0.50	0.50	ug/L							
Tetrachloroethylene (PCE)	<0.50	0.50	ug/L							
Toluene	<0.50	0.50	ug/L							
1,2,3-Trichlorobenzene	<0.50	0.50	ug/L							
1,2,4-Trichlorobenzene	<0.50	0.50	ug/L							
1,1,1-Trichloroethane	<0.50	0.50	ug/L							
1,1,2-Trichloroethane	<0.50	0.50	ug/L							
Trichloroethylene (TCE)	<0.50	0.50	ug/L							
Trichlorofluoromethane (R11)	<0.50	0.50	ug/L							
1,2,3-Trichloropropane	<0.50	0.50	ug/L							
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	<0.50	0.50	ug/L							
1,3,5-Trimethylbenzene	<0.50	0.50	ug/L							
1,2,4-Trimethylbenzene	<0.50	0.50	ug/L							
Vinyl chloride	<0.50	0.50	ug/L							
o-Xylene	<0.50	0.50	ug/L							
m,p-Xylenes	<1.0	1.0	ug/L							
Surrogate: 4-Bromofluorobenzene	*48.1*		*ug/L*	*50*		*96.3*	*70-140*			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

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Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
Blank (B8F2214-BLK1) Continued				Prepared & Analyzed: 06/22/18						
Surrogate: Dibromofluoromethane	*60.2*		*ug/L*	*50*		*120*	*70-140*			
Surrogate: Toluene-d8	*50.8*		*ug/L*	*50*		*102*	*70-140*			
LCS (B8F2214-BS1)				Prepared & Analyzed: 06/22/18						
Acetone	**20.8**	10	ug/L	20		104	70-130			
tert-Amyl Methyl Ether (TAME)	**19.9**	2.0	ug/L	20		99.3	70-130			
Benzene	**19.5**	0.50	ug/L	20		97.5	75-125			
Bromobenzene	**21.3**	0.50	ug/L	20		106	70-130			
Bromochloromethane	**19.9**	0.50	ug/L	20		99.4	70-130			
Bromodichloromethane	**18.4**	0.50	ug/L	20		91.8	75-125			
Bromoform	**18.0**	0.50	ug/L	20		90.0	75-125			
Bromomethane	**21.1**	0.50	ug/L	20		106	75-125			
2-Butanone (MEK)	**23.4**	10	ug/L	20		117	70-130			
tert-Butyl alcohol (TBA)	**110**	10	ug/L	100		110	70-130			
sec-Butylbenzene	**18.5**	0.50	ug/L	20		92.7	70-130			
tert-Butylbenzene	**20.7**	0.50	ug/L	20		104	70-130			
n-Butylbenzene	**19.4**	0.50	ug/L	20		97.1	70-130			
Carbon Disulfide	**18.7**	0.50	ug/L	20		93.6	70-130			
Carbon Tetrachloride	**18.0**	0.50	ug/L	20		89.8	75-125			
Chlorobenzene	**19.8**	0.50	ug/L	20		98.8	75-125			
Chloroethane	**18.4**	0.50	ug/L	20		91.9	75-125			
Chloroform	**18.1**	0.50	ug/L	20		90.3	75-125			
Chloromethane	**18.0**	0.50	ug/L	20		90.2	65-125			
2-Chlorotoluene	**19.3**	0.50	ug/L	20		96.4	70-130			
4-Chlorotoluene	**19.4**	0.50	ug/L	20		97.0	70-130			
1,2-Dibromo-3-chloropropane	**23.8**	1.0	ug/L	20		119	70-130			
Dibromochloromethane	**19.0**	0.50	ug/L	20		95.0	75-125			
1,2-Dibromoethane (EDB)	**19.0**	0.50	ug/L	20		94.9	70-130			
Dibromomethane	**19.9**	0.50	ug/L	20		99.3	70-130			
1,3-Dichlorobenzene	**21.5**	0.50	ug/L	20		107	70-130			
1,2-Dichlorobenzene	**23.6**	0.50	ug/L	20		118	70-130			
1,4-Dichlorobenzene	**22.7**	0.50	ug/L	20		114	75-125			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

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Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
LCS (B8F2214-BS1) Continued				Prepared & Analyzed: 06/22/18						
Dichlorodifluoromethane (R12)	**19.4**	0.50	ug/L	20		97.0	70-130			
1,1-Dichloroethane	**19.1**	0.50	ug/L	20		95.5	70-125			
1,2-Dichloroethane (EDC)	**18.3**	0.50	ug/L	20		91.3	75-125			
1,1-Dichloroethylene	**16.3**	0.50	ug/L	20		81.7	70-130			
trans-1,2-Dichloroethylene	**18.5**	0.50	ug/L	20		92.4	75-125			
cis-1,2-Dichloroethylene	**17.7**	0.50	ug/L	20		88.4	75-125			
1,2-Dichloropropane	**18.7**	0.50	ug/L	20		93.3	75-130			
2,2-Dichloropropane	**16.8**	0.50	ug/L	20		84.2	70-130			
1,3-Dichloropropane	**20.7**	0.50	ug/L	20		103	70-130			
cis-1,3-Dichloropropylene	**19.5**	0.50	ug/L	20		97.6	75-125			
trans-1,3-Dichloropropylene	**19.4**	0.50	ug/L	20		96.8	70-130			
1,1-Dichloropropylene	**17.8**	0.50	ug/L	20		89.2	70-130			
Diisopropyl ether (DIPE)	**17.7**	2.0	ug/L	20		88.6	70-130			
Ethylbenzene	**19.1**	0.50	ug/L	20		95.4	75-125			
Ethyl-tert-Butyl Ether (ETBE)	**19.8**	2.0	ug/L	20		99.0	70-130			
Hexachlorobutadiene	**21.4**	1.0	ug/L	20		107	70-130			
2-Hexanone (MBK)	**20.0**	10	ug/L	20		100	70-130			
Isopropylbenzene	**18.8**	0.50	ug/L	20		94.2	70-130			
4-Isopropyltoluene	**20.5**	1.0	ug/L	20		103	70-130			
Methyl-tert-Butyl Ether (MTBE)	**43.1**	2.0	ug/L	40		108	75-125			
Methylene Chloride	**17.2**	5.0	ug/L	20		85.9	75-130			
4-Methyl-2-pentanone (MIBK)	**21.6**	10	ug/L	20		108	70-130			
Naphthalene	**25.9**	2.0	ug/L	20		130	70-130			
n-Propylbenzene	**19.0**	0.50	ug/L	20		94.8	70-130			
Styrene	**19.8**	0.50	ug/L	20		99.0	70-130			
1,1,1,2-Tetrachloroethane	**20.8**	0.50	ug/L	20		104	70-130			
1,1,2,2-Tetrachloroethane	**24.6**	0.50	ug/L	20		123	70-135			
Tetrachloroethylene (PCE)	**19.1**	0.50	ug/L	20		95.4	75-125			
Toluene	**18.9**	0.50	ug/L	20		94.4	75-125			
1,2,3-Trichlorobenzene	**24.4**	0.50	ug/L	20		122	70-130			
1,2,4-Trichlorobenzene	**24.0**	0.50	ug/L	20		120	70-130			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
LCS (B8F2214-BS1) Continued				Prepared & Analyzed: 06/22/18						
1,1,1-Trichloroethane	**17.8**	0.50	ug/L	20		88.8	75-125			
1,1,2-Trichloroethane	**21.5**	0.50	ug/L	20		108	75-125			
Trichloroethylene (TCE)	**18.8**	0.50	ug/L	20		93.8	75-125			
Trichlorofluoromethane (R11)	**19.8**	0.50	ug/L	20		98.8	70-130			
1,2,3-Trichloropropane	**23.5**	0.50	ug/L	20		118	70-130			
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	**17.2**	0.50	ug/L	20		86.2	70-130			
1,3,5-Trimethylbenzene	**18.9**	0.50	ug/L	20		94.6	70-130			
1,2,4-Trimethylbenzene	**18.8**	0.50	ug/L	20		94.0	70-130			
Vinyl chloride	**16.5**	0.50	ug/L	20		82.6	75-125			
o-Xylene	**19.4**	0.50	ug/L	20		96.8	75-125			
m,p-Xylenes	**38.3**	1.0	ug/L	40		95.7	70-130			
Surrogate: 4-Bromofluorobenzene	*47.6*		*ug/L*	*50*		*95.2*	*70-140*			
Surrogate: Dibromofluoromethane	*49.4*		*ug/L*	*50*		*98.8*	*70-140*			
Surrogate: Toluene-d8	*52.4*		*ug/L*	*50*		*105*	*70-140*			
LCS Dup (B8F2214-BSD1)				Prepared & Analyzed: 06/22/18						
Acetone	**19.8**	10	ug/L	20		98.8	70-130	5.22	30	
tert-Amyl Methyl Ether (TAME)	**18.8**	2.0	ug/L	20		94.2	70-130	5.27	30	
Benzene	**21.2**	0.50	ug/L	20		106	75-125	8.45	30	
Bromobenzene	**21.5**	0.50	ug/L	20		107	70-130	0.935	30	
Bromochloromethane	**22.0**	0.50	ug/L	20		110	70-130	10.2	30	
Bromodichloromethane	**19.5**	0.50	ug/L	20		97.6	75-125	6.23	30	
Bromoform	**17.2**	0.50	ug/L	20		85.8	75-125	4.78	30	
Bromomethane	**18.0**	0.50	ug/L	20		90.2	75-125	15.8	30	
2-Butanone (MEK)	**19.7**	10	ug/L	20		98.6	70-130	17.2	30	
tert-Butyl alcohol (TBA)	**82.7**	10	ug/L	100		82.7	70-130	28.5	30	
sec-Butylbenzene	**19.5**	0.50	ug/L	20		97.4	70-130	4.89	30	
tert-Butylbenzene	**22.0**	0.50	ug/L	20		110	70-130	5.85	30	
n-Butylbenzene	**20.0**	0.50	ug/L	20		100	70-130	3.19	30	
Carbon Disulfide	**15.6**	0.50	ug/L	20		78.0	70-130	18.2	30	
Carbon Tetrachloride	**20.6**	0.50	ug/L	20		103	75-125	13.9	30	



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
LCS Dup (B8F2214-BSD1) Continued				Prepared & Analyzed: 06/22/18						
Chlorobenzene	**21.4**	0.50	ug/L	20		107	75-125	7.83	30	
Chloroethane	**18.2**	0.50	ug/L	20		91.1	75-125	0.874	30	
Chloroform	**20.0**	0.50	ug/L	20		100	75-125	10.1	30	
Chloromethane	**16.0**	0.50	ug/L	20		80.1	65-125	11.9	30	
2-Chlorotoluene	**20.4**	0.50	ug/L	20		102	70-130	5.45	30	
4-Chlorotoluene	**20.0**	0.50	ug/L	20		100	70-130	3.10	30	
1,2-Dibromo-3-chloropropane	**16.3**	1.0	ug/L	20		81.4	70-130	37.7	30	AA-C1
Dibromochloromethane	**19.1**	0.50	ug/L	20		95.4	75-125	0.473	30	
1,2-Dibromoethane (EDB)	**18.4**	0.50	ug/L	20		92.2	70-130	2.89	30	
Dibromomethane	**19.4**	0.50	ug/L	20		97.2	70-130	2.14	30	
1,3-Dichlorobenzene	**22.4**	0.50	ug/L	20		112	70-130	4.42	30	
1,2-Dichlorobenzene	**22.9**	0.50	ug/L	20		114	70-130	3.31	30	
1,4-Dichlorobenzene	**22.4**	0.50	ug/L	20		112	75-125	1.64	30	
Dichlorodifluoromethane (R12)	**17.8**	0.50	ug/L	20		89.2	70-130	8.38	30	
1,1-Dichloroethane	**21.2**	0.50	ug/L	20		106	70-125	10.3	30	
1,2-Dichloroethane (EDC)	**19.0**	0.50	ug/L	20		94.8	75-125	3.76	30	
1,1-Dichloroethylene	**17.3**	0.50	ug/L	20		86.6	70-130	5.82	30	
trans-1,2-Dichloroethylene	**22.0**	0.50	ug/L	20		110	75-125	17.3	30	
cis-1,2-Dichloroethylene	**20.3**	0.50	ug/L	20		101	75-125	13.6	30	
1,2-Dichloropropane	**19.4**	0.50	ug/L	20		96.8	75-130	3.63	30	
2,2-Dichloropropane	**18.5**	0.50	ug/L	20		92.7	70-130	9.67	30	
1,3-Dichloropropane	**20.0**	0.50	ug/L	20		100	70-130	3.29	30	
cis-1,3-Dichloropropylene	**19.8**	0.50	ug/L	20		98.8	75-125	1.22	30	
trans-1,3-Dichloropropylene	**19.1**	0.50	ug/L	20		95.4	70-130	1.46	30	
1,1-Dichloropropylene	**19.7**	0.50	ug/L	20		98.5	70-130	9.91	30	
Diisopropyl ether (DIPE)	**18.2**	2.0	ug/L	20		91.2	70-130	3.00	30	
Ethylbenzene	**21.1**	0.50	ug/L	20		106	75-125	10.1	30	
Ethyl-tert-Butyl Ether (ETBE)	**19.1**	2.0	ug/L	20		95.4	70-130	3.71	30	
Hexachlorobutadiene	**24.0**	1.0	ug/L	20		120	70-130	11.6	30	
2-Hexanone (MBK)	**17.9**	10	ug/L	20		89.6	70-130	11.1	30	
Isopropylbenzene	**20.7**	0.50	ug/L	20		103	70-130	9.31	30	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
LCS Dup (B8F2214-BSD1) Continued				Prepared & Analyzed: 06/22/18						
4-Isopropyltoluene	**21.5**	1.0	ug/L	20		108	70-130	4.90	30	
Methyl-tert-Butyl Ether (MTBE)	**40.7**	2.0	ug/L	40		102	75-125	5.77	30	
Methylene Chloride	**15.9**	5.0	ug/L	20		79.5	75-130	7.74	30	
4-Methyl-2-pentanone (MIBK)	**16.4**	10	ug/L	20		81.9	70-130	27.7	30	
Naphthalene	**21.0**	2.0	ug/L	20		105	70-130	21.1	30	
n-Propylbenzene	**20.2**	0.50	ug/L	20		101	70-130	6.19	30	
Styrene	**20.5**	0.50	ug/L	20		103	70-130	3.62	30	
1,1,1,2-Tetrachloroethane	**22.0**	0.50	ug/L	20		110	70-130	5.61	30	
1,1,2,2-Tetrachloroethane	**20.6**	0.50	ug/L	20		103	70-135	17.5	30	
Tetrachloroethylene (PCE)	**22.6**	0.50	ug/L	20		113	75-125	16.8	30	
Toluene	**21.2**	0.50	ug/L	20		106	75-125	11.4	30	
1,2,3-Trichlorobenzene	**22.0**	0.50	ug/L	20		110	70-130	10.1	30	
1,2,4-Trichlorobenzene	**22.9**	0.50	ug/L	20		114	70-130	4.48	30	
1,1,1-Trichloroethane	**19.8**	0.50	ug/L	20		98.8	75-125	10.6	30	
1,1,2-Trichloroethane	**20.3**	0.50	ug/L	20		102	75-125	5.69	30	
Trichloroethylene (TCE)	**20.4**	0.50	ug/L	20		102	75-125	8.48	30	
Trichlorofluoromethane (R11)	**18.3**	0.50	ug/L	20		91.4	70-130	7.78	30	
1,2,3-Trichloropropane	**19.1**	0.50	ug/L	20		95.5	70-130	20.7	30	
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	**16.0**	0.50	ug/L	20		80.0	70-130	7.40	30	
1,3,5-Trimethylbenzene	**20.2**	0.50	ug/L	20		101	70-130	6.70	30	
1,2,4-Trimethylbenzene	**20.2**	0.50	ug/L	20		101	70-130	7.23	30	
Vinyl chloride	**21.4**	0.50	ug/L	20		107	75-125	25.9	30	
o-Xylene	**20.6**	0.50	ug/L	20		103	75-125	6.40	30	
m,p-Xylenes	**42.1**	1.0	ug/L	40		105	70-130	9.50	30	
Surrogate: 4-Bromofluorobenzene	*47.6*		*ug/L*	*50*		*95.2*	*70-140*			
Surrogate: Dibromofluoromethane	*47.6*		*ug/L*	*50*		*95.2*	*70-140*			
Surrogate: Toluene-d8	*51.8*		*ug/L*	*50*		*104*	*70-140*			
Matrix Spike (B8F2214-MS1)		**Source: 8F12016-01**		Prepared: 06/22/18 Analyzed: 06/23/18						
Acetone	**28.1**	10	ug/L	20	25.2	14.5	70-130			QM-07
tert-Amyl Methyl Ether (TAME)	**18.4**	2.0	ug/L	20		92.0	70-130			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
Matrix Spike (B8F2214-MS1) Continued Source: 8F12016-01 Prepared: 06/22/18 Analyzed: 06/23/18										
Benzene	**23.0**	0.50	ug/L	20		115	70-130			
Bromobenzene	**20.4**	0.50	ug/L	20		102	70-130			
Bromochloromethane	**20.0**	0.50	ug/L	20		100	70-130			
Bromodichloromethane	**19.5**	0.50	ug/L	20		97.6	70-130			
Bromoform	**15.3**	0.50	ug/L	20		76.6	70-130			
Bromomethane	**24.3**	0.50	ug/L	20		121	70-130			
2-Butanone (MEK)	**18.4**	10	ug/L	20		91.9	70-130			
tert-Butyl alcohol (TBA)	**89.5**	10	ug/L	100		89.5	70-130			
sec-Butylbenzene	**20.2**	0.50	ug/L	20		101	70-130			
tert-Butylbenzene	**22.4**	0.50	ug/L	20		112	70-130			
n-Butylbenzene	**20.7**	0.50	ug/L	20		104	70-130			
Carbon Disulfide	**21.9**	0.50	ug/L	20		110	70-130			
Carbon Tetrachloride	**20.8**	0.50	ug/L	20		104	70-130			
Chlorobenzene	**21.9**	0.50	ug/L	20		109	70-130			
Chloroethane	**23.3**	0.50	ug/L	20		117	70-130			
Chloroform	**20.5**	0.50	ug/L	20		102	70-130			
Chloromethane	**21.6**	0.50	ug/L	20		108	70-130			
2-Chlorotoluene	**21.1**	0.50	ug/L	20		105	70-130			
4-Chlorotoluene	**20.8**	0.50	ug/L	20		104	70-130			
1,2-Dibromo-3-chloropropane	**17.1**	1.0	ug/L	20		85.7	70-130			
Dibromochloromethane	**18.4**	0.50	ug/L	20		91.8	70-130			
1,2-Dibromoethane (EDB)	**17.4**	0.50	ug/L	20		87.2	70-130			
Dibromomethane	**19.0**	0.50	ug/L	20		94.9	70-130			
1,3-Dichlorobenzene	**21.6**	0.50	ug/L	20		108	70-130			
1,2-Dichlorobenzene	**22.0**	0.50	ug/L	20		110	70-130			
1,4-Dichlorobenzene	**21.9**	0.50	ug/L	20		109	70-130			
Dichlorodifluoromethane (R12)	**22.0**	0.50	ug/L	20		110	70-130			
1,1-Dichloroethane	**22.7**	0.50	ug/L	20		113	70-130			
1,2-Dichloroethane (EDC)	**19.1**	0.50	ug/L	20		95.4	70-130			
1,1-Dichloroethylene	**24.2**	0.50	ug/L	20		121	70-130			
trans-1,2-Dichloroethylene	**22.4**	0.50	ug/L	20		112	70-130			



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
Matrix Spike (B8F2214-MS1) Continued Source: 8F12016-01 Prepared: 06/22/18 Analyzed: 06/23/18										
cis-1,2-Dichloroethylene	**20.0**	0.50	ug/L	20		99.9	70-130			
1,2-Dichloropropane	**21.2**	0.50	ug/L	20		106	70-130			
2,2-Dichloropropane	**17.2**	0.50	ug/L	20		86.2	70-130			
1,3-Dichloropropane	**20.6**	0.50	ug/L	20		103	70-130			
cis-1,3-Dichloropropylene	**19.8**	0.50	ug/L	20		98.8	70-130			
trans-1,3-Dichloropropylene	**18.5**	0.50	ug/L	20		92.4	70-130			
1,1-Dichloropropylene	**21.1**	0.50	ug/L	20		105	70-130			
Diisopropyl ether (DIPE)	**19.3**	2.0	ug/L	20		96.6	70-130			
Ethylbenzene	**22.7**	0.50	ug/L	20		114	70-130			
Ethyl-tert-Butyl Ether (ETBE)	**19.3**	2.0	ug/L	20		96.5	70-130			
Hexachlorobutadiene	**18.7**	1.0	ug/L	20		93.6	70-130			
2-Hexanone (MBK)	**16.3**	10	ug/L	20		81.4	70-130			
Isopropylbenzene	**21.1**	0.50	ug/L	20		106	70-130			
4-Isopropyltoluene	**21.8**	1.0	ug/L	20		109	70-130			
Methyl-tert-Butyl Ether (MTBE)	**39.5**	2.0	ug/L	40		98.7	70-130			
Methylene Chloride	**27.5**	5.0	ug/L	20		138	70-130			QM-07
4-Methyl-2-pentanone (MIBK)	**13.4**	10	ug/L	20		66.8	70-130			QM-07
Naphthalene	**21.9**	2.0	ug/L	20	0.360	108	70-130			
n-Propylbenzene	**21.4**	0.50	ug/L	20		107	70-130			
Styrene	**20.9**	0.50	ug/L	20		104	70-130			
1,1,1,2-Tetrachloroethane	**22.0**	0.50	ug/L	20		110	70-130			
1,1,2,2-Tetrachloroethane	**21.3**	0.50	ug/L	20		106	70-130			
Tetrachloroethylene (PCE)	**22.0**	0.50	ug/L	20		110	70-130			
Toluene	**22.6**	0.50	ug/L	20		113	70-130			
1,2,3-Trichlorobenzene	**20.3**	0.50	ug/L	20		102	70-130			
1,2,4-Trichlorobenzene	**20.3**	0.50	ug/L	20		102	70-130			
1,1,1-Trichloroethane	**20.8**	0.50	ug/L	20		104	70-130			
1,1,2-Trichloroethane	**21.1**	0.50	ug/L	20		106	70-130			
Trichloroethylene (TCE)	**21.2**	0.50	ug/L	20		106	70-130			
Trichlorofluoromethane (R11)	**22.6**	0.50	ug/L	20		113	70-130			
1,2,3-Trichloropropane	**19.3**	0.50	ug/L	20		96.6	70-130			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
Matrix Spike (B8F2214-MS1) Continued Source: 8F12016-01 Prepared: 06/22/18 Analyzed: 06/23/18										
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	**21.8**	0.50	ug/L	20		109	70-130			
1,3,5-Trimethylbenzene	**20.7**	0.50	ug/L	20		104	70-130			
1,2,4-Trimethylbenzene	**20.7**	0.50	ug/L	20		104	70-130			
Vinyl chloride	**24.6**	0.50	ug/L	20		123	70-130			
o-Xylene	**21.9**	0.50	ug/L	20		110	70-130			
m,p-Xylenes	**44.2**	1.0	ug/L	40		111	70-130			
Surrogate: 4-Bromofluorobenzene	*50.7*		*ug/L*	*50*		*101*	*70-140*			
Surrogate: Dibromofluoromethane	*49.3*		*ug/L*	*50*		*98.6*	*70-140*			
Surrogate: Toluene-d8	*59.2*		*ug/L*	*50*		*118*	*70-140*			
Matrix Spike Dup (B8F2214-MSD1) **Source: 8F12016-01** Prepared: 06/22/18 Analyzed: 06/23/18										
Acetone	**36.6**	10	ug/L	20	25.2	57.2	70-130	26.4	30	QM-07
tert-Amyl Methyl Ether (TAME)	**22.0**	2.0	ug/L	20		110	70-130	18.1	30	
Benzene	**23.6**	0.50	ug/L	20		118	70-130	2.32	30	
Bromobenzene	**20.3**	0.50	ug/L	20		101	70-130	0.738	30	
Bromochloromethane	**22.7**	0.50	ug/L	20		113	70-130	12.3	30	
Bromodichloromethane	**22.2**	0.50	ug/L	20		111	70-130	13.1	30	
Bromoform	**16.2**	0.50	ug/L	20		81.1	70-130	5.77	30	
Bromomethane	**25.4**	0.50	ug/L	20		127	70-130	4.43	30	
2-Butanone (MEK)	**22.2**	10	ug/L	20		111	70-130	18.7	30	
tert-Butyl alcohol (TBA)	**90.6**	10	ug/L	100		90.6	70-130	1.24	30	
sec-Butylbenzene	**19.7**	0.50	ug/L	20		98.6	70-130	2.40	30	
tert-Butylbenzene	**21.9**	0.50	ug/L	20		110	70-130	2.48	30	
n-Butylbenzene	**19.8**	0.50	ug/L	20		98.8	70-130	4.74	30	
Carbon Disulfide	**21.3**	0.50	ug/L	20		106	70-130	3.10	30	
Carbon Tetrachloride	**21.0**	0.50	ug/L	20		105	70-130	1.01	30	
Chlorobenzene	**20.0**	0.50	ug/L	20		99.9	70-130	9.03	30	
Chloroethane	**22.6**	0.50	ug/L	20		113	70-130	3.18	30	
Chloroform	**21.8**	0.50	ug/L	20		109	70-130	6.38	30	
Chloromethane	**21.0**	0.50	ug/L	20		105	70-130	2.91	30	
2-Chlorotoluene	**20.5**	0.50	ug/L	20		103	70-130	2.69	30	



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
Matrix Spike Dup (B8F2214-MSD1) Continued	**Source: 8F12016-01** Prepared: 06/22/18 Analyzed: 06/23/18									
4-Chlorotoluene	**20.1**	0.50	ug/L	20		101	70-130	3.18	30	
1,2-Dibromo-3-chloropropane	**20.2**	1.0	ug/L	20		101	70-130	16.6	30	
Dibromochloromethane	**18.3**	0.50	ug/L	20		91.6	70-130	0.273	30	
1,2-Dibromoethane (EDB)	**18.7**	0.50	ug/L	20		93.5	70-130	6.97	30	
Dibromomethane	**22.8**	0.50	ug/L	20		114	70-130	18.4	30	
1,3-Dichlorobenzene	**20.8**	0.50	ug/L	20		104	70-130	3.63	30	
1,2-Dichlorobenzene	**22.4**	0.50	ug/L	20		112	70-130	1.44	30	
1,4-Dichlorobenzene	**21.9**	0.50	ug/L	20		110	70-130	0.183	30	
Dichlorodifluoromethane (R12)	**22.6**	0.50	ug/L	20		113	70-130	2.69	30	
1,1-Dichloroethane	**23.4**	0.50	ug/L	20		117	70-130	3.38	30	
1,2-Dichloroethane (EDC)	**22.6**	0.50	ug/L	20		113	70-130	16.7	30	
1,1-Dichloroethylene	**22.2**	0.50	ug/L	20		111	70-130	8.49	30	
trans-1,2-Dichloroethylene	**21.8**	0.50	ug/L	20		109	70-130	2.72	30	
cis-1,2-Dichloroethylene	**20.7**	0.50	ug/L	20		103	70-130	3.39	30	
1,2-Dichloropropane	**23.4**	0.50	ug/L	20		117	70-130	9.78	30	
2,2-Dichloropropane	**17.5**	0.50	ug/L	20		87.6	70-130	1.55	30	
1,3-Dichloropropane	**21.7**	0.50	ug/L	20		109	70-130	5.29	30	
cis-1,3-Dichloropropylene	**21.5**	0.50	ug/L	20		108	70-130	8.48	30	
trans-1,3-Dichloropropylene	**18.5**	0.50	ug/L	20		92.4	70-130	0.0541	30	
1,1-Dichloropropylene	**20.9**	0.50	ug/L	20		105	70-130	0.666	30	
Diisopropyl ether (DIPE)	**21.7**	2.0	ug/L	20		109	70-130	11.7	30	
Ethylbenzene	**19.9**	0.50	ug/L	20		99.7	70-130	13.0	30	
Ethyl-tert-Butyl Ether (ETBE)	**23.5**	2.0	ug/L	20		118	70-130	19.8	30	
Hexachlorobutadiene	**18.4**	1.0	ug/L	20		92.2	70-130	1.51	30	
2-Hexanone (MBK)	**17.0**	10	ug/L	20		85.0	70-130	4.27	30	
Isopropylbenzene	**20.5**	0.50	ug/L	20		103	70-130	2.93	30	
4-Isopropyltoluene	**21.0**	1.0	ug/L	20		105	70-130	3.37	30	
Methyl-tert-Butyl Ether (MTBE)	**48.6**	2.0	ug/L	40		121	70-130	20.7	30	
Methylene Chloride	**32.2**	5.0	ug/L	20		161	70-130	15.6	30	QM-07
4-Methyl-2-pentanone (MIBK)	**19.1**	10	ug/L	20		95.6	70-130	35.5	30	AA-C1
Naphthalene	**25.0**	2.0	ug/L	20	0.360	123	70-130	13.1	30	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
Matrix Spike Dup (B8F2214-MSD1) Continued				**Source: 8F12016-01**		Prepared: 06/22/18	Analyzed: 06/23/18			
n-Propylbenzene	**20.4**	0.50	ug/L	20		102	70-130	5.12	30	
Styrene	**18.8**	0.50	ug/L	20		93.8	70-130	10.8	30	
1,1,1,2-Tetrachloroethane	**20.4**	0.50	ug/L	20		102	70-130	7.63	30	
1,1,2,2-Tetrachloroethane	**24.7**	0.50	ug/L	20		124	70-130	14.9	30	
Tetrachloroethylene (PCE)	**18.2**	0.50	ug/L	20		91.0	70-130	19.1	30	
Toluene	**19.7**	0.50	ug/L	20		98.7	70-130	13.6	30	
1,2,3-Trichlorobenzene	**20.0**	0.50	ug/L	20		100	70-130	1.44	30	
1,2,4-Trichlorobenzene	**19.2**	0.50	ug/L	20		96.0	70-130	5.71	30	
1,1,1-Trichloroethane	**20.7**	0.50	ug/L	20		104	70-130	0.289	30	
1,1,2-Trichloroethane	**21.6**	0.50	ug/L	20		108	70-130	2.20	30	
Trichloroethylene (TCE)	**21.3**	0.50	ug/L	20		107	70-130	0.282	30	
Trichlorofluoromethane (R11)	**23.4**	0.50	ug/L	20		117	70-130	3.47	30	
1,2,3-Trichloropropane	**22.3**	0.50	ug/L	20		112	70-130	14.5	30	
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	**21.4**	0.50	ug/L	20		107	70-130	1.90	30	
1,3,5-Trimethylbenzene	**20.2**	0.50	ug/L	20		101	70-130	2.79	30	
1,2,4-Trimethylbenzene	**20.2**	0.50	ug/L	20		101	70-130	2.34	30	
Vinyl chloride	**24.1**	0.50	ug/L	20		120	70-130	2.06	30	
o-Xylene	**19.8**	0.50	ug/L	20		99.1	70-130	9.97	30	
m,p-Xylenes	**38.8**	1.0	ug/L	40		97.0	70-130	13.1	30	
Surrogate: 4-Bromofluorobenzene	*51.6*		*ug/L*	*50*		*103*	*70-140*			
Surrogate: Dibromofluoromethane	*54.0*		*ug/L*	*50*		*108*	*70-140*			
Surrogate: Toluene-d8	*53.6*		*ug/L*	*50*		*107*	*70-140*			
VOCs & OXYGENATES by GC/MS EPA 5035 - Quality Control										
Batch B8F2222 - EPA 5035										
Blank (B8F2222-BLK1)						Prepared & Analyzed: 06/22/18				
Acetone	<50	50	ug/kg							
tert-Amyl Methyl Ether (TAME)	<5.0	5.0	ug/kg							
Benzene	<2.0	2.0	ug/kg							
Bromobenzene	<5.0	5.0	ug/kg							

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
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Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS EPA 5035 - Quality Control										
Batch B8F2222 - EPA 5035										
Blank (B8F2222-BLK1) Continued				Prepared & Analyzed: 06/22/18						
Bromochloromethane	<5.0	5.0	ug/kg							
Bromodichloromethane	<5.0	5.0	ug/kg							
Bromoform	<5.0	5.0	ug/kg							
Bromomethane	<5.0	5.0	ug/kg							
2-Butanone (MEK)	<50	50	ug/kg							
tert-Butyl alcohol (TBA)	<20	20	ug/kg							
sec-Butylbenzene	<5.0	5.0	ug/kg							
tert-Butylbenzene	<5.0	5.0	ug/kg							
n-Butylbenzene	<5.0	5.0	ug/kg							
Carbon Disulfide	<5.0	5.0	ug/kg							
Carbon Tetrachloride	<5.0	5.0	ug/kg							
Chlorobenzene	<5.0	5.0	ug/kg							
Chloroethane	<5.0	5.0	ug/kg							
Chloroform	<5.0	5.0	ug/kg							
Chloromethane	<5.0	5.0	ug/kg							
2-Chlorotoluene	<5.0	5.0	ug/kg							
4-Chlorotoluene	<5.0	5.0	ug/kg							
1,2-Dibromo-3-chloropropane	<10	10	ug/kg							
Dibromochloromethane	<5.0	5.0	ug/kg							
1,2-Dibromoethane (EDB)	<5.0	5.0	ug/kg							
Dibromomethane	<5.0	5.0	ug/kg							
1,4-Dichlorobenzene	<5.0	5.0	ug/kg							
1,3-Dichlorobenzene	<5.0	5.0	ug/kg							
1,2-Dichlorobenzene	<5.0	5.0	ug/kg							
Dichlorodifluoromethane (R12)	<5.0	5.0	ug/kg							
1,1-Dichloroethane	<5.0	5.0	ug/kg							
1,2-Dichloroethane (EDC)	<5.0	5.0	ug/kg							
trans-1,2-Dichloroethylene	<5.0	5.0	ug/kg							
cis-1,2-Dichloroethylene	<5.0	5.0	ug/kg							
1,1-Dichloroethylene	<5.0	5.0	ug/kg							
2,2-Dichloropropane	<5.0	5.0	ug/kg							



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LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
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Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS EPA 5035 - Quality Control										
Batch B8F2222 - EPA 5035										
Blank (B8F2222-BLK1) Continued				Prepared & Analyzed: 06/22/18						
1,3-Dichloropropane	<5.0	5.0	ug/kg							
1,2-Dichloropropane	<5.0	5.0	ug/kg							
trans-1,3-Dichloropropylene	<5.0	5.0	ug/kg							
1,1-Dichloropropylene	<5.0	5.0	ug/kg							
cis-1,3-Dichloropropylene	<5.0	5.0	ug/kg							
Diisopropyl ether (DIPE)	<5.0	5.0	ug/kg							
Ethylbenzene	<2.0	2.0	ug/kg							
Ethyl-tert-Butyl Ether (ETBE)	<5.0	5.0	ug/kg							
Hexachlorobutadiene	<10	10	ug/kg							
2-Hexanone (MBK)	<50	50	ug/kg							
Isopropylbenzene	<5.0	5.0	ug/kg							
4-Isopropyltoluene	<5.0	5.0	ug/kg							
Methyl-tert-Butyl Ether (MTBE)	<5.0	5.0	ug/kg							
Methylene Chloride	<50	50	ug/kg							
4-Methyl-2-pentanone (MIBK)	<50	50	ug/kg							
Naphthalene	<10	10	ug/kg							
n-Propylbenzene	<5.0	5.0	ug/kg							
Styrene	<5.0	5.0	ug/kg							
1,1,1,2-Tetrachloroethane	<5.0	5.0	ug/kg							
1,1,2,2-Tetrachloroethane	<5.0	5.0	ug/kg							
Tetrachloroethylene (PCE)	<5.0	5.0	ug/kg							
Toluene	<2.0	2.0	ug/kg							
1,2,4-Trichlorobenzene	<5.0	5.0	ug/kg							
1,2,3-Trichlorobenzene	<5.0	5.0	ug/kg							
1,1,2-Trichloroethane	<5.0	5.0	ug/kg							
1,1,1-Trichloroethane	<5.0	5.0	ug/kg							
Trichloroethylene (TCE)	<5.0	5.0	ug/kg							
Trichlorofluoromethane (R11)	<5.0	5.0	ug/kg							
1,2,3-Trichloropropane	<5.0	5.0	ug/kg							
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	<5.0	5.0	ug/kg							
1,3,5-Trimethylbenzene	<5.0	5.0	ug/kg							

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS EPA 5035 - Quality Control										
Batch B8F2222 - EPA 5035										
Blank (B8F2222-BLK1) Continued				Prepared & Analyzed: 06/22/18						
1,2,4-Trimethylbenzene	<5.0	5.0	ug/kg							
Vinyl chloride	<5.0	5.0	ug/kg							
o-Xylene	<2.0	2.0	ug/kg							
m,p-Xylenes	<2.0	2.0	ug/kg							
Surrogate: 4-Bromofluorobenzene	*94.8*		*ug/kg*	*100*		*94.8*	*70-140*			
Surrogate: Dibromofluoromethane	*118*		*ug/kg*	*100*		*118*	*70-140*			
Surrogate: Toluene-d8	*95.4*		*ug/kg*	*100*		*95.4*	*70-140*			
LCS (B8F2222-BS1)				Prepared & Analyzed: 06/22/18						
Acetone	**35.6**	50	ug/kg	40		89.1	70-130			
tert-Amyl Methyl Ether (TAME)	**36.8**	5.0	ug/kg	40		92.0	70-130			
Benzene	**38.0**	2.0	ug/kg	40		95.0	75-125			
Bromobenzene	**42.1**	5.0	ug/kg	40		105	70-130			
Bromochloromethane	**42.8**	5.0	ug/kg	40		107	70-130			
Bromodichloromethane	**40.3**	5.0	ug/kg	40		101	75-125			
Bromoform	**39.5**	5.0	ug/kg	40		98.8	75-125			
Bromomethane	**52.5**	5.0	ug/kg	40		131	75-125			**
2-Butanone (MEK)	**25.2**	50	ug/kg	40		62.9	70-130			***
tert-Butyl alcohol (TBA)	**166**	20	ug/kg	200		83.1	70-130			
sec-Butylbenzene	**41.5**	5.0	ug/kg	40		104	70-130			
tert-Butylbenzene	**41.6**	5.0	ug/kg	40		104	70-130			
n-Butylbenzene	**40.6**	5.0	ug/kg	40		102	70-130			
Carbon Disulfide	**39.9**	5.0	ug/kg	40		99.8	70-130			
Carbon Tetrachloride	**42.2**	5.0	ug/kg	40		106	75-125			
Chlorobenzene	**42.3**	5.0	ug/kg	40		106	75-125			
Chloroethane	**47.1**	5.0	ug/kg	40		118	75-125			
Chloroform	**42.6**	5.0	ug/kg	40		106	75-125			
Chloromethane	**40.2**	5.0	ug/kg	40		100	65-125			
2-Chlorotoluene	**40.9**	5.0	ug/kg	40		102	70-130			
4-Chlorotoluene	**41.7**	5.0	ug/kg	40		104	70-130			
1,2-Dibromo-3-chloropropane	**36.8**	10	ug/kg	40		91.9	70-130			
Dibromochloromethane	**40.9**	5.0	ug/kg	40		102	75-125			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS EPA 5035 - Quality Control										
Batch B8F2222 - EPA 5035										
LCS (B8F2222-BS1) Continued				Prepared & Analyzed: 06/22/18						
1,2-Dibromoethane (EDB)	**38.4**	5.0	ug/kg	40		96.1	70-130			
Dibromomethane	**38.5**	5.0	ug/kg	40		96.3	70-130			
1,4-Dichlorobenzene	**40.7**	5.0	ug/kg	40		102	75-125			
1,3-Dichlorobenzene	**41.4**	5.0	ug/kg	40		103	70-130			
1,2-Dichlorobenzene	**42.6**	5.0	ug/kg	40		107	70-130			
Dichlorodifluoromethane (R12)	**32.4**	5.0	ug/kg	40		81.0	70-130			
1,1-Dichloroethane	**40.4**	5.0	ug/kg	40		101	70-125			
1,2-Dichloroethane (EDC)	**42.9**	5.0	ug/kg	40		107	75-125			
trans-1,2-Dichloroethylene	**42.6**	5.0	ug/kg	40		106	75-125			
cis-1,2-Dichloroethylene	**41.4**	5.0	ug/kg	40		104	75-125			
1,1-Dichloroethylene	**44.0**	5.0	ug/kg	40		110	70-130			
2,2-Dichloropropane	**40.3**	5.0	ug/kg	40		101	70-130			
1,3-Dichloropropane	**37.0**	5.0	ug/kg	40		92.4	70-130			
1,2-Dichloropropane	**39.1**	5.0	ug/kg	40		97.8	75-130			
trans-1,3-Dichloropropylene	**40.7**	5.0	ug/kg	40		102	70-130			
1,1-Dichloropropylene	**40.8**	5.0	ug/kg	40		102	70-130			
cis-1,3-Dichloropropylene	**40.4**	5.0	ug/kg	40		101	75-125			
Diisopropyl ether (DIPE)	**38.6**	5.0	ug/kg	40		96.4	70-130			
Ethylbenzene	**41.7**	2.0	ug/kg	40		104	75-125			
Ethyl-tert-Butyl Ether (ETBE)	**39.6**	5.0	ug/kg	40		99.0	70-130			
Hexachlorobutadiene	**40.9**	10	ug/kg	40		102	70-130			
2-Hexanone (MBK)	**32.6**	50	ug/kg	40		81.4	70-130			
Isopropylbenzene	**41.9**	5.0	ug/kg	40		105	70-130			
4-Isopropyltoluene	**42.3**	5.0	ug/kg	40		106	70-130			
Methyl-tert-Butyl Ether (MTBE)	**78.2**	5.0	ug/kg	80		97.8	75-125			
Methylene Chloride	**36.8**	50	ug/kg	40		92.0	75-130			
4-Methyl-2-pentanone (MIBK)	**38.0**	50	ug/kg	40		95.0	70-130			
Naphthalene	**40.8**	10	ug/kg	40		102	70-130			
n-Propylbenzene	**41.7**	5.0	ug/kg	40		104	70-130			
Styrene	**40.3**	5.0	ug/kg	40		101	70-130			
1,1,1,2-Tetrachloroethane	**42.0**	5.0	ug/kg	40		105	70-130			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS EPA 5035 - Quality Control										
Batch B8F2222 - EPA 5035										
LCS (B8F2222-BS1) Continued				Prepared & Analyzed: 06/22/18						
1,1,2,2-Tetrachloroethane	**37.0**	5.0	ug/kg	40		92.5	70-135			
Tetrachloroethylene (PCE)	**41.0**	5.0	ug/kg	40		102	75-125			
Toluene	**41.7**	2.0	ug/kg	40		104	75-125			
1,2,4-Trichlorobenzene	**42.5**	5.0	ug/kg	40		106	70-130			
1,2,3-Trichlorobenzene	**42.0**	5.0	ug/kg	40		105	70-130			
1,1,2-Trichloroethane	**38.3**	5.0	ug/kg	40		95.8	75-125			
1,1,1-Trichloroethane	**42.7**	5.0	ug/kg	40		107	75-125			
Trichloroethylene (TCE)	**39.6**	5.0	ug/kg	40		99.1	75-125			
Trichlorofluoromethane (R11)	**42.4**	5.0	ug/kg	40		106	70-130			
1,2,3-Trichloropropane	**34.9**	5.0	ug/kg	40		87.2	70-130			
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	**40.7**	5.0	ug/kg	40		102	70-130			
1,3,5-Trimethylbenzene	**41.4**	5.0	ug/kg	40		103	70-130			
1,2,4-Trimethylbenzene	**40.8**	5.0	ug/kg	40		102	70-130			
Vinyl chloride	**42.1**	5.0	ug/kg	40		105	75-125			
o-Xylene	**40.6**	2.0	ug/kg	40		102	75-125			
m,p-Xylenes	**79.9**	2.0	ug/kg	80		99.8	70-130			
Surrogate: 4-Bromofluorobenzene	*96.6*		*ug/kg*	*100*		*96.6*	*70-140*			
Surrogate: Dibromofluoromethane	*95.8*		*ug/kg*	*100*		*95.8*	*70-140*			
Surrogate: Toluene-d8	*96.4*		*ug/kg*	*100*		*96.4*	*70-140*			
LCS Dup (B8F2222-BSD1)				Prepared & Analyzed: 06/22/18						
Acetone	**38.2**	50	ug/kg	40		95.6	70-130	7.04	30	
tert-Amyl Methyl Ether (TAME)	**36.4**	5.0	ug/kg	40		91.0	70-130	1.20	30	
Benzene	**36.9**	2.0	ug/kg	40		92.2	75-125	2.99	30	
Bromobenzene	**42.2**	5.0	ug/kg	40		106	70-130	0.332	30	
Bromochloromethane	**43.3**	5.0	ug/kg	40		108	70-130	1.11	30	
Bromodichloromethane	**40.1**	5.0	ug/kg	40		100	75-125	0.448	30	
Bromoform	**40.8**	5.0	ug/kg	40		102	75-125	3.09	30	
Bromomethane	**49.3**	5.0	ug/kg	40		123	75-125	6.25	30	
2-Butanone (MEK)	**26.2**	50	ug/kg	40		65.6	70-130	4.13	30	***
tert-Butyl alcohol (TBA)	**172**	20	ug/kg	200		86.1	70-130	3.52	30	



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS EPA 5035 - Quality Control										
Batch B8F2222 - EPA 5035										
LCS Dup (B8F2222-BSD1) Continued				Prepared & Analyzed: 06/22/18						
sec-Butylbenzene	**40.8**	5.0	ug/kg	40		102	70-130	1.75	30	
tert-Butylbenzene	**40.9**	5.0	ug/kg	40		102	70-130	1.79	30	
n-Butylbenzene	**39.3**	5.0	ug/kg	40		98.2	70-130	3.25	30	
Carbon Disulfide	**38.2**	5.0	ug/kg	40		95.4	70-130	4.46	30	
Carbon Tetrachloride	**41.1**	5.0	ug/kg	40		103	75-125	2.74	30	
Chlorobenzene	**41.1**	5.0	ug/kg	40		103	75-125	2.92	30	
Chloroethane	**47.2**	5.0	ug/kg	40		118	75-125	0.297	30	
Chloroform	**42.0**	5.0	ug/kg	40		105	75-125	1.32	30	
Chloromethane	**40.5**	5.0	ug/kg	40		101	65-125	0.744	30	
2-Chlorotoluene	**39.6**	5.0	ug/kg	40		99.0	70-130	3.13	30	
4-Chlorotoluene	**40.1**	5.0	ug/kg	40		100	70-130	3.96	30	
1,2-Dibromo-3-chloropropane	**39.9**	10	ug/kg	40		99.8	70-130	8.24	30	
Dibromochloromethane	**40.5**	5.0	ug/kg	40		101	75-125	0.884	30	
1,2-Dibromoethane (EDB)	**38.9**	5.0	ug/kg	40		97.2	70-130	1.09	30	
Dibromomethane	**39.8**	5.0	ug/kg	40		99.4	70-130	3.22	30	
1,4-Dichlorobenzene	**40.2**	5.0	ug/kg	40		100	75-125	1.38	30	
1,3-Dichlorobenzene	**40.4**	5.0	ug/kg	40		101	70-130	2.30	30	
1,2-Dichlorobenzene	**42.6**	5.0	ug/kg	40		107	70-130	0.0469	30	
Dichlorodifluoromethane (R12)	**30.9**	5.0	ug/kg	40		77.4	70-130	4.67	30	
1,1-Dichloroethane	**39.6**	5.0	ug/kg	40		99.0	70-125	2.15	30	
1,2-Dichloroethane (EDC)	**42.0**	5.0	ug/kg	40		105	75-125	2.17	30	
trans-1,2-Dichloroethylene	**41.2**	5.0	ug/kg	40		103	75-125	3.24	30	
cis-1,2-Dichloroethylene	**41.5**	5.0	ug/kg	40		104	75-125	0.241	30	
1,1-Dichloroethylene	**43.4**	5.0	ug/kg	40		109	70-130	1.33	30	
2,2-Dichloropropane	**36.3**	5.0	ug/kg	40		90.8	70-130	10.4	30	
1,3-Dichloropropane	**37.5**	5.0	ug/kg	40		93.8	70-130	1.56	30	
1,2-Dichloropropane	**38.2**	5.0	ug/kg	40		95.4	75-130	2.38	30	
trans-1,3-Dichloropropylene	**39.4**	5.0	ug/kg	40		98.4	70-130	3.30	30	
1,1-Dichloropropylene	**38.2**	5.0	ug/kg	40		95.6	70-130	6.48	30	
cis-1,3-Dichloropropylene	**38.5**	5.0	ug/kg	40		96.2	75-125	4.92	30	
Diisopropyl ether (DIPE)	**37.5**	5.0	ug/kg	40		93.8	70-130	2.79	30	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS EPA 5035 - Quality Control										
Batch B8F2222 - EPA 5035										
LCS Dup (B8F2222-BSD1) Continued				Prepared & Analyzed: 06/22/18						
Ethylbenzene	**41.1**	2.0	ug/kg	40		103	75-125	1.45	30	
Ethyl-tert-Butyl Ether (ETBE)	**38.7**	5.0	ug/kg	40		96.7	70-130	2.30	30	
Hexachlorobutadiene	**42.2**	10	ug/kg	40		106	70-130	3.23	30	
2-Hexanone (MBK)	**34.3**	50	ug/kg	40		85.8	70-130	5.32	30	
Isopropylbenzene	**40.6**	5.0	ug/kg	40		102	70-130	3.01	30	
4-Isopropyltoluene	**41.9**	5.0	ug/kg	40		105	70-130	0.903	30	
Methyl-tert-Butyl Ether (MTBE)	**78.0**	5.0	ug/kg	80		97.4	75-125	0.307	30	
Methylene Chloride	**40.9**	50	ug/kg	40		102	75-130	10.5	30	
4-Methyl-2-pentanone (MIBK)	**41.3**	50	ug/kg	40		103	70-130	8.32	30	
Naphthalene	**41.3**	10	ug/kg	40		103	70-130	1.22	30	
n-Propylbenzene	**40.8**	5.0	ug/kg	40		102	70-130	1.99	30	
Styrene	**39.4**	5.0	ug/kg	40		98.4	70-130	2.26	30	
1,1,1,2-Tetrachloroethane	**41.7**	5.0	ug/kg	40		104	70-130	0.812	30	
1,1,2,2-Tetrachloroethane	**39.0**	5.0	ug/kg	40		97.6	70-135	5.31	30	
Tetrachloroethylene (PCE)	**39.5**	5.0	ug/kg	40		98.8	75-125	3.58	30	
Toluene	**40.4**	2.0	ug/kg	40		101	75-125	3.02	30	
1,2,4-Trichlorobenzene	**42.7**	5.0	ug/kg	40		107	70-130	0.282	30	
1,2,3-Trichlorobenzene	**43.5**	5.0	ug/kg	40		109	70-130	3.60	30	
1,1,2-Trichloroethane	**38.4**	5.0	ug/kg	40		96.0	75-125	0.104	30	
1,1,1-Trichloroethane	**41.1**	5.0	ug/kg	40		103	75-125	3.68	30	
Trichloroethylene (TCE)	**39.3**	5.0	ug/kg	40		98.2	75-125	0.963	30	
Trichlorofluoromethane (R11)	**42.2**	5.0	ug/kg	40		106	70-130	0.284	30	
1,2,3-Trichloropropane	**37.0**	5.0	ug/kg	40		92.4	70-130	5.73	30	
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	**42.4**	5.0	ug/kg	40		106	70-130	4.19	30	
1,3,5-Trimethylbenzene	**39.9**	5.0	ug/kg	40		99.8	70-130	3.64	30	
1,2,4-Trimethylbenzene	**40.0**	5.0	ug/kg	40		100	70-130	1.98	30	
Vinyl chloride	**42.3**	5.0	ug/kg	40		106	75-125	0.474	30	
o-Xylene	**40.1**	2.0	ug/kg	40		100	75-125	1.34	30	
m,p-Xylenes	**77.9**	2.0	ug/kg	80		97.4	70-130	2.46	30	
Surrogate: 4-Bromofluorobenzene	*96.1*		*ug/kg*	*100*		*96.1*	*70-140*			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS EPA 5035 - Quality Control										
Batch B8F2222 - EPA 5035										
LCS Dup (B8F2222-BSD1) Continued				Prepared & Analyzed: 06/22/18						
Surrogate: Dibromofluoromethane	*97.5*		*ug/kg*	*100*		*97.5*	*70-140*			
Surrogate: Toluene-d8	*95.0*		*ug/kg*	*100*		*95.0*	*70-140*			
Batch B8F2536 - EPA 5035										
Blank (B8F2536-BLK1)				Prepared & Analyzed: 06/25/18						
Acetone	<50	50	ug/kg							
tert-Amyl Methyl Ether (TAME)	<5.0	5.0	ug/kg							
Benzene	<2.0	2.0	ug/kg							
Bromobenzene	<5.0	5.0	ug/kg							
Bromochloromethane	<5.0	5.0	ug/kg							
Bromodichloromethane	<5.0	5.0	ug/kg							
Bromoform	<5.0	5.0	ug/kg							
Bromomethane	<5.0	5.0	ug/kg							
2-Butanone (MEK)	<50	50	ug/kg							
tert-Butyl alcohol (TBA)	<20	20	ug/kg							
sec-Butylbenzene	<5.0	5.0	ug/kg							
tert-Butylbenzene	<5.0	5.0	ug/kg							
n-Butylbenzene	<5.0	5.0	ug/kg							
Carbon Disulfide	<5.0	5.0	ug/kg							
Carbon Tetrachloride	<5.0	5.0	ug/kg							
Chlorobenzene	<5.0	5.0	ug/kg							
Chloroethane	<5.0	5.0	ug/kg							
Chloroform	<5.0	5.0	ug/kg							
Chloromethane	<5.0	5.0	ug/kg							
2-Chlorotoluene	<5.0	5.0	ug/kg							
4-Chlorotoluene	<5.0	5.0	ug/kg							
1,2-Dibromo-3-chloropropane	<10	10	ug/kg							
Dibromochloromethane	<5.0	5.0	ug/kg							
1,2-Dibromoethane (EDB)	<5.0	5.0	ug/kg							
Dibromomethane	<5.0	5.0	ug/kg							
1,4-Dichlorobenzene	<5.0	5.0	ug/kg							
1,3-Dichlorobenzene	<5.0	5.0	ug/kg							

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS EPA 5035 - Quality Control										
Batch B8F2536 - EPA 5035										
Blank (B8F2536-BLK1) Continued				Prepared & Analyzed: 06/25/18						
1,2-Dichlorobenzene	<5.0	5.0	ug/kg							
Dichlorodifluoromethane (R12)	<5.0	5.0	ug/kg							
1,1-Dichloroethane	<5.0	5.0	ug/kg							
1,2-Dichloroethane (EDC)	<5.0	5.0	ug/kg							
trans-1,2-Dichloroethylene	<5.0	5.0	ug/kg							
cis-1,2-Dichloroethylene	<5.0	5.0	ug/kg							
1,1-Dichloroethylene	<5.0	5.0	ug/kg							
2,2-Dichloropropane	<5.0	5.0	ug/kg							
1,3-Dichloropropane	<5.0	5.0	ug/kg							
1,2-Dichloropropane	<5.0	5.0	ug/kg							
trans-1,3-Dichloropropylene	<5.0	5.0	ug/kg							
1,1-Dichloropropylene	<5.0	5.0	ug/kg							
cis-1,3-Dichloropropylene	<5.0	5.0	ug/kg							
Diisopropyl ether (DIPE)	<5.0	5.0	ug/kg							
Ethylbenzene	<2.0	2.0	ug/kg							
Ethyl-tert-Butyl Ether (ETBE)	<5.0	5.0	ug/kg							
Hexachlorobutadiene	<10	10	ug/kg							
2-Hexanone (MBK)	<50	50	ug/kg							
Isopropylbenzene	<5.0	5.0	ug/kg							
4-Isopropyltoluene	<5.0	5.0	ug/kg							
Methyl-tert-Butyl Ether (MTBE)	<5.0	5.0	ug/kg							
Methylene Chloride	<50	50	ug/kg							
4-Methyl-2-pentanone (MIBK)	<50	50	ug/kg							
Naphthalene	<10	10	ug/kg							
n-Propylbenzene	<5.0	5.0	ug/kg							
Styrene	<5.0	5.0	ug/kg							
1,1,1,2-Tetrachloroethane	<5.0	5.0	ug/kg							
1,1,2,2-Tetrachloroethane	<5.0	5.0	ug/kg							
Tetrachloroethylene (PCE)	<5.0	5.0	ug/kg							
Toluene	<2.0	2.0	ug/kg							
1,2,4-Trichlorobenzene	<5.0	5.0	ug/kg							

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS EPA 5035 - Quality Control										
Batch B8F2536 - EPA 5035										
Blank (B8F2536-BLK1) Continued				Prepared & Analyzed: 06/25/18						
1,2,3-Trichlorobenzene	<5.0	5.0	ug/kg							
1,1,2-Trichloroethane	<5.0	5.0	ug/kg							
1,1,1-Trichloroethane	<5.0	5.0	ug/kg							
Trichloroethylene (TCE)	<5.0	5.0	ug/kg							
Trichlorofluoromethane (R11)	<5.0	5.0	ug/kg							
1,2,3-Trichloropropane	<5.0	5.0	ug/kg							
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	<5.0	5.0	ug/kg							
1,3,5-Trimethylbenzene	<5.0	5.0	ug/kg							
1,2,4-Trimethylbenzene	<5.0	5.0	ug/kg							
Vinyl chloride	<5.0	5.0	ug/kg							
o-Xylene	<2.0	2.0	ug/kg							
m,p-Xylenes	<2.0	2.0	ug/kg							
Surrogate: 4-Bromofluorobenzene	*92.0*		*ug/kg*	*100*		*92.0*	*70-140*			
Surrogate: Dibromofluoromethane	*118*		*ug/kg*	*100*		*118*	*70-140*			
Surrogate: Toluene-d8	*93.5*		*ug/kg*	*100*		*93.5*	*70-140*			
LCS (B8F2536-BS1)				Prepared & Analyzed: 06/25/18						
Acetone	**30.6**	50	ug/kg	40		76.4	70-130			
tert-Amyl Methyl Ether (TAME)	**35.2**	5.0	ug/kg	40		88.0	70-130			
Benzene	**36.9**	2.0	ug/kg	40		92.3	75-125			
Bromobenzene	**41.1**	5.0	ug/kg	40		103	70-130			
Bromochloromethane	**43.1**	5.0	ug/kg	40		108	70-130			
Bromodichloromethane	**40.6**	5.0	ug/kg	40		101	75-125			
Bromoform	**39.4**	5.0	ug/kg	40		98.4	75-125			
Bromomethane	**47.9**	5.0	ug/kg	40		120	75-125			
2-Butanone (MEK)	**24.2**	50	ug/kg	40		60.6	70-130			***
tert-Butyl alcohol (TBA)	**183**	20	ug/kg	200		91.3	70-130			
sec-Butylbenzene	**38.2**	5.0	ug/kg	40		95.4	70-130			
tert-Butylbenzene	**38.2**	5.0	ug/kg	40		95.5	70-130			
n-Butylbenzene	**36.3**	5.0	ug/kg	40		90.8	70-130			
Carbon Disulfide	**37.5**	5.0	ug/kg	40		93.6	70-130			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS EPA 5035 - Quality Control										
Batch B8F2536 - EPA 5035										
LCS (B8F2536-BS1) Continued				Prepared & Analyzed: 06/25/18						
Carbon Tetrachloride	**41.1**	5.0	ug/kg	40		103	75-125			
Chlorobenzene	**41.2**	5.0	ug/kg	40		103	75-125			
Chloroethane	**40.4**	5.0	ug/kg	40		101	75-125			
Chloroform	**41.3**	5.0	ug/kg	40		103	75-125			
Chloromethane	**37.8**	5.0	ug/kg	40		94.6	65-125			
2-Chlorotoluene	**38.2**	5.0	ug/kg	40		95.5	70-130			
4-Chlorotoluene	**39.3**	5.0	ug/kg	40		98.2	70-130			
1,2-Dibromo-3-chloropropane	**36.7**	10	ug/kg	40		91.7	70-130			
Dibromochloromethane	**40.2**	5.0	ug/kg	40		100	75-125			
1,2-Dibromoethane (EDB)	**38.1**	5.0	ug/kg	40		95.2	70-130			
Dibromomethane	**39.3**	5.0	ug/kg	40		98.2	70-130			
1,4-Dichlorobenzene	**39.1**	5.0	ug/kg	40		97.7	75-125			
1,3-Dichlorobenzene	**39.2**	5.0	ug/kg	40		98.0	70-130			
1,2-Dichlorobenzene	**41.2**	5.0	ug/kg	40		103	70-130			
Dichlorodifluoromethane (R12)	**25.1**	5.0	ug/kg	40		62.8	70-130			***
1,1-Dichloroethane	**39.9**	5.0	ug/kg	40		99.7	70-125			
1,2-Dichloroethane (EDC)	**41.7**	5.0	ug/kg	40		104	75-125			
trans-1,2-Dichloroethylene	**40.2**	5.0	ug/kg	40		100	75-125			
cis-1,2-Dichloroethylene	**40.1**	5.0	ug/kg	40		100	75-125			
1,1-Dichloroethylene	**43.7**	5.0	ug/kg	40		109	70-130			
2,2-Dichloropropane	**39.5**	5.0	ug/kg	40		98.8	70-130			
1,3-Dichloropropane	**37.7**	5.0	ug/kg	40		94.4	70-130			
1,2-Dichloropropane	**39.2**	5.0	ug/kg	40		97.9	75-130			
trans-1,3-Dichloropropylene	**40.0**	5.0	ug/kg	40		100	70-130			
1,1-Dichloropropylene	**38.5**	5.0	ug/kg	40		96.3	70-130			
cis-1,3-Dichloropropylene	**39.7**	5.0	ug/kg	40		99.3	75-125			
Diisopropyl ether (DIPE)	**37.4**	5.0	ug/kg	40		93.4	70-130			
Ethylbenzene	**39.7**	2.0	ug/kg	40		99.2	75-125			
Ethyl-tert-Butyl Ether (ETBE)	**39.1**	5.0	ug/kg	40		97.6	70-130			
Hexachlorobutadiene	**35.9**	10	ug/kg	40		89.8	70-130			
2-Hexanone (MBK)	**35.6**	50	ug/kg	40		89.0	70-130			



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS EPA 5035 - Quality Control										
Batch B8F2536 - EPA 5035										
LCS (B8F2536-BS1) Continued				Prepared & Analyzed: 06/25/18						
Isopropylbenzene	**38.7**	5.0	ug/kg	40		96.8	70-130			
4-Isopropyltoluene	**38.9**	5.0	ug/kg	40		97.4	70-130			
Methyl-tert-Butyl Ether (MTBE)	**75.8**	5.0	ug/kg	80		94.8	75-125			
Methylene Chloride	**36.2**	50	ug/kg	40		90.4	75-130			
4-Methyl-2-pentanone (MIBK)	**39.9**	50	ug/kg	40		99.6	70-130			
Naphthalene	**34.8**	10	ug/kg	40		86.9	70-130			
n-Propylbenzene	**38.4**	5.0	ug/kg	40		96.0	70-130			
Styrene	**39.3**	5.0	ug/kg	40		98.2	70-130			
1,1,1,2-Tetrachloroethane	**41.8**	5.0	ug/kg	40		104	70-130			
1,1,2,2-Tetrachloroethane	**36.7**	5.0	ug/kg	40		91.8	70-135			
Tetrachloroethylene (PCE)	**40.3**	5.0	ug/kg	40		101	75-125			
Toluene	**39.8**	2.0	ug/kg	40		99.4	75-125			
1,2,4-Trichlorobenzene	**39.6**	5.0	ug/kg	40		99.1	70-130			
1,2,3-Trichlorobenzene	**38.9**	5.0	ug/kg	40		97.3	70-130			
1,1,2-Trichloroethane	**38.0**	5.0	ug/kg	40		95.0	75-125			
1,1,1-Trichloroethane	**41.0**	5.0	ug/kg	40		102	75-125			
Trichloroethylene (TCE)	**38.1**	5.0	ug/kg	40		95.4	75-125			
Trichlorofluoromethane (R11)	**42.1**	5.0	ug/kg	40		105	70-130			
1,2,3-Trichloropropane	**34.8**	5.0	ug/kg	40		86.9	70-130			
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	**39.8**	5.0	ug/kg	40		99.5	70-130			
1,3,5-Trimethylbenzene	**38.1**	5.0	ug/kg	40		95.2	70-130			
1,2,4-Trimethylbenzene	**38.4**	5.0	ug/kg	40		96.0	70-130			
Vinyl chloride	**40.5**	5.0	ug/kg	40		101	75-125			
o-Xylene	**38.6**	2.0	ug/kg	40		96.6	75-125			
m,p-Xylenes	**76.0**	2.0	ug/kg	80		95.0	70-130			
Surrogate: 4-Bromofluorobenzene	*94.9*		*ug/kg*	*100*		*94.9*	*70-140*			
Surrogate: Dibromofluoromethane	*95.6*		*ug/kg*	*100*		*95.6*	*70-140*			
Surrogate: Toluene-d8	*94.8*		*ug/kg*	*100*		*94.8*	*70-140*			
LCS Dup (B8F2536-BSD1)				Prepared & Analyzed: 06/25/18						
Acetone	**32.1**	50	ug/kg	40		80.4	70-130	5.04	30	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS EPA 5035 - Quality Control										
Batch B8F2536 - EPA 5035										
LCS Dup (B8F2536-BSD1) Continued				Prepared & Analyzed: 06/25/18						
tert-Amyl Methyl Ether (TAME)	**36.4**	5.0	ug/kg	40		91.0	70-130	3.30	30	
Benzene	**38.1**	2.0	ug/kg	40		95.2	75-125	3.09	30	
Bromobenzene	**42.0**	5.0	ug/kg	40		105	70-130	2.02	30	
Bromochloromethane	**44.3**	5.0	ug/kg	40		111	70-130	2.88	30	
Bromodichloromethane	**41.2**	5.0	ug/kg	40		103	75-125	1.66	30	
Bromoform	**40.5**	5.0	ug/kg	40		101	75-125	2.75	30	
Bromomethane	**46.0**	5.0	ug/kg	40		115	75-125	4.09	30	
2-Butanone (MEK)	**24.7**	50	ug/kg	40		61.8	70-130	1.96	30	***
tert-Butyl alcohol (TBA)	**152**	20	ug/kg	200		76.1	70-130	18.2	30	
sec-Butylbenzene	**41.0**	5.0	ug/kg	40		103	70-130	7.17	30	
tert-Butylbenzene	**41.5**	5.0	ug/kg	40		104	70-130	8.18	30	
n-Butylbenzene	**39.6**	5.0	ug/kg	40		99.1	70-130	8.69	30	
Carbon Disulfide	**38.3**	5.0	ug/kg	40		95.8	70-130	2.22	30	
Carbon Tetrachloride	**41.8**	5.0	ug/kg	40		105	75-125	1.79	30	
Chlorobenzene	**41.3**	5.0	ug/kg	40		103	75-125	0.339	30	
Chloroethane	**38.9**	5.0	ug/kg	40		97.4	75-125	3.58	30	
Chloroform	**41.9**	5.0	ug/kg	40		105	75-125	1.59	30	
Chloromethane	**38.1**	5.0	ug/kg	40		95.2	65-125	0.685	30	
2-Chlorotoluene	**40.1**	5.0	ug/kg	40		100	70-130	4.90	30	
4-Chlorotoluene	**40.8**	5.0	ug/kg	40		102	70-130	3.89	30	
1,2-Dibromo-3-chloropropane	**39.1**	10	ug/kg	40		97.8	70-130	6.49	30	
Dibromochloromethane	**42.1**	5.0	ug/kg	40		105	75-125	4.62	30	
1,2-Dibromoethane (EDB)	**39.3**	5.0	ug/kg	40		98.3	70-130	3.26	30	
Dibromomethane	**39.3**	5.0	ug/kg	40		98.2	70-130	0.0509	30	
1,4-Dichlorobenzene	**40.6**	5.0	ug/kg	40		102	75-125	3.91	30	
1,3-Dichlorobenzene	**40.8**	5.0	ug/kg	40		102	70-130	4.05	30	
1,2-Dichlorobenzene	**42.0**	5.0	ug/kg	40		105	70-130	1.87	30	
Dichlorodifluoromethane (R12)	**28.8**	5.0	ug/kg	40		72.0	70-130	13.8	30	
1,1-Dichloroethane	**40.8**	5.0	ug/kg	40		102	70-125	2.23	30	
1,2-Dichloroethane (EDC)	**42.3**	5.0	ug/kg	40		106	75-125	1.62	30	
trans-1,2-Dichloroethylene	**41.1**	5.0	ug/kg	40		103	75-125	2.31	30	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS EPA 5035 - Quality Control										
Batch B8F2536 - EPA 5035										
LCS Dup (B8F2536-BSD1) Continued				Prepared & Analyzed: 06/25/18						
cis-1,2-Dichloroethylene	**40.8**	5.0	ug/kg	40		102	75-125	1.78	30	
1,1-Dichloroethylene	**41.1**	5.0	ug/kg	40		103	70-130	6.13	30	
2,2-Dichloropropane	**37.2**	5.0	ug/kg	40		92.9	70-130	6.16	30	
1,3-Dichloropropane	**38.6**	5.0	ug/kg	40		96.4	70-130	2.20	30	
1,2-Dichloropropane	**39.6**	5.0	ug/kg	40		99.0	75-130	1.17	30	
trans-1,3-Dichloropropylene	**40.5**	5.0	ug/kg	40		101	70-130	1.19	30	
1,1-Dichloropropylene	**39.6**	5.0	ug/kg	40		99.1	70-130	2.87	30	
cis-1,3-Dichloropropylene	**40.2**	5.0	ug/kg	40		101	75-125	1.25	30	
Diisopropyl ether (DIPE)	**38.2**	5.0	ug/kg	40		95.4	70-130	2.12	30	
Ethylbenzene	**41.5**	2.0	ug/kg	40		104	75-125	4.53	30	
Ethyl-tert-Butyl Ether (ETBE)	**39.9**	5.0	ug/kg	40		99.8	70-130	2.18	30	
Hexachlorobutadiene	**41.6**	10	ug/kg	40		104	70-130	14.6	30	
2-Hexanone (MBK)	**33.9**	50	ug/kg	40		84.6	70-130	4.95	30	
Isopropylbenzene	**41.0**	5.0	ug/kg	40		103	70-130	5.77	30	
4-Isopropyltoluene	**41.8**	5.0	ug/kg	40		104	70-130	6.99	30	
Methyl-tert-Butyl Ether (MTBE)	**78.8**	5.0	ug/kg	80		98.5	75-125	3.80	30	
Methylene Chloride	**37.1**	50	ug/kg	40		92.6	75-130	2.46	30	
4-Methyl-2-pentanone (MIBK)	**40.1**	50	ug/kg	40		100	70-130	0.501	30	
Naphthalene	**37.8**	10	ug/kg	40		94.4	70-130	8.33	30	
n-Propylbenzene	**41.1**	5.0	ug/kg	40		103	70-130	6.75	30	
Styrene	**39.6**	5.0	ug/kg	40		99.0	70-130	0.811	30	
1,1,1,2-Tetrachloroethane	**42.7**	5.0	ug/kg	40		107	70-130	2.22	30	
1,1,2,2-Tetrachloroethane	**37.6**	5.0	ug/kg	40		94.0	70-135	2.42	30	
Tetrachloroethylene (PCE)	**41.2**	5.0	ug/kg	40		103	75-125	2.11	30	
Toluene	**41.8**	2.0	ug/kg	40		104	75-125	4.91	30	
1,2,4-Trichlorobenzene	**42.1**	5.0	ug/kg	40		105	70-130	6.02	30	
1,2,3-Trichlorobenzene	**41.6**	5.0	ug/kg	40		104	70-130	6.70	30	
1,1,2-Trichloroethane	**40.9**	5.0	ug/kg	40		102	75-125	7.45	30	
1,1,1-Trichloroethane	**42.3**	5.0	ug/kg	40		106	75-125	3.12	30	
Trichloroethylene (TCE)	**39.6**	5.0	ug/kg	40		99.0	75-125	3.81	30	
Trichlorofluoromethane (R11)	**48.0**	5.0	ug/kg	40		120	70-130	13.2	30	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS EPA 5035 - Quality Control										
Batch B8F2536 - EPA 5035										
LCS Dup (B8F2536-BSD1) Continued				Prepared & Analyzed: 06/25/18						
1,2,3-Trichloropropane	**36.0**	5.0	ug/kg	40		90.0	70-130	3.56	30	
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	**39.7**	5.0	ug/kg	40		99.2	70-130	0.252	30	
1,3,5-Trimethylbenzene	**40.9**	5.0	ug/kg	40		102	70-130	7.09	30	
1,2,4-Trimethylbenzene	**40.4**	5.0	ug/kg	40		101	70-130	4.93	30	
Vinyl chloride	**38.2**	5.0	ug/kg	40		95.4	75-125	5.80	30	
o-Xylene	**39.2**	2.0	ug/kg	40		98.0	75-125	1.44	30	
m,p-Xylenes	**78.5**	2.0	ug/kg	80		98.2	70-130	3.29	30	
Surrogate: 4-Bromofluorobenzene	*95.6*		*ug/kg*	*100*		*95.6*	*70-140*			
Surrogate: Dibromofluoromethane	*96.3*		*ug/kg*	*100*		*96.3*	*70-140*			
Surrogate: Toluene-d8	*96.9*		*ug/kg*	*100*		*96.9*	*70-140*			
Carbon Chain by GC/FID - Quality Control										
Batch B8F2223 - EPA 3550B										
Blank (B8F2223-BLK1)				Prepared & Analyzed: 06/22/18						
C6-C8	<1.0	1.0	mg/kg							
C8-C10	<1.0	1.0	mg/kg							
C10-C12	<1.0	1.0	mg/kg							
C12-C14	<1.0	1.0	mg/kg							
C14-C16	<1.0	1.0	mg/kg							
C16-C18	<1.0	1.0	mg/kg							
C18-C20	<1.0	1.0	mg/kg							
C20-C22	<1.0	1.0	mg/kg							
C22-C24	<1.0	1.0	mg/kg							
C24-C26	<1.0	1.0	mg/kg							
C26-C28	<1.0	1.0	mg/kg							
C28-C32	<1.0	1.0	mg/kg							
C32-C34	<1.0	1.0	mg/kg							
C34-C36	<1.0	1.0	mg/kg							
C36-C40	<1.0	1.0	mg/kg							
C40-C44	<1.0	1.0	mg/kg							
TPH (C6-C44)	<10	10	mg/kg							

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Carbon Chain by GC/FID - Quality Control										
Batch B8F2223 - EPA 3550B										
Blank (B8F2223-BLK1) Continued				Prepared & Analyzed: 06/22/18						
Gasoline Range Organics (C6-C10)	<5.0	5.0	mg/kg							
Diesel Range Organics (C10-C23)	<5.0	5.0	mg/kg							
Oil Range Organics (C23-C44)	<5.0	5.0	mg/kg							
Surrogate: o-Terphenyl	*8.57*		*mg/kg*	*10*		*85.7*	*50-150*			
LCS (B8F2223-BS1)				Prepared & Analyzed: 06/22/18						
Diesel Range Organics as Diesel	**201**	10	mg/kg	200		100	75-125			
Surrogate: o-Terphenyl	*12.2*		*mg/kg*	*10*		*122*	*50-150*			
LCS Dup (B8F2223-BSD1)				Prepared: 06/22/18 Analyzed: 06/23/18						
Diesel Range Organics as Diesel	**198**	10	mg/kg	200		99.2	75-125	1.24	40	
Surrogate: o-Terphenyl	*12.3*		*mg/kg*	*10*		*123*	*50-150*			
Matrix Spike (B8F2223-MS1)		**Source: 8F20019-28**		Prepared: 06/22/18 Analyzed: 06/23/18						
Diesel Range Organics as Diesel	**192**	10	mg/kg	200	11.7	90.3	70-130			
Surrogate: o-Terphenyl	*11.3*		*mg/kg*	*10*		*113*	*50-150*			
Matrix Spike Dup (B8F2223-MSD1)		**Source: 8F20019-28**		Prepared: 06/22/18 Analyzed: 06/23/18						
Diesel Range Organics as Diesel	**199**	10	mg/kg	200	11.7	93.7	70-130	3.45	40	
Surrogate: o-Terphenyl	*10.8*		*mg/kg*	*10*		*108*	*50-150*			
Batch B8F2525 - EPA 3510C										
Blank (B8F2525-BLK1)				Prepared & Analyzed: 06/25/18						
C6-C8	<0.010	0.010	mg/L							
C8-C10	<0.010	0.010	mg/L							
C10-C12	<0.010	0.010	mg/L							
C12-C14	<0.010	0.010	mg/L							
C14-C16	<0.010	0.010	mg/L							
C16-C18	<0.010	0.010	mg/L							
C18-C20	<0.010	0.010	mg/L							
C20-C22	<0.010	0.010	mg/L							
C22-C24	<0.010	0.010	mg/L							
C24-C26	<0.010	0.010	mg/L							
C26-C28	<0.010	0.010	mg/L							

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Carbon Chain by GC/FID - Quality Control										
Batch B8F2525 - EPA 3510C										
Blank (B8F2525-BLK1) Continued				Prepared & Analyzed: 06/25/18						
C28-C32	<0.010	0.010	mg/L							
C32-C34	<0.010	0.010	mg/L							
C34-C36	<0.010	0.010	mg/L							
C36-C40	<0.010	0.010	mg/L							
C40-C44	<0.010	0.010	mg/L							
TPH (C6-C44)	<0.10	0.10	mg/L							
Gasoline Range Organics (C6-C10)	<0.10	0.10	mg/L							
Diesel Range Organics (C10-C23)	<0.10	0.10	mg/L							
Oil Range Organics (C23-C44)	<0.10	0.10	mg/L							
Surrogate: o-Terphenyl	*0.0310*		*mg/L*	*0.040*		*77.5*	*50-150*			
LCS (B8F2525-BS1)				Prepared & Analyzed: 06/25/18						
Diesel Range Organics as Diesel	**0.626**	0.10	mg/L	0.80		78.2	75-125			
Surrogate: o-Terphenyl	*0.0258*		*mg/L*	*0.040*		*64.4*	*50-150*			
LCS Dup (B8F2525-BSD1)				Prepared & Analyzed: 06/25/18						
Diesel Range Organics as Diesel	**0.772**	0.10	mg/L	0.80		96.5	75-125	20.9	30	
Surrogate: o-Terphenyl	*0.0414*		*mg/L*	*0.040*		*103*	*50-150*			
Batch B8F2909 - EPA 3550B										
Blank (B8F2909-BLK1)				Prepared & Analyzed: 06/29/18						
C6-C8	<1.0	1.0	mg/kg							
C8-C10	<1.0	1.0	mg/kg							
C10-C12	<1.0	1.0	mg/kg							
C12-C14	<1.0	1.0	mg/kg							
C14-C16	<1.0	1.0	mg/kg							
C16-C18	<1.0	1.0	mg/kg							
C18-C20	<1.0	1.0	mg/kg							
C20-C22	<1.0	1.0	mg/kg							
C22-C24	<1.0	1.0	mg/kg							
C24-C26	<1.0	1.0	mg/kg							
C26-C28	<1.0	1.0	mg/kg							
C28-C32	<1.0	1.0	mg/kg							

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Carbon Chain by GC/FID - Quality Control										
Batch B8F2909 - EPA 3550B										
Blank (B8F2909-BLK1) Continued				Prepared & Analyzed: 06/29/18						
C32-C34	<1.0	1.0	mg/kg							
C34-C36	<1.0	1.0	mg/kg							
C36-C40	<1.0	1.0	mg/kg							
C40-C44	<1.0	1.0	mg/kg							
TPH (C6-C44)	<10	10	mg/kg							
Gasoline Range Organics (C6-C10)	<5.0	5.0	mg/kg							
Diesel Range Organics (C10-C23)	<5.0	5.0	mg/kg							
Oil Range Organics (C23-C44)	<5.0	5.0	mg/kg							
Surrogate: o-Terphenyl	*8.92*		*mg/kg*	*10*		*89.2*	*50-150*			
LCS (B8F2909-BS1)				Prepared & Analyzed: 06/29/18						
Diesel Range Organics as Diesel	**240**	10	mg/kg	200		120	75-125			
Surrogate: o-Terphenyl	*13.1*		*mg/kg*	*10*		*131*	*50-150*			
LCS Dup (B8F2909-BSD1)				Prepared & Analyzed: 06/29/18						
Diesel Range Organics as Diesel	**246**	10	mg/kg	200		123	75-125	2.22	40	
Surrogate: o-Terphenyl	*13.7*		*mg/kg*	*10*		*137*	*50-150*			
Matrix Spike (B8F2909-MS1)		**Source: 8F20019-03**		Prepared & Analyzed: 06/29/18						
Diesel Range Organics as Diesel	**212**	10	mg/kg	200	51.6	80.4	70-130			
Surrogate: o-Terphenyl	*11.0*		*mg/kg*	*10*		*110*	*50-150*			
Matrix Spike Dup (B8F2909-MSD1)		**Source: 8F20019-03**		Prepared & Analyzed: 06/29/18						
Diesel Range Organics as Diesel	**216**	10	mg/kg	200	51.6	82.2	70-130	1.62	40	
Surrogate: o-Terphenyl	*11.6*		*mg/kg*	*10*		*116*	*50-150*			
Total Metals by ICP Atomic Emission Spectroscopy - Quality Control										
Batch B8F2910 - EPA 3050B										
Blank (B8F2910-BLK1)				Prepared: 06/28/18 Analyzed: 06/29/18						
Lead	<3.0	3.0	mg/kg							
LCS (B8F2910-BS1)				Prepared: 06/28/18 Analyzed: 06/29/18						
Lead	**49.3**	3.0	mg/kg	50		98.7	80-120			
LCS Dup (B8F2910-BSD1)				Prepared: 06/28/18 Analyzed: 06/29/18						

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Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Total Metals by ICP Atomic Emission Spectroscopy - Quality Control										
Batch B8F2910 - EPA 3050B										
LCS Dup (B8F2910-BSD1) Continued				Prepared: 06/28/18 Analyzed: 06/29/18						
Lead	**53.0**	3.0	mg/kg	50		106	80-120	7.14	20	
Matrix Spike (B8F2910-MS1)		**Source: 8F20019-02**		Prepared: 06/28/18 Analyzed: 06/29/18						
Lead	**53.6**	3.0	mg/kg	50	6.73	93.7	75-125			
Matrix Spike Dup (B8F2910-MSD1)		**Source: 8F20019-02**		Prepared: 06/28/18 Analyzed: 06/29/18						
Lead	**52.9**	3.0	mg/kg	50	6.73	92.3	75-125	1.30	40	
Total Metals by ICP/MS EPA 6020B - Quality Control										
Batch B8F2221 - EPA 3020A										
Blank (B8F2221-BLK1)				Prepared: 06/22/18 Analyzed: 06/25/18						
Antimony	<5.0	5.0	ug/L							
Arsenic	<5.0	5.0	ug/L							
Barium	<5.0	5.0	ug/L							
Beryllium	<5.0	5.0	ug/L							
Cadmium	<5.0	5.0	ug/L							
Chromium	<5.0	5.0	ug/L							
Cobalt	<5.0	5.0	ug/L							
Copper	<5.0	5.0	ug/L							
Lead	<5.0	5.0	ug/L							
Molybdenum	<5.0	5.0	ug/L							
Nickel	<5.0	5.0	ug/L							
Selenium	<20	20	ug/L							
Silver	<5.0	5.0	ug/L							
Thallium	<5.0	5.0	ug/L							
Vanadium	<20	20	ug/L							
Zinc	<20	20	ug/L							
LCS (B8F2221-BS1)				Prepared: 06/22/18 Analyzed: 06/25/18						
Antimony	**50.5**	5.0	ug/L	50		101	80-120			
Arsenic	**49.7**	5.0	ug/L	50		99.3	80-120			
Barium	**50.3**	5.0	ug/L	50		101	80-120			
Beryllium	**45.5**	5.0	ug/L	50		91.0	80-120			
Cadmium	**49.7**	5.0	ug/L	50		99.4	80-120			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Total Metals by ICP/MS EPA 6020B - Quality Control										
Batch B8F2221 - EPA 3020A										
LCS (B8F2221-BS1) Continued				Prepared: 06/22/18 Analyzed: 06/25/18						
Chromium	**45.6**	5.0	ug/L	50		91.2	80-120			
Cobalt	**49.7**	5.0	ug/L	50		99.4	80-120			
Copper	**47.1**	5.0	ug/L	50		94.2	80-120			
Lead	**49.8**	5.0	ug/L	50		99.6	80-120			
Nickel	**50.5**	5.0	ug/L	50		101	80-120			
Selenium	**251**	20	ug/L	250		100	80-120			
Silver	**50.8**	5.0	ug/L	50		102	80-120			
Thallium	**49.6**	5.0	ug/L	50		99.1	80-120			
Vanadium	**60.0**	20	ug/L	50		120	80-120			
Zinc	**54.5**	20	ug/L	50		109	80-120			
LCS Dup (B8F2221-BSD1)				Prepared: 06/22/18 Analyzed: 06/25/18						
Antimony	**50.6**	5.0	ug/L	50		101	80-120	0.247	20	
Arsenic	**48.0**	5.0	ug/L	50		96.1	80-120	3.30	20	
Barium	**50.7**	5.0	ug/L	50		101	80-120	0.682	20	
Beryllium	**46.6**	5.0	ug/L	50		93.1	80-120	2.32	20	
Cadmium	**49.8**	5.0	ug/L	50		99.5	80-120	0.0503	20	
Chromium	**45.2**	5.0	ug/L	50		90.4	80-120	0.882	20	
Cobalt	**49.4**	5.0	ug/L	50		98.7	80-120	0.757	20	
Copper	**46.3**	5.0	ug/L	50		92.6	80-120	1.66	20	
Lead	**49.8**	5.0	ug/L	50		99.6	80-120	0.00	20	
Molybdenum	**50.2**	5.0	ug/L	50		100	80-120	0.892	20	
Nickel	**50.0**	5.0	ug/L	50		99.9	80-120	1.05	20	
Selenium	**243**	20	ug/L	250		97.2	80-120	3.04	20	
Silver	**48.0**	5.0	ug/L	50		96.1	80-120	5.47	20	
Thallium	**50.4**	5.0	ug/L	50		101	80-120	1.80	20	
Vanadium	**60.0**	20	ug/L	50		120	80-120	0.00	20	
Zinc	**48.2**	20	ug/L	50		96.4	80-120	12.2	20	
Duplicate (B8F2221-DUP1)				**Source: 8F20019-26** Prepared: 06/22/18 Analyzed: 06/25/18						
Antimony	**<5.0**	5.0	ug/L		<5.0				30	
Arsenic	**110**	5.0	ug/L		102			7.56	30	
Barium	**310**	5.0	ug/L		300			3.33	30	

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Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Total Metals by ICP/MS EPA 6020B - Quality Control										
Batch B8F2221 - EPA 3020A										
Duplicate (B8F2221-DUP1) Continued			**Source: 8F20019-26**			Prepared: 06/22/18		Analyzed: 06/25/18		
Beryllium	**47.5**	5.0	ug/L		<5.0				30	
Cadmium	**<5.0**	5.0	ug/L		<5.0				30	
Chromium	**21.9**	5.0	ug/L		26.2			18.0	30	
Cobalt	**6.15**	5.0	ug/L		5.95			3.31	30	
Copper	**17.0**	5.0	ug/L		17.1			0.587	30	
Lead	**11.4**	5.0	ug/L		11.0			4.02	30	
Molybdenum	**65.6**	5.0	ug/L		60.2			8.43	30	
Nickel	**56.4**	5.0	ug/L		48.5			15.1	30	
Selenium	**<20**	20	ug/L		<20				30	
Silver	**<5.0**	5.0	ug/L		<5.0				30	
Thallium	**<5.0**	5.0	ug/L		<5.0				30	
Vanadium	**32.3**	20	ug/L		34.7			7.09	30	
Zinc	**43.4**	20	ug/L		45.8			5.56	30	
Matrix Spike (B8F2221-MS1)			**Source: 8F20018-05**			Prepared: 06/22/18		Analyzed: 06/25/18		
Antimony	**52.4**	5.0	ug/L	50		105	75-125			
Arsenic	**54.3**	5.0	ug/L	50		109	75-125			
Barium	**200**	5.0	ug/L	50	49.7	301	75-125			QM-07
Beryllium	**38.0**	5.0	ug/L	50		76.0	75-125			
Cadmium	**49.2**	5.0	ug/L	50		98.3	75-125			
Chromium	**46.4**	5.0	ug/L	50		92.8	75-125			
Cobalt	**53.3**	5.0	ug/L	50		107	75-125			
Copper	**54.0**	5.0	ug/L	50	5.12	97.8	75-125			
Lead	**55.3**	5.0	ug/L	50		111	75-125			
Molybdenum	**59.3**	5.0	ug/L	50	11.6	95.4	75-125			
Nickel	**67.5**	5.0	ug/L	50	5.52	124	75-125			
Selenium	**340**	20	ug/L	250		136	75-125			QM-07
Silver	**47.0**	5.0	ug/L	50		93.9	75-125			
Thallium	**51.4**	5.0	ug/L	50		103	75-125			
Vanadium	**112**	20	ug/L	50	21.8	180	75-125			QM-07
Zinc	**74.8**	20	ug/L	50		150	75-125			QM-07
Matrix Spike Dup (B8F2221-MSD1)			**Source: 8F20018-05**			Prepared: 06/22/18		Analyzed: 06/25/18		



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Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Total Metals by ICP/MS EPA 6020B - Quality Control										
Batch B8F2221 - EPA 3020A										
Matrix Spike Dup (B8F2221-MSD1) Continued				**Source: 8F20018-05**		Prepared: 06/22/18	Analyzed: 06/25/18			
Antimony	**53.7**	5.0	ug/L	50		107	75-125	2.55	30	
Arsenic	**54.2**	5.0	ug/L	50		108	75-125	0.184	30	
Barium	**200**	5.0	ug/L	50	49.7	301	75-125	0.175	30	QM-07
Beryllium	**38.8**	5.0	ug/L	50		77.5	75-125	1.89	30	
Cadmium	**50.6**	5.0	ug/L	50		101	75-125	2.91	30	
Chromium	**47.4**	5.0	ug/L	50		94.8	75-125	2.08	30	
Cobalt	**53.8**	5.0	ug/L	50		108	75-125	0.980	30	
Copper	**52.0**	5.0	ug/L	50	5.12	93.6	75-125	3.96	30	
Lead	**56.5**	5.0	ug/L	50		113	75-125	2.24	30	
Molybdenum	**59.2**	5.0	ug/L	50	11.6	95.2	75-125	0.169	30	
Nickel	**67.6**	5.0	ug/L	50	5.52	124	75-125	0.111	30	
Selenium	**282**	20	ug/L	250		113	75-125	18.6	30	
Silver	**46.9**	5.0	ug/L	50		93.8	75-125	0.160	30	
Thallium	**52.7**	5.0	ug/L	50		105	75-125	2.45	30	
Vanadium	**115**	20	ug/L	50	21.8	186	75-125	2.89	30	QM-07
Zinc	**78.2**	20	ug/L	50		156	75-125	4.48	30	QM-07
Total Metals CAM 17 - Quality Control										
Batch B8F2220 - EPA 3050B										
Blank (B8F2220-BLK1)						Prepared: 06/22/18	Analyzed: 06/25/18			
Antimony	<10	10	mg/kg							
Arsenic	<0.50	0.50	mg/kg							
Barium	<10	10	mg/kg							
Beryllium	<1.0	1.0	mg/kg							
Cadmium	<1.0	1.0	mg/kg							
Chromium	<3.0	3.0	mg/kg							
Cobalt	<3.0	3.0	mg/kg							
Copper	<3.0	3.0	mg/kg							
Lead	<3.0	3.0	mg/kg							
Molybdenum	<5.0	5.0	mg/kg							
Nickel	<3.0	3.0	mg/kg							

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Total Metals CAM 17 - Quality Control										
Batch B8F2220 - EPA 3050B										
Blank (B8F2220-BLK1) Continued				Prepared: 06/22/18 Analyzed: 06/25/18						
Selenium	<0.50	0.50	mg/kg							
Silver	<1.0	1.0	mg/kg							
Thallium	<5.0	5.0	mg/kg							
Vanadium	<10	10	mg/kg							
Zinc	<3.0	3.0	mg/kg							
LCS (B8F2220-BS1)				Prepared: 06/22/18 Analyzed: 06/25/18						
Antimony	**54.5**	10	mg/kg	50		109	80-120			
Arsenic	**52.5**	0.50	mg/kg	50		105	80-120			
Barium	**52.4**	10	mg/kg	50		105	80-120			
Beryllium	**56.7**	1.0	mg/kg	50		113	80-120			
Cadmium	**57.1**	1.0	mg/kg	50		114	80-120			
Chromium	**53.7**	3.0	mg/kg	50		107	80-120			
Cobalt	**55.1**	3.0	mg/kg	50		110	80-120			
Copper	**51.5**	3.0	mg/kg	50		103	80-120			
Lead	**52.9**	3.0	mg/kg	50		106	80-120			
Molybdenum	**56.8**	5.0	mg/kg	50		114	80-120			
Nickel	**55.3**	3.0	mg/kg	50		111	80-120			
Selenium	**55.0**	0.50	mg/kg	50		110	80-120			
Silver	**51.6**	1.0	mg/kg	50		103	80-120			
Thallium	**55.7**	5.0	mg/kg	50		111	80-120			
Vanadium	**54.9**	10	mg/kg	50		110	80-120			
Zinc	**58.0**	3.0	mg/kg	50		116	80-120			
LCS Dup (B8F2220-BSD1)				Prepared: 06/22/18 Analyzed: 06/25/18						
Antimony	**51.0**	10	mg/kg	50		102	80-120	6.62	20	
Arsenic	**49.3**	0.50	mg/kg	50		98.6	80-120	6.25	20	
Barium	**49.5**	10	mg/kg	50		99.1	80-120	5.71	20	
Beryllium	**53.7**	1.0	mg/kg	50		107	80-120	5.45	20	
Cadmium	**53.9**	1.0	mg/kg	50		108	80-120	5.71	20	
Chromium	**50.4**	3.0	mg/kg	50		101	80-120	6.22	20	
Cobalt	**51.9**	3.0	mg/kg	50		104	80-120	6.04	20	
Copper	**48.0**	3.0	mg/kg	50		96.1	80-120	6.90	20	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Total Metals CAM 17 - Quality Control										
Batch B8F2220 - EPA 3050B										
LCS Dup (B8F2220-BSD1) Continued				Prepared: 06/22/18 Analyzed: 06/25/18						
Lead	**50.2**	3.0	mg/kg	50		100	80-120	5.18	20	
Molybdenum	**53.3**	5.0	mg/kg	50		107	80-120	6.34	20	
Nickel	**52.2**	3.0	mg/kg	50		104	80-120	5.77	20	
Selenium	**51.3**	0.50	mg/kg	50		103	80-120	6.94	20	
Silver	**48.9**	1.0	mg/kg	50		97.8	80-120	5.49	20	
Thallium	**51.9**	5.0	mg/kg	50		104	80-120	7.19	20	
Vanadium	**51.5**	10	mg/kg	50		103	80-120	6.30	20	
Zinc	**55.5**	3.0	mg/kg	50		111	80-120	4.42	20	
Duplicate (B8F2220-DUP1)			**Source: 8F21005-01**	Prepared: 06/22/18 Analyzed: 06/25/18						
Antimony	**<10**	10	mg/kg						40	
Arsenic	**2.48**	0.50	mg/kg		2.75			10.3	40	
Barium	**47.4**	10	mg/kg		42.0			12.2	40	
Beryllium	**<1.0**	1.0	mg/kg						40	
Cadmium	**<1.0**	1.0	mg/kg						40	
Chromium	**12.3**	3.0	mg/kg		11.8			3.65	40	
Cobalt	**3.63**	3.0	mg/kg		3.58			1.39	40	
Copper	**<3.0**	3.0	mg/kg		3.13				40	
Lead	**47.2**	3.0	mg/kg		27.8			51.6	40	AA-C1
Molybdenum	**<5.0**	5.0	mg/kg						40	
Nickel	**10.0**	3.0	mg/kg		10.3			3.15	40	
Selenium	**<0.50**	0.50	mg/kg						40	
Silver	**<1.0**	1.0	mg/kg						40	
Thallium	**<5.0**	5.0	mg/kg						40	
Vanadium	**27.9**	10	mg/kg		26.4			5.46	40	
Zinc	**60.5**	3.0	mg/kg		56.5			6.80	40	
Matrix Spike (B8F2220-MS1)			**Source: 8F20019-01**	Prepared: 06/22/18 Analyzed: 06/25/18						
Antimony	**25.9**	10	mg/kg	50	<10	51.7	75-125			QM-07
Arsenic	**47.5**	0.50	mg/kg	50	2.99	89.1	75-125			
Barium	**112**	10	mg/kg	50	53.8	116	75-125			
Beryllium	**45.5**	1.0	mg/kg	50	<1.0	91.0	75-125			
Cadmium	**39.4**	1.0	mg/kg	50	<1.0	78.8	75-125			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Total Metals CAM 17 - Quality Control										
Batch B8F2220 - EPA 3050B										
Matrix Spike (B8F2220-MS1) Continued Source: 8F20019-01 Prepared: 06/22/18 Analyzed: 06/25/18										
Chromium	**60.4**	3.0	mg/kg	50	12.7	95.3	75-125			
Cobalt	**48.3**	3.0	mg/kg	50	3.18	90.2	75-125			
Copper	**82.7**	3.0	mg/kg	50	10.3	145	75-125			QM-07
Lead	**79.6**	3.0	mg/kg	50	34.2	90.7	75-125			
Molybdenum	**49.5**	5.0	mg/kg	50	<5.0	99.0	75-125			
Nickel	**53.7**	3.0	mg/kg	50	9.18	89.0	75-125			
Selenium	**39.6**	0.50	mg/kg	50	<0.50	79.2	75-125			
Silver	**50.0**	1.0	mg/kg	50	<1.0	100	75-125			
Thallium	**38.3**	5.0	mg/kg	50	<5.0	76.5	60-140			
Vanadium	**78.2**	10	mg/kg	50	25.0	106	75-125			
Zinc	**127**	3.0	mg/kg	50	74.1	105	75-125			
Matrix Spike Dup (B8F2220-MSD1) **Source: 8F20019-01** Prepared: 06/22/18 Analyzed: 06/25/18										
Antimony	**26.4**	10	mg/kg	50	<10	52.9	75-125	2.18	40	QM-07
Arsenic	**47.9**	0.50	mg/kg	50	2.99	89.9	75-125	0.880	40	
Barium	**106**	10	mg/kg	50	53.8	104	75-125	5.52	40	
Beryllium	**46.1**	1.0	mg/kg	50	<1.0	92.2	75-125	1.31	40	
Cadmium	**40.1**	1.0	mg/kg	50	<1.0	80.2	75-125	1.76	40	
Chromium	**60.6**	3.0	mg/kg	50	12.7	95.7	75-125	0.347	40	
Cobalt	**48.6**	3.0	mg/kg	50	3.18	90.8	75-125	0.702	40	
Copper	**65.7**	3.0	mg/kg	50	10.3	111	75-125	22.9	40	
Lead	**81.6**	3.0	mg/kg	50	34.2	94.6	75-125	2.47	40	
Molybdenum	**49.8**	5.0	mg/kg	50	<5.0	99.7	75-125	0.725	40	
Nickel	**53.6**	3.0	mg/kg	50	9.18	88.9	75-125	0.0373	40	
Selenium	**42.3**	0.50	mg/kg	50	<0.50	84.6	75-125	6.57	40	
Silver	**51.4**	1.0	mg/kg	50	<1.0	103	75-125	2.78	40	
Thallium	**36.8**	5.0	mg/kg	50	<5.0	73.6	60-140	3.92	40	
Vanadium	**75.8**	10	mg/kg	50	25.0	102	75-125	3.18	40	
Zinc	**117**	3.0	mg/kg	50	74.1	86.3	75-125	7.70	40	
Total Metals CAM 17 - Quality Control										
Batch B8F2125 - EPA 7470A Prep										
Blank (B8F2125-BLK1) Prepared: 06/21/18 Analyzed: 06/22/18										



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94898
Date Received: 06/20/18
Date Reported: 06/29/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Total Metals CAM 17 - Quality Control										
Batch B8F2125 - EPA 7470A Prep										
Blank (B8F2125-BLK1) Continued				Prepared: 06/21/18 Analyzed: 06/22/18						
Mercury	<0.00050	0.00050	mg/L							
LCS (B8F2125-BS1)				Prepared: 06/21/18 Analyzed: 06/22/18						
Mercury	**0.0100**	0.00050	mg/L	0.010		100	80-120			
LCS Dup (B8F2125-BSD1)				Prepared: 06/21/18 Analyzed: 06/22/18						
Mercury	**0.0100**	0.00050	mg/L	0.010		100	80-120	0.150	20	
Duplicate (B8F2125-DUP1)			**Source: 8F20018-01**	Prepared: 06/21/18 Analyzed: 06/22/18						
Mercury	**<0.00050**	0.00050	mg/L						25	
Matrix Spike (B8F2125-MS1)			**Source: 8F20018-07**	Prepared: 06/21/18 Analyzed: 06/22/18						
Mercury	**0.00957**	0.00050	mg/L	0.010		95.7	75-125			
Matrix Spike Dup (B8F2125-MSD1)			**Source: 8F20018-07**	Prepared: 06/21/18 Analyzed: 06/22/18						
Mercury	**0.00988**	0.00050	mg/L	0.010		98.8	75-125	3.24	20	
Batch B8F2534 - EPA 7471A Prep										
Blank (B8F2534-BLK1)				Prepared & Analyzed: 06/25/18						
Mercury	<0.020	0.020	mg/kg							
LCS (B8F2534-BS1)				Prepared & Analyzed: 06/25/18						
Mercury	**0.518**	0.020	mg/kg	0.50		104	80-120			
LCS Dup (B8F2534-BSD1)				Prepared & Analyzed: 06/25/18						
Mercury	**0.526**	0.020	mg/kg	0.50		105	80-120	1.34	25	
Duplicate (B8F2534-DUP1)			**Source: 8F21005-01**	Prepared & Analyzed: 06/25/18						
Mercury	**0.0680**	0.020	mg/kg		0.0790			15.0	25	
Matrix Spike (B8F2534-MS1)			**Source: 8F20019-01**	Prepared & Analyzed: 06/25/18						
Mercury	**0.728**	0.020	mg/kg	0.50	0.248	96.0	75-125			
Matrix Spike Dup (B8F2534-MSD1)			**Source: 8F20019-01**	Prepared & Analyzed: 06/25/18						
Mercury	**0.757**	0.020	mg/kg	0.50	0.248	102	75-125	3.91	25	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A94898
Project No:	NA	**Date Received:**	06/20/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	06/29/18

Special Notes

[1] = * : Subcontracted to a DOHS State-Certified Laboratory

[2] = ** : Exceeds upper control limit.

[3] = *** : Exceeds lower control limit.

[4] = **AA-C1** : Exceeds RPD limit.

[5] = **QM-07** : The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.

[6] = **S-04** : The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.

[7] = **S-GC** : Surrogate recovery outside of control limits. The data was accepted based on valid recovery of the remaining surrogate(s).

Viorel Vasile
Operations Manager

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Ordered By

American Analytics
9765 Eton Avenue
Chatsworth, CA 91311-4306

Number of Pages	**3**
Date Received	**06/22/2018**
Date Reported	**06/25/2018**

Telephone: (818)998-5547
Attention: Viorel Vasile

Job Number	Order Date	Client
93058	06/22/2018	AA

Project ID: A94898/8F20019
Project Name: PO# SUB03582-A94898

Enclosed please find results of analyses of 2 soil samples which were analyzed as specified on the attached chain of custody. If there are any questions, please do not hesitate to call.

Checked By: _____ Approved By: C. Razmara

Cyrus Razmara, Ph.D.
Laboratory Director

AETL

AMERICAN ANALYTICS CHAIN-OF-CUSTODY RECORD

9765 ETON AVE., CHATSWORTH, CA 91311
Tel: 818-998-5547 FAX: 818-998-7258

93058

A.A. COC No.: 70051689

Page 1 of 1

Client: AMERICAN ANALYTICS	Project Name / No.: A94898/8F20019	Sampler's Name:	
Project Manager: Viorel Vasile	Site Address:	Sampler's Signature:	
Phone:	City:	P.O. No.: SUB03582-A94898	
Fax:	State & Zip:	Quote No.:	

TAT Turnaround Codes **

(1) = Same Day Rush
(2) = 24 Hour Rush
(3) = 48 Hour Rush
(4) = 72 Hour Rush
(5) = 5 Day Rush
X = 10 Working Days (Standard TAT)

ANALYSIS REQUESTED (Test Name)

Please enter the TAT Turnaround Codes ** below

Client I.D.	A.A. I.D.	Date	Time	Sample Matrix	No. of Cont	Hexavalent Cr										Special Instructions
8F20019-08	93058-01	6/20/18	1100	SOIL	1	X										by EPA 8151A
-20	93058.02	-"-	1415	-"-	1	X										48-Hr Rush

For Laboratory Use	Relinquished by	Date	Time	Received by
	Relinquished by	06/22/18	0950	Received by: Jean Claude
A.A. Project No.:	Relinquished by	Date	Time	Received by

Note: By relinquishing samples to American Analytics, client agrees to pay for the services requested on this chain of custody form and any additional client-requested analyses performed on this project. Payment for services is due within 30 days from the date of invoice. Sample(s) will be disposed of after 45 days following the submittal of the sample(s) to American Analytics.

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COOLER RECEIPT FORM

Client Name: American Analytical
Project Name:
AETL Job Number: 93058
Date Received: 06/22/18 Received by: Jean Claude
Carrier: ☐ AETL Courier ☒ Client ☐ GSO ☐ FedEx ☐ UPS
☐ Others:

Samples were received in: ☒ Cooler (1) ☐ Other (Specify):
Inside temperature of shipping container No 1: 3.3°C, No 2: _____, No 3: _____
Type of sample containers: ☐ VOA, ☐ Glass bottles, ☒ Wide mouth jars, ☐ HDPE bottles, ☐ Metal sleeves, ☐ Others (Specify):
How are samples preserved: ☐ None, ☐ Ice, ☒ Blue Ice, ☐ Dry Ice
X None, _ HNO_3, _ NaOH, _ ZnOAc, _ HCl, _ $Na_2S_2O_3$, _ MeOH
_ Other (Specify):

	Yes	No, explain below	Name, if client was notified.
1. Are the COCs Correct?	X		
2. Are the Sample labels legible?	X		
3. Do samples match the COC?	X		
4. Are the required analyses clear?	X		
5. Is there enough samples for required analysis?	X		
6. Are samples sealed with evidence tape?	NA		
7. Are sample containers in good condition?	X		
8. Are samples preserved?	X		
9. Are samples preserved properly for the intended analysis?	X		
10. Are the VOAs free of headspace?	NA		
11. Are the jars free of headspace?	↓		

Explain all "No" answers for above questions:

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Ordered By

American Analytics
9765 Eton Avenue
Chatsworth, CA 91311-4306

Project ID: A94898/8F20019
Date Received 06/22/2018
Date Reported 06/25/2018

Telephone: (818)998-5547
Attention: Viorel Vasile

Job Number	Order Date	Client
93058	06/22/2018	AA

CERTIFICATE OF ANALYSIS
CASE NARRATIVE

AETL received 2 samples with the following specification on 06/22/2018.

Lab ID	Sample ID	Sample Date	Matrix	Quantity Of Containers
93058.01	8F20019-08	06/20/2018	Soil	1
93058.02	8F20019-20	06/20/2018	Soil	1

Method ^ Submethod	Req Date	Priority	TAT	Units
(8151A)	06/25/2018	3	Rush	ug/Kg

The samples were analyzed as specified on the enclosed chain of custody.
No analytical non-conformances were encountered.

Unless otherwise noted, all results of soil and solid samples are based on wet weight.

Checked By: _____ Approved By: C. Razmara

Cyrus Razmara, Ph.D.
Laboratory Director

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ANALYTICAL RESULTS

Ordered By

American Analytics
9765 Eton Avenue
Chatsworth, CA 91311-4306

Telephone: (818)998-5547
Attn: Viorel Vasile
Page: **2**

Project ID: A94898/8F20019
Project Name: PO# SUB03582-A94898

AETL Job Number	Submitted	Client
93058	06/22/2018	AA

Method: (8151A), Chlorinated Herbicides by GC/ECD

QC Batch No: 062518MB1

Our Lab I.D.			Method Blank	**93058.01**	**93058.02**		
Client Sample I.D.				8F20019-08	8F20019-20		
Date Sampled				**06/20/2018**	**06/20/2018**		
Date Prepared			**06/25/2018**	**06/25/2018**	**06/25/2018**		
Preparation Method			**3550B**	**3550B**	**3550B**		
Date Analyzed			**06/25/2018**	**06/25/2018**	**06/25/2018**		
Matrix			Soil	Soil	Soil		
Units			ug/Kg	ug/Kg	ug/Kg		
Dilution Factor			1	1	1		
Analytes	**MDL**	**PQL**	**Results**	**Results**	**Results**		
Acifluorfen	**20**	**20**	**ND**	**ND**	**ND**		
Bentazon	**10**	**10**	**ND**	**ND**	**ND**		
Chloramben	**10**	**10**	**ND**	**ND**	**ND**		
2,4-D	**10**	**10**	**ND**	**ND**	**ND**		
Dalapon	**20**	**20**	**ND**	**ND**	**ND**		
2,4-DB	**10**	**10**	**ND**	**ND**	**ND**		
DCPA diacid	**20**	**20**	**ND**	**ND**	**ND**		
Dicamba	**10**	**10**	**ND**	**ND**	**ND**		
3,5-Dichlorobenzoic acid	**10**	**10**	**ND**	**ND**	**ND**		
Dichloroprop	**10**	**10**	**ND**	**ND**	**ND**		
Dinoseb (DNBP, 2-sec-Butyl-4, 6-dinitrophenol)	**20**	**20**	**ND**	**ND**	**ND**		
MCPA	**2000**	**2000**	**ND**	**ND**	**ND**		
MCPP	**2000**	**2000**	**ND**	**ND**	**ND**		
4-Nitrophenol	**10**	**10**	**ND**	**ND**	**ND**		
Pentachlorophenol (PCP)	**10**	**10**	**ND**	**ND**	**ND**		
Picloram	**10**	**10**	**ND**	**ND**	**ND**		
2,4,5-T (2,4,5-Trichlorophenoxyacetic acid)	**10**	**10**	**ND**	**ND**	**ND**		
2,4,5-TP	**10**	**10**	**ND**	**ND**	**ND**		
Our Lab I.D.			Method Blank	**93058.01**	**93058.02**		
Surrogates	**%Rec.Limit**		**% Rec.**	**% Rec.**	**% Rec.**		
DCAA	**40-150**		**47.8**	**49.0**	**71.0**		

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QUALITY CONTROL RESULTS

Ordered By

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Telephone: (818)998-5547
Attn: Viorel Vasile
Page: **3**

Project ID: A94898/8F20019
Project Name: PO# SUB03582-A94898

AETL Job Number	Submitted	Client
93058	06/22/2018	AA

Method: (8151A), Chlorinated Herbicides by GC/ECD

QC Batch No: 062518MB1; Dup or Spiked Sample: 93022.01; LCS: Clean Sand; QC Prepared: 06/25/2018; QC Analyzed: 06/25/2018; Units: ug/Kg

Analytes	Sample Result	MS Concen	MS Recov	MS % REC	MS DUP Concen	MS DUP Recov	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit
2,4-D	0.00	25.0	12.8	51.2	25.0	11.0	44.0	15.1	40-140	<40
Dinoseb (DNBP, 2-sec-Butyl-4, 6-dinitrophenol)	0.00	25.0	19.2	76.8	25.0	16.4	65.6	15.7	40-140	<40
2,4,5-T (2,4,5-Trichlorophenoxyacetic acid)	0.00	25.0	10.2	40.8	25.0	13.0	52.0	24.1	40-140	<40
Surrogates										
DCAA	0.00	50.0	30.1	60.2	50.0	21.5	43.0	33.3	40-140	<40

QC Batch No: 062518MB1; Dup or Spiked Sample: 93022.01; LCS: Clean Sand; QC Prepared: 06/25/2018; QC Analyzed: 06/25/2018; Units: ug/Kg

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS DUP Concen	LCS DUP Recov	LCS DUP % REC	LCS RPD % REC	LCS/LCSD % Limit	LCS RPD % Limit	
2,4-D	25.0	24.4	97.6	25.0	18.2	72.8	29.1	50-140	<40	
Dinoseb (DNBP, 2-sec-Butyl-4, 6-dinitrophenol)	25.0	19.4	77.6	25.0	19.9	79.6	2.5	50-140	<40	
2,4,5-T (2,4,5-Trichlorophenoxyacetic acid)	25.0	19.4	77.6	25.0	19.3	77.2	<1	50-140	<40	
LCS										
Dalapon	25.0	32.5	130	25.0	32.0	128	1.6	50-140	<40	
2,4-DB	25.0	23.5	94.0	25.0	15.7	62.8	39.8	50-140	<40	
Dicamba	25.0	20.5	82.0	25.0	21.8	87.2	6.1	50-140	<40	
Dichloroprop	25.0	14.6	58.4	25.0	20.3	81.2	32.7	50-140	<40	
MCPA	2,500	2,190	87.4	2,500	2,260	90.4	3.4	50-140	<40	
MCPP	2,500	2,270	90.7	2,500	2,350	93.9	3.5	50-140	<40	
2,4,5-TP	25.0	20.9	83.6	25.0	21.7	86.8	3.8	50-140	<40	
Surrogates										
DCAA	50.0	37.9	75.8	50.0	34.9	69.8	8.2	50-140	<40	

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Data Qualifiers and Descriptors

Data Qualifier:

#:	Recovery is not within acceptable control limits.
*:	In the QC section, sample results have been taken directly from the ICP reading. No preparation factor has been applied.
B:	Analyte was present in the Method Blank.
D:	Result is from a diluted analysis.
E:	Result is beyond calibration limits and is estimated.
H:	Analysis was performed over the allowed holding time due to circumstances which were beyond laboratory control.
J:	Analyte was detected . However, the analyte concentration is an estimated value, which is between the Method Detection Limit (MDL) and the Practical Quantitation Limit (PQL).
M:	Matrix spike recovery is outside control limits due to matrix interference. Laboratory Control Sample recovery was acceptable.
MCL:	Maximum Contaminant Level
NS:	No Standard Available
S6:	Surrogate recovery is outside control limits due to matrix interference.
S8:	The analysis of the sample required a dilution such that the surrogate concentration was diluted below the method acceptance criteria.
X:	Results represent LCS and LCSD data.

Definition:

%Limi:	Percent acceptable limits.
%REC:	Percent recovery.
Con.L:	Acceptable Control Limits
Conce:	Added concentration to the sample.
LCS:	Laboratory Control Sample
MDL:	Method Detection Limit is a statistically derived number which is specific for each instrument, each method, and each compound. It indicates a distinctively detectable quantity with 99% probability.

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Data Qualifiers and Descriptors

MS:	Matrix Spike
MS DU:	Matrix Spike Duplicate
ND:	Analyte was not detected in the sample at or above MDL.
PQL:	Practical Quantitation Limit or ML (Minimum Level as per RWQCB) is the minimum concentration that can be quantified with more than 99% confidence. Taking into account all aspects of the entire analytical instrumentation and practice.
Recov:	Recovered concentration in the sample.
RPD:	Relative Percent Difference

AMERICAN ANALYTICS CHAIN-OF-CUSTODY RECORD

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A.A. COC No.: 1583
70051779
Page 1 of 2

Client: AECOM	Project Name / No.: 128 Hurricane St., Marina Del Ray 60558849	Sampler's Name: A. Vigna
Project Manager: Kalena Johnson	Site Address:	Sampler's Signature:
Phone:	City:	P.O. No.:
Fax:	State & Zip:	Quote No.:

TAT Turnaround Codes **

(1) = Same Day Rush
(2) = 24 Hour Rush
(3) = 48 Hour Rush
(4) = 72 Hour Rush
(5) = 5 Day Rush
X = 10 Working Days (Standard TAT)

* → (3)

ANALYSIS REQUESTED (Test Name)

Please enter the TAT Turnaround Codes ** below

Client I.D.	A.A. I.D.	Date	Time	Sample Matrix	No. of Cont	TPH (418.1)	TPH cc (8015m)	Metals (6010)	VOCs (8260B 5035)	OCPs/PCBs (8081A)	Herbicides (8151A)	SVOCs (8270C)	OCPs	Lab	Hold
SB-4-0.5	8F20019-01	6/20/18	0900	Soil	3	X	X	X							
SB-4-1	-02		0905		4	X	X		X						
SB-4-2.5	-03		0912		6										X
SB-4-3.5	-04		0918		5	X	X	X	X			X			
SB-4-5	-05		0930		5		X	X	X			X			
SB-4-10	-06		1002		5		X	X	X						
SB-4-15	-07		1020		4		X		X						
SB-6-6.5	-08		1100		3		X	X		X	X				
SB-6-1	-09		1105		4	X	X		X						
SB-6-2.5	-10		1120		3		X	X							
SB-6-5	-11		1130		6		X		X						
SB-5-0.5	-12		1140		1			X							
SB-5-1	-13		1150		4			X	X						
SB-5-2.5	-14		1200		1			X							
SB-5-5	-15		1225		5		X	X	X						

Special Instructions
* : 48-hr Rush
6/22/18 48-hr Rush
Cl reported by Kena 6/24/18

For Laboratory Use

REVIEWED
Date 8/21/18 Time 0630
TAT N Days Sign:

A.A. Project No.: A948098 / 8F20019

	Date	Time	
Relinquished by	6/20/18	1615	Received by
Relinquished by	6-20-18	622	Received by
Relinquished by	Date	Time	Received by

Note: By relinquishing samples to American Analytics, client agrees to pay for the services requested on this chain of custody form and any additional client-requested analyses performed on this project. Payment for services is due within 30 days from the date of invoice. Sample(s) will be disposed of after 45 days following the submittal of the sample(s) to American Analytics.

AMERICAN ANALYTICS CHAIN-OF-CUSTODY RECORD

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A.A. COC No.: 15832
70051780
Page 2 of 2

Client: AECOM | Project Name / No.: 128 Hurricane St, Marina Del Rey 60553849 | Sampler's Name: A. Vigna
Project Manager: Kaleena Johnson | Site Address: | Sampler's Signature:
Phone: | City: | P.O. No.:
Fax: | State & Zip: | Quote No.:

TAT Turnaround Codes **

(1) = Same Day Rush
(2) = 24 Hour Rush
(3) = 48 Hour Rush
(4) = 72 Hour Rush
(5) = 5 Day Rush
X = 10 Working Days (Standard TAT)

ANALYSIS REQUESTED (Test Name)

Please enter the TAT Turnaround Codes ** below

Client I.D.	A.A. I.D.	Date	Time	Sample Matrix	No. of Cont	TPH (HFT)	TPHcc (8015M)	Metals (6010B)	VOCs (8260B 5035)	oPCBs/PCBs (8082A)	Herbicides (8151A)	Metals (6020A 7000)	VOCs (8260B)	OCPs	Lead	Special Instructions
SB-3-0.5	8F20019-16	6/20/18	1330	Soil	1			X						⊙		
SB-3-1	-17		1340		4	X	⊗		X							
SB-3-2.5	-18		1350		1		⊙	X								
SB-3-5	-19		1400		5		X		X						⊙	
SB-1-0.5	-20		1415		3		X	X		X	X					
SB-1-1	-21		1430		4	X	⊗		⊗							TPHcc and VOCs
SB-1-2.5	-22		1445		3		X	X								
SB-2-0.5	-23		1455		2		X	X								
SB-2-1	-24	↓	1500	↓	4	X	⊗		X							
TB-062018	-25	6/20/18	0800	Water								X				
SB-4	-26	6/20/18	1520	Water	5		X					X	X			
SB-1-1DUP	-27	↓	1500	Soil	4	X	⊗		X							
SB-3-5DUP	-28	↓	1400	Soil	5		X		X							

For Laboratory Use

REVIEWED
Date 8/21/18 Time 0630
TAT N Days Sign:

A.A. Project No.: A94898 / 8F20019

	Relinquished by	Date	Time	Received by
1		6/20/18	1615	
2		6-20-18	622	
3				

Note: By relinquishing samples to American Analytics, client agrees to pay for the services requested on this chain of custody form and any additional client-requested analyses performed on this project. Payment for services is due within 30 days from the date of invoice. Sample(s) will be disposed of after 45 days following the submittal of the sample(s) to American Analytics.

AMERICAN ANALYTICS

9765 Eton Avenue
Chatsworth
California 91311
Tel: (818) 998-5547
Fax: (818) 998-7258

June 26, 2018

Kaleena Johnson

AECOM (LA)

300 S. Grand Ave., Suite 800

Los Angeles, CA 90017

Re : 128 Hurricane - Soil & GW

A94899 / 8F21005

Enclosed is an analytical report for the above-referenced project. The samples included in this report were received on 06/21/18 14:03 and analyzed in accordance with the attached chain-of-custody.

Unless otherwise noted, all analytical testing was accomplished in accordance with the guidelines established in our Quality Assurance Program Manual, applicable standard operating procedures, and other related documentation. The results in this analytical report are limited to the samples tested and any reproduction thereof must be made in its entirety.

If you have any questions regarding this report or require additional information please call me at American Analytics.

Sincerely,



Viorel Vasile

Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94899
Date Received: 06/21/18
Date Reported: 06/26/18

Sample ID	Laboratory ID	Matrix	TAT	Date Sampled	Date Received
8260B+OXYGENATES					
EB-062018	8F21005-06	Water	2	06/20/18 16:30	06/21/18 14:03
CAM Metals Less Hg 6000/7000					
TP-1-1.5	8F21005-01	Soil	2	06/21/18 09:10	06/21/18 14:03
TP-1-2.5	8F21005-02	Soil	2	06/21/18 09:20	06/21/18 14:03
TP-2-0.5	8F21005-03	Soil	2	06/21/18 10:10	06/21/18 14:03
TP-2-2.5	8F21005-04	Soil	2	06/21/18 10:20	06/21/18 14:03
TP-2-2.5 DUP	8F21005-05	Soil	2	06/21/18 10:20	06/21/18 14:03
Carbon Chain Characterization 8015M					
TP-1-1.5	8F21005-01	Soil	2	06/21/18 09:10	06/21/18 14:03
TP-1-2.5	8F21005-02	Soil	2	06/21/18 09:20	06/21/18 14:03
TP-2-0.5	8F21005-03	Soil	2	06/21/18 10:10	06/21/18 14:03
TP-2-2.5	8F21005-04	Soil	2	06/21/18 10:20	06/21/18 14:03
TP-2-2.5 DUP	8F21005-05	Soil	2	06/21/18 10:20	06/21/18 14:03
EB-062018	8F21005-06	Water	2	06/20/18 16:30	06/21/18 14:03
Mercury Total EPA 7470A/7471A					
TP-1-1.5	8F21005-01	Soil	2	06/21/18 09:10	06/21/18 14:03
TP-1-2.5	8F21005-02	Soil	2	06/21/18 09:20	06/21/18 14:03

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94899
Date Received: 06/21/18
Date Reported: 06/26/18

Sample ID	Laboratory ID	Matrix	TAT	Date Sampled	Date Received
TP-2-0.5	8F21005-03	Soil	2	06/21/18 10:10	06/21/18 14:03
TP-2-2.5	8F21005-04	Soil	2	06/21/18 10:20	06/21/18 14:03
TP-2-2.5 DUP	8F21005-05	Soil	2	06/21/18 10:20	06/21/18 14:03
EB-062018	8F21005-06	Water	2	06/20/18 16:30	06/21/18 14:03
Metals Total 6020B					
EB-062018	8F21005-06	Water	2	06/20/18 16:30	06/21/18 14:03

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Carbon Chain by GC/FID

AA Project No: A94899
Date Received: 06/21/18
Date Reported: 06/26/18
Units: mg/kg

Date Sampled:	06/21/18	06/21/18	06/21/18	06/21/18	
Date Prepared:	06/25/18	06/25/18	06/25/18	06/25/18	
Date Analyzed:	06/25/18	06/25/18	06/25/18	06/25/18	
AA ID No:	8F21005-01	8F21005-02	8F21005-03	8F21005-04	
Client ID No:	TP-1-1.5	TP-1-2.5	TP-2-0.5	TP-2-2.5	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	10	5	5	MRL
Carbon Chain Characterization 8015M (EPA 8015M)					
C6-C8	<1.0	<10	<5.0	<5.0	1.0
C8-C10	<1.0	<10	<5.0	<5.0	1.0
C10-C12	<1.0	<10	<5.0	<5.0	1.0
C12-C14	<1.0	<10	<5.0	<5.0	1.0
C14-C16	<1.0	**21**	<5.0	<5.0	1.0
C16-C18	<1.0	**99**	<5.0	<5.0	1.0
C18-C20	**2.7**	**160**	<5.0	<5.0	1.0
C20-C22	**5.9**	**230**	<5.0	<5.0	1.0
C22-C24	**12**	**360**	<5.0	<5.0	1.0
C24-C26	**4.1**	**420**	<5.0	<5.0	1.0
C26-C28	**34**	**590**	<5.0	<5.0	1.0
C28-C32	**75**	**1400**	<5.0	**7.9**	1.0
C32-C34	**21**	**510**	<5.0	<5.0	1.0
C34-C36	**22**	**310**	<5.0	<5.0	1.0
C36-C40	**33**	**520**	<5.0	<5.0	1.0
C40-C44	**29**	**350**	<5.0	<5.0	1.0
TPH (C6-C44)	**240**	**5000**	<50	<50	10
Gasoline Range Organics (C6-C10)	<5.0	<50	<25	<25	5.0
Diesel Range Organics (C10-C23)	**14**	**690**	<25	<25	5.0
Oil Range Organics (C23-C44)	**220**	**4300**	<25	<25	5.0
Surrogates					**%REC Limits**
o-Terphenyl	90%	65%	85%	92%	50-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A94899
Project No:	NA	**Date Received:**	06/21/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	06/26/18
Method:	Carbon Chain by GC/FID	**Units:**	mg/kg

Date Sampled:	06/21/18	
Date Prepared:	06/25/18	
Date Analyzed:	06/25/18	
AA ID No:	8F21005-05	
Client ID No:	TP-2-2.5 DUP	
Matrix:	Soil	
Dilution Factor:	5	MRL

Carbon Chain Characterization 8015M (EPA 8015M)

C6-C8	<5.0	1.0
C8-C10	<5.0	1.0
C10-C12	<5.0	1.0
C12-C14	<5.0	1.0
C14-C16	<5.0	1.0
C16-C18	<5.0	1.0
C18-C20	<5.0	1.0
C20-C22	<5.0	1.0
C22-C24	<5.0	1.0
C24-C26	<5.0	1.0
C26-C28	<5.0	1.0
C28-C32	<5.0	1.0
C32-C34	<5.0	1.0
C34-C36	<5.0	1.0
C36-C40	<5.0	1.0
C40-C44	<5.0	1.0
TPH (C6-C44)	<50	10
Gasoline Range Organics (C6-C10)	<25	5.0
Diesel Range Organics (C10-C23)	<25	5.0
Oil Range Organics (C23-C44)	<25	5.0

Surrogates		**%REC Limits**
o-Terphenyl	88%	50-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A94899
Project No:	NA	**Date Received:**	06/21/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	06/26/18
Method:	Carbon Chain by GC/FID	**Units:**	mg/L

Date Sampled:	06/20/18	
Date Prepared:	06/25/18	
Date Analyzed:	06/25/18	
AA ID No:	8F21005-06	
Client ID No:	EB-062018	
Matrix:	Water	
Dilution Factor:	1	MRL

Carbon Chain Characterization 8015M (EPA 8015M)

C6-C8	<0.010	0.010
C8-C10	<0.010	0.010
C10-C12	<0.010	0.010
C12-C14	<0.010	0.010
C14-C16	<0.010	0.010
C16-C18	<0.010	0.010
C18-C20	<0.010	0.010
C20-C22	<0.010	0.010
C22-C24	<0.010	0.010
C24-C26	<0.010	0.010
C26-C28	<0.010	0.010
C28-C32	<0.010	0.010
C32-C34	<0.010	0.010
C34-C36	<0.010	0.010
C36-C40	<0.010	0.010
C40-C44	<0.010	0.010
TPH (C6-C44)	<0.10	0.10
Gasoline Range Organics (C6-C10)	<0.10	0.10
Diesel Range Organics (C10-C23)	<0.10	0.10
Oil Range Organics (C23-C44)	<0.10	0.10

Surrogates		**%REC Limits**
o-Terphenyl	82%	50-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Total Metals CAM 17

AA Project No: A94899
Date Received: 06/21/18
Date Reported: 06/26/18
Units: mg/kg

Date Sampled:	06/21/18	06/21/18	06/21/18	06/21/18	
Date Prepared:	06/25/18	06/25/18	06/25/18	06/25/18	
Date Analyzed:	06/25/18	06/25/18	06/25/18	06/25/18	
AA ID No:	8F21005-01	8F21005-02	8F21005-03	8F21005-04	
Client ID No:	TP-1-1.5	TP-1-2.5	TP-2-0.5	TP-2-2.5	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
Mercury Total EPA 7470A/7471A (EPA 7471A)					
Mercury	**0.079**	**0.078**	**0.36**	**0.027**	0.020

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A94899
Project No:	NA	**Date Received:**	06/21/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	06/26/18
Method:	Total Metals CAM 17	**Units:**	mg/kg

Date Sampled:	06/21/18	
Date Prepared:	06/25/18	
Date Analyzed:	06/25/18	
AA ID No:	8F21005-05	
Client ID No:	TP-2-2.5 DUP	
Matrix:	Soil	
Dilution Factor:	1	MRL
Mercury Total EPA 7470A/7471A (EPA 7471A)		
Mercury	**0.022**	0.020

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A94899
Project No:	NA	**Date Received:**	06/21/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	06/26/18
Method:	Total Metals by ICP/MS EPA 6020B	**Units:**	ug/L

Date Sampled:	06/20/18	
Date Prepared:	06/22/18	
Date Analyzed:	06/25/18	
AA ID No:	8F21005-06	
Client ID No:	EB-062018	
Matrix:	Water	
Dilution Factor:	1	MRL

Metals Total 6020B (EPA 6020B)

Antimony	<5.0	5.0
Arsenic	<5.0	5.0
Barium	<5.0	5.0
Beryllium	<5.0	5.0
Cadmium	<5.0	5.0
Chromium	<5.0	5.0
Cobalt	<5.0	5.0
Copper	<5.0	5.0
Lead	<5.0	5.0
Molybdenum	<5.0	5.0
Nickel	<5.0	5.0
Selenium	<20	20
Silver	<5.0	5.0
Thallium	<5.0	5.0
Vanadium	<20	20
Zinc	<20	20

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A94899
Project No:	NA	**Date Received:**	06/21/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	06/26/18
Method:	Total Metals CAM 17	**Units:**	mg/L

Date Sampled:	06/20/18	
Date Prepared:	06/22/18	
Date Analyzed:	06/22/18	
AA ID No:	8F21005-06	
Client ID No:	EB-062018	
Matrix:	Water	
Dilution Factor:	1	MRL

Mercury Total EPA 7470A/7471A (EPA 7470A)

Mercury	<0.00050	0.00050

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A94899
Project No:	NA	**Date Received:**	06/21/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	06/26/18
Method:	Total Metals CAM 17	**Units:**	mg/kg

Date Sampled:	06/21/18	06/21/18	06/21/18	06/21/18	
Date Prepared:	06/22/18	06/22/18	06/22/18	06/22/18	
Date Analyzed:	06/25/18	06/25/18	06/25/18	06/25/18	
AA ID No:	8F21005-01	8F21005-02	8F21005-03	8F21005-04	
Client ID No:	TP-1-1.5	TP-1-2.5	TP-2-0.5	TP-2-2.5	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
CAM Metals Less Hg 6000/7000 (EPA 6010B/7000)					
Antimony	<10	<10	<10	<10	10
Arsenic	**2.8**	**4.3**	**4.3**	**2.4**	0.50
Barium	**42**	**81**	**57**	**35**	10
Beryllium	<1.0	<1.0	<1.0	<1.0	1.0
Cadmium	<1.0	<1.0	<1.0	<1.0	1.0
Chromium	**12**	**15**	**12**	**11**	3.0
Cobalt	**3.6**	**5.4**	**3.8**	<3.0	3.0
Copper	**3.1**	**11**	**3.8**	<3.0	3.0
Lead	**28**	**130**	**5.2**	**4.5**	3.0
Molybdenum	<5.0	<5.0	<5.0	<5.0	5.0
Nickel	**10**	**26**	**8.5**	**8.8**	3.0
Selenium	<0.50	<0.50	<0.50	<0.50	0.50
Silver	<1.0	<1.0	<1.0	<1.0	1.0
Thallium	<5.0	<5.0	<5.0	<5.0	5.0
Vanadium	**26**	**51**	**25**	**21**	10
Zinc	**57**	**160**	**20**	**18**	3.0

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A94899
Project No:	NA	**Date Received:**	06/21/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	06/26/18
Method:	Total Metals CAM 17	**Units:**	mg/kg

Date Sampled:	06/21/18	
Date Prepared:	06/22/18	
Date Analyzed:	06/25/18	
AA ID No:	8F21005-05	
Client ID No:	TP-2-2.5 DUP	
Matrix:	Soil	
Dilution Factor:	1	MRL

CAM Metals Less Hg 6000/7000 (EPA 6010B/7000)

Antimony	<10	10
Arsenic	**2.2**	0.50
Barium	**51**	10
Beryllium	<1.0	1.0
Cadmium	<1.0	1.0
Chromium	**16**	3.0
Cobalt	**4.4**	3.0
Copper	**3.4**	3.0
Lead	<3.0	3.0
Molybdenum	<5.0	5.0
Nickel	**13**	3.0
Selenium	<0.50	0.50
Silver	<1.0	1.0
Thallium	<5.0	5.0
Vanadium	**30**	10
Zinc	**23**	3.0

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A94899
Project No:	NA	**Date Received:**	06/21/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	06/26/18
Method:	VOCs & OXYGENATES by GC/MS	**Units:**	ug/L

Date Sampled:	06/20/18	
Date Prepared:	06/22/18	
Date Analyzed:	06/22/18	
AA ID No:	8F21005-06	
Client ID No:	EB-062018	
Matrix:	Water	
Dilution Factor:	1	MRL

8260B+OXYGENATES (EPA 8260B)

Acetone	<10	10
tert-Amyl Methyl Ether (TAME)	<2.0	2.0
Benzene	<0.50	0.50
Bromobenzene	<0.50	0.50
Bromochloromethane	<0.50	0.50
Bromodichloromethane	<0.50	0.50
Bromoform	<0.50	0.50
Bromomethane	<0.50	0.50
2-Butanone (MEK)	<10	10
tert-Butyl alcohol (TBA)	<10	10
sec-Butylbenzene	<0.50	0.50
tert-Butylbenzene	<0.50	0.50
n-Butylbenzene	<0.50	0.50
Carbon Disulfide	<0.50	0.50
Carbon Tetrachloride	<0.50	0.50
Chlorobenzene	<0.50	0.50
Chloroethane	<0.50	0.50
Chloroform	<0.50	0.50
Chloromethane	<0.50	0.50
2-Chlorotoluene	<0.50	0.50
4-Chlorotoluene	<0.50	0.50
1,2-Dibromo-3-chloropropane	<1.0	1.0
Dibromochloromethane	<0.50	0.50
1,2-Dibromoethane (EDB)	<0.50	0.50
Dibromomethane	<0.50	0.50
1,3-Dichlorobenzene	<0.50	0.50
1,2-Dichlorobenzene	<0.50	0.50

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: VOCs & OXYGENATES by GC/MS

AA Project No: A94899
Date Received: 06/21/18
Date Reported: 06/26/18
Units: ug/L

Date Sampled:	06/20/18	
Date Prepared:	06/22/18	
Date Analyzed:	06/22/18	
AA ID No:	8F21005-06	
Client ID No:	EB-062018	
Matrix:	Water	
Dilution Factor:	1	MRL

8260B+OXYGENATES (EPA 8260B) (continued)

1,4-Dichlorobenzene	<0.50	0.50
Dichlorodifluoromethane (R12)	<0.50	0.50
1,1-Dichloroethane	<0.50	0.50
1,2-Dichloroethane (EDC)	<0.50	0.50
1,1-Dichloroethylene	<0.50	0.50
trans-1,2-Dichloroethylene	<0.50	0.50
cis-1,2-Dichloroethylene	<0.50	0.50
1,2-Dichloropropane	<0.50	0.50
2,2-Dichloropropane	<0.50	0.50
1,3-Dichloropropane	<0.50	0.50
cis-1,3-Dichloropropylene	<0.50	0.50
trans-1,3-Dichloropropylene	<0.50	0.50
1,1-Dichloropropylene	<0.50	0.50
Diisopropyl ether (DIPE)	<2.0	2.0
Ethylbenzene	<0.50	0.50
Ethyl-tert-Butyl Ether (ETBE)	<2.0	2.0
Hexachlorobutadiene	<1.0	1.0
2-Hexanone (MBK)	<10	10
Isopropylbenzene	<0.50	0.50
4-Isopropyltoluene	<1.0	1.0
Methyl-tert-Butyl Ether (MTBE)	<2.0	2.0
Methylene Chloride	<5.0	5.0
4-Methyl-2-pentanone (MIBK)	<10	10
Naphthalene	<2.0	2.0
n-Propylbenzene	<0.50	0.50
Styrene	<0.50	0.50
1,1,1,2-Tetrachloroethane	<0.50	0.50

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A94899
Project No:	NA	**Date Received:**	06/21/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	06/26/18
Method:	VOCs & OXYGENATES by GC/MS	**Units:**	ug/L

Date Sampled:	06/20/18	
Date Prepared:	06/22/18	
Date Analyzed:	06/22/18	
AA ID No:	8F21005-06	
Client ID No:	EB-062018	
Matrix:	Water	
Dilution Factor:	1	MRL

8260B+OXYGENATES (EPA 8260B) (continued)

1,1,2,2-Tetrachloroethane	<0.50	0.50
Tetrachloroethylene (PCE)	<0.50	0.50
Toluene	<0.50	0.50
1,2,3-Trichlorobenzene	<0.50	0.50
1,2,4-Trichlorobenzene	<0.50	0.50
1,1,1-Trichloroethane	<0.50	0.50
1,1,2-Trichloroethane	<0.50	0.50
Trichloroethylene (TCE)	<0.50	0.50
Trichlorofluoromethane (R11)	<0.50	0.50
1,2,3-Trichloropropane	<0.50	0.50
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	<0.50	0.50
1,3,5-Trimethylbenzene	<0.50	0.50
1,2,4-Trimethylbenzene	<0.50	0.50
Vinyl chloride	<0.50	0.50
o-Xylene	<0.50	0.50
m,p-Xylenes	<1.0	1.0

Surrogates		**%REC Limits**
4-Bromofluorobenzene	103%	70-140
Dibromofluoromethane	129%	70-140
Toluene-d8	104%	70-140

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94899
Date Received: 06/21/18
Date Reported: 06/26/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
Blank (B8F2214-BLK1)				Prepared & Analyzed: 06/22/18						
Acetone	<10	10	ug/L							
tert-Amyl Methyl Ether (TAME)	<2.0	2.0	ug/L							
Benzene	<0.50	0.50	ug/L							
Bromobenzene	<0.50	0.50	ug/L							
Bromochloromethane	<0.50	0.50	ug/L							
Bromodichloromethane	<0.50	0.50	ug/L							
Bromoform	<0.50	0.50	ug/L							
Bromomethane	<0.50	0.50	ug/L							
2-Butanone (MEK)	<10	10	ug/L							
tert-Butyl alcohol (TBA)	<10	10	ug/L							
sec-Butylbenzene	<0.50	0.50	ug/L							
tert-Butylbenzene	<0.50	0.50	ug/L							
n-Butylbenzene	<0.50	0.50	ug/L							
Carbon Disulfide	<0.50	0.50	ug/L							
Carbon Tetrachloride	<0.50	0.50	ug/L							
Chlorobenzene	<0.50	0.50	ug/L							
Chloroethane	<0.50	0.50	ug/L							
Chloroform	<0.50	0.50	ug/L							
Chloromethane	<0.50	0.50	ug/L							
2-Chlorotoluene	<0.50	0.50	ug/L							
4-Chlorotoluene	<0.50	0.50	ug/L							
1,2-Dibromo-3-chloropropane	<1.0	1.0	ug/L							
Dibromochloromethane	<0.50	0.50	ug/L							
1,2-Dibromoethane (EDB)	<0.50	0.50	ug/L							
Dibromomethane	<0.50	0.50	ug/L							
1,3-Dichlorobenzene	<0.50	0.50	ug/L							
1,2-Dichlorobenzene	<0.50	0.50	ug/L							
1,4-Dichlorobenzene	<0.50	0.50	ug/L							
Dichlorodifluoromethane (R12)	<0.50	0.50	ug/L							
1,1-Dichloroethane	<0.50	0.50	ug/L							
1,2-Dichloroethane (EDC)	<0.50	0.50	ug/L							



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

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Date Reported: 06/26/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
Blank (B8F2214-BLK1) Continued				Prepared & Analyzed: 06/22/18						
1,1-Dichloroethylene	<0.50	0.50	ug/L							
trans-1,2-Dichloroethylene	<0.50	0.50	ug/L							
cis-1,2-Dichloroethylene	<0.50	0.50	ug/L							
1,2-Dichloropropane	<0.50	0.50	ug/L							
2,2-Dichloropropane	<0.50	0.50	ug/L							
1,3-Dichloropropane	<0.50	0.50	ug/L							
cis-1,3-Dichloropropylene	<0.50	0.50	ug/L							
trans-1,3-Dichloropropylene	<0.50	0.50	ug/L							
1,1-Dichloropropylene	<0.50	0.50	ug/L							
Diisopropyl ether (DIPE)	<2.0	2.0	ug/L							
Ethylbenzene	<0.50	0.50	ug/L							
Ethyl-tert-Butyl Ether (ETBE)	<2.0	2.0	ug/L							
Hexachlorobutadiene	<1.0	1.0	ug/L							
2-Hexanone (MBK)	<10	10	ug/L							
Isopropylbenzene	<0.50	0.50	ug/L							
4-Isopropyltoluene	<1.0	1.0	ug/L							
Methyl-tert-Butyl Ether (MTBE)	<2.0	2.0	ug/L							
Methylene Chloride	<5.0	5.0	ug/L							
4-Methyl-2-pentanone (MIBK)	<10	10	ug/L							
Naphthalene	<2.0	2.0	ug/L							
n-Propylbenzene	<0.50	0.50	ug/L							
Styrene	<0.50	0.50	ug/L							
1,1,1,2-Tetrachloroethane	<0.50	0.50	ug/L							
1,1,2,2-Tetrachloroethane	<0.50	0.50	ug/L							
Tetrachloroethylene (PCE)	<0.50	0.50	ug/L							
Toluene	<0.50	0.50	ug/L							
1,2,3-Trichlorobenzene	<0.50	0.50	ug/L							
1,2,4-Trichlorobenzene	<0.50	0.50	ug/L							
1,1,1-Trichloroethane	<0.50	0.50	ug/L							
1,1,2-Trichloroethane	<0.50	0.50	ug/L							
Trichloroethylene (TCE)	<0.50	0.50	ug/L							

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

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Date Reported: 06/26/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
Blank (B8F2214-BLK1) Continued				Prepared & Analyzed: 06/22/18						
Trichlorofluoromethane (R11)	<0.50	0.50	ug/L							
1,2,3-Trichloropropane	<0.50	0.50	ug/L							
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	<0.50	0.50	ug/L							
1,3,5-Trimethylbenzene	<0.50	0.50	ug/L							
1,2,4-Trimethylbenzene	<0.50	0.50	ug/L							
Vinyl chloride	<0.50	0.50	ug/L							
o-Xylene	<0.50	0.50	ug/L							
m,p-Xylenes	<1.0	1.0	ug/L							
Surrogate: 4-Bromofluorobenzene	*48.1*		*ug/L*	*50*		*96.3*	*70-140*			
Surrogate: Dibromofluoromethane	*60.2*		*ug/L*	*50*		*120*	*70-140*			
Surrogate: Toluene-d8	*50.8*		*ug/L*	*50*		*102*	*70-140*			
LCS (B8F2214-BS1)				Prepared & Analyzed: 06/22/18						
Acetone	**20.8**	10	ug/L	20		104	70-130			
tert-Amyl Methyl Ether (TAME)	**19.9**	2.0	ug/L	20		99.3	70-130			
Benzene	**19.5**	0.50	ug/L	20		97.5	75-125			
Bromobenzene	**21.3**	0.50	ug/L	20		106	70-130			
Bromochloromethane	**19.9**	0.50	ug/L	20		99.4	70-130			
Bromodichloromethane	**18.4**	0.50	ug/L	20		91.8	75-125			
Bromoform	**18.0**	0.50	ug/L	20		90.0	75-125			
Bromomethane	**21.1**	0.50	ug/L	20		106	75-125			
2-Butanone (MEK)	**23.4**	10	ug/L	20		117	70-130			
tert-Butyl alcohol (TBA)	**110**	10	ug/L	100		110	70-130			
sec-Butylbenzene	**18.5**	0.50	ug/L	20		92.7	70-130			
tert-Butylbenzene	**20.7**	0.50	ug/L	20		104	70-130			
n-Butylbenzene	**19.4**	0.50	ug/L	20		97.1	70-130			
Carbon Disulfide	**18.7**	0.50	ug/L	20		93.6	70-130			
Carbon Tetrachloride	**18.0**	0.50	ug/L	20		89.8	75-125			
Chlorobenzene	**19.8**	0.50	ug/L	20		98.8	75-125			
Chloroethane	**18.4**	0.50	ug/L	20		91.9	75-125			
Chloroform	**18.1**	0.50	ug/L	20		90.3	75-125			



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

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Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
LCS (B8F2214-BS1) Continued				Prepared & Analyzed: 06/22/18						
Chloromethane	**18.0**	0.50	ug/L	20		90.2	65-125			
2-Chlorotoluene	**19.3**	0.50	ug/L	20		96.4	70-130			
4-Chlorotoluene	**19.4**	0.50	ug/L	20		97.0	70-130			
1,2-Dibromo-3-chloropropane	**23.8**	1.0	ug/L	20		119	70-130			
Dibromochloromethane	**19.0**	0.50	ug/L	20		95.0	75-125			
1,2-Dibromoethane (EDB)	**19.0**	0.50	ug/L	20		94.9	70-130			
Dibromomethane	**19.9**	0.50	ug/L	20		99.3	70-130			
1,3-Dichlorobenzene	**21.5**	0.50	ug/L	20		107	70-130			
1,2-Dichlorobenzene	**23.6**	0.50	ug/L	20		118	70-130			
1,4-Dichlorobenzene	**22.7**	0.50	ug/L	20		114	75-125			
Dichlorodifluoromethane (R12)	**19.4**	0.50	ug/L	20		97.0	70-130			
1,1-Dichloroethane	**19.1**	0.50	ug/L	20		95.5	70-125			
1,2-Dichloroethane (EDC)	**18.3**	0.50	ug/L	20		91.3	75-125			
1,1-Dichloroethylene	**16.3**	0.50	ug/L	20		81.7	70-130			
trans-1,2-Dichloroethylene	**18.5**	0.50	ug/L	20		92.4	75-125			
cis-1,2-Dichloroethylene	**17.7**	0.50	ug/L	20		88.4	75-125			
1,2-Dichloropropane	**18.7**	0.50	ug/L	20		93.3	75-130			
2,2-Dichloropropane	**16.8**	0.50	ug/L	20		84.2	70-130			
1,3-Dichloropropane	**20.7**	0.50	ug/L	20		103	70-130			
cis-1,3-Dichloropropylene	**19.5**	0.50	ug/L	20		97.6	75-125			
trans-1,3-Dichloropropylene	**19.4**	0.50	ug/L	20		96.8	70-130			
1,1-Dichloropropylene	**17.8**	0.50	ug/L	20		89.2	70-130			
Diisopropyl ether (DIPE)	**17.7**	2.0	ug/L	20		88.6	70-130			
Ethylbenzene	**19.1**	0.50	ug/L	20		95.4	75-125			
Ethyl-tert-Butyl Ether (ETBE)	**19.8**	2.0	ug/L	20		99.0	70-130			
Hexachlorobutadiene	**21.4**	1.0	ug/L	20		107	70-130			
2-Hexanone (MBK)	**20.0**	10	ug/L	20		100	70-130			
Isopropylbenzene	**18.8**	0.50	ug/L	20		94.2	70-130			
4-Isopropyltoluene	**20.5**	1.0	ug/L	20		103	70-130			
Methyl-tert-Butyl Ether (MTBE)	**43.1**	2.0	ug/L	40		108	75-125			
Methylene Chloride	**17.2**	5.0	ug/L	20		85.9	75-130			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

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Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
LCS (B8F2214-BS1) Continued				Prepared & Analyzed: 06/22/18						
4-Methyl-2-pentanone (MIBK)	**21.6**	10	ug/L	20		108	70-130			
Naphthalene	**25.9**	2.0	ug/L	20		130	70-130			
n-Propylbenzene	**19.0**	0.50	ug/L	20		94.8	70-130			
Styrene	**19.8**	0.50	ug/L	20		99.0	70-130			
1,1,1,2-Tetrachloroethane	**20.8**	0.50	ug/L	20		104	70-130			
1,1,2,2-Tetrachloroethane	**24.6**	0.50	ug/L	20		123	70-135			
Tetrachloroethylene (PCE)	**19.1**	0.50	ug/L	20		95.4	75-125			
Toluene	**18.9**	0.50	ug/L	20		94.4	75-125			
1,2,3-Trichlorobenzene	**24.4**	0.50	ug/L	20		122	70-130			
1,2,4-Trichlorobenzene	**24.0**	0.50	ug/L	20		120	70-130			
1,1,1-Trichloroethane	**17.8**	0.50	ug/L	20		88.8	75-125			
1,1,2-Trichloroethane	**21.5**	0.50	ug/L	20		108	75-125			
Trichloroethylene (TCE)	**18.8**	0.50	ug/L	20		93.8	75-125			
Trichlorofluoromethane (R11)	**19.8**	0.50	ug/L	20		98.8	70-130			
1,2,3-Trichloropropane	**23.5**	0.50	ug/L	20		118	70-130			
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	**17.2**	0.50	ug/L	20		86.2	70-130			
1,3,5-Trimethylbenzene	**18.9**	0.50	ug/L	20		94.6	70-130			
1,2,4-Trimethylbenzene	**18.8**	0.50	ug/L	20		94.0	70-130			
Vinyl chloride	**16.5**	0.50	ug/L	20		82.6	75-125			
o-Xylene	**19.4**	0.50	ug/L	20		96.8	75-125			
m,p-Xylenes	**38.3**	1.0	ug/L	40		95.7	70-130			
Surrogate: 4-Bromofluorobenzene	*47.6*		*ug/L*	*50*		*95.2*	*70-140*			
Surrogate: Dibromofluoromethane	*49.4*		*ug/L*	*50*		*98.8*	*70-140*			
Surrogate: Toluene-d8	*52.4*		*ug/L*	*50*		*105*	*70-140*			
LCS Dup (B8F2214-BSD1)				Prepared & Analyzed: 06/22/18						
Acetone	**19.8**	10	ug/L	20		98.8	70-130	5.22	30	
tert-Amyl Methyl Ether (TAME)	**18.8**	2.0	ug/L	20		94.2	70-130	5.27	30	
Benzene	**21.2**	0.50	ug/L	20		106	75-125	8.45	30	
Bromobenzene	**21.5**	0.50	ug/L	20		107	70-130	0.935	30	
Bromochloromethane	**22.0**	0.50	ug/L	20		110	70-130	10.2	30	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

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Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
LCS Dup (B8F2214-BSD1) Continued				Prepared & Analyzed: 06/22/18						
Bromodichloromethane	**19.5**	0.50	ug/L	20		97.6	75-125	6.23	30	
Bromoform	**17.2**	0.50	ug/L	20		85.8	75-125	4.78	30	
Bromomethane	**18.0**	0.50	ug/L	20		90.2	75-125	15.8	30	
2-Butanone (MEK)	**19.7**	10	ug/L	20		98.6	70-130	17.2	30	
tert-Butyl alcohol (TBA)	**82.7**	10	ug/L	100		82.7	70-130	28.5	30	
sec-Butylbenzene	**19.5**	0.50	ug/L	20		97.4	70-130	4.89	30	
tert-Butylbenzene	**22.0**	0.50	ug/L	20		110	70-130	5.85	30	
n-Butylbenzene	**20.0**	0.50	ug/L	20		100	70-130	3.19	30	
Carbon Disulfide	**15.6**	0.50	ug/L	20		78.0	70-130	18.2	30	
Carbon Tetrachloride	**20.6**	0.50	ug/L	20		103	75-125	13.9	30	
Chlorobenzene	**21.4**	0.50	ug/L	20		107	75-125	7.83	30	
Chloroethane	**18.2**	0.50	ug/L	20		91.1	75-125	0.874	30	
Chloroform	**20.0**	0.50	ug/L	20		100	75-125	10.1	30	
Chloromethane	**16.0**	0.50	ug/L	20		80.1	65-125	11.9	30	
2-Chlorotoluene	**20.4**	0.50	ug/L	20		102	70-130	5.45	30	
4-Chlorotoluene	**20.0**	0.50	ug/L	20		100	70-130	3.10	30	
1,2-Dibromo-3-chloropropane	**16.3**	1.0	ug/L	20		81.4	70-130	37.7	30	AA-C1
Dibromochloromethane	**19.1**	0.50	ug/L	20		95.4	75-125	0.473	30	
1,2-Dibromoethane (EDB)	**18.4**	0.50	ug/L	20		92.2	70-130	2.89	30	
Dibromomethane	**19.4**	0.50	ug/L	20		97.2	70-130	2.14	30	
1,3-Dichlorobenzene	**22.4**	0.50	ug/L	20		112	70-130	4.42	30	
1,2-Dichlorobenzene	**22.9**	0.50	ug/L	20		114	70-130	3.31	30	
1,4-Dichlorobenzene	**22.4**	0.50	ug/L	20		112	75-125	1.64	30	
Dichlorodifluoromethane (R12)	**17.8**	0.50	ug/L	20		89.2	70-130	8.38	30	
1,1-Dichloroethane	**21.2**	0.50	ug/L	20		106	70-125	10.3	30	
1,2-Dichloroethane (EDC)	**19.0**	0.50	ug/L	20		94.8	75-125	3.76	30	
1,1-Dichloroethylene	**17.3**	0.50	ug/L	20		86.6	70-130	5.82	30	
trans-1,2-Dichloroethylene	**22.0**	0.50	ug/L	20		110	75-125	17.3	30	
cis-1,2-Dichloroethylene	**20.3**	0.50	ug/L	20		101	75-125	13.6	30	
1,2-Dichloropropane	**19.4**	0.50	ug/L	20		96.8	75-130	3.63	30	
2,2-Dichloropropane	**18.5**	0.50	ug/L	20		92.7	70-130	9.67	30	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

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Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
LCS Dup (B8F2214-BSD1) Continued				Prepared & Analyzed: 06/22/18						
1,3-Dichloropropane	**20.0**	0.50	ug/L	20		100	70-130	3.29	30	
cis-1,3-Dichloropropylene	**19.8**	0.50	ug/L	20		98.8	75-125	1.22	30	
trans-1,3-Dichloropropylene	**19.1**	0.50	ug/L	20		95.4	70-130	1.46	30	
1,1-Dichloropropylene	**19.7**	0.50	ug/L	20		98.5	70-130	9.91	30	
Diisopropyl ether (DIPE)	**18.2**	2.0	ug/L	20		91.2	70-130	3.00	30	
Ethylbenzene	**21.1**	0.50	ug/L	20		106	75-125	10.1	30	
Ethyl-tert-Butyl Ether (ETBE)	**19.1**	2.0	ug/L	20		95.4	70-130	3.71	30	
Hexachlorobutadiene	**24.0**	1.0	ug/L	20		120	70-130	11.6	30	
2-Hexanone (MBK)	**17.9**	10	ug/L	20		89.6	70-130	11.1	30	
Isopropylbenzene	**20.7**	0.50	ug/L	20		103	70-130	9.31	30	
4-Isopropyltoluene	**21.5**	1.0	ug/L	20		108	70-130	4.90	30	
Methyl-tert-Butyl Ether (MTBE)	**40.7**	2.0	ug/L	40		102	75-125	5.77	30	
Methylene Chloride	**15.9**	5.0	ug/L	20		79.5	75-130	7.74	30	
4-Methyl-2-pentanone (MIBK)	**16.4**	10	ug/L	20		81.9	70-130	27.7	30	
Naphthalene	**21.0**	2.0	ug/L	20		105	70-130	21.1	30	
n-Propylbenzene	**20.2**	0.50	ug/L	20		101	70-130	6.19	30	
Styrene	**20.5**	0.50	ug/L	20		103	70-130	3.62	30	
1,1,1,2-Tetrachloroethane	**22.0**	0.50	ug/L	20		110	70-130	5.61	30	
1,1,2,2-Tetrachloroethane	**20.6**	0.50	ug/L	20		103	70-135	17.5	30	
Tetrachloroethylene (PCE)	**22.6**	0.50	ug/L	20		113	75-125	16.8	30	
Toluene	**21.2**	0.50	ug/L	20		106	75-125	11.4	30	
1,2,3-Trichlorobenzene	**22.0**	0.50	ug/L	20		110	70-130	10.1	30	
1,2,4-Trichlorobenzene	**22.9**	0.50	ug/L	20		114	70-130	4.48	30	
1,1,1-Trichloroethane	**19.8**	0.50	ug/L	20		98.8	75-125	10.6	30	
1,1,2-Trichloroethane	**20.3**	0.50	ug/L	20		102	75-125	5.69	30	
Trichloroethylene (TCE)	**20.4**	0.50	ug/L	20		102	75-125	8.48	30	
Trichlorofluoromethane (R11)	**18.3**	0.50	ug/L	20		91.4	70-130	7.78	30	
1,2,3-Trichloropropane	**19.1**	0.50	ug/L	20		95.5	70-130	20.7	30	
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	**16.0**	0.50	ug/L	20		80.0	70-130	7.40	30	
1,3,5-Trimethylbenzene	**20.2**	0.50	ug/L	20		101	70-130	6.70	30	
1,2,4-Trimethylbenzene	**20.2**	0.50	ug/L	20		101	70-130	7.23	30	



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94899
Date Received: 06/21/18
Date Reported: 06/26/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
LCS Dup (B8F2214-BSD1) Continued				Prepared & Analyzed: 06/22/18						
Vinyl chloride	**21.4**	0.50	ug/L	20		107	75-125	25.9	30	
o-Xylene	**20.6**	0.50	ug/L	20		103	75-125	6.40	30	
m,p-Xylenes	**42.1**	1.0	ug/L	40		105	70-130	9.50	30	
Surrogate: 4-Bromofluorobenzene	*47.6*		*ug/L*	*50*		*95.2*	*70-140*			
Surrogate: Dibromofluoromethane	*47.6*		*ug/L*	*50*		*95.2*	*70-140*			
Surrogate: Toluene-d8	*51.8*		*ug/L*	*50*		*104*	*70-140*			
Matrix Spike (B8F2214-MS1)		**Source: 8F12016-01**		Prepared: 06/22/18		Analyzed: 06/23/18				
Acetone	**28.1**	10	ug/L	20	25.2	14.5	70-130			QM-07
tert-Amyl Methyl Ether (TAME)	**18.4**	2.0	ug/L	20		92.0	70-130			
Benzene	**23.0**	0.50	ug/L	20		115	70-130			
Bromobenzene	**20.4**	0.50	ug/L	20		102	70-130			
Bromochloromethane	**20.0**	0.50	ug/L	20		100	70-130			
Bromodichloromethane	**19.5**	0.50	ug/L	20		97.6	70-130			
Bromoform	**15.3**	0.50	ug/L	20		76.6	70-130			
Bromomethane	**24.3**	0.50	ug/L	20		121	70-130			
2-Butanone (MEK)	**18.4**	10	ug/L	20		91.9	70-130			
tert-Butyl alcohol (TBA)	**89.5**	10	ug/L	100		89.5	70-130			
sec-Butylbenzene	**20.2**	0.50	ug/L	20		101	70-130			
tert-Butylbenzene	**22.4**	0.50	ug/L	20		112	70-130			
n-Butylbenzene	**20.7**	0.50	ug/L	20		104	70-130			
Carbon Disulfide	**21.9**	0.50	ug/L	20		110	70-130			
Carbon Tetrachloride	**20.8**	0.50	ug/L	20		104	70-130			
Chlorobenzene	**21.9**	0.50	ug/L	20		109	70-130			
Chloroethane	**23.3**	0.50	ug/L	20		117	70-130			
Chloroform	**20.5**	0.50	ug/L	20		102	70-130			
Chloromethane	**21.6**	0.50	ug/L	20		108	70-130			
2-Chlorotoluene	**21.1**	0.50	ug/L	20		105	70-130			
4-Chlorotoluene	**20.8**	0.50	ug/L	20		104	70-130			
1,2-Dibromo-3-chloropropane	**17.1**	1.0	ug/L	20		85.7	70-130			
Dibromochloromethane	**18.4**	0.50	ug/L	20		91.8	70-130			
1,2-Dibromoethane (EDB)	**17.4**	0.50	ug/L	20		87.2	70-130			



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94899
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Date Reported: 06/26/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
Matrix Spike (B8F2214-MS1) Continued Source: 8F12016-01 Prepared: 06/22/18 Analyzed: 06/23/18										
Dibromomethane	**19.0**	0.50	ug/L	20		94.9	70-130			
1,3-Dichlorobenzene	**21.6**	0.50	ug/L	20		108	70-130			
1,2-Dichlorobenzene	**22.0**	0.50	ug/L	20		110	70-130			
1,4-Dichlorobenzene	**21.9**	0.50	ug/L	20		109	70-130			
Dichlorodifluoromethane (R12)	**22.0**	0.50	ug/L	20		110	70-130			
1,1-Dichloroethane	**22.7**	0.50	ug/L	20		113	70-130			
1,2-Dichloroethane (EDC)	**19.1**	0.50	ug/L	20		95.4	70-130			
1,1-Dichloroethylene	**24.2**	0.50	ug/L	20		121	70-130			
trans-1,2-Dichloroethylene	**22.4**	0.50	ug/L	20		112	70-130			
cis-1,2-Dichloroethylene	**20.0**	0.50	ug/L	20		99.9	70-130			
1,2-Dichloropropane	**21.2**	0.50	ug/L	20		106	70-130			
2,2-Dichloropropane	**17.2**	0.50	ug/L	20		86.2	70-130			
1,3-Dichloropropane	**20.6**	0.50	ug/L	20		103	70-130			
cis-1,3-Dichloropropylene	**19.8**	0.50	ug/L	20		98.8	70-130			
trans-1,3-Dichloropropylene	**18.5**	0.50	ug/L	20		92.4	70-130			
1,1-Dichloropropylene	**21.1**	0.50	ug/L	20		105	70-130			
Diisopropyl ether (DIPE)	**19.3**	2.0	ug/L	20		96.6	70-130			
Ethylbenzene	**22.7**	0.50	ug/L	20		114	70-130			
Ethyl-tert-Butyl Ether (ETBE)	**19.3**	2.0	ug/L	20		96.5	70-130			
Hexachlorobutadiene	**18.7**	1.0	ug/L	20		93.6	70-130			
2-Hexanone (MBK)	**16.3**	10	ug/L	20		81.4	70-130			
Isopropylbenzene	**21.1**	0.50	ug/L	20		106	70-130			
4-Isopropyltoluene	**21.8**	1.0	ug/L	20		109	70-130			
Methyl-tert-Butyl Ether (MTBE)	**39.5**	2.0	ug/L	40		98.7	70-130			
Methylene Chloride	**27.5**	5.0	ug/L	20		138	70-130			QM-07
4-Methyl-2-pentanone (MIBK)	**13.4**	10	ug/L	20		66.8	70-130			QM-07
Naphthalene	**21.9**	2.0	ug/L	20	0.360	108	70-130			
n-Propylbenzene	**21.4**	0.50	ug/L	20		107	70-130			
Styrene	**20.9**	0.50	ug/L	20		104	70-130			
1,1,1,2-Tetrachloroethane	**22.0**	0.50	ug/L	20		110	70-130			
1,1,2,2-Tetrachloroethane	**21.3**	0.50	ug/L	20		106	70-130			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94899
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Date Reported: 06/26/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
Matrix Spike (B8F2214-MS1) Continued Source: 8F12016-01 Prepared: 06/22/18 Analyzed: 06/23/18										
Tetrachloroethylene (PCE)	**22.0**	0.50	ug/L	20		110	70-130			
Toluene	**22.6**	0.50	ug/L	20		113	70-130			
1,2,3-Trichlorobenzene	**20.3**	0.50	ug/L	20		102	70-130			
1,2,4-Trichlorobenzene	**20.3**	0.50	ug/L	20		102	70-130			
1,1,1-Trichloroethane	**20.8**	0.50	ug/L	20		104	70-130			
1,1,2-Trichloroethane	**21.1**	0.50	ug/L	20		106	70-130			
Trichloroethylene (TCE)	**21.2**	0.50	ug/L	20		106	70-130			
Trichlorofluoromethane (R11)	**22.6**	0.50	ug/L	20		113	70-130			
1,2,3-Trichloropropane	**19.3**	0.50	ug/L	20		96.6	70-130			
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	**21.8**	0.50	ug/L	20		109	70-130			
1,3,5-Trimethylbenzene	**20.7**	0.50	ug/L	20		104	70-130			
1,2,4-Trimethylbenzene	**20.7**	0.50	ug/L	20		104	70-130			
Vinyl chloride	**24.6**	0.50	ug/L	20		123	70-130			
o-Xylene	**21.9**	0.50	ug/L	20		110	70-130			
m,p-Xylenes	**44.2**	1.0	ug/L	40		111	70-130			
Surrogate: 4-Bromofluorobenzene	*50.7*		*ug/L*	*50*		*101*	*70-140*			
Surrogate: Dibromofluoromethane	*49.3*		*ug/L*	*50*		*98.6*	*70-140*			
Surrogate: Toluene-d8	*59.2*		*ug/L*	*50*		*118*	*70-140*			
Matrix Spike Dup (B8F2214-MSD1) **Source: 8F12016-01** Prepared: 06/22/18 Analyzed: 06/23/18										
Acetone	**36.6**	10	ug/L	20	25.2	57.2	70-130	26.4	30	QM-07
tert-Amyl Methyl Ether (TAME)	**22.0**	2.0	ug/L	20		110	70-130	18.1	30	
Benzene	**23.6**	0.50	ug/L	20		118	70-130	2.32	30	
Bromobenzene	**20.3**	0.50	ug/L	20		101	70-130	0.738	30	
Bromochloromethane	**22.7**	0.50	ug/L	20		113	70-130	12.3	30	
Bromodichloromethane	**22.2**	0.50	ug/L	20		111	70-130	13.1	30	
Bromoform	**16.2**	0.50	ug/L	20		81.1	70-130	5.77	30	
Bromomethane	**25.4**	0.50	ug/L	20		127	70-130	4.43	30	
2-Butanone (MEK)	**22.2**	10	ug/L	20		111	70-130	18.7	30	
tert-Butyl alcohol (TBA)	**90.6**	10	ug/L	100		90.6	70-130	1.24	30	
sec-Butylbenzene	**19.7**	0.50	ug/L	20		98.6	70-130	2.40	30	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94899
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Date Reported: 06/26/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
Matrix Spike Dup (B8F2214-MSD1) Continued	**Source: 8F12016-01**			Prepared: 06/22/18		Analyzed: 06/23/18				
tert-Butylbenzene	**21.9**	0.50	ug/L	20		110	70-130	2.48	30	
n-Butylbenzene	**19.8**	0.50	ug/L	20		98.8	70-130	4.74	30	
Carbon Disulfide	**21.3**	0.50	ug/L	20		106	70-130	3.10	30	
Carbon Tetrachloride	**21.0**	0.50	ug/L	20		105	70-130	1.01	30	
Chlorobenzene	**20.0**	0.50	ug/L	20		99.9	70-130	9.03	30	
Chloroethane	**22.6**	0.50	ug/L	20		113	70-130	3.18	30	
Chloroform	**21.8**	0.50	ug/L	20		109	70-130	6.38	30	
Chloromethane	**21.0**	0.50	ug/L	20		105	70-130	2.91	30	
2-Chlorotoluene	**20.5**	0.50	ug/L	20		103	70-130	2.69	30	
4-Chlorotoluene	**20.1**	0.50	ug/L	20		101	70-130	3.18	30	
1,2-Dibromo-3-chloropropane	**20.2**	1.0	ug/L	20		101	70-130	16.6	30	
Dibromochloromethane	**18.3**	0.50	ug/L	20		91.6	70-130	0.273	30	
1,2-Dibromoethane (EDB)	**18.7**	0.50	ug/L	20		93.5	70-130	6.97	30	
Dibromomethane	**22.8**	0.50	ug/L	20		114	70-130	18.4	30	
1,3-Dichlorobenzene	**20.8**	0.50	ug/L	20		104	70-130	3.63	30	
1,2-Dichlorobenzene	**22.4**	0.50	ug/L	20		112	70-130	1.44	30	
1,4-Dichlorobenzene	**21.9**	0.50	ug/L	20		110	70-130	0.183	30	
Dichlorodifluoromethane (R12)	**22.6**	0.50	ug/L	20		113	70-130	2.69	30	
1,1-Dichloroethane	**23.4**	0.50	ug/L	20		117	70-130	3.38	30	
1,2-Dichloroethane (EDC)	**22.6**	0.50	ug/L	20		113	70-130	16.7	30	
1,1-Dichloroethylene	**22.2**	0.50	ug/L	20		111	70-130	8.49	30	
trans-1,2-Dichloroethylene	**21.8**	0.50	ug/L	20		109	70-130	2.72	30	
cis-1,2-Dichloroethylene	**20.7**	0.50	ug/L	20		103	70-130	3.39	30	
1,2-Dichloropropane	**23.4**	0.50	ug/L	20		117	70-130	9.78	30	
2,2-Dichloropropane	**17.5**	0.50	ug/L	20		87.6	70-130	1.55	30	
1,3-Dichloropropane	**21.7**	0.50	ug/L	20		109	70-130	5.29	30	
cis-1,3-Dichloropropylene	**21.5**	0.50	ug/L	20		108	70-130	8.48	30	
trans-1,3-Dichloropropylene	**18.5**	0.50	ug/L	20		92.4	70-130	0.0541	30	
1,1-Dichloropropylene	**20.9**	0.50	ug/L	20		105	70-130	0.666	30	
Diisopropyl ether (DIPE)	**21.7**	2.0	ug/L	20		109	70-130	11.7	30	
Ethylbenzene	**19.9**	0.50	ug/L	20		99.7	70-130	13.0	30	



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94899
Date Received: 06/21/18
Date Reported: 06/26/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
Matrix Spike Dup (B8F2214-MSD1) Continued	**Source: 8F12016-01** Prepared: 06/22/18 Analyzed: 06/23/18									
Ethyl-tert-Butyl Ether (ETBE)	**23.5**	2.0	ug/L	20		118	70-130	19.8	30	
Hexachlorobutadiene	**18.4**	1.0	ug/L	20		92.2	70-130	1.51	30	
2-Hexanone (MBK)	**17.0**	10	ug/L	20		85.0	70-130	4.27	30	
Isopropylbenzene	**20.5**	0.50	ug/L	20		103	70-130	2.93	30	
4-Isopropyltoluene	**21.0**	1.0	ug/L	20		105	70-130	3.37	30	
Methyl-tert-Butyl Ether (MTBE)	**48.6**	2.0	ug/L	40		121	70-130	20.7	30	
Methylene Chloride	**32.2**	5.0	ug/L	20		161	70-130	15.6	30	QM-07
4-Methyl-2-pentanone (MIBK)	**19.1**	10	ug/L	20		95.6	70-130	35.5	30	AA-C1
Naphthalene	**25.0**	2.0	ug/L	20	0.360	123	70-130	13.1	30	
n-Propylbenzene	**20.4**	0.50	ug/L	20		102	70-130	5.12	30	
Styrene	**18.8**	0.50	ug/L	20		93.8	70-130	10.8	30	
1,1,1,2-Tetrachloroethane	**20.4**	0.50	ug/L	20		102	70-130	7.63	30	
1,1,2,2-Tetrachloroethane	**24.7**	0.50	ug/L	20		124	70-130	14.9	30	
Tetrachloroethylene (PCE)	**18.2**	0.50	ug/L	20		91.0	70-130	19.1	30	
Toluene	**19.7**	0.50	ug/L	20		98.7	70-130	13.6	30	
1,2,3-Trichlorobenzene	**20.0**	0.50	ug/L	20		100	70-130	1.44	30	
1,2,4-Trichlorobenzene	**19.2**	0.50	ug/L	20		96.0	70-130	5.71	30	
1,1,1-Trichloroethane	**20.7**	0.50	ug/L	20		104	70-130	0.289	30	
1,1,2-Trichloroethane	**21.6**	0.50	ug/L	20		108	70-130	2.20	30	
Trichloroethylene (TCE)	**21.3**	0.50	ug/L	20		107	70-130	0.282	30	
Trichlorofluoromethane (R11)	**23.4**	0.50	ug/L	20		117	70-130	3.47	30	
1,2,3-Trichloropropane	**22.3**	0.50	ug/L	20		112	70-130	14.5	30	
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	**21.4**	0.50	ug/L	20		107	70-130	1.90	30	
1,3,5-Trimethylbenzene	**20.2**	0.50	ug/L	20		101	70-130	2.79	30	
1,2,4-Trimethylbenzene	**20.2**	0.50	ug/L	20		101	70-130	2.34	30	
Vinyl chloride	**24.1**	0.50	ug/L	20		120	70-130	2.06	30	
o-Xylene	**19.8**	0.50	ug/L	20		99.1	70-130	9.97	30	
m,p-Xylenes	**38.8**	1.0	ug/L	40		97.0	70-130	13.1	30	
Surrogate: 4-Bromofluorobenzene	*51.6*		*ug/L*	*50*		*103*	*70-140*			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94899
Date Received: 06/21/18
Date Reported: 06/26/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2214 - EPA 5030B										
Matrix Spike Dup (B8F2214-MSD1) Continued				**Source: 8F12016-01**		Prepared: 06/22/18	Analyzed: 06/23/18			
Surrogate: Dibromofluoromethane	*54.0*		*ug/L*	*50*		*108*	*70-140*			
Surrogate: Toluene-d8	*53.6*		*ug/L*	*50*		*107*	*70-140*			
Carbon Chain by GC/FID - Quality Control										
Batch B8F2525 - EPA 3510C										
Blank (B8F2525-BLK1)						Prepared & Analyzed: 06/25/18				
C6-C8	<0.010	0.010	mg/L							
C8-C10	<0.010	0.010	mg/L							
C10-C12	<0.010	0.010	mg/L							
C12-C14	<0.010	0.010	mg/L							
C14-C16	<0.010	0.010	mg/L							
C16-C18	<0.010	0.010	mg/L							
C18-C20	<0.010	0.010	mg/L							
C20-C22	<0.010	0.010	mg/L							
C22-C24	<0.010	0.010	mg/L							
C24-C26	<0.010	0.010	mg/L							
C26-C28	<0.010	0.010	mg/L							
C28-C32	<0.010	0.010	mg/L							
C32-C34	<0.010	0.010	mg/L							
C34-C36	<0.010	0.010	mg/L							
C36-C40	<0.010	0.010	mg/L							
C40-C44	<0.010	0.010	mg/L							
TPH (C6-C44)	<0.10	0.10	mg/L							
Gasoline Range Organics (C6-C10)	<0.10	0.10	mg/L							
Diesel Range Organics (C10-C23)	<0.10	0.10	mg/L							
Oil Range Organics (C23-C44)	<0.10	0.10	mg/L							
Surrogate: o-Terphenyl	*0.0310*		*mg/L*	*0.040*		*77.5*	*50-150*			
LCS (B8F2525-BS1)						Prepared & Analyzed: 06/25/18				
Diesel Range Organics as Diesel	**0.626**	0.10	mg/L	0.80		78.2	75-125			
Surrogate: o-Terphenyl	*0.0258*		*mg/L*	*0.040*		*64.4*	*50-150*			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94899
Date Received: 06/21/18
Date Reported: 06/26/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Carbon Chain by GC/FID - Quality Control										
Batch B8F2525 - EPA 3510C										
LCS Dup (B8F2525-BSD1)				Prepared & Analyzed: 06/25/18						
Diesel Range Organics as Diesel	**0.772**	0.10	mg/L	0.80		96.5	75-125	20.9	30	
Surrogate: o-Terphenyl	*0.0414*		*mg/L*	*0.040*		*103*	*50-150*			
Batch B8F2532 - EPA 3550B										
Blank (B8F2532-BLK1)				Prepared & Analyzed: 06/25/18						
C6-C8	<1.0	1.0	mg/kg							
C8-C10	<1.0	1.0	mg/kg							
C10-C12	<1.0	1.0	mg/kg							
C12-C14	<1.0	1.0	mg/kg							
C14-C16	<1.0	1.0	mg/kg							
C16-C18	<1.0	1.0	mg/kg							
C18-C20	<1.0	1.0	mg/kg							
C20-C22	<1.0	1.0	mg/kg							
C22-C24	<1.0	1.0	mg/kg							
C24-C26	<1.0	1.0	mg/kg							
C26-C28	<1.0	1.0	mg/kg							
C28-C32	<1.0	1.0	mg/kg							
C32-C34	<1.0	1.0	mg/kg							
C34-C36	<1.0	1.0	mg/kg							
C36-C40	<1.0	1.0	mg/kg							
C40-C44	<1.0	1.0	mg/kg							
TPH (C6-C44)	<10	10	mg/kg							
Gasoline Range Organics (C6-C10)	<5.0	5.0	mg/kg							
Diesel Range Organics (C10-C23)	<5.0	5.0	mg/kg							
Oil Range Organics (C23-C44)	<5.0	5.0	mg/kg							
Surrogate: o-Terphenyl	*8.56*		*mg/kg*	*10*		*85.6*	*50-150*			
LCS (B8F2532-BS1)				Prepared & Analyzed: 06/25/18						
Diesel Range Organics as Diesel	**199**	10	mg/kg	200		99.7	75-125			
Surrogate: o-Terphenyl	*12.6*		*mg/kg*	*10*		*126*	*50-150*			
LCS Dup (B8F2532-BSD1)				Prepared & Analyzed: 06/25/18						
Diesel Range Organics as Diesel	**211**	10	mg/kg	200		105	75-125	5.41	40	



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94899
Date Received: 06/21/18
Date Reported: 06/26/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Carbon Chain by GC/FID - Quality Control										
Batch B8F2532 - EPA 3550B										
LCS Dup (B8F2532-BSD1) Continued				Prepared & Analyzed: 06/25/18						
Surrogate: o-Terphenyl	*12.8*		*mg/kg*	*10*		*128*	*50-150*			
Matrix Spike (B8F2532-MS1)		**Source: 8F25015-01**		Prepared & Analyzed: 06/25/18						
Diesel Range Organics as Diesel	**176**	10	mg/kg	200		88.0	70-130			
Surrogate: o-Terphenyl	*11.0*		*mg/kg*	*10*		*110*	*50-150*			
Batch B8F2533 - EPA 3550B										
Blank (B8F2533-BLK1)				Prepared & Analyzed: 06/25/18						
C6-C8	<1.0	1.0	mg/kg							
C8-C10	<1.0	1.0	mg/kg							
C10-C12	<1.0	1.0	mg/kg							
C12-C14	<1.0	1.0	mg/kg							
C14-C16	<1.0	1.0	mg/kg							
C16-C18	<1.0	1.0	mg/kg							
C18-C20	<1.0	1.0	mg/kg							
C20-C22	<1.0	1.0	mg/kg							
C22-C24	<1.0	1.0	mg/kg							
C24-C26	<1.0	1.0	mg/kg							
C26-C28	<1.0	1.0	mg/kg							
C28-C32	<1.0	1.0	mg/kg							
C32-C34	<1.0	1.0	mg/kg							
C34-C36	<1.0	1.0	mg/kg							
C36-C40	<1.0	1.0	mg/kg							
C40-C44	<1.0	1.0	mg/kg							
TPH (C6-C44)	<10	10	mg/kg							
Gasoline Range Organics (C6-C10)	<5.0	5.0	mg/kg							
Diesel Range Organics (C10-C23)	<5.0	5.0	mg/kg							
Oil Range Organics (C23-C44)	<5.0	5.0	mg/kg							
Surrogate: o-Terphenyl	*7.63*		*mg/kg*	*10*		*76.3*	*50-150*			
LCS (B8F2533-BS1)				Prepared & Analyzed: 06/25/18						
Diesel Range Organics as Diesel	**210**	10	mg/kg	200		105	75-125			
Surrogate: o-Terphenyl	*10.6*		*mg/kg*	*10*		*106*	*50-150*			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94899
Date Received: 06/21/18
Date Reported: 06/26/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Carbon Chain by GC/FID - Quality Control										
Batch B8F2533 - EPA 3550B										
LCS Dup (B8F2533-BSD1)				Prepared & Analyzed: 06/25/18						
Diesel Range Organics as Diesel	**225**	10	mg/kg	200		113	75-125	6.97	40	
Surrogate: o-Terphenyl	*10.9*		*mg/kg*	*10*		*109*	*50-150*			
Matrix Spike (B8F2533-MS1)		**Source: 8F25015-06**		Prepared & Analyzed: 06/25/18						
Diesel Range Organics as Diesel	**161**	10	mg/kg	200	13.5	73.7	70-130			
Surrogate: o-Terphenyl	*8.12*		*mg/kg*	*10*		*81.2*	*50-150*			
Matrix Spike Dup (B8F2533-MSD1)		**Source: 8F25015-06**		Prepared & Analyzed: 06/25/18						
Diesel Range Organics as Diesel	**204**	10	mg/kg	200	13.5	95.1	70-130	23.5	40	
Surrogate: o-Terphenyl	*8.89*		*mg/kg*	*10*		*88.9*	*50-150*			
Total Metals by ICP/MS EPA 6020B - Quality Control										
Batch B8F2221 - EPA 3020A										
Blank (B8F2221-BLK1)				Prepared: 06/22/18 Analyzed: 06/25/18						
Antimony	<5.0	5.0	ug/L							
Arsenic	<5.0	5.0	ug/L							
Barium	<5.0	5.0	ug/L							
Beryllium	<5.0	5.0	ug/L							
Cadmium	<5.0	5.0	ug/L							
Chromium	<5.0	5.0	ug/L							
Cobalt	<5.0	5.0	ug/L							
Copper	<5.0	5.0	ug/L							
Lead	<5.0	5.0	ug/L							
Molybdenum	<5.0	5.0	ug/L							
Nickel	<5.0	5.0	ug/L							
Selenium	<20	20	ug/L							
Silver	<5.0	5.0	ug/L							
Thallium	<5.0	5.0	ug/L							
Vanadium	<20	20	ug/L							
Zinc	<20	20	ug/L							
LCS (B8F2221-BS1)				Prepared: 06/22/18 Analyzed: 06/25/18						
Antimony	**50.5**	5.0	ug/L	50		101	80-120			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94899
Date Received: 06/21/18
Date Reported: 06/26/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Total Metals by ICP/MS EPA 6020B - Quality Control										
Batch B8F2221 - EPA 3020A										
LCS (B8F2221-BS1) Continued				Prepared: 06/22/18 Analyzed: 06/25/18						
Arsenic	**49.7**	5.0	ug/L	50		99.3	80-120			
Barium	**50.3**	5.0	ug/L	50		101	80-120			
Beryllium	**45.5**	5.0	ug/L	50		91.0	80-120			
Cadmium	**49.7**	5.0	ug/L	50		99.4	80-120			
Chromium	**45.6**	5.0	ug/L	50		91.2	80-120			
Cobalt	**49.7**	5.0	ug/L	50		99.4	80-120			
Copper	**47.1**	5.0	ug/L	50		94.2	80-120			
Lead	**49.8**	5.0	ug/L	50		99.6	80-120			
Nickel	**50.5**	5.0	ug/L	50		101	80-120			
Selenium	**251**	20	ug/L	250		100	80-120			
Silver	**50.8**	5.0	ug/L	50		102	80-120			
Thallium	**49.6**	5.0	ug/L	50		99.1	80-120			
Vanadium	**60.0**	20	ug/L	50		120	80-120			
Zinc	**54.5**	20	ug/L	50		109	80-120			
LCS Dup (B8F2221-BSD1)				Prepared: 06/22/18 Analyzed: 06/25/18						
Antimony	**50.6**	5.0	ug/L	50		101	80-120	0.247	20	
Arsenic	**48.0**	5.0	ug/L	50		96.1	80-120	3.30	20	
Barium	**50.7**	5.0	ug/L	50		101	80-120	0.682	20	
Beryllium	**46.6**	5.0	ug/L	50		93.1	80-120	2.32	20	
Cadmium	**49.8**	5.0	ug/L	50		99.5	80-120	0.0503	20	
Chromium	**45.2**	5.0	ug/L	50		90.4	80-120	0.882	20	
Cobalt	**49.4**	5.0	ug/L	50		98.7	80-120	0.757	20	
Copper	**46.3**	5.0	ug/L	50		92.6	80-120	1.66	20	
Lead	**49.8**	5.0	ug/L	50		99.6	80-120	0.00	20	
Molybdenum	**50.2**	5.0	ug/L	50		100	80-120	0.892	20	
Nickel	**50.0**	5.0	ug/L	50		99.9	80-120	1.05	20	
Selenium	**243**	20	ug/L	250		97.2	80-120	3.04	20	
Silver	**48.0**	5.0	ug/L	50		96.1	80-120	5.47	20	
Thallium	**50.4**	5.0	ug/L	50		101	80-120	1.80	20	
Vanadium	**60.0**	20	ug/L	50		120	80-120	0.00	20	
Zinc	**48.2**	20	ug/L	50		96.4	80-120	12.2	20	

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Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94899
Date Received: 06/21/18
Date Reported: 06/26/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Total Metals by ICP/MS EPA 6020B - Quality Control										
Batch B8F2221 - EPA 3020A										
Duplicate (B8F2221-DUP1)	**Source: 8F20019-26**		Prepared: 06/22/18	Analyzed: 06/25/18						
Antimony	**<5.0**	5.0	ug/L						30	
Arsenic	**110**	5.0	ug/L		102			7.56	30	
Barium	**310**	5.0	ug/L		300			3.33	30	
Beryllium	**47.5**	5.0	ug/L						30	
Cadmium	**<5.0**	5.0	ug/L						30	
Chromium	**21.9**	5.0	ug/L		26.2			18.0	30	
Cobalt	**6.15**	5.0	ug/L		5.95			3.31	30	
Copper	**17.0**	5.0	ug/L		17.1			0.587	30	
Lead	**11.4**	5.0	ug/L		11.0			4.02	30	
Molybdenum	**65.6**	5.0	ug/L		60.2			8.43	30	
Nickel	**56.4**	5.0	ug/L		48.5			15.1	30	
Selenium	**<20**	20	ug/L						30	
Silver	**<5.0**	5.0	ug/L						30	
Thallium	**<5.0**	5.0	ug/L						30	
Vanadium	**32.3**	20	ug/L		34.7			7.09	30	
Zinc	**43.4**	20	ug/L		45.8			5.56	30	
Matrix Spike (B8F2221-MS1)	**Source: 8F20018-05**		Prepared: 06/22/18	Analyzed: 06/25/18						
Antimony	**52.4**	5.0	ug/L	50		105	75-125			
Arsenic	**54.3**	5.0	ug/L	50		109	75-125			
Barium	**200**	5.0	ug/L	50	49.7	301	75-125			QM-07
Beryllium	**38.0**	5.0	ug/L	50		76.0	75-125			
Cadmium	**49.2**	5.0	ug/L	50		98.3	75-125			
Chromium	**46.4**	5.0	ug/L	50		92.8	75-125			
Cobalt	**53.3**	5.0	ug/L	50		107	75-125			
Copper	**54.0**	5.0	ug/L	50	5.12	97.8	75-125			
Lead	**55.3**	5.0	ug/L	50		111	75-125			
Molybdenum	**59.3**	5.0	ug/L	50	11.6	95.4	75-125			
Nickel	**67.5**	5.0	ug/L	50	5.52	124	75-125			
Selenium	**340**	20	ug/L	250		136	75-125			QM-07
Silver	**47.0**	5.0	ug/L	50		93.9	75-125			
Thallium	**51.4**	5.0	ug/L	50		103	75-125			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94899
Date Received: 06/21/18
Date Reported: 06/26/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Total Metals by ICP/MS EPA 6020B - Quality Control										
Batch B8F2221 - EPA 3020A										
Matrix Spike (B8F2221-MS1) Continued Source: 8F20018-05 Prepared: 06/22/18 Analyzed: 06/25/18										
Vanadium	**112**	20	ug/L	50	21.8	180	75-125			QM-07
Zinc	**74.8**	20	ug/L	50		150	75-125			QM-07
Matrix Spike Dup (B8F2221-MSD1) **Source: 8F20018-05** Prepared: 06/22/18 Analyzed: 06/25/18										
Antimony	**53.7**	5.0	ug/L	50		107	75-125	2.55	30	
Arsenic	**54.2**	5.0	ug/L	50		108	75-125	0.184	30	
Barium	**200**	5.0	ug/L	50	49.7	301	75-125	0.175	30	QM-07
Beryllium	**38.8**	5.0	ug/L	50		77.5	75-125	1.89	30	
Cadmium	**50.6**	5.0	ug/L	50		101	75-125	2.91	30	
Chromium	**47.4**	5.0	ug/L	50		94.8	75-125	2.08	30	
Cobalt	**53.8**	5.0	ug/L	50		108	75-125	0.980	30	
Copper	**52.0**	5.0	ug/L	50	5.12	93.6	75-125	3.96	30	
Lead	**56.5**	5.0	ug/L	50		113	75-125	2.24	30	
Molybdenum	**59.2**	5.0	ug/L	50	11.6	95.2	75-125	0.169	30	
Nickel	**67.6**	5.0	ug/L	50	5.52	124	75-125	0.111	30	
Selenium	**282**	20	ug/L	250		113	75-125	18.6	30	
Silver	**46.9**	5.0	ug/L	50		93.8	75-125	0.160	30	
Thallium	**52.7**	5.0	ug/L	50		105	75-125	2.45	30	
Vanadium	**115**	20	ug/L	50	21.8	186	75-125	2.89	30	QM-07
Zinc	**78.2**	20	ug/L	50		156	75-125	4.48	30	QM-07
Total Metals CAM 17 - Quality Control										
Batch B8F2220 - EPA 3050B										
Blank (B8F2220-BLK1) Prepared: 06/22/18 Analyzed: 06/25/18										
Antimony	<10	10	mg/kg							
Arsenic	<0.50	0.50	mg/kg							
Barium	<10	10	mg/kg							
Beryllium	<1.0	1.0	mg/kg							
Cadmium	<1.0	1.0	mg/kg							
Chromium	<3.0	3.0	mg/kg							
Cobalt	<3.0	3.0	mg/kg							
Copper	<3.0	3.0	mg/kg							
Lead	<3.0	3.0	mg/kg							



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94899
Date Received: 06/21/18
Date Reported: 06/26/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Total Metals CAM 17 - Quality Control										
Batch B8F2220 - EPA 3050B										
Blank (B8F2220-BLK1) Continued				Prepared: 06/22/18 Analyzed: 06/25/18						
Molybdenum	<5.0	5.0	mg/kg							
Nickel	<3.0	3.0	mg/kg							
Selenium	<0.50	0.50	mg/kg							
Silver	<1.0	1.0	mg/kg							
Thallium	<5.0	5.0	mg/kg							
Vanadium	<10	10	mg/kg							
Zinc	<3.0	3.0	mg/kg							
LCS (B8F2220-BS1)				Prepared: 06/22/18 Analyzed: 06/25/18						
Antimony	**54.5**	10	mg/kg	50		109	80-120			
Arsenic	**52.5**	0.50	mg/kg	50		105	80-120			
Barium	**52.4**	10	mg/kg	50		105	80-120			
Beryllium	**56.7**	1.0	mg/kg	50		113	80-120			
Cadmium	**57.1**	1.0	mg/kg	50		114	80-120			
Chromium	**53.7**	3.0	mg/kg	50		107	80-120			
Cobalt	**55.1**	3.0	mg/kg	50		110	80-120			
Copper	**51.5**	3.0	mg/kg	50		103	80-120			
Lead	**52.9**	3.0	mg/kg	50		106	80-120			
Molybdenum	**56.8**	5.0	mg/kg	50		114	80-120			
Nickel	**55.3**	3.0	mg/kg	50		111	80-120			
Selenium	**55.0**	0.50	mg/kg	50		110	80-120			
Silver	**51.6**	1.0	mg/kg	50		103	80-120			
Thallium	**55.7**	5.0	mg/kg	50		111	80-120			
Vanadium	**54.9**	10	mg/kg	50		110	80-120			
Zinc	**58.0**	3.0	mg/kg	50		116	80-120			
LCS Dup (B8F2220-BSD1)				Prepared: 06/22/18 Analyzed: 06/25/18						
Antimony	**51.0**	10	mg/kg	50		102	80-120	6.62	20	
Arsenic	**49.3**	0.50	mg/kg	50		98.6	80-120	6.25	20	
Barium	**49.5**	10	mg/kg	50		99.1	80-120	5.71	20	
Beryllium	**53.7**	1.0	mg/kg	50		107	80-120	5.45	20	
Cadmium	**53.9**	1.0	mg/kg	50		108	80-120	5.71	20	
Chromium	**50.4**	3.0	mg/kg	50		101	80-120	6.22	20	



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94899
Date Received: 06/21/18
Date Reported: 06/26/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Total Metals CAM 17 - Quality Control										
Batch B8F2220 - EPA 3050B										
LCS Dup (B8F2220-BSD1) Continued				Prepared: 06/22/18 Analyzed: 06/25/18						
Cobalt	**51.9**	3.0	mg/kg	50		104	80-120	6.04	20	
Copper	**48.0**	3.0	mg/kg	50		96.1	80-120	6.90	20	
Lead	**50.2**	3.0	mg/kg	50		100	80-120	5.18	20	
Molybdenum	**53.3**	5.0	mg/kg	50		107	80-120	6.34	20	
Nickel	**52.2**	3.0	mg/kg	50		104	80-120	5.77	20	
Selenium	**51.3**	0.50	mg/kg	50		103	80-120	6.94	20	
Silver	**48.9**	1.0	mg/kg	50		97.8	80-120	5.49	20	
Thallium	**51.9**	5.0	mg/kg	50		104	80-120	7.19	20	
Vanadium	**51.5**	10	mg/kg	50		103	80-120	6.30	20	
Zinc	**55.5**	3.0	mg/kg	50		111	80-120	4.42	20	
Duplicate (B8F2220-DUP1)				**Source: 8F21005-01** Prepared: 06/22/18 Analyzed: 06/25/18						
Antimony	**<10**	10	mg/kg		<10				40	
Arsenic	**2.48**	0.50	mg/kg		2.75			10.3	40	
Barium	**47.4**	10	mg/kg		42.0			12.2	40	
Beryllium	**<1.0**	1.0	mg/kg		<1.0				40	
Cadmium	**<1.0**	1.0	mg/kg		<1.0				40	
Chromium	**12.3**	3.0	mg/kg		11.8			3.65	40	
Cobalt	**3.63**	3.0	mg/kg		3.58			1.39	40	
Copper	**<3.0**	3.0	mg/kg		3.13				40	
Lead	**47.2**	3.0	mg/kg		27.8			51.6	40	AA-C1
Molybdenum	**<5.0**	5.0	mg/kg		<5.0				40	
Nickel	**10.0**	3.0	mg/kg		10.3			3.15	40	
Selenium	**<0.50**	0.50	mg/kg		<0.50				40	
Silver	**<1.0**	1.0	mg/kg		<1.0				40	
Thallium	**<5.0**	5.0	mg/kg		<5.0				40	
Vanadium	**27.9**	10	mg/kg		26.4			5.46	40	
Zinc	**60.5**	3.0	mg/kg		56.5			6.80	40	
Matrix Spike (B8F2220-MS1)				**Source: 8F20019-01** Prepared: 06/22/18 Analyzed: 06/25/18						
Antimony	**25.9**	10	mg/kg	50		51.7	75-125			QM-07
Arsenic	**47.5**	0.50	mg/kg	50	2.99	89.1	75-125			
Barium	**112**	10	mg/kg	50	53.8	116	75-125			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94899
Date Received: 06/21/18
Date Reported: 06/26/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Total Metals CAM 17 - Quality Control										
Batch B8F2220 - EPA 3050B										
Matrix Spike (B8F2220-MS1) Continued Source: 8F20019-01 Prepared: 06/22/18 Analyzed: 06/25/18										
Beryllium	**45.5**	1.0	mg/kg	50		91.0	75-125			
Cadmium	**39.4**	1.0	mg/kg	50		78.8	75-125			
Chromium	**60.4**	3.0	mg/kg	50	12.7	95.3	75-125			
Cobalt	**48.3**	3.0	mg/kg	50	3.18	90.2	75-125			
Copper	**82.7**	3.0	mg/kg	50	10.3	145	75-125			QM-07
Lead	**79.6**	3.0	mg/kg	50	34.2	90.7	75-125			
Molybdenum	**49.5**	5.0	mg/kg	50		99.0	75-125			
Nickel	**53.7**	3.0	mg/kg	50	9.18	89.0	75-125			
Selenium	**39.6**	0.50	mg/kg	50		79.2	75-125			
Silver	**50.0**	1.0	mg/kg	50		100	75-125			
Thallium	**38.3**	5.0	mg/kg	50		76.5	60-140			
Vanadium	**78.2**	10	mg/kg	50	25.0	106	75-125			
Zinc	**127**	3.0	mg/kg	50	74.1	105	75-125			
Matrix Spike Dup (B8F2220-MSD1) **Source: 8F20019-01** Prepared: 06/22/18 Analyzed: 06/25/18										
Antimony	**26.4**	10	mg/kg	50		52.9	75-125	2.18	40	QM-07
Arsenic	**47.9**	0.50	mg/kg	50	2.99	89.9	75-125	0.880	40	
Barium	**106**	10	mg/kg	50	53.8	104	75-125	5.52	40	
Beryllium	**46.1**	1.0	mg/kg	50		92.2	75-125	1.31	40	
Cadmium	**40.1**	1.0	mg/kg	50		80.2	75-125	1.76	40	
Chromium	**60.6**	3.0	mg/kg	50	12.7	95.7	75-125	0.347	40	
Cobalt	**48.6**	3.0	mg/kg	50	3.18	90.8	75-125	0.702	40	
Copper	**65.7**	3.0	mg/kg	50	10.3	111	75-125	22.9	40	
Lead	**81.6**	3.0	mg/kg	50	34.2	94.6	75-125	2.47	40	
Molybdenum	**49.8**	5.0	mg/kg	50		99.7	75-125	0.725	40	
Nickel	**53.6**	3.0	mg/kg	50	9.18	88.9	75-125	0.0373	40	
Selenium	**42.3**	0.50	mg/kg	50		84.6	75-125	6.57	40	
Silver	**51.4**	1.0	mg/kg	50		103	75-125	2.78	40	
Thallium	**36.8**	5.0	mg/kg	50		73.6	60-140	3.92	40	
Vanadium	**75.8**	10	mg/kg	50	25.0	102	75-125	3.18	40	
Zinc	**117**	3.0	mg/kg	50	74.1	86.3	75-125	7.70	40	
Total Metals CAM 17 - Quality Control										

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A94899
Date Received: 06/21/18
Date Reported: 06/26/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Total Metals CAM 17 - Quality Control										
Batch B8F2219 - EPA 7470A Prep										
Blank (B8F2219-BLK1)				Prepared & Analyzed: 06/22/18						
Mercury	<0.00050	0.00050	mg/L							
LCS (B8F2219-BS1)				Prepared & Analyzed: 06/22/18						
Mercury	**0.0101**	0.00050	mg/L	0.010		101	80-120			
LCS Dup (B8F2219-BSD1)				Prepared & Analyzed: 06/22/18						
Mercury	**0.00999**	0.00050	mg/L	0.010		99.9	80-120	1.34	20	
Matrix Spike (B8F2219-MS1)		**Source: 8F21005-06**		Prepared & Analyzed: 06/22/18						
Mercury	**0.00963**	0.00050	mg/L	0.010	0.00050	96.3	75-125			
Matrix Spike Dup (B8F2219-MSD1)		**Source: 8F21005-06**		Prepared & Analyzed: 06/22/18						
Mercury	**0.00972**	0.00050	mg/L	0.010	0.00050	97.2	75-125	0.930	20	
Batch B8F2534 - EPA 7471A Prep										
Blank (B8F2534-BLK1)				Prepared & Analyzed: 06/25/18						
Mercury	<0.020	0.020	mg/kg							
LCS (B8F2534-BS1)				Prepared & Analyzed: 06/25/18						
Mercury	**0.518**	0.020	mg/kg	0.50		104	80-120			
LCS Dup (B8F2534-BSD1)				Prepared & Analyzed: 06/25/18						
Mercury	**0.526**	0.020	mg/kg	0.50		105	80-120	1.34	25	
Duplicate (B8F2534-DUP1)		**Source: 8F21005-01**		Prepared & Analyzed: 06/25/18						
Mercury	**0.0680**	0.020	mg/kg		0.0790			15.0	25	
Matrix Spike (B8F2534-MS1)		**Source: 8F20019-01**		Prepared & Analyzed: 06/25/18						
Mercury	**0.728**	0.020	mg/kg	0.50	0.248	96.0	75-125			
Matrix Spike Dup (B8F2534-MSD1)		**Source: 8F20019-01**		Prepared & Analyzed: 06/25/18						
Mercury	**0.757**	0.020	mg/kg	0.50	0.248	102	75-125	3.91	25	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A94899
Project No:	NA	**Date Received:**	06/21/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	06/26/18

Special Notes

[1] = **AA-C1** : Exceeds RPD limit.

[2] = **QM-07** : The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.

Viorel Vasile
Operations Manager

AMERICAN ANALYTICS CHAIN-OF-CUSTODY RECORD

9765 ETON AVE., CHATSWORTH, CA 91311
Tel: 818-998-5547 FAX: 818-998-7258

A.A. COC No.: 70051783
Page 1 of 1

Client: AECOM	Project Name / No.: 125 Hurricane St. 60553849	Sampler's Name: A. Vigna
Project Manager: Kaleena Johnson	Site Address:	Sampler's Signature:
Phone:	City:	P.O. No.:
Fax:	State & Zip:	Quote No.:

TAT Turnaround Codes **

(1) = Same Day Rush
(2) = 24 Hour Rush
(3) = 48 Hour Rush
(4) = 72 Hour Rush
(5) = 5 Day Rush
X = 10 Working Days (Standard TAT)

* → (3)

ANALYSIS REQUESTED (Test Name)

Please enter the TAT Turnaround Codes ** below

Client I.D.	A.A. I.D.	Date	Time	Sample Matrix	No. of Cont	TPH (8015M)	Metals (6010B)	Metals (6020) 2006	VOCs (8260B)	Special Instructions
TP-1-1.5	8F21005-01	6/21/18	0910	Soil	3	X	X			*: 48-hr Rush as requested by K.J. on 6/22/18
TP-1-2.5	-02		0920		3	X	X			
TP-2-0.5	-03		1010		3	X	X			
TP-2-2.5	-04		1020		3	X	X			
TP-2-2.5DUP	-05		1020		3	X	X			
EB-062018	-06	6/20/18	1630	Water	5	X		X	X	

For Laboratory Use

REVIEWED
Date 6/21/18 Time 1530
TAT N Days Sign:

A.A. Project No.: A94899/8F21005

Relinquished by	Date	Time	Received by
	6/21/18	1245	
	6-21-18	203	
	Date	Time	Received by

Note: By relinquishing samples to American Analytics, client agrees to pay for the services requested on this chain of custody form and any additional client-requested analyses performed on this project. Payment for services is due within 30 days from the date of invoice. Sample(s) will be disposed of after 45 days following the submittal of the sample(s) to American Analytics.

AMERICAN ANALYTICS

9765 Eton Avenue
Chatsworth
California 91311
Tel: (818) 998-5547
Fax: (818) 998-7258

July 03, 2018

Kaleena Johnson

AECOM (LA)

300 S. Grand Ave., Suite 800

Los Angeles, CA 90017

Re : 128 Hurricane - Soil & GW

A948102 / 8F28008

Enclosed is an analytical report for the above-referenced project. The samples included in this report were received on 06/28/18 17:36 and analyzed in accordance with the attached chain-of-custody.

Unless otherwise noted, all analytical testing was accomplished in accordance with the guidelines established in our Quality Assurance Program Manual, applicable standard operating procedures, and other related documentation. The results in this analytical report are limited to the samples tested and any reproduction thereof must be made in its entirety.

If you have any questions regarding this report or require additional information please call me at American Analytics.

Sincerely,



Viorel Vasile

Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

Sample ID	Laboratory ID	Matrix	TAT	Date Sampled	Date Received
Carbon Chain Characterization 8015M					
SO-1-2.5	8F28008-01	Soil	2	06/28/18 08:40	06/28/18 17:36
SO-2-2.5	8F28008-02	Soil	2	06/28/18 08:48	06/28/18 17:36
SO-2-3.5	8F28008-03	Soil	2	06/28/18 08:51	06/28/18 17:36
SO-2-5	8F28008-04	Soil	2	06/28/18 08:54	06/28/18 17:36
SO-3-2.5	8F28008-05	Soil	2	06/28/18 09:30	06/28/18 17:36
SO-3-3.5	8F28008-06	Soil	2	06/28/18 09:35	06/28/18 17:36
SO-3-5	8F28008-07	Soil	2	06/28/18 09:40	06/28/18 17:36
SO-3-10	8F28008-08	Soil	2	06/28/18 09:55	06/28/18 17:36
SO-3	8F28008-09	Water	2	06/28/18 10:00	06/28/18 17:36
SO-4-2.5	8F28008-10	Soil	2	06/28/18 10:22	06/28/18 17:36
SO-4-3.5	8F28008-11	Soil	2	06/28/18 10:25	06/28/18 17:36
SO-4-5	8F28008-12	Soil	2	06/28/18 10:28	06/28/18 17:36
SO-4-5DUP	8F28008-13	Soil	2	06/28/18 10:28	06/28/18 17:36
SO-5-2.5	8F28008-14	Soil	2	06/28/18 10:45	06/28/18 17:36
SO-5-3.5	8F28008-15	Soil	2	06/28/18 10:50	06/28/18 17:36
SO-5-5	8F28008-16	Soil	2	06/28/18 10:53	06/28/18 17:36
SO-6-0.5	8F28008-17	Soil	2	06/28/18 10:58	06/28/18 17:36
SO-6-2.5	8F28008-18	Soil	2	06/28/18 11:04	06/28/18 17:36
SO-6-3.5	8F28008-19	Soil	2	06/28/18 11:08	06/28/18 17:36



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

Sample ID	Laboratory ID	Matrix	TAT	Date Sampled	Date Received
SO-6-5	8F28008-20	Soil	2	06/28/18 11:10	06/28/18 17:36
SO-7-2.5	8F28008-21	Soil	2	06/28/18 11:22	06/28/18 17:36
SO-7-3.5	8F28008-22	Soil	2	06/28/18 11:30	06/28/18 17:36
SO-7-5	8F28008-23	Soil	2	06/28/18 11:46	06/28/18 17:36
SO-7-5DUP	8F28008-24	Soil	2	06/28/18 11:46	06/28/18 17:36
SO-8-2.5	8F28008-25	Soil	2	06/28/18 12:40	06/28/18 17:36
SO-8-3.5	8F28008-26	Soil	2	06/28/18 12:50	06/28/18 17:36
SO-8-5	8F28008-27	Soil	2	06/28/18 12:55	06/28/18 17:36
SO-8-10	8F28008-28	Soil	2	06/28/18 13:05	06/28/18 17:36
SO-8	8F28008-29	Water	2	06/28/18 13:15	06/28/18 17:36
SO-9-2.5	8F28008-30	Soil	2	06/28/18 13:33	06/28/18 17:36
SO-9-3.5	8F28008-31	Soil	2	06/28/18 13:35	06/28/18 17:36
SO-9-5	8F28008-32	Soil	2	06/28/18 13:40	06/28/18 17:36
SO-12-2.5	8F28008-33	Soil	2	06/28/18 13:50	06/28/18 17:36
SO-12-3.5	8F28008-34	Soil	2	06/28/18 13:57	06/28/18 17:36
SO-12-5	8F28008-35	Soil	2	06/28/18 14:05	06/28/18 17:36
SO-10-2.5	8F28008-36	Soil	2	06/28/18 14:12	06/28/18 17:36
SO-10-3.5	8F28008-37	Soil	2	06/28/18 14:18	06/28/18 17:36
SO-11-2.5	8F28008-38	Soil	2	06/28/18 14:29	06/28/18 17:36
SO-11-3.5	8F28008-39	Soil	2	06/28/18 14:33	06/28/18 17:36



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

Sample ID	Laboratory ID	Matrix	TAT	Date Sampled	Date Received
SO-13-2.5	8F28008-40	Soil	2	06/28/18 14:49	06/28/18 17:36
SO-13-3.5	8F28008-41	Soil	2	06/28/18 14:53	06/28/18 17:36
SO-13-5	8F28008-42	Soil	2	06/28/18 14:55	06/28/18 17:36
SO-13-10	8F28008-43	Soil	2	06/28/18 15:00	06/28/18 17:36
SO-13-5DUP	8F28008-44	Soil	2	06/28/18 14:55	06/28/18 17:36
SO-13	8F28008-45	Water	2	06/28/18 15:05	06/28/18 17:36
EB-062318	8F28008-46	Water	2	06/28/18 15:25	06/28/18 17:36
Chloride by Ion Chromatography					
SO-3	8F28008-09	Water	2	06/28/18 10:00	06/28/18 17:36
SO-8	8F28008-29	Water	2	06/28/18 13:15	06/28/18 17:36
SO-13	8F28008-45	Water	2	06/28/18 15:05	06/28/18 17:36
Conductivity SM2510 B					
SO-3	8F28008-09	Water	2	06/28/18 10:00	06/28/18 17:36
SO-8	8F28008-29	Water	2	06/28/18 13:15	06/28/18 17:36
SO-13	8F28008-45	Water	2	06/28/18 15:05	06/28/18 17:36
Hardness SM2340C					
SO-3	8F28008-09	Water	2	06/28/18 10:00	06/28/18 17:36
SO-8	8F28008-29	Water	2	06/28/18 13:15	06/28/18 17:36
SO-13	8F28008-45	Water	2	06/28/18 15:05	06/28/18 17:36



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

Sample ID	Laboratory ID	Matrix	TAT	Date Sampled	Date Received
Lead Total EPA 6010B					
SO-1-2.5	8F28008-01	Soil	2	06/28/18 08:40	06/28/18 17:36
SO-2-2.5	8F28008-02	Soil	2	06/28/18 08:48	06/28/18 17:36
SO-2-3.5	8F28008-03	Soil	2	06/28/18 08:51	06/28/18 17:36
SO-2-5	8F28008-04	Soil	2	06/28/18 08:54	06/28/18 17:36
SO-3-2.5	8F28008-05	Soil	2	06/28/18 09:30	06/28/18 17:36
SO-3-3.5	8F28008-06	Soil	2	06/28/18 09:35	06/28/18 17:36
SO-3-5	8F28008-07	Soil	2	06/28/18 09:40	06/28/18 17:36
SO-3-10	8F28008-08	Soil	2	06/28/18 09:55	06/28/18 17:36
SO-4-2.5	8F28008-10	Soil	2	06/28/18 10:22	06/28/18 17:36
SO-4-3.5	8F28008-11	Soil	2	06/28/18 10:25	06/28/18 17:36
SO-4-5	8F28008-12	Soil	2	06/28/18 10:28	06/28/18 17:36
SO-4-5DUP	8F28008-13	Soil	2	06/28/18 10:28	06/28/18 17:36
SO-5-2.5	8F28008-14	Soil	2	06/28/18 10:45	06/28/18 17:36
SO-5-3.5	8F28008-15	Soil	2	06/28/18 10:50	06/28/18 17:36
SO-5-5	8F28008-16	Soil	2	06/28/18 10:53	06/28/18 17:36
SO-6-0.5	8F28008-17	Soil	2	06/28/18 10:58	06/28/18 17:36
SO-6-2.5	8F28008-18	Soil	2	06/28/18 11:04	06/28/18 17:36
SO-6-3.5	8F28008-19	Soil	2	06/28/18 11:08	06/28/18 17:36
SO-6-5	8F28008-20	Soil	2	06/28/18 11:10	06/28/18 17:36



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

Sample ID	Laboratory ID	Matrix	TAT	Date Sampled	Date Received
SO-7-2.5	8F28008-21	Soil	2	06/28/18 11:22	06/28/18 17:36
SO-7-3.5	8F28008-22	Soil	2	06/28/18 11:30	06/28/18 17:36
SO-7-5	8F28008-23	Soil	2	06/28/18 11:46	06/28/18 17:36
SO-7-5DUP	8F28008-24	Soil	2	06/28/18 11:46	06/28/18 17:36
SO-8-2.5	8F28008-25	Soil	2	06/28/18 12:40	06/28/18 17:36
SO-8-3.5	8F28008-26	Soil	2	06/28/18 12:50	06/28/18 17:36
SO-8-5	8F28008-27	Soil	2	06/28/18 12:55	06/28/18 17:36
SO-8-10	8F28008-28	Soil	2	06/28/18 13:05	06/28/18 17:36
SO-9-2.5	8F28008-30	Soil	2	06/28/18 13:33	06/28/18 17:36
SO-9-3.5	8F28008-31	Soil	2	06/28/18 13:35	06/28/18 17:36
SO-9-5	8F28008-32	Soil	2	06/28/18 13:40	06/28/18 17:36
SO-12-2.5	8F28008-33	Soil	2	06/28/18 13:50	06/28/18 17:36
SO-12-3.5	8F28008-34	Soil	2	06/28/18 13:57	06/28/18 17:36
SO-12-5	8F28008-35	Soil	2	06/28/18 14:05	06/28/18 17:36
SO-10-2.5	8F28008-36	Soil	2	06/28/18 14:12	06/28/18 17:36
SO-10-3.5	8F28008-37	Soil	2	06/28/18 14:18	06/28/18 17:36
SO-11-2.5	8F28008-38	Soil	2	06/28/18 14:29	06/28/18 17:36
SO-11-3.5	8F28008-39	Soil	2	06/28/18 14:33	06/28/18 17:36
SO-13-2.5	8F28008-40	Soil	2	06/28/18 14:49	06/28/18 17:36
SO-13-3.5	8F28008-41	Soil	2	06/28/18 14:53	06/28/18 17:36



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

Sample ID	Laboratory ID	Matrix	TAT	Date Sampled	Date Received
SO-13-5	8F28008-42	Soil	2	06/28/18 14:55	06/28/18 17:36
SO-13-10	8F28008-43	Soil	2	06/28/18 15:00	06/28/18 17:36
SO-13-5DUP	8F28008-44	Soil	2	06/28/18 14:55	06/28/18 17:36
Nitrate as N by Ion Chromatography					
SO-3	8F28008-09	Water	2	06/28/18 10:00	06/28/18 17:36
SO-8	8F28008-29	Water	2	06/28/18 13:15	06/28/18 17:36
SO-13	8F28008-45	Water	2	06/28/18 15:05	06/28/18 17:36
pH Measurement SM4500H+ B					
SO-3	8F28008-09	Water	2	06/28/18 10:00	06/28/18 17:36
SO-8	8F28008-29	Water	2	06/28/18 13:15	06/28/18 17:36
SO-13	8F28008-45	Water	2	06/28/18 15:05	06/28/18 17:36
Salinity SM 2520					
SO-3	8F28008-09	Water	2	06/28/18 10:00	06/28/18 17:36
SO-8	8F28008-29	Water	2	06/28/18 13:15	06/28/18 17:36
SO-13	8F28008-45	Water	2	06/28/18 15:05	06/28/18 17:36
Sulfate by Ion Chromatography					
SO-3	8F28008-09	Water	2	06/28/18 10:00	06/28/18 17:36
SO-8	8F28008-29	Water	2	06/28/18 13:15	06/28/18 17:36

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

Sample ID	Laboratory ID	Matrix	TAT	Date Sampled	Date Received
SO-13	8F28008-45	Water	2	06/28/18 15:05	06/28/18 17:36
TDS SM2540C					
SO-3	8F28008-09	Water	2	06/28/18 10:00	06/28/18 17:36
SO-8	8F28008-29	Water	2	06/28/18 13:15	06/28/18 17:36
SO-13	8F28008-45	Water	2	06/28/18 15:05	06/28/18 17:36

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A948102
Project No:	NA	**Date Received:**	06/28/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	07/03/18
Method:	Carbon Chain by GC/FID	**Units:**	mg/kg

Date Sampled:	06/28/18	06/28/18	06/28/18	06/28/18	
Date Prepared:	06/29/18	06/29/18	06/29/18	06/29/18	
Date Analyzed:	06/29/18	06/29/18	06/29/18	06/30/18	
AA ID No:	8F28008-01	8F28008-02	8F28008-03	8F28008-04	
Client ID No:	SO-1-2.5	SO-2-2.5	SO-2-3.5	SO-2-5	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	10	10	1	MRL
Carbon Chain Characterization 8015M (EPA 8015M)					
C6-C8	<1.0	<10	<10	<1.0	1.0
C8-C10	<1.0	<10	<10	<1.0	1.0
C10-C12	<1.0	<10	**19**	<1.0	1.0
C12-C14	<1.0	<10	**110**	<1.0	1.0
C14-C16	<1.0	<10	**180**	<1.0	1.0
C16-C18	<1.0	<10	**270**	<1.0	1.0
C18-C20	**1.8**	<10	**240**	<1.0	1.0
C20-C22	**4.4**	**53**	**280**	<1.0	1.0
C22-C24	**8.8**	**92**	**320**	<1.0	1.0
C24-C26	**10**	**80**	**260**	<1.0	1.0
C26-C28	**16**	**190**	**310**	<1.0	1.0
C28-C32	**45**	**430**	**560**	<1.0	1.0
C32-C34	**16**	**140**	**150**	<1.0	1.0
C34-C36	**13**	**140**	**130**	<1.0	1.0
C36-C40	**24**	**140**	**190**	**1.5**	1.0
C40-C44	**16**	**130**	**120**	**5.1**	1.0
TPH (C6-C44)	**160**	**1400**	**3100**	<10	10
Gasoline Range Organics (C6-C10)	<5.0	<50	<50	<5.0	5.0
Diesel Range Organics (C10-C23)	**11**	**99**	**1300**	<5.0	5.0
Oil Range Organics (C23-C44)	**150**	**1300**	**1900**	**6.6**	5.0
Surrogates					**%REC Limits**
o-Terphenyl	121%	105%	95%	95%	50-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Carbon Chain by GC/FID

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18
Units: mg/kg

Date Sampled:	06/28/18	06/28/18	06/28/18	06/28/18	
Date Prepared:	06/29/18	06/29/18	06/29/18	06/29/18	
Date Analyzed:	06/30/18	06/30/18	06/30/18	06/30/18	
AA ID No:	8F28008-05	8F28008-06	8F28008-07	8F28008-08	
Client ID No:	SO-3-2.5	SO-3-3.5	SO-3-5	SO-3-10	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
Carbon Chain Characterization 8015M (EPA 8015M)					
C6-C8	<1.0	<1.0	<1.0	<1.0	1.0
C8-C10	<1.0	<1.0	<1.0	<1.0	1.0
C10-C12	<1.0	<1.0	<1.0	<1.0	1.0
C12-C14	<1.0	<1.0	<1.0	<1.0	1.0
C14-C16	<1.0	<1.0	<1.0	<1.0	1.0
C16-C18	<1.0	<1.0	<1.0	<1.0	1.0
C18-C20	<1.0	<1.0	<1.0	<1.0	1.0
C20-C22	<1.0	<1.0	<1.0	<1.0	1.0
C22-C24	<1.0	<1.0	<1.0	<1.0	1.0
C24-C26	<1.0	<1.0	<1.0	<1.0	1.0
C26-C28	**2.8**	<1.0	<1.0	<1.0	1.0
C28-C32	**7.8**	<1.0	**1.7**	<1.0	1.0
C32-C34	**1.8**	<1.0	<1.0	<1.0	1.0
C34-C36	**1.7**	<1.0	<1.0	<1.0	1.0
C36-C40	**3.4**	<1.0	<1.0	<1.0	1.0
C40-C44	**2.9**	<1.0	<1.0	**1.6**	1.0
TPH (C6-C44)	**20**	<10	<10	<10	10
Gasoline Range Organics (C6-C10)	<5.0	<5.0	<5.0	<5.0	5.0
Diesel Range Organics (C10-C23)	<5.0	<5.0	<5.0	<5.0	5.0
Oil Range Organics (C23-C44)	**20**	<5.0	<5.0	<5.0	5.0
Surrogates					**%REC Limits**
o-Terphenyl	95%	96%	98%	95%	50-150



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Carbon Chain by GC/FID

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18
Units: mg/kg

Date Sampled:	06/28/18	06/28/18	06/28/18	06/28/18	
Date Prepared:	06/29/18	06/29/18	06/29/18	06/29/18	
Date Analyzed:	07/02/18	06/30/18	07/02/18	06/30/18	
AA ID No:	8F28008-10	8F28008-11	8F28008-12	8F28008-13	
Client ID No:	SO-4-2.5	SO-4-3.5	SO-4-5	SO-4-5DUP	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
Carbon Chain Characterization 8015M (EPA 8015M)					
C6-C8	<1.0	<1.0	<1.0	<1.0	1.0
C8-C10	<1.0	<1.0	<1.0	<1.0	1.0
C10-C12	<1.0	<1.0	<1.0	<1.0	1.0
C12-C14	<1.0	<1.0	<1.0	<1.0	1.0
C14-C16	<1.0	<1.0	<1.0	<1.0	1.0
C16-C18	**5.7**	<1.0	<1.0	<1.0	1.0
C18-C20	**11**	<1.0	<1.0	<1.0	1.0
C20-C22	**19**	<1.0	**4.2**	<1.0	1.0
C22-C24	**33**	<1.0	**13**	<1.0	1.0
C24-C26	**35**	<1.0	**19**	<1.0	1.0
C26-C28	**53**	<1.0	**41**	**1.3**	1.0
C28-C32	**130**	<1.0	**110**	**3.4**	1.0
C32-C34	**41**	<1.0	**35**	<1.0	1.0
C34-C36	**34**	<1.0	**32**	<1.0	1.0
C36-C40	**34**	<1.0	**49**	**1.8**	1.0
C40-C44	**28**	**2.6**	**39**	**1.0**	1.0
TPH (C6-C44)	**430**	<10	**340**	<10	10
Gasoline Range Organics (C6-C10)	<5.0	<5.0	<5.0	<5.0	5.0
Diesel Range Organics (C10-C23)	**53**	<5.0	**11**	<5.0	5.0
Oil Range Organics (C23-C44)	**370**	<5.0	**330**	**7.5**	5.0
Surrogates					**%REC Limits**
o-Terphenyl	78%	93%	93%	97%	50-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A948102
Project No:	NA	**Date Received:**	06/28/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	07/03/18
Method:	Carbon Chain by GC/FID	**Units:**	mg/kg

Date Sampled:	06/28/18	06/28/18	06/28/18	06/28/18	
Date Prepared:	06/29/18	06/29/18	06/29/18	06/29/18	
Date Analyzed:	06/30/18	06/30/18	06/30/18	07/02/18	
AA ID No:	8F28008-14	8F28008-15	8F28008-16	8F28008-17	
Client ID No:	SO-5-2.5	SO-5-3.5	SO-5-5	SO-6-0.5	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
Carbon Chain Characterization 8015M (EPA 8015M)					
C6-C8	<1.0	<1.0	<1.0	<1.0	1.0
C8-C10	<1.0	<1.0	<1.0	<1.0	1.0
C10-C12	<1.0	<1.0	<1.0	<1.0	1.0
C12-C14	<1.0	<1.0	<1.0	<1.0	1.0
C14-C16	<1.0	<1.0	<1.0	<1.0	1.0
C16-C18	<1.0	<1.0	<1.0	<1.0	1.0
C18-C20	<1.0	<1.0	<1.0	<1.0	1.0
C20-C22	<1.0	<1.0	<1.0	<1.0	1.0
C22-C24	<1.0	<1.0	<1.0	**2.3**	1.0
C24-C26	<1.0	<1.0	<1.0	**2.8**	1.0
C26-C28	<1.0	<1.0	<1.0	**8.3**	1.0
C28-C32	**2.7**	**2.2**	<1.0	**25**	1.0
C32-C34	<1.0	<1.0	<1.0	**9.1**	1.0
C34-C36	<1.0	<1.0	<1.0	**6.7**	1.0
C36-C40	<1.0	<1.0	<1.0	**15**	1.0
C40-C44	<1.0	<1.0	**1.7**	**9.5**	1.0
TPH (C6-C44)	<10	<10	<10	**79**	10
Gasoline Range Organics (C6-C10)	<5.0	<5.0	<5.0	<5.0	5.0
Diesel Range Organics (C10-C23)	<5.0	<5.0	<5.0	<5.0	5.0
Oil Range Organics (C23-C44)	<5.0	<5.0	<5.0	**78**	5.0
Surrogates					**%REC Limits**
o-Terphenyl	94%	96%	97%	92%	50-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Carbon Chain by GC/FID

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18
Units: mg/kg

Date Sampled:	06/28/18	06/28/18	06/28/18	06/28/18	
Date Prepared:	06/29/18	06/29/18	06/29/18	06/29/18	
Date Analyzed:	06/30/18	06/30/18	06/30/18	06/30/18	
AA ID No:	8F28008-18	8F28008-19	8F28008-20	8F28008-21	
Client ID No:	SO-6-2.5	SO-6-3.5	SO-6-5	SO-7-2.5	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	10	1	1	1	MRL
Carbon Chain Characterization 8015M (EPA 8015M)					
C6-C8	<10	<1.0	<1.0	<1.0	1.0
C8-C10	<10	<1.0	<1.0	<1.0	1.0
C10-C12	<10	<1.0	<1.0	<1.0	1.0
C12-C14	<10	<1.0	<1.0	<1.0	1.0
C14-C16	<10	<1.0	<1.0	<1.0	1.0
C16-C18	**24**	<1.0	<1.0	<1.0	1.0
C18-C20	**41**	<1.0	<1.0	<1.0	1.0
C20-C22	**63**	<1.0	<1.0	<1.0	1.0
C22-C24	**96**	<1.0	<1.0	<1.0	1.0
C24-C26	**110**	<1.0	<1.0	<1.0	1.0
C26-C28	**160**	<1.0	<1.0	<1.0	1.0
C28-C32	**360**	<1.0	<1.0	**2.9**	1.0
C32-C34	**100**	<1.0	<1.0	<1.0	1.0
C34-C36	**85**	<1.0	<1.0	<1.0	1.0
C36-C40	**120**	<1.0	<1.0	**1.7**	1.0
C40-C44	**79**	**1.5**	<1.0	**1.9**	1.0
TPH (C6-C44)	**1200**	<10	<10	<10	10
Gasoline Range Organics (C6-C10)	<50	<5.0	<5.0	<5.0	5.0
Diesel Range Organics (C10-C23)	**180**	<5.0	<5.0	<5.0	5.0
Oil Range Organics (C23-C44)	**1100**	<5.0	<5.0	**6.5**	5.0
Surrogates					**%REC Limits**
o-Terphenyl	89%	98%	99%	83%	50-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Carbon Chain by GC/FID

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18
Units: mg/kg

Date Sampled:	06/28/18	06/28/18	06/28/18	06/28/18	
Date Prepared:	06/29/18	06/29/18	06/29/18	06/29/18	
Date Analyzed:	06/30/18	06/30/18	06/30/18	06/30/18	
AA ID No:	8F28008-22	8F28008-23	8F28008-24	8F28008-25	
Client ID No:	SO-7-3.5	SO-7-5	SO-7-5DUP	SO-8-2.5	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	10	MRL
Carbon Chain Characterization 8015M (EPA 8015M)					
C6-C8	<1.0	<1.0	<1.0	<10	1.0
C8-C10	<1.0	<1.0	<1.0	<10	1.0
C10-C12	<1.0	<1.0	<1.0	**10**	1.0
C12-C14	<1.0	<1.0	<1.0	**65**	1.0
C14-C16	<1.0	<1.0	<1.0	**150**	1.0
C16-C18	<1.0	<1.0	<1.0	**270**	1.0
C18-C20	<1.0	**1.7**	<1.0	**360**	1.0
C20-C22	<1.0	**2.5**	<1.0	**480**	1.0
C22-C24	<1.0	**4.2**	**1.6**	**650**	1.0
C24-C26	<1.0	**4.3**	**1.4**	**560**	1.0
C26-C28	**1.7**	**6.3**	**3.8**	**830**	1.0
C28-C32	**4.5**	**15**	**8.4**	**1700**	1.0
C32-C34	<1.0	**3.6**	**2.3**	**490**	1.0
C34-C36	<1.0	**3.3**	**1.7**	**290**	1.0
C36-C40	**1.3**	**2.8**	**2.8**	**520**	1.0
C40-C44	**1.5**	**1.6**	**2.3**	**330**	1.0
TPH (C6-C44)	<10	**46**	**24**	**6800**	10
Gasoline Range Organics (C6-C10)	<5.0	<5.0	<5.0	<50	5.0
Diesel Range Organics (C10-C23)	<5.0	**6.4**	<5.0	**1700**	5.0
Oil Range Organics (C23-C44)	**9.0**	**39**	**24**	**5100**	5.0
Surrogates					**%REC Limits**
o-Terphenyl	78%	89%	86%	66%	50-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Carbon Chain by GC/FID

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18
Units: mg/kg

Date Sampled:	06/28/18	06/28/18	06/28/18	06/28/18	
Date Prepared:	06/29/18	06/29/18	06/29/18	06/29/18	
Date Analyzed:	06/30/18	06/30/18	06/30/18	06/30/18	
AA ID No:	8F28008-26	8F28008-27	8F28008-28	8F28008-30	
Client ID No:	SO-8-3.5	SO-8-5	SO-8-10	SO-9-2.5	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	10	MRL
Carbon Chain Characterization 8015M (EPA 8015M)					
C6-C8	<1.0	<1.0	<1.0	<10	1.0
C8-C10	<1.0	<1.0	<1.0	**58**	1.0
C10-C12	<1.0	<1.0	<1.0	**160**	1.0
C12-C14	<1.0	<1.0	<1.0	**460**	1.0
C14-C16	<1.0	<1.0	<1.0	**670**	1.0
C16-C18	<1.0	<1.0	<1.0	**860**	1.0
C18-C20	<1.0	<1.0	<1.0	**810**	1.0
C20-C22	<1.0	<1.0	<1.0	**1000**	1.0
C22-C24	<1.0	<1.0	<1.0	**1200**	1.0
C24-C26	<1.0	<1.0	<1.0	**1000**	1.0
C26-C28	<1.0	<1.0	<1.0	**1400**	1.0
C28-C32	**3.1**	<1.0	<1.0	**2700**	1.0
C32-C34	**1.2**	<1.0	<1.0	**690**	1.0
C34-C36	**1.3**	<1.0	<1.0	**560**	1.0
C36-C40	**5.5**	**1.6**	<1.0	**860**	1.0
C40-C44	**8.3**	**3.4**	**1.1**	**390**	1.0
TPH (C6-C44)	**19**	<10	<10	**13000**	10
Gasoline Range Organics (C6-C10)	<5.0	<5.0	<5.0	**58**	5.0
Diesel Range Organics (C10-C23)	<5.0	<5.0	<5.0	**4600**	5.0
Oil Range Organics (C23-C44)	**19**	**5.0**	<5.0	**8200**	5.0
Surrogates					**%REC Limits**
o-Terphenyl	91%	85%	87%	130%	50-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A948102
Project No:	NA	**Date Received:**	06/28/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	07/03/18
Method:	Carbon Chain by GC/FID	**Units:**	mg/kg

Date Sampled:	06/28/18	06/28/18	06/28/18	06/28/18	
Date Prepared:	06/29/18	06/29/18	06/29/18	06/29/18	
Date Analyzed:	06/30/18	06/30/18	06/30/18	07/02/18	
AA ID No:	8F28008-31	8F28008-32	8F28008-33	8F28008-34	
Client ID No:	SO-9-3.5	SO-9-5	SO-12-2.5	SO-12-3.5	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	1	MRL
Carbon Chain Characterization 8015M (EPA 8015M)					
C6-C8	<1.0	<1.0	<1.0	<1.0	1.0
C8-C10	<1.0	<1.0	<1.0	**7.4**	1.0
C10-C12	<1.0	<1.0	<1.0	**10**	1.0
C12-C14	**2.9**	<1.0	<1.0	**15**	1.0
C14-C16	**5.3**	<1.0	<1.0	**18**	1.0
C16-C18	**9.8**	<1.0	<1.0	**24**	1.0
C18-C20	**13**	<1.0	**3.8**	**25**	1.0
C20-C22	**17**	<1.0	**8.8**	**36**	1.0
C22-C24	**26**	<1.0	**40**	**49**	1.0
C24-C26	**24**	<1.0	**82**	**50**	1.0
C26-C28	**32**	<1.0	**130**	**64**	1.0
C28-C32	**78**	<1.0	**300**	**110**	1.0
C32-C34	**24**	<1.0	**71**	**40**	1.0
C34-C36	**21**	<1.0	**64**	**32**	1.0
C36-C40	**24**	**2.7**	**140**	**60**	1.0
C40-C44	**25**	**5.6**	**89**	**35**	1.0
TPH (C6-C44)	**300**	<10	**920**	**580**	10
Gasoline Range Organics (C6-C10)	<5.0	<5.0	<5.0	**7.4**	5.0
Diesel Range Organics (C10-C23)	**61**	<5.0	**33**	**150**	5.0
Oil Range Organics (C23-C44)	**240**	**8.2**	**890**	**420**	5.0
Surrogates					**%REC Limits**
o-Terphenyl	81%	89%	88%	78%	50-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Carbon Chain by GC/FID

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18
Units: mg/kg

Date Sampled:	06/28/18	06/28/18	06/28/18	06/28/18	
Date Prepared:	06/29/18	06/29/18	06/29/18	06/29/18	
Date Analyzed:	07/02/18	06/30/18	06/30/18	06/30/18	
AA ID No:	8F28008-35	8F28008-36	8F28008-37	8F28008-38	
Client ID No:	SO-12-5	SO-10-2.5	SO-10-3.5	SO-11-2.5	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	1	1	10	MRL
Carbon Chain Characterization 8015M (EPA 8015M)					
C6-C8	<1.0	<1.0	<1.0	<10	1.0
C8-C10	<1.0	<1.0	<1.0	<10	1.0
C10-C12	**1.9**	<1.0	<1.0	<10	1.0
C12-C14	**1.1**	<1.0	<1.0	<10	1.0
C14-C16	**1.4**	<1.0	<1.0	<10	1.0
C16-C18	**4.1**	<1.0	<1.0	**33**	1.0
C18-C20	**17**	<1.0	<1.0	**59**	1.0
C20-C22	**68**	<1.0	<1.0	**94**	1.0
C22-C24	**150**	<1.0	<1.0	**130**	1.0
C24-C26	**200**	<1.0	<1.0	**120**	1.0
C26-C28	**260**	**2.7**	<1.0	**190**	1.0
C28-C32	**410**	**8.9**	<1.0	**460**	1.0
C32-C34	**140**	**2.5**	<1.0	**120**	1.0
C34-C36	**110**	**2.8**	<1.0	**81**	1.0
C36-C40	**220**	**7.6**	**3.2**	**140**	1.0
C40-C44	**160**	**7.3**	**4.2**	**110**	1.0
TPH (C6-C44)	**1700**	**32**	<10	**1500**	10
Gasoline Range Organics (C6-C10)	<5.0	<5.0	<5.0	<50	5.0
Diesel Range Organics (C10-C23)	**170**	<5.0	<5.0	**250**	5.0
Oil Range Organics (C23-C44)	**1600**	**32**	**7.5**	**1300**	5.0
Surrogates					**%REC Limits**
o-Terphenyl	74%	84%	87%	119%	50-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Carbon Chain by GC/FID

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18
Units: mg/kg

Date Sampled:	06/28/18	06/28/18	06/28/18	06/28/18	
Date Prepared:	06/29/18	06/29/18	06/29/18	06/29/18	
Date Analyzed:	07/02/18	06/30/18	06/30/18	06/30/18	
AA ID No:	8F28008-39	8F28008-40	8F28008-41	8F28008-42	
Client ID No:	SO-11-3.5	SO-13-2.5	SO-13-3.5	SO-13-5	
Matrix:	Soil	Soil	Soil	Soil	
Dilution Factor:	1	10	1	1	MRL
Carbon Chain Characterization 8015M (EPA 8015M)					
C6-C8	<1.0	<10	<1.0	<1.0	1.0
C8-C10	<1.0	<10	<1.0	<1.0	1.0
C10-C12	<1.0	**25**	<1.0	<1.0	1.0
C12-C14	<1.0	**120**	<1.0	<1.0	1.0
C14-C16	<1.0	**220**	<1.0	<1.0	1.0
C16-C18	<1.0	**340**	<1.0	<1.0	1.0
C18-C20	**1.1**	**360**	<1.0	<1.0	1.0
C20-C22	**3.0**	**530**	<1.0	<1.0	1.0
C22-C24	**5.6**	**590**	<1.0	<1.0	1.0
C24-C26	**5.0**	**550**	<1.0	<1.0	1.0
C26-C28	**11**	**660**	<1.0	<1.0	1.0
C28-C32	**32**	**1200**	<1.0	**1.1**	1.0
C32-C34	**9.8**	**320**	<1.0	<1.0	1.0
C34-C36	**12**	**210**	<1.0	<1.0	1.0
C36-C40	**26**	**340**	**3.8**	**1.8**	1.0
C40-C44	**23**	**140**	**5.9**	**3.8**	1.0
TPH (C6-C44)	**130**	**5600**	<10	<10	10
Gasoline Range Organics (C6-C10)	<5.0	<50	<5.0	<5.0	5.0
Diesel Range Organics (C10-C23)	**7.0**	**1900**	<5.0	<5.0	5.0
Oil Range Organics (C23-C44)	**120**	**3700**	**9.7**	**6.6**	5.0
Surrogates					**%REC Limits**
o-Terphenyl	89%	61%	89%	88%	50-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Carbon Chain by GC/FID

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18
Units: mg/kg

Date Sampled:	06/28/18	06/28/18	
Date Prepared:	06/29/18	06/29/18	
Date Analyzed:	06/30/18	07/01/18	
AA ID No:	8F28008-43	8F28008-44	
Client ID No:	SO-13-10	SO-13-5DUP	
Matrix:	Soil	Soil	
Dilution Factor:	1	1	MRL
Carbon Chain Characterization 8015M (EPA 8015M)			
C6-C8	<1.0	<1.0	1.0
C8-C10	<1.0	<1.0	1.0
C10-C12	<1.0	<1.0	1.0
C12-C14	<1.0	<1.0	1.0
C14-C16	<1.0	<1.0	1.0
C16-C18	<1.0	<1.0	1.0
C18-C20	<1.0	<1.0	1.0
C20-C22	<1.0	<1.0	1.0
C22-C24	<1.0	<1.0	1.0
C24-C26	<1.0	<1.0	1.0
C26-C28	<1.0	<1.0	1.0
C28-C32	<1.0	<1.0	1.0
C32-C34	<1.0	<1.0	1.0
C34-C36	<1.0	<1.0	1.0
C36-C40	<1.0	<1.0	1.0
C40-C44	**1.8**	**1.6**	1.0
TPH (C6-C44)	<10	<10	10
Gasoline Range Organics (C6-C10)	<5.0	<5.0	5.0
Diesel Range Organics (C10-C23)	<5.0	<5.0	5.0
Oil Range Organics (C23-C44)	<5.0	<5.0	5.0
Surrogates			**%REC Limits**
o-Terphenyl	90%	90%	50-150

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Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Chloride by Ion Chromatography

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

AA I.D. No.	Client I.D. No.	Sampled	Prepared	Analyzed	Dilution	Result	Units	MRL
Chloride by Ion Chromatography (EPA 300.0)								
8F28008-09	SO-3	06/28/18	06/29/18	06/29/18	100	**1300**	mg/L	0.5
8F28008-29	SO-8	06/28/18	06/29/18	06/29/18	400	**3800**	mg/L	0.5
8F28008-45	SO-13	06/28/18	06/29/18	06/29/18	100	**1400**	mg/L	0.5



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LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Nitrate by Ion Chromatography

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

AA I.D. No.	Client I.D. No.	Sampled	Prepared	Analyzed	Dilution	Result	Units	MRL
Nitrate as N by Ion Chromatography (EPA 300.0)								
8F28008-09	SO-3	06/28/18	06/29/18	06/29/18	1	**0.56**	mg/L	0.1
8F28008-29	SO-8	06/28/18	06/29/18	06/29/18	1	**0.60**	mg/L	0.1
8F28008-45	SO-13	06/28/18	06/29/18	06/29/18	1	**0.37**	mg/L	0.1

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LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Sulfate by Ion Chromatography

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

AA I.D. No.	Client I.D. No.	Sampled	Prepared	Analyzed	Dilution	Result	Units	MRL
Sulfate by Ion Chromatography (EPA 300.0)								
8F28008-09	SO-3	06/28/18	06/29/18	06/29/18	20	**140**	mg/L	0.5
8F28008-29	SO-8	06/28/18	06/29/18	06/29/18	50	**560**	mg/L	0.5
8F28008-45	SO-13	06/28/18	06/29/18	06/29/18	20	**160**	mg/L	0.5



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LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: General Chemistry Analyses

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

AA I.D. No.	Client I.D. No.	Sampled	Prepared	Analyzed	Dilution	Result	Units	MRL
Conductivity SM2510 B (SM2510 B)								
8F28008-09	SO-3	06/28/18	06/29/18	06/29/18	1	**5200**	umhos/cm	10
8F28008-29	SO-8	06/28/18	06/29/18	06/29/18	1	**14000**	umhos/cm	10
8F28008-45	SO-13	06/28/18	06/29/18	06/29/18	1	**5200**	umhos/cm	10
Hardness SM2340C (SM2340C)								
8F28008-09	SO-3	06/28/18	07/02/18	07/02/18	1	**680**	mg/L	2
8F28008-29	SO-8	06/28/18	07/02/18	07/02/18	1	**1600**	mg/L	2
8F28008-45	SO-13	06/28/18	07/02/18	07/02/18	1	**730**	mg/L	2
pH Measurement SM4500H+ B (SM4500H+ B) O-04								
8F28008-09	SO-3	06/28/18	06/29/18	06/29/18	1	**6.5**	pH Units	0.01
8F28008-29	SO-8	06/28/18	06/29/18	06/29/18	1	**6.5**	pH Units	0.01
8F28008-45	SO-13	06/28/18	06/29/18	06/29/18	1	**7.0**	pH Units	0.01
Salinity SM 2520 (SM 2520)								
8F28008-09	SO-3	06/28/18	06/29/18	06/29/18	1	**2.8**	Salinity units	0.1
8F28008-29	SO-8	06/28/18	06/29/18	06/29/18	1	**8.1**	Salinity units	0.1
8F28008-45	SO-13	06/28/18	06/29/18	06/29/18	1	**2.8**	Salinity units	0.1
TDS SM2540C (SM2540C)								
8F28008-09	SO-3	06/28/18	07/02/18	07/02/18	1	**3300**	mg/L	10
8F28008-29	SO-8	06/28/18	07/02/18	07/02/18	1	**8600**	mg/L	10

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LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: General Chemistry Analyses

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

AA I.D. No.	Client I.D. No.	Sampled	Prepared	Analyzed	Dilution	Result	Units	MRL
TDS SM2540C (SM2540C)								
8F28008-45	SO-13	06/28/18	07/02/18	07/02/18	1	**3300**	mg/L	10

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LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A948102
Project No:	NA	**Date Received:**	06/28/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	07/03/18
Method:	Carbon Chain by GC/FID	**Units:**	mg/L

Date Sampled:	06/28/18	06/28/18	06/28/18	06/28/18	
Date Prepared:	06/29/18	06/29/18	06/29/18	06/29/18	
Date Analyzed:	06/29/18	06/29/18	06/29/18	06/29/18	
AA ID No:	8F28008-09	8F28008-29	8F28008-45	8F28008-46	
Client ID No:	SO-3	SO-8	SO-13	EB-062318	
Matrix:	Water	Water	Water	Water	
Dilution Factor:	1	1	1	1	MRL
Carbon Chain Characterization 8015M (EPA 8015M)					
C6-C8	<0.010	<0.010	<0.010	<0.010	0.010
C8-C10	<0.010	<0.010	<0.010	<0.010	0.010
C10-C12	**0.019**	**0.020**	**0.010**	<0.010	0.010
C12-C14	**0.042**	**0.037**	**0.015**	<0.010	0.010
C14-C16	**0.052**	**0.072**	**0.027**	<0.010	0.010
C16-C18	**0.097**	**0.11**	**0.049**	<0.010	0.010
C18-C20	**0.081**	**0.072**	**0.053**	<0.010	0.010
C20-C22	**0.13**	**0.081**	**0.066**	<0.010	0.010
C22-C24	**0.099**	**0.068**	**0.073**	<0.010	0.010
C24-C26	**0.10**	**0.025**	**0.050**	<0.010	0.010
C26-C28	**0.092**	**0.035**	**0.050**	<0.010	0.010
C28-C32	**0.15**	**0.054**	**0.088**	<0.010	0.010
C32-C34	**0.053**	**0.022**	**0.033**	<0.010	0.010
C34-C36	**0.036**	**0.015**	**0.023**	<0.010	0.010
C36-C40	**0.046**	**0.019**	**0.036**	<0.010	0.010
C40-C44	**0.026**	**0.025**	**0.026**	<0.010	0.010
TPH (C6-C44)	**0.97**	**0.66**	**0.60**	<0.10	0.10
Gasoline Range Organics (C6-C10)	<0.10	<0.10	<0.10	<0.10	0.10
Diesel Range Organics (C10-C23)	**0.42**	**0.42**	**0.25**	<0.10	0.10
Oil Range Organics (C23-C44)	**0.56**	**0.23**	**0.34**	<0.10	0.10
Surrogates					**%REC Limits**
o-Terphenyl	66%	57%	60%	67%	50-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Total Metals by ICP Atomic Emission Spectroscopy

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

AA I.D. No.	Client I.D. No.	Sampled	Prepared	Analyzed	Dilution	Result	Units	MRL
Lead Total EPA 6010B (EPA 6010B)								
8F28008-01	SO-1-2.5	06/28/18	06/29/18	07/02/18	1	**12**	mg/kg	3
8F28008-02	SO-2-2.5	06/28/18	06/29/18	07/02/18	1	**29**	mg/kg	3
8F28008-03	SO-2-3.5	06/28/18	06/29/18	07/02/18	1	<3.0	mg/kg	3
8F28008-04	SO-2-5	06/28/18	06/29/18	07/02/18	1	**160**	mg/kg	3
8F28008-05	SO-3-2.5	06/28/18	06/29/18	07/02/18	1	**5.0**	mg/kg	3
8F28008-06	SO-3-3.5	06/28/18	06/29/18	07/02/18	1	<3.0	mg/kg	3
8F28008-07	SO-3-5	06/28/18	06/29/18	07/02/18	1	**3.6**	mg/kg	3
8F28008-08	SO-3-10	06/28/18	06/29/18	07/02/18	1	<3.0	mg/kg	3
8F28008-10	SO-4-2.5	06/28/18	06/29/18	07/02/18	1	<3.0	mg/kg	3
8F28008-11	SO-4-3.5	06/28/18	06/29/18	07/02/18	1	<3.0	mg/kg	3
8F28008-12	SO-4-5	06/28/18	06/29/18	07/02/18	1	**10**	mg/kg	3
8F28008-13	SO-4-5DUP	06/28/18	06/29/18	07/02/18	1	**7.1**	mg/kg	3
8F28008-14	SO-5-2.5	06/28/18	06/29/18	07/02/18	1	**5.2**	mg/kg	3
8F28008-15	SO-5-3.5	06/28/18	06/29/18	07/02/18	1	**3.5**	mg/kg	3
8F28008-16	SO-5-5	06/28/18	06/29/18	07/02/18	1	**3.5**	mg/kg	3
8F28008-17	SO-6-0.5	06/28/18	06/29/18	07/02/18	1	**27**	mg/kg	3
8F28008-18	SO-6-2.5	06/28/18	06/29/18	07/02/18	1	**32**	mg/kg	3
8F28008-19	SO-6-3.5	06/28/18	06/29/18	07/02/18	1	**8.0**	mg/kg	3
8F28008-20	SO-6-5	06/28/18	06/29/18	07/02/18	1	<3.0	mg/kg	3
8F28008-21	SO-7-2.5	06/28/18	06/29/18	07/02/18	1	**7.0**	mg/kg	3
8F28008-22	SO-7-3.5	06/28/18	06/29/18	07/02/18	1	**7.8**	mg/kg	3
8F28008-23	SO-7-5	06/28/18	06/29/18	07/02/18	1	**6.7**	mg/kg	3
8F28008-24	SO-7-5DUP	06/28/18	06/29/18	07/02/18	1	**8.6**	mg/kg	3
8F28008-25	SO-8-2.5	06/28/18	06/29/18	07/02/18	1	**46**	mg/kg	3
8F28008-26	SO-8-3.5	06/28/18	06/29/18	07/02/18	1	<3.0	mg/kg	3



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: Total Metals by ICP Atomic Emission Spectroscopy

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

AA I.D. No.	Client I.D. No.	Sampled	Prepared	Analyzed	Dilution	Result	Units	MRL
Lead Total EPA 6010B (EPA 6010B)								
8F28008-27	SO-8-5	06/28/18	06/29/18	07/02/18	1	<3.0	mg/kg	3
8F28008-28	SO-8-10	06/28/18	06/29/18	07/02/18	1	<3.0	mg/kg	3
8F28008-30	SO-9-2.5	06/28/18	06/29/18	07/02/18	1	**82**	mg/kg	3
8F28008-31	SO-9-3.5	06/28/18	06/29/18	07/02/18	1	<3.0	mg/kg	3
8F28008-32	SO-9-5	06/28/18	06/29/18	07/02/18	1	<3.0	mg/kg	3
8F28008-33	SO-12-2.5	06/28/18	06/29/18	07/02/18	1	**5.9**	mg/kg	3
8F28008-34	SO-12-3.5	06/28/18	06/29/18	07/02/18	1	**9.2**	mg/kg	3
8F28008-35	SO-12-5	06/28/18	06/29/18	07/02/18	1	**34**	mg/kg	3
8F28008-36	SO-10-2.5	06/28/18	06/29/18	07/02/18	1	**6.2**	mg/kg	3
8F28008-37	SO-10-3.5	06/28/18	06/29/18	07/02/18	1	**7.0**	mg/kg	3
8F28008-38	SO-11-2.5	06/28/18	06/29/18	07/02/18	1	**17**	mg/kg	3
8F28008-39	SO-11-3.5	06/28/18	06/29/18	07/02/18	1	**8.6**	mg/kg	3
8F28008-40	SO-13-2.5	06/28/18	06/29/18	07/02/18	1	**4.9**	mg/kg	3
8F28008-41	SO-13-3.5	06/28/18	06/29/18	07/02/18	1	<3.0	mg/kg	3
8F28008-42	SO-13-5	06/28/18	06/29/18	07/02/18	1	<3.0	mg/kg	3
8F28008-43	SO-13-10	06/28/18	06/29/18	07/02/18	1	<3.0	mg/kg	3
8F28008-44	SO-13-5DUP	06/28/18	06/29/18	07/02/18	1	<3.0	mg/kg	3



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Chloride by Ion Chromatography - Quality Control										
Batch B8F2916 - NO PREP										
Blank (B8F2916-BLK1)				Prepared & Analyzed: 06/29/18						
Chloride	<0.50	0.50	mg/L							
LCS (B8F2916-BS1)				Prepared & Analyzed: 06/29/18						
Chloride	**4.70**	0.50	mg/L	5.0		94.0	90-110			
LCS Dup (B8F2916-BSD1)				Prepared & Analyzed: 06/29/18						
Chloride	**4.76**	0.50	mg/L	5.0		95.2	90-110	1.27	20	
Duplicate (B8F2916-DUP1)		**Source: 8F28008-09**		Prepared & Analyzed: 06/29/18						
Chloride	**1440**	50	mg/L		1290			10.8	20	
Duplicate (B8F2916-DUP2)		**Source: 8F29001-02**		Prepared & Analyzed: 06/29/18						
Chloride	**123**	5.0	mg/L		116			6.20	20	
Nitrate by Ion Chromatography - Quality Control										
Batch B8F2917 - NO PREP										
Blank (B8F2917-BLK1)				Prepared & Analyzed: 06/29/18						
Nitrate as N	<0.10	0.10	mg/L							
LCS (B8F2917-BS1)				Prepared & Analyzed: 06/29/18						
Nitrate as N	**4.51**	0.10	mg/L	5.0		90.2	90-110			
LCS Dup (B8F2917-BSD1)				Prepared & Analyzed: 06/29/18						
Nitrate as N	**4.52**	0.10	mg/L	5.0		90.4	90-110	0.221	20	
Matrix Spike (B8F2917-MS1)		**Source: 8F28008-29**		Prepared & Analyzed: 06/29/18						
Nitrate as N	**1.67**	0.10	mg/L	1.0	0.600	107	80-120			
Matrix Spike Dup (B8F2917-MSD1)		**Source: 8F28008-29**		Prepared & Analyzed: 06/29/18						
Nitrate as N	**1.61**	0.10	mg/L	1.0	0.600	101	80-120	3.66	30	
Sulfate by Ion Chromatography - Quality Control										
Batch B8F2918 - NO PREP										
Blank (B8F2918-BLK1)				Prepared & Analyzed: 06/29/18						
Sulfate	<0.50	0.50	mg/L							
LCS (B8F2918-BS1)				Prepared & Analyzed: 06/29/18						
Sulfate	**5.02**	0.50	mg/L	5.0		100	90-110			
LCS Dup (B8F2918-BSD1)				Prepared & Analyzed: 06/29/18						
Sulfate	**5.40**	0.50	mg/L	5.0		108	90-110	7.29	20	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
General Chemistry Analyses - Quality Control										
Batch B8F2919 - NO PREP										
Blank (B8F2919-BLK1)				Prepared & Analyzed: 06/29/18						
Salinity	<0.10	0.10	Salinity units							
Specific Conductance (EC)	<10	10	umhos/cm							
Duplicate (B8F2919-DUP1)			**Source: 8F28008-29**	Prepared & Analyzed: 06/29/18						
Specific Conductance (EC)	**15100**	20	umhos/cm		13800			9.14	25	
Salinity	**8.40**	0.20	Salinity units		8.10			3.64	20	
Batch B8F2920 - NO PREP										
Blank (B8F2920-BLK1)				Prepared & Analyzed: 07/02/18						
Total Dissolved Solids	<10	10	mg/L							
LCS (B8F2920-BS1)				Prepared & Analyzed: 07/02/18						
Total Dissolved Solids	**520**	10	mg/L	500		104	80-120			
LCS Dup (B8F2920-BSD1)				Prepared & Analyzed: 07/02/18						
Total Dissolved Solids	**580**	10	mg/L	500		116	80-120	10.9	25	
Duplicate (B8F2920-DUP1)			**Source: 8F28008-29**	Prepared & Analyzed: 07/02/18						
Total Dissolved Solids	**7400**	1000	mg/L		8600			15.0	20	
Batch B8F2923 - NO PREP										
Duplicate (B8F2923-DUP1)			**Source: 8F28008-09**	Prepared & Analyzed: 06/29/18						**O-04**
pH	**6.97**	0.010	pH Units		6.47			7.44	20	
Batch B8G0221 - NO PREP										
Blank (B8G0221-BLK1)				Prepared & Analyzed: 07/02/18						
Hardness	<2.0	2.0	mg/L							
LCS (B8G0221-BS1)				Prepared & Analyzed: 07/02/18						
Hardness	**1000**	2.0	mg/L	1000		100	80-120			
LCS Dup (B8G0221-BSD1)				Prepared & Analyzed: 07/02/18						
Hardness	**998**	2.0	mg/L	1000		99.8	80-120	0.200	25	
Duplicate (B8G0221-DUP1)			**Source: 8F28008-29**	Prepared & Analyzed: 07/02/18						
Hardness	**1600**	2.0	mg/L		1640			1.85	20	
Carbon Chain by GC/FID - Quality Control										

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Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Carbon Chain by GC/FID - Quality Control										
Batch B8F2901 - EPA 3510C										
Blank (B8F2901-BLK1)				Prepared & Analyzed: 06/29/18						
C6-C8	<0.010	0.010	mg/L							
C8-C10	<0.010	0.010	mg/L							
C10-C12	<0.010	0.010	mg/L							
C12-C14	<0.010	0.010	mg/L							
C14-C16	<0.010	0.010	mg/L							
C16-C18	<0.010	0.010	mg/L							
C18-C20	<0.010	0.010	mg/L							
C20-C22	<0.010	0.010	mg/L							
C22-C24	<0.010	0.010	mg/L							
C24-C26	<0.010	0.010	mg/L							
C26-C28	<0.010	0.010	mg/L							
C28-C32	<0.010	0.010	mg/L							
C32-C34	<0.010	0.010	mg/L							
C34-C36	<0.010	0.010	mg/L							
C36-C40	<0.010	0.010	mg/L							
C40-C44	<0.010	0.010	mg/L							
TPH (C6-C44)	<0.10	0.10	mg/L							
Gasoline Range Organics (C6-C10)	<0.10	0.10	mg/L							
Diesel Range Organics (C10-C23)	<0.10	0.10	mg/L							
Oil Range Organics (C23-C44)	<0.10	0.10	mg/L							
Surrogate: o-Terphenyl	*0.0386*		*mg/L*	*0.040*		*96.5*	*50-150*			
LCS (B8F2901-BS1)				Prepared & Analyzed: 06/29/18						
Diesel Range Organics as Diesel	**0.687**	0.10	mg/L	0.80		85.9	75-125			
Surrogate: o-Terphenyl	*0.0404*		*mg/L*	*0.040*		*101*	*50-150*			
LCS Dup (B8F2901-BSD1)				Prepared & Analyzed: 06/29/18						
Diesel Range Organics as Diesel	**0.661**	0.10	mg/L	0.80		82.7	75-125	3.87	30	
Surrogate: o-Terphenyl	*0.0382*		*mg/L*	*0.040*		*95.4*	*50-150*			
Batch B8F2911 - EPA 3550B										
Blank (B8F2911-BLK1)				Prepared & Analyzed: 06/29/18						
C6-C8	<1.0	1.0	mg/kg							



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Carbon Chain by GC/FID - Quality Control										
Batch B8F2911 - EPA 3550B										
Blank (B8F2911-BLK1) Continued				Prepared & Analyzed: 06/29/18						
C8-C10	<1.0	1.0	mg/kg							
C10-C12	<1.0	1.0	mg/kg							
C12-C14	<1.0	1.0	mg/kg							
C14-C16	<1.0	1.0	mg/kg							
C16-C18	<1.0	1.0	mg/kg							
C18-C20	<1.0	1.0	mg/kg							
C20-C22	<1.0	1.0	mg/kg							
C22-C24	<1.0	1.0	mg/kg							
C24-C26	<1.0	1.0	mg/kg							
C26-C28	<1.0	1.0	mg/kg							
C28-C32	<1.0	1.0	mg/kg							
C32-C34	<1.0	1.0	mg/kg							
C34-C36	<1.0	1.0	mg/kg							
C36-C40	<1.0	1.0	mg/kg							
C40-C44	<1.0	1.0	mg/kg							
TPH (C6-C44)	<10	10	mg/kg							
Gasoline Range Organics (C6-C10)	<5.0	5.0	mg/kg							
Diesel Range Organics (C10-C23)	<5.0	5.0	mg/kg							
Oil Range Organics (C23-C44)	<5.0	5.0	mg/kg							
Surrogate: o-Terphenyl	*8.38*		*mg/kg*	*10*		*83.8*	*50-150*			
LCS (B8F2911-BS1)				Prepared & Analyzed: 06/29/18						
Diesel Range Organics as Diesel	**157**	10	mg/kg	200		78.4	75-125			
Surrogate: o-Terphenyl	*11.3*		*mg/kg*	*10*		*113*	*50-150*			
LCS Dup (B8F2911-BSD1)				Prepared & Analyzed: 06/29/18						
Diesel Range Organics as Diesel	**161**	10	mg/kg	200		80.7	75-125	2.88	40	
Surrogate: o-Terphenyl	*12.1*		*mg/kg*	*10*		*121*	*50-150*			
Matrix Spike (B8F2911-MS1)		**Source: 8F28008-17**		Prepared: 06/29/18			Analyzed: 06/30/18			
Diesel Range Organics as Diesel	**219**	10	mg/kg	200	80.3	69.4	70-130			QM-07
Surrogate: o-Terphenyl	*12.9*		*mg/kg*	*10*		*129*	*50-150*			
Matrix Spike Dup (B8F2911-MSD1)		**Source: 8F28008-17**		Prepared: 06/29/18			Analyzed: 06/30/18			



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Carbon Chain by GC/FID - Quality Control										
Batch B8F2911 - EPA 3550B										
Diesel Range Organics as Diesel	**244**	10	mg/kg	200	80.3	81.8	70-130	10.8	40	
Surrogate: o-Terphenyl	*12.0*		*mg/kg*	*10*		*120*	*50-150*			
Batch B8F2912 - EPA 3550B										
Blank (B8F2912-BLK1)				Prepared: 06/29/18 Analyzed: 06/30/18						
C6-C8	<1.0	1.0	mg/kg							
C8-C10	<1.0	1.0	mg/kg							
C10-C12	<1.0	1.0	mg/kg							
C12-C14	<1.0	1.0	mg/kg							
C14-C16	<1.0	1.0	mg/kg							
C16-C18	<1.0	1.0	mg/kg							
C18-C20	<1.0	1.0	mg/kg							
C20-C22	<1.0	1.0	mg/kg							
C22-C24	<1.0	1.0	mg/kg							
C24-C26	<1.0	1.0	mg/kg							
C26-C28	<1.0	1.0	mg/kg							
C28-C32	<1.0	1.0	mg/kg							
C32-C34	<1.0	1.0	mg/kg							
C34-C36	<1.0	1.0	mg/kg							
C36-C40	<1.0	1.0	mg/kg							
C40-C44	<1.0	1.0	mg/kg							
TPH (C6-C44)	<10	10	mg/kg							
Gasoline Range Organics (C6-C10)	<5.0	5.0	mg/kg							
Diesel Range Organics (C10-C23)	<5.0	5.0	mg/kg							
Oil Range Organics (C23-C44)	<5.0	5.0	mg/kg							
Surrogate: o-Terphenyl	*8.55*		*mg/kg*	*10*		*85.5*	*50-150*			
LCS (B8F2912-BS1)				Prepared: 06/29/18 Analyzed: 06/30/18						
Diesel Range Organics as Diesel	**163**	10	mg/kg	200		81.7	75-125			
Surrogate: o-Terphenyl	*11.5*		*mg/kg*	*10*		*115*	*50-150*			
LCS Dup (B8F2912-BSD1)				Prepared: 06/29/18 Analyzed: 06/30/18						
Diesel Range Organics as Diesel	**168**	10	mg/kg	200		83.9	75-125	2.72	40	
Surrogate: o-Terphenyl	*12.4*		*mg/kg*	*10*		*124*	*50-150*			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Carbon Chain by GC/FID - Quality Control										
Batch B8F2912 - EPA 3550B										
Matrix Spike (B8F2912-MS1)		**Source: 8F28008-36**		Prepared: 06/29/18		Analyzed: 06/30/18				
Diesel Range Organics as Diesel	**157**	10	mg/kg	200	34.0	61.6	70-130			QM-07
Surrogate: o-Terphenyl	*11.5*		*mg/kg*	*10*		*115*	*50-150*			
Matrix Spike Dup (B8F2912-MSD1)		**Source: 8F28008-36**		Prepared: 06/29/18		Analyzed: 06/30/18				
Diesel Range Organics as Diesel	**158**	10	mg/kg	200	34.0	61.9	70-130	0.398	40	QM-07
Surrogate: o-Terphenyl	*11.3*		*mg/kg*	*10*		*113*	*50-150*			
Batch B8F2913 - EPA 3550B										
Blank (B8F2913-BLK1)				Prepared: 06/29/18		Analyzed: 06/30/18				
C6-C8	<1.0	1.0	mg/kg							
C8-C10	<1.0	1.0	mg/kg							
C10-C12	<1.0	1.0	mg/kg							
C12-C14	<1.0	1.0	mg/kg							
C14-C16	<1.0	1.0	mg/kg							
C16-C18	<1.0	1.0	mg/kg							
C18-C20	<1.0	1.0	mg/kg							
C20-C22	<1.0	1.0	mg/kg							
C22-C24	<1.0	1.0	mg/kg							
C24-C26	<1.0	1.0	mg/kg							
C26-C28	<1.0	1.0	mg/kg							
C28-C32	<1.0	1.0	mg/kg							
C32-C34	<1.0	1.0	mg/kg							
C34-C36	<1.0	1.0	mg/kg							
C36-C40	<1.0	1.0	mg/kg							
C40-C44	<1.0	1.0	mg/kg							
TPH (C6-C44)	<10	10	mg/kg							
Gasoline Range Organics (C6-C10)	<5.0	5.0	mg/kg							
Diesel Range Organics (C10-C23)	<5.0	5.0	mg/kg							
Oil Range Organics (C23-C44)	<5.0	5.0	mg/kg							
Surrogate: o-Terphenyl	*8.38*		*mg/kg*	*10*		*83.8*	*50-150*			
LCS (B8F2913-BS1)				Prepared: 06/29/18		Analyzed: 06/30/18				
Diesel Range Organics as Diesel	**163**	10	mg/kg	200		81.7	75-125			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Carbon Chain by GC/FID - Quality Control										
Batch B8F2913 - EPA 3550B										
LCS (B8F2913-BS1) Continued				Prepared: 06/29/18 Analyzed: 06/30/18						
Surrogate: o-Terphenyl	*11.4*		*mg/kg*	*10*		*114*	*50-150*			
LCS Dup (B8F2913-BSD1)				Prepared: 06/29/18 Analyzed: 06/30/18						
Diesel Range Organics as Diesel	**164**	10	mg/kg	200		82.2	75-125	0.627	40	
Surrogate: o-Terphenyl	*12.0*		*mg/kg*	*10*		*120*	*50-150*			
Total Metals by ICP Atomic Emission Spectroscopy - Quality Control										
Batch B8F2926 - EPA 3050B										
Blank (B8F2926-BLK1)				Prepared: 06/29/18 Analyzed: 07/02/18						
Lead	<3.0	3.0	mg/kg							
LCS (B8F2926-BS1)				Prepared: 06/29/18 Analyzed: 07/02/18						
Lead	**49.5**	3.0	mg/kg	50		99.0	80-120		20	
LCS Dup (B8F2926-BSD1)				Prepared: 06/29/18 Analyzed: 07/02/18						
Lead	**49.4**	3.0	mg/kg	50		98.8	80-120	0.182	20	
Duplicate (B8F2926-DUP1)			**Source: 8F28008-17**	Prepared: 06/29/18 Analyzed: 07/02/18						
Lead	**32.4**	3.0	mg/kg		27.3			17.2	40	
Matrix Spike (B8F2926-MS1)			**Source: 8F28008-05**	Prepared: 06/29/18 Analyzed: 07/02/18						
Lead	**57.1**	3.0	mg/kg	50	5.00	104	75-125		40	
Matrix Spike Dup (B8F2926-MSD1)			**Source: 8F28008-05**	Prepared: 06/29/18 Analyzed: 07/02/18						
Lead	**51.3**	3.0	mg/kg	50	5.00	92.6	75-125	10.7	40	
Batch B8F2927 - EPA 3050B										
Blank (B8F2927-BLK1)				Prepared: 06/29/18 Analyzed: 07/02/18						
Lead	<3.0	3.0	mg/kg							
LCS (B8F2927-BS1)				Prepared: 06/29/18 Analyzed: 07/02/18						
Lead	**48.2**	3.0	mg/kg	50		96.5	80-120		20	
LCS Dup (B8F2927-BSD1)				Prepared: 06/29/18 Analyzed: 07/02/18						
Lead	**46.0**	3.0	mg/kg	50		91.9	80-120	4.82	20	
Duplicate (B8F2927-DUP1)			**Source: 8F28008-33**	Prepared: 06/29/18 Analyzed: 07/02/18						
Lead	**6.08**	3.0	mg/kg		5.88			3.34	40	
Matrix Spike (B8F2927-MS1)			**Source: 8F28008-21**	Prepared: 06/29/18 Analyzed: 07/02/18						
Lead	**54.4**	3.0	mg/kg	50	7.05	94.8	75-125		40	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948102
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Total Metals by ICP Atomic Emission Spectroscopy - Quality Control										
Batch B8F2927 - EPA 3050B										
Matrix Spike Dup (B8F2927-MSD1)		**Source: 8F28008-21**		Prepared: 06/29/18		Analyzed: 07/02/18				
Lead	**52.4**	3.0	mg/kg	50	7.05	90.7	75-125	3.82	40	
Batch B8F2928 - EPA 3050B										
Blank (B8F2928-BLK1)				Prepared: 06/29/18		Analyzed: 07/02/18				
Lead	<3.0	3.0	mg/kg							
LCS (B8F2928-BS1)				Prepared: 06/29/18		Analyzed: 07/02/18				
Lead	**48.2**	3.0	mg/kg	50		96.5	80-120		20	
LCS Dup (B8F2928-BSD1)				Prepared: 06/29/18		Analyzed: 07/02/18				
Lead	**46.0**	3.0	mg/kg	50		91.9	80-120	4.82	20	
Duplicate (B8F2928-DUP1)		**Source: 8F28008-44**		Prepared: 06/29/18		Analyzed: 07/02/18				
Lead	**<3.0**	3.0	mg/kg		<3.0				40	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A948102
Project No:	NA	**Date Received:**	06/28/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	07/03/18

Special Notes

[1] = O-04 : This sample was analyzed outside the EPA recommended holding time.

[2] = QM-07 : The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.

Viorel Vasile
Operations Manager

AMERICAN ANALYTICS CHAIN-OF-CUSTODY RECORD

9765 ETON AVE., CHATSWORTH, CA 91311
Tel: 818-998-5547 FAX: 818-998-7258

A.A. COC No.: 17007
70051778
Page 1 of 4

Client: AECOM	Project Name / No.: 128 Hurricane St / 60553849	Sampler's Name: A. Vigna
Project Manager: Kaleena Johnson	Site Address:	Sampler's Signature:
Phone:	City: LA	P.O. No.:
Fax:	State & Zip: CA	Quote No.:

TAT Turnaround Codes **

(1) = Same Day Rush
(2) = 24 Hour Rush
(3) = 48 Hour Rush
(4) = 72 Hour Rush
(5) = 5 Day Rush
X = 10 Working Days (Standard TAT)

ANALYSIS REQUESTED (Test Name)

Please enter the TAT Turnaround Codes ** below

Client I.D.	A.A. I.D.	Date	Time	Sample Matrix	No. of Cont	TPHcc(8015)	Lead	General H_2O Quality								Special Instructions
SO-1-2.5	8F28008-01	6/28/18	0840	Soil	1	X	X									Gen. H_2O Qual=
SO-2-2.5	-02		0848			X	X									pH, TDS,
SO-2-3.5	-03		0851			X	X									Salinity, hardness,
SO-2-5	-04		0854			X	X									sulfates, chlorides,
SO-3-2.5	-05		0930			X	X									+ nitrates
SO-3-3.5	-06		0935			X	X									
SO-3-5	07		0940			X	X									48 Hr TAT
SO-3-10	08		~~0955~~ 1000			X	X									
SO-3	09		1000	Water	2	X		X								
SO-4-2.5	10		1022	Soil	1	X	X									
SO-4-3.5	11		1025			X	X									
SO-4-5	12		1028			X	X									
SO-4-5DUP	13		1028			X	X									
SO-5-2.5	14		1045			X	X									
SO-5-3.5	15		1050			X	X									

For Laboratory Use

PRIORITY
Rush 48 Hrs SH
Date 6/29/18 Time 0730 Sign

A.A. Project No.: A18D102 / 8F28008

	Date	Time	
Relinquished by	6/29/18	1530	Received by
Relinquished by	6-28-18	536	Received by Brian Oliver
Relinquished by	Date	Time	Received by

Note: By relinquishing samples to American Analytics, client agrees to pay for the services requested on this chain of custody form and any additional client-requested analyses performed on this project. Payment for services is due within 30 days from the date of invoice. Sample(s) will be disposed of after 45 days following the submittal of the sample(s) to American Analytics.

AMERICAN ANALYTICS CHAIN-OF-CUSTODY RECORD

9765 ETON AVE., CHATSWORTH, CA 91311
Tel: 818-998-5547 FAX: 818-998-7258

A.A. COC No.: 15884
70051781

Client: AECOM	Project Name / No.: 128 Hurricane St. / 60553849	Sampler's Name: A. Vigna
Project Manager: Kaleena Johnson	Site Address:	Sampler's Signature: [signature]
Phone:	City: LA	P.O. No.:
Fax:	State & Zip: CA	Quote No.:

TAT Turnaround Codes **

1 = Same Day Rush
2 = 24 Hour Rush
3 = 48 Hour Rush
4 = 72 Hour Rush
5 = 5 Day Rush
X = 10 Working Days (Standard TAT)

ANALYSIS REQUESTED (Test Name)

Please enter the TAT Turnaround Codes ** below

Client I.D.	A.A. I.D.	Date	Time	Sample Matrix	No. of Cont	TPHcc (8015)	Lead	General H2O Quality								Special Instructions
SO-5-5	9F28008-16	6/28/18	1053	Soil	1	X	X									
SO-6-0.5	-17		1058			X	X									
SO-6-2.5	18		1104			X	X									
SO-6-3.5	19		1108			X	X									
SO-6-5	20		1110			X	X									
SO-7-2.5	21		1122			X	X									
SO-7-3.5	22		1130			X	X									
SO-7-5	23		1146			X	X									
SO-7-5DUP	24		1146			X	X									
SO-8-2.5	25		1240			X	X									
SO-8-3.5	26		1250			X	X									
SO-8-5	27		1255			X	X									
SO-8-10	28		1305			X	X	~~X~~ AD								
SO-8	29		1315	Water	2	X		X								
SO-9-2.5	30		1333	Soil	1	X	X									

For Laboratory Use

PRIORITY
Rush 48 Hrs SH
Date 6/29/16 Time 0700 Sign [signature]

A.A. Project No.: A948102/9F28008

Relinquished by	Date	Time	Received by
[signature]	6/28/18	1530	[signature]
[signature]	6-28-18	536	Ben Clivean

Note: By relinquishing samples to American Analytics, client agrees to pay for the services requested on this chain of custody form and any additional client-requested analyses performed on this project. Payment for services is due within 30 days from the date of invoice. Sample(s) will be disposed of after 45 days following the submittal of the sample(s) to American Analytics.

AMERICAN ANALYTICS CHAIN-OF-CUSTODY RECORD

9765 ETON AVE., CHATSWORTH, CA 91311
Tel: 818-998-5547 FAX: 818-998-7258

A.A. COC No.: 6445
70051782

Client: AECOM	Project Name / No.: 128 Hurricane St 60553849	Sampler's Name: A. Vigna	
Project Manager: Kaleena Johnson	Site Address:	Sampler's Signature:	
Phone:	City: LA	P.O. No.:	
Fax:	State & Zip: CA	Quote No.:	

TAT Turnaround Codes **

(1) = Same Day Rush
(2) = 24 Hour Rush
(3) = 48 Hour Rush
(4) = 72 Hour Rush
(5) = 5 Day Rush
X = 10 Working Days (Standard TAT)

ANALYSIS REQUESTED (Test Name)

Please enter the TAT Turnaround Codes ** below

Client I.D.	A.A. I.D.	Date	Time	Sample Matrix	No. of Cont	TPH cc (8015)	Lead	Gen. water quality								Special Instructions
SO-9-3.5	18F29009-31	6/29/18	1335	Soil	2	X	X									
SO-9-5	32		1340			X	X									
SO-12-2.5	33		1350			X	X									
SO-12-3.5	34		1357			X	X									
SO-12-5	35		1405			X	X									
SO-10-2.5	36		1412			X	X									
SO-10-3.5	37		1418			X	X									
SO-11-2.5	38		1429			X	X									
SO-11-3.5	39		1433			X	X									
SO-13-2.5	40		1449			X	X									
SO-13 -3.5	41		1453			X	X									
SO-13 -5	42		1455			X	X									
SO-13 -10	43		1500			X	X									
SO-13-5DUP	44		1455			X	X									
SO-13	45		1505	Water		X		X								

For Laboratory Use

PRIORITY
Rush 48 Hrs SH
Date 6/29/18 Time 0720 Sign

A.A. Project No.: 18X4810 / 18F29008

	Date	Time	
Relinquished by	6/29/18	1530	Received by
Relinquished by	6-28-18	536	Received by
Relinquished by	Date	Time	Received by

Note: By relinquishing samples to American Analytics, client agrees to pay for the services requested on this chain of custody form and any additional client-requested analyses performed on this project. Payment for services is due within 30 days from the date of invoice. Sample(s) will be disposed of after 45 days following the submittal of the sample(s) to American Analytics.

AMERICAN ANALYTICS CHAIN-OF-CUSTODY RECORD

9765 ETON AVE., CHATSWORTH, CA 91311
Tel: 818-998-5547 FAX: 818-998-7258

A.A. COC No.: 5866
70051730
Page 4 of 4

Client: AECOM	Project Name / No.: 128 Hurricane St 60553849	Sampler's Name: A. Vigna	
Project Manager: Kaleena Johnson	Site Address:	Sampler's Signature:	
Phone:	City: LA	P.O. No.:	
Fax:	State & Zip: CA	Quote No.:	

TAT Turnaround Codes **

(1) = Same Day Rush
(2) = 24 Hour Rush
(3) = 48 Hour Rush
(4) = 72 Hour Rush
(5) = 5 Day Rush
X = 10 Working Days (Standard TAT)

ANALYSIS REQUESTED (Test Name)

Client I.D.	A.A. I.D.	Date	Time	Sample Matrix	No. of Cont	TPHmo (8015)	Please enter the TAT Turnaround Codes ** below	Special Instructions
EB-062318	16F29008-46	6/28/18	1525	Water	1	X		

For Laboratory Use

PRIORITY
Rush 48 Hrs SH
Date 6/29/18 Time 0730 Sign

A.A. Project No.: A09102 / 16F29008

	Date	Time	
Relinquished by	6/28/18	1530	Received by
Relinquished by	6.28.18	536	Received by
Relinquished by	Date	Time	Received by

Note: By relinquishing samples to American Analytics, client agrees to pay for the services requested on this chain of custody form and any additional client-requested analyses performed on this project. Payment for services is due within 30 days from the date of invoice. Sample(s) will be disposed of after 45 days following the submittal of the sample(s) to American Analytics.

AMERICAN ANALYTICS

9765 Eton Avenue
Chatsworth
California 91311
Tel: (818) 998-5547
Fax: (818) 998-7258

July 03, 2018

Kaleena Johnson

AECOM (LA)

300 S. Grand Ave., Suite 800

Los Angeles, CA 90017

Re : 128 Hurricane - Soil & GW

A948103 / 8F28009

Enclosed is an analytical report for the above-referenced project. The samples included in this report were received on 06/28/18 17:36 and analyzed in accordance with the attached chain-of-custody.

Unless otherwise noted, all analytical testing was accomplished in accordance with the guidelines established in our Quality Assurance Program Manual, applicable standard operating procedures, and other related documentation. The results in this analytical report are limited to the samples tested and any reproduction thereof must be made in its entirety.

If you have any questions regarding this report or require additional information please call me at American Analytics.

Sincerely,



Viorel Vasile

Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948103
Date Received: 06/28/18
Date Reported: 07/03/18

Sample ID	Laboratory ID	Matrix	TAT	Date Sampled	Date Received
8260B+OXYGENATES					
Waste062318	8F28009-01	Soil	2	06/28/18 15:20	06/28/18 17:36
CAM Metals Less Hg 6000/7000					
Waste062318	8F28009-01	Soil	2	06/28/18 15:20	06/28/18 17:36
Carbon Chain Characterization 8015M					
Waste062318	8F28009-01	Soil	2	06/28/18 15:20	06/28/18 17:36
Mercury Total EPA 7470A/7471A					
Waste062318	8F28009-01	Soil	2	06/28/18 15:20	06/28/18 17:36

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A948103
Project No:	NA	**Date Received:**	06/28/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	07/03/18
Method:	VOCs & OXYGENATES by GC/MS	**Units:**	ug/kg

Date Sampled:	06/28/18	
Date Prepared:	06/29/18	
Date Analyzed:	06/29/18	
AA ID No:	8F28009-01	
Client ID No:	Waste062318	
Matrix:	Soil	
Dilution Factor:	1	MRL

8260B+OXYGENATES (EPA 8260B)

Acetone	<50	50
tert-Amyl Methyl Ether (TAME)	<5.0	5.0
Benzene	<2.0	2.0
Bromobenzene	<5.0	5.0
Bromochloromethane	<5.0	5.0
Bromodichloromethane	<5.0	5.0
Bromoform	<5.0	5.0
Bromomethane	<5.0	5.0
2-Butanone (MEK)	<50	50
tert-Butyl alcohol (TBA)	<20	20
tert-Butylbenzene	<5.0	5.0
sec-Butylbenzene	<5.0	5.0
n-Butylbenzene	<5.0	5.0
Carbon Disulfide	<5.0	5.0
Carbon Tetrachloride	<5.0	5.0
Chlorobenzene	<5.0	5.0
Chloroethane	<5.0	5.0
Chloroform	<5.0	5.0
Chloromethane	<5.0	5.0
2-Chlorotoluene	<5.0	5.0
4-Chlorotoluene	<5.0	5.0
1,2-Dibromo-3-chloropropane	<10	10
Dibromochloromethane	<5.0	5.0
1,2-Dibromoethane (EDB)	<5.0	5.0
Dibromomethane	<5.0	5.0
1,2-Dichlorobenzene	<5.0	5.0
1,3-Dichlorobenzene	<5.0	5.0

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW
Method: VOCs & OXYGENATES by GC/MS

AA Project No: A948103
Date Received: 06/28/18
Date Reported: 07/03/18
Units: ug/kg

Date Sampled:	06/28/18
Date Prepared:	06/29/18
Date Analyzed:	06/29/18
AA ID No:	8F28009-01
Client ID No:	Waste062318
Matrix:	Soil
Dilution Factor:	1

8260B+OXYGENATES (EPA 8260B) (continued)

		MRL
1,4-Dichlorobenzene	<5.0	5.0
Dichlorodifluoromethane (R12)	<5.0	5.0
1,1-Dichloroethane	<5.0	5.0
1,2-Dichloroethane (EDC)	<5.0	5.0
trans-1,2-Dichloroethylene	<5.0	5.0
cis-1,2-Dichloroethylene	<5.0	5.0
1,1-Dichloroethylene	<5.0	5.0
1,2-Dichloropropane	<5.0	5.0
2,2-Dichloropropane	<5.0	5.0
1,3-Dichloropropane	<5.0	5.0
1,1-Dichloropropylene	<5.0	5.0
trans-1,3-Dichloropropylene	<5.0	5.0
cis-1,3-Dichloropropylene	<5.0	5.0
Diisopropyl ether (DIPE)	<5.0	5.0
Ethylbenzene	<2.0	2.0
Ethyl-tert-Butyl Ether (ETBE)	<5.0	5.0
Hexachlorobutadiene	<10	10
2-Hexanone (MBK)	<50	50
Isopropylbenzene	<5.0	5.0
4-Isopropyltoluene	<5.0	5.0
Methyl-tert-Butyl Ether (MTBE)	<5.0	5.0
Methylene Chloride	<50	50
4-Methyl-2-pentanone (MIBK)	<50	50
Naphthalene	<10	10
n-Propylbenzene	<5.0	5.0
Styrene	<5.0	5.0
1,1,1,2-Tetrachloroethane	<5.0	5.0

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A948103
Project No:	NA	**Date Received:**	06/28/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	07/03/18
Method:	VOCs & OXYGENATES by GC/MS	**Units:**	ug/kg

Date Sampled:	06/28/18	
Date Prepared:	06/29/18	
Date Analyzed:	06/29/18	
AA ID No:	8F28009-01	
Client ID No:	Waste062318	
Matrix:	Soil	
Dilution Factor:	1	MRL

8260B+OXYGENATES (EPA 8260B) (continued)

1,1,2,2-Tetrachloroethane	<5.0	5.0
Tetrachloroethylene (PCE)	<5.0	5.0
Toluene	<2.0	2.0
1,2,4-Trichlorobenzene	<5.0	5.0
1,2,3-Trichlorobenzene	<5.0	5.0
1,1,2-Trichloroethane	<5.0	5.0
1,1,1-Trichloroethane	<5.0	5.0
Trichloroethylene (TCE)	<5.0	5.0
Trichlorofluoromethane (R11)	<5.0	5.0
1,2,3-Trichloropropane	<5.0	5.0
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	<5.0	5.0
1,3,5-Trimethylbenzene	<5.0	5.0
1,2,4-Trimethylbenzene	<5.0	5.0
Vinyl chloride	<5.0	5.0
o-Xylene	<2.0	2.0
m,p-Xylenes	<2.0	2.0

Surrogates		**%REC Limits**
4-Bromofluorobenzene	101%	70-140
Dibromofluoromethane	123%	70-140
Toluene-d8	101%	70-140

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A948103
Project No:	NA	**Date Received:**	06/28/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	07/03/18
Method:	Carbon Chain by GC/FID	**Units:**	mg/kg

Date Sampled:	06/28/18	
Date Prepared:	06/29/18	
Date Analyzed:	07/01/18	
AA ID No:	8F28009-01	
Client ID No:	Waste062318	
Matrix:	Soil	
Dilution Factor:	1	MRL

Carbon Chain Characterization 8015M (EPA 8015M)

C6-C8	<1.0	1.0
C8-C10	<1.0	1.0
C10-C12	<1.0	1.0
C12-C14	<1.0	1.0
C14-C16	<1.0	1.0
C16-C18	<1.0	1.0
C18-C20	**2.0**	1.0
C20-C22	**5.8**	1.0
C22-C24	**11**	1.0
C24-C26	**14**	1.0
C26-C28	**23**	1.0
C28-C32	**64**	1.0
C32-C34	**18**	1.0
C34-C36	**19**	1.0
C36-C40	**30**	1.0
C40-C44	**17**	1.0
TPH (C6-C44)	**200**	10
Gasoline Range Organics (C6-C10)	<5.0	5.0
Diesel Range Organics (C10-C23)	**13**	5.0
Oil Range Organics (C23-C44)	**190**	5.0

Surrogates		**%REC Limits**
o-Terphenyl	97%	50-150

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A948103
Project No:	NA	**Date Received:**	06/28/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	07/03/18
Method:	Total Metals CAM 17	**Units:**	mg/kg

Date Sampled:	06/28/18	
Date Prepared:	06/29/18	
Date Analyzed:	07/02/18	
AA ID No:	8F28009-01	
Client ID No:	Waste062318	
Matrix:	Soil	
Dilution Factor:	1	MRL

CAM Metals Less Hg 6000/7000 (EPA 6010B/7000)

Antimony	<10	10
Arsenic	**2.9**	0.50
Barium	**51**	10
Beryllium	<1.0	1.0
Cadmium	<1.0	1.0
Chromium	**11**	3.0
Cobalt	**3.2**	3.0
Copper	**3.3**	3.0
Lead	**22**	3.0
Molybdenum	<5.0	5.0
Nickel	**9.2**	3.0
Selenium	<0.50	0.50
Silver	<1.0	1.0
Thallium	<5.0	5.0
Vanadium	**24**	10
Zinc	**84**	3.0

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A948103
Project No:	NA	**Date Received:**	06/28/18
Project Name:	128 Hurricane - Soil & GW	**Date Reported:**	07/03/18
Method:	Total Metals CAM 17	**Units:**	mg/kg

Date Sampled:	06/28/18	
Date Prepared:	07/02/18	
Date Analyzed:	07/02/18	
AA ID No:	8F28009-01	
Client ID No:	Waste062318	
Matrix:	Soil	
Dilution Factor:	1	MRL

Mercury Total EPA 7470A/7471A (EPA 7471A)

Mercury	**0.094**	0.020

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948103
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2925 - EPA 5035										
Blank (B8F2925-BLK1)				Prepared & Analyzed: 06/29/18						
Acetone	<50	50	ug/kg							
tert-Amyl Methyl Ether (TAME)	<5.0	5.0	ug/kg							
Benzene	<2.0	2.0	ug/kg							
Bromobenzene	<5.0	5.0	ug/kg							
Bromochloromethane	<5.0	5.0	ug/kg							
Bromodichloromethane	<5.0	5.0	ug/kg							
Bromoform	<5.0	5.0	ug/kg							
Bromomethane	<5.0	5.0	ug/kg							
2-Butanone (MEK)	<50	50	ug/kg							
tert-Butyl alcohol (TBA)	<20	20	ug/kg							
tert-Butylbenzene	<5.0	5.0	ug/kg							
sec-Butylbenzene	<5.0	5.0	ug/kg							
n-Butylbenzene	<5.0	5.0	ug/kg							
Carbon Disulfide	<5.0	5.0	ug/kg							
Carbon Tetrachloride	<5.0	5.0	ug/kg							
Chlorobenzene	<5.0	5.0	ug/kg							
Chloroethane	<5.0	5.0	ug/kg							
Chloroform	<5.0	5.0	ug/kg							
Chloromethane	<5.0	5.0	ug/kg							
2-Chlorotoluene	<5.0	5.0	ug/kg							
4-Chlorotoluene	<5.0	5.0	ug/kg							
1,2-Dibromo-3-chloropropane	<10	10	ug/kg							
Dibromochloromethane	<5.0	5.0	ug/kg							
1,2-Dibromoethane (EDB)	<5.0	5.0	ug/kg							
Dibromomethane	<5.0	5.0	ug/kg							
1,2-Dichlorobenzene	<5.0	5.0	ug/kg							
1,3-Dichlorobenzene	<5.0	5.0	ug/kg							
1,4-Dichlorobenzene	<5.0	5.0	ug/kg							
Dichlorodifluoromethane (R12)	<5.0	5.0	ug/kg							
1,1-Dichloroethane	<5.0	5.0	ug/kg							
1,2-Dichloroethane (EDC)	<5.0	5.0	ug/kg							



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948103
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2925 - EPA 5035										
Blank (B8F2925-BLK1) Continued				Prepared & Analyzed: 06/29/18						
trans-1,2-Dichloroethylene	<5.0	5.0	ug/kg							
cis-1,2-Dichloroethylene	<5.0	5.0	ug/kg							
1,1-Dichloroethylene	<5.0	5.0	ug/kg							
1,2-Dichloropropane	<5.0	5.0	ug/kg							
2,2-Dichloropropane	<5.0	5.0	ug/kg							
1,3-Dichloropropane	<5.0	5.0	ug/kg							
1,1-Dichloropropylene	<5.0	5.0	ug/kg							
trans-1,3-Dichloropropylene	<5.0	5.0	ug/kg							
cis-1,3-Dichloropropylene	<5.0	5.0	ug/kg							
Diisopropyl ether (DIPE)	<5.0	5.0	ug/kg							
Ethylbenzene	<2.0	2.0	ug/kg							
Ethyl-tert-Butyl Ether (ETBE)	<5.0	5.0	ug/kg							
Hexachlorobutadiene	<10	10	ug/kg							
2-Hexanone (MBK)	<50	50	ug/kg							
Isopropylbenzene	<5.0	5.0	ug/kg							
4-Isopropyltoluene	<5.0	5.0	ug/kg							
Methyl-tert-Butyl Ether (MTBE)	<5.0	5.0	ug/kg							
Methylene Chloride	<50	50	ug/kg							
4-Methyl-2-pentanone (MIBK)	<50	50	ug/kg							
Naphthalene	<10	10	ug/kg							
n-Propylbenzene	<5.0	5.0	ug/kg							
Styrene	<5.0	5.0	ug/kg							
1,1,1,2-Tetrachloroethane	<5.0	5.0	ug/kg							
1,1,2,2-Tetrachloroethane	<5.0	5.0	ug/kg							
Tetrachloroethylene (PCE)	<5.0	5.0	ug/kg							
Toluene	<2.0	2.0	ug/kg							
1,2,4-Trichlorobenzene	<5.0	5.0	ug/kg							
1,2,3-Trichlorobenzene	<5.0	5.0	ug/kg							
1,1,2-Trichloroethane	<5.0	5.0	ug/kg							
1,1,1-Trichloroethane	<5.0	5.0	ug/kg							
Trichloroethylene (TCE)	<5.0	5.0	ug/kg							

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948103
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2925 - EPA 5035										
Blank (B8F2925-BLK1) Continued				Prepared & Analyzed: 06/29/18						
Trichlorofluoromethane (R11)	<5.0	5.0	ug/kg							
1,2,3-Trichloropropane	<5.0	5.0	ug/kg							
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	<5.0	5.0	ug/kg							
1,3,5-Trimethylbenzene	<5.0	5.0	ug/kg							
1,2,4-Trimethylbenzene	<5.0	5.0	ug/kg							
Vinyl chloride	<5.0	5.0	ug/kg							
o-Xylene	<2.0	2.0	ug/kg							
m,p-Xylenes	<2.0	2.0	ug/kg							
Surrogate: 4-Bromofluorobenzene	*94.9*		*ug/kg*	*100*		*94.9*	*70-140*			
Surrogate: Dibromofluoromethane	*117*		*ug/kg*	*100*		*117*	*70-140*			
Surrogate: Toluene-d8	*98.1*		*ug/kg*	*100*		*98.1*	*70-140*			
LCS (B8F2925-BS1)				Prepared & Analyzed: 06/29/18						
Acetone	**27.1**	50	ug/kg	40		67.8	70-130			***
tert-Amyl Methyl Ether (TAME)	**35.4**	5.0	ug/kg	40		88.4	70-130			
Benzene	**37.1**	2.0	ug/kg	40		92.7	75-125			
Bromobenzene	**41.2**	5.0	ug/kg	40		103	70-130			
Bromochloromethane	**40.5**	5.0	ug/kg	40		101	70-130			
Bromodichloromethane	**39.4**	5.0	ug/kg	40		98.4	75-125			
Bromoform	**38.5**	5.0	ug/kg	40		96.2	75-125			
Bromomethane	**45.8**	5.0	ug/kg	40		115	75-125			
2-Butanone (MEK)	**37.8**	50	ug/kg	40		94.4	70-130			
tert-Butyl alcohol (TBA)	**159**	20	ug/kg	200		79.3	70-130			
tert-Butylbenzene	**41.4**	5.0	ug/kg	40		104	70-130			
sec-Butylbenzene	**41.0**	5.0	ug/kg	40		102	70-130			
n-Butylbenzene	**40.7**	5.0	ug/kg	40		102	70-130			
Carbon Disulfide	**34.6**	5.0	ug/kg	40		86.4	70-130			
Carbon Tetrachloride	**40.4**	5.0	ug/kg	40		101	75-125			
Chlorobenzene	**41.2**	5.0	ug/kg	40		103	75-125			
Chloroethane	**41.2**	5.0	ug/kg	40		103	75-125			
Chloroform	**41.4**	5.0	ug/kg	40		104	75-125			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948103
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2925 - EPA 5035										
LCS (B8F2925-BS1) Continued				Prepared & Analyzed: 06/29/18						
Chloromethane	**37.4**	5.0	ug/kg	40		93.4	65-125			
2-Chlorotoluene	**39.6**	5.0	ug/kg	40		98.9	70-130			
4-Chlorotoluene	**40.4**	5.0	ug/kg	40		101	7-130			
1,2-Dibromo-3-chloropropane	**34.9**	10	ug/kg	40		87.3	70-130			
Dibromochloromethane	**39.2**	5.0	ug/kg	40		98.0	75-125			
1,2-Dibromoethane (EDB)	**37.4**	5.0	ug/kg	40		93.5	70-130			
Dibromomethane	**37.9**	5.0	ug/kg	40		94.8	70-130			
1,2-Dichlorobenzene	**42.4**	5.0	ug/kg	40		106	70-130			
1,3-Dichlorobenzene	**40.9**	5.0	ug/kg	40		102	70-130			
1,4-Dichlorobenzene	**40.5**	5.0	ug/kg	40		101	75-125			
Dichlorodifluoromethane (R12)	**26.9**	5.0	ug/kg	40		67.2	70-130			***
1,1-Dichloroethane	**39.2**	5.0	ug/kg	40		97.9	70-125			
1,2-Dichloroethane (EDC)	**41.4**	5.0	ug/kg	40		103	75-125			
trans-1,2-Dichloroethylene	**41.2**	5.0	ug/kg	40		103	75-125			
cis-1,2-Dichloroethylene	**40.2**	5.0	ug/kg	40		101	75-125			
1,1-Dichloroethylene	**37.0**	5.0	ug/kg	40		92.5	70-130			
1,2-Dichloropropane	**38.5**	5.0	ug/kg	40		96.2	75-130			
2,2-Dichloropropane	**39.3**	5.0	ug/kg	40		98.2	70-130			
1,3-Dichloropropane	**36.7**	5.0	ug/kg	40		91.6	70-130			
1,1-Dichloropropylene	**38.6**	5.0	ug/kg	40		96.4	70-130			
trans-1,3-Dichloropropylene	**39.7**	5.0	ug/kg	40		99.2	70-130			
cis-1,3-Dichloropropylene	**38.5**	5.0	ug/kg	40		96.3	75-125			
Diisopropyl ether (DIPE)	**37.1**	5.0	ug/kg	40		92.6	70-130			
Ethylbenzene	**41.0**	2.0	ug/kg	40		102	75-125			
Ethyl-tert-Butyl Ether (ETBE)	**37.5**	5.0	ug/kg	40		93.7	70-130			
Hexachlorobutadiene	**44.1**	10	ug/kg	40		110	70-130			
2-Hexanone (MBK)	**32.7**	50	ug/kg	40		81.8	70-130			
Isopropylbenzene	**40.1**	5.0	ug/kg	40		100	70-130			
4-Isopropyltoluene	**42.2**	5.0	ug/kg	40		106	70-130			
Methyl-tert-Butyl Ether (MTBE)	**74.3**	5.0	ug/kg	80		92.9	75-125			
Methylene Chloride	**28.9**	50	ug/kg	40		72.2	75-130			***



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948103
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2925 - EPA 5035										
LCS (B8F2925-BS1) Continued				Prepared & Analyzed: 06/29/18						
4-Methyl-2-pentanone (MIBK)	**36.8**	50	ug/kg	40		92.0	70-130			
Naphthalene	**40.1**	10	ug/kg	40		100	70-130			
n-Propylbenzene	**41.3**	5.0	ug/kg	40		103	70-130			
Styrene	**39.2**	5.0	ug/kg	40		97.9	70-130			
1,1,1,2-Tetrachloroethane	**40.1**	5.0	ug/kg	40		100	70-130			
1,1,2,2-Tetrachloroethane	**36.6**	5.0	ug/kg	40		91.4	70-135			
Tetrachloroethylene (PCE)	**39.5**	5.0	ug/kg	40		98.7	75-125			
Toluene	**40.8**	2.0	ug/kg	40		102	75-125			
1,2,4-Trichlorobenzene	**45.5**	5.0	ug/kg	40		114	70-130			
1,2,3-Trichlorobenzene	**44.9**	5.0	ug/kg	40		112	70-130			
1,1,2-Trichloroethane	**37.1**	5.0	ug/kg	40		92.8	75-125			
1,1,1-Trichloroethane	**41.3**	5.0	ug/kg	40		103	75-125			
Trichloroethylene (TCE)	**38.6**	5.0	ug/kg	40		96.4	75-125			
Trichlorofluoromethane (R11)	**40.3**	5.0	ug/kg	40		101	70-130			
1,2,3-Trichloropropane	**35.1**	5.0	ug/kg	40		87.6	70-130			
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	**35.4**	5.0	ug/kg	40		88.4	70-130			
1,3,5-Trimethylbenzene	**40.5**	5.0	ug/kg	40		101	70-130			
1,2,4-Trimethylbenzene	**40.2**	5.0	ug/kg	40		101	70-130			
Vinyl chloride	**37.4**	5.0	ug/kg	40		93.4	75-125			
o-Xylene	**39.5**	2.0	ug/kg	40		98.6	75-125			
m,p-Xylenes	**78.3**	2.0	ug/kg	80		97.9	70-130			
Surrogate: 4-Bromofluorobenzene	*94.3*		*ug/kg*	*100*		*94.3*	*70-140*			
Surrogate: Dibromofluoromethane	*96.0*		*ug/kg*	*100*		*96.0*	*70-140*			
Surrogate: Toluene-d8	*94.8*		*ug/kg*	*100*		*94.8*	*70-140*			
LCS Dup (B8F2925-BSD1)				Prepared & Analyzed: 06/29/18						
Acetone	**33.2**	50	ug/kg	40		83.0	70-130	20.1	30	
tert-Amyl Methyl Ether (TAME)	**36.4**	5.0	ug/kg	40		91.0	70-130	2.84	30	
Benzene	**36.4**	2.0	ug/kg	40		90.9	75-125	1.96	30	
Bromobenzene	**41.5**	5.0	ug/kg	40		104	70-130	0.774	30	
Bromochloromethane	**45.8**	5.0	ug/kg	40		114	70-130	12.2	30	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948103
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2925 - EPA 5035										
LCS Dup (B8F2925-BSD1) Continued				Prepared & Analyzed: 06/29/18						
Bromodichloromethane	**41.8**	5.0	ug/kg	40		105	75-125	6.01	30	
Bromoform	**39.2**	5.0	ug/kg	40		98.1	75-125	2.01	30	
Bromomethane	**56.0**	5.0	ug/kg	40		140	75-125	19.9	30	**
2-Butanone (MEK)	**24.2**	50	ug/kg	40		60.6	70-130	43.7	30	***
tert-Butyl alcohol (TBA)	**199**	20	ug/kg	200		99.6	70-130	22.8	30	
tert-Butylbenzene	**41.1**	5.0	ug/kg	40		103	70-130	0.727	30	
sec-Butylbenzene	**39.8**	5.0	ug/kg	40		99.4	70-130	2.92	30	
n-Butylbenzene	**37.6**	5.0	ug/kg	40		94.0	70-130	8.02	30	
Carbon Disulfide	**37.9**	5.0	ug/kg	40		94.7	70-130	9.11	30	
Carbon Tetrachloride	**44.6**	5.0	ug/kg	40		112	75-125	9.98	30	
Chlorobenzene	**40.2**	5.0	ug/kg	40		100	75-125	2.60	30	
Chloroethane	**47.1**	5.0	ug/kg	40		118	75-125	13.5	30	
Chloroform	**45.0**	5.0	ug/kg	40		112	75-125	8.19	30	
Chloromethane	**44.2**	5.0	ug/kg	40		110	65-125	16.7	30	
2-Chlorotoluene	**39.5**	5.0	ug/kg	40		98.7	70-130	0.202	30	
4-Chlorotoluene	**40.0**	5.0	ug/kg	40		99.9	7-130	1.10	30	
1,2-Dibromo-3-chloropropane	**37.9**	10	ug/kg	40		94.6	70-130	8.08	30	
Dibromochloromethane	**41.2**	5.0	ug/kg	40		103	75-125	5.02	30	
1,2-Dibromoethane (EDB)	**36.4**	5.0	ug/kg	40		91.0	70-130	2.76	30	
Dibromomethane	**38.9**	5.0	ug/kg	40		97.4	70-130	2.71	30	
1,2-Dichlorobenzene	**41.5**	5.0	ug/kg	40		104	70-130	2.15	30	
1,3-Dichlorobenzene	**40.3**	5.0	ug/kg	40		101	70-130	1.28	30	
1,4-Dichlorobenzene	**39.9**	5.0	ug/kg	40		99.6	75-125	1.64	30	
Dichlorodifluoromethane (R12)	**28.2**	5.0	ug/kg	40		70.4	70-130	4.72	30	
1,1-Dichloroethane	**40.3**	5.0	ug/kg	40		101	70-125	2.92	30	
1,2-Dichloroethane (EDC)	**47.4**	5.0	ug/kg	40		119	75-125	13.7	30	
trans-1,2-Dichloroethylene	**41.6**	5.0	ug/kg	40		104	75-125	0.967	30	
cis-1,2-Dichloroethylene	**41.1**	5.0	ug/kg	40		103	75-125	2.16	30	
1,1-Dichloroethylene	**44.2**	5.0	ug/kg	40		111	70-130	17.8	30	
1,2-Dichloropropane	**37.0**	5.0	ug/kg	40		92.4	75-130	3.92	30	
2,2-Dichloropropane	**39.3**	5.0	ug/kg	40		98.2	70-130	0.102	30	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948103
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2925 - EPA 5035										
LCS Dup (B8F2925-BSD1) Continued				Prepared & Analyzed: 06/29/18						
1,3-Dichloropropane	**35.5**	5.0	ug/kg	40		88.8	70-130	3.16	30	
1,1-Dichloropropylene	**38.6**	5.0	ug/kg	40		96.4	70-130	0.0519	30	
trans-1,3-Dichloropropylene	**38.1**	5.0	ug/kg	40		95.3	70-130	4.06	30	
cis-1,3-Dichloropropylene	**39.1**	5.0	ug/kg	40		97.8	75-125	1.60	30	
Diisopropyl ether (DIPE)	**36.7**	5.0	ug/kg	40		91.8	70-130	0.976	30	
Ethylbenzene	**39.3**	2.0	ug/kg	40		98.4	75-125	4.08	30	
Ethyl-tert-Butyl Ether (ETBE)	**40.7**	5.0	ug/kg	40		102	70-130	8.29	30	
Hexachlorobutadiene	**44.6**	10	ug/kg	40		111	70-130	1.08	30	
2-Hexanone (MBK)	**29.3**	50	ug/kg	40		73.3	70-130	10.9	30	
Isopropylbenzene	**39.7**	5.0	ug/kg	40		99.3	70-130	1.00	30	
4-Isopropyltoluene	**41.1**	5.0	ug/kg	40		103	70-130	2.74	30	
Methyl-tert-Butyl Ether (MTBE)	**83.0**	5.0	ug/kg	80		104	75-125	11.0	30	
Methylene Chloride	**35.5**	50	ug/kg	40		88.8	75-130	20.6	30	
4-Methyl-2-pentanone (MIBK)	**34.8**	50	ug/kg	40		87.0	70-130	5.64	30	
Naphthalene	**40.5**	10	ug/kg	40		101	70-130	0.894	30	
n-Propylbenzene	**39.2**	5.0	ug/kg	40		98.0	70-130	5.17	30	
Styrene	**37.4**	5.0	ug/kg	40		93.4	70-130	4.65	30	
1,1,1,2-Tetrachloroethane	**41.6**	5.0	ug/kg	40		104	70-130	3.53	30	
1,1,2,2-Tetrachloroethane	**35.4**	5.0	ug/kg	40		88.4	70-135	3.39	30	
Tetrachloroethylene (PCE)	**38.5**	5.0	ug/kg	40		96.2	75-125	2.62	30	
Toluene	**38.6**	2.0	ug/kg	40		96.4	75-125	5.50	30	
1,2,4-Trichlorobenzene	**39.9**	5.0	ug/kg	40		99.8	70-130	13.1	30	
1,2,3-Trichlorobenzene	**41.5**	5.0	ug/kg	40		104	70-130	8.01	30	
1,1,2-Trichloroethane	**35.8**	5.0	ug/kg	40		89.6	75-125	3.56	30	
1,1,1-Trichloroethane	**44.3**	5.0	ug/kg	40		111	75-125	6.87	30	
Trichloroethylene (TCE)	**39.5**	5.0	ug/kg	40		98.8	75-125	2.41	30	
Trichlorofluoromethane (R11)	**46.9**	5.0	ug/kg	40		117	70-130	15.1	30	
1,2,3-Trichloropropane	**32.9**	5.0	ug/kg	40		82.4	70-130	6.24	30	
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	**39.3**	5.0	ug/kg	40		98.2	70-130	10.5	30	
1,3,5-Trimethylbenzene	**39.7**	5.0	ug/kg	40		99.2	70-130	2.04	30	
1,2,4-Trimethylbenzene	**38.9**	5.0	ug/kg	40		97.2	70-130	3.44	30	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948103
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2925 - EPA 5035										
LCS Dup (B8F2925-BSD1) Continued				Prepared & Analyzed: 06/29/18						
Vinyl chloride	**45.1**	5.0	ug/kg	40		113	75-125	18.8	30	
o-Xylene	**37.6**	2.0	ug/kg	40		94.0	75-125	4.88	30	
m,p-Xylenes	**74.6**	2.0	ug/kg	80		93.3	70-130	4.79	30	
Surrogate: 4-Bromofluorobenzene	*95.9*		*ug/kg*	*100*		*95.9*	*70-140*			
Surrogate: Dibromofluoromethane	*102*		*ug/kg*	*100*		*102*	*70-140*			
Surrogate: Toluene-d8	*98.0*		*ug/kg*	*100*		*98.0*	*70-140*			
Matrix Spike (B8F2925-MS1)			**Source: 8F28009-01**	Prepared & Analyzed: 06/29/18						
Acetone	**37.6**	50	ug/kg	38	<50	97.9	70-130			
tert-Amyl Methyl Ether (TAME)	**35.0**	5.0	ug/kg	38	<5.0	91.0	70-130			
Benzene	**31.8**	2.0	ug/kg	38	<2.0	82.6	70-130			
Bromobenzene	**36.7**	5.0	ug/kg	38	<5.0	95.4	70-130			
Bromochloromethane	**42.8**	5.0	ug/kg	38	<5.0	111	70-130			
Bromodichloromethane	**35.7**	5.0	ug/kg	38	<5.0	92.9	70-130			
Bromoform	**34.1**	5.0	ug/kg	38	<5.0	88.8	70-130			
Bromomethane	**49.6**	5.0	ug/kg	38	<5.0	129	70-130			
2-Butanone (MEK)	**23.3**	50	ug/kg	38	<50	60.6	70-130			***
tert-Butyl alcohol (TBA)	**182**	20	ug/kg	190	<20	94.4	70-130			
tert-Butylbenzene	**35.0**	5.0	ug/kg	38	<5.0	91.1	70-130			
sec-Butylbenzene	**32.8**	5.0	ug/kg	38	<5.0	85.4	70-130			
n-Butylbenzene	**28.7**	5.0	ug/kg	38	<5.0	74.6	70-130			
Carbon Disulfide	**32.1**	5.0	ug/kg	38	<5.0	83.5	70-130			
Carbon Tetrachloride	**37.1**	5.0	ug/kg	38	<5.0	96.5	70-130			
Chlorobenzene	**33.3**	5.0	ug/kg	38	<5.0	86.5	70-130			
Chloroethane	**47.2**	5.0	ug/kg	38	<5.0	123	70-130			
Chloroform	**39.4**	5.0	ug/kg	38	<5.0	102	70-130			
Chloromethane	**44.2**	5.0	ug/kg	38	<5.0	115	70-130			
2-Chlorotoluene	**33.3**	5.0	ug/kg	38	<5.0	86.7	70-130			
4-Chlorotoluene	**33.2**	5.0	ug/kg	38	<5.0	86.3	70-130			
1,2-Dibromo-3-chloropropane	**35.7**	10	ug/kg	38	<10	92.7	70-130			
Dibromochloromethane	**37.1**	5.0	ug/kg	38	<5.0	96.5	70-130			
1,2-Dibromoethane (EDB)	**35.2**	5.0	ug/kg	38	<5.0	91.6	70-130			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948103
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2925 - EPA 5035										
Matrix Spike (B8F2925-MS1) Continued Source: 8F28009-01 Prepared & Analyzed: 06/29/18										
Dibromomethane	**36.6**	5.0	ug/kg	38	<5.0	95.0	70-130			
1,2-Dichlorobenzene	**32.6**	5.0	ug/kg	38	<5.0	84.7	70-130			
1,3-Dichlorobenzene	**31.6**	5.0	ug/kg	38	<5.0	82.2	70-130			
1,4-Dichlorobenzene	**31.7**	5.0	ug/kg	38	<5.0	82.5	70-130			
Dichlorodifluoromethane (R12)	**32.7**	5.0	ug/kg	38	<5.0	85.0	70-130			
1,1-Dichloroethane	**37.6**	5.0	ug/kg	38	<5.0	97.9	70-130			
1,2-Dichloroethane (EDC)	**42.2**	5.0	ug/kg	38	<5.0	110	70-130			
trans-1,2-Dichloroethylene	**38.0**	5.0	ug/kg	38	<5.0	98.9	70-130			
cis-1,2-Dichloroethylene	**36.8**	5.0	ug/kg	38	<5.0	95.6	70-130			
1,1-Dichloroethylene	**42.0**	5.0	ug/kg	38	<5.0	109	70-130			
1,2-Dichloropropane	**32.4**	5.0	ug/kg	38	<5.0	84.3	70-130			
2,2-Dichloropropane	**37.5**	5.0	ug/kg	38	<5.0	97.4	70-130			
1,3-Dichloropropane	**34.2**	5.0	ug/kg	38	<5.0	89.0	70-130			
1,1-Dichloropropylene	**32.2**	5.0	ug/kg	38	<5.0	83.8	70-130			
trans-1,3-Dichloropropylene	**30.4**	5.0	ug/kg	38	<5.0	79.1	70-130			
cis-1,3-Dichloropropylene	**34.3**	5.0	ug/kg	38	<5.0	89.3	70-130			
Diisopropyl ether (DIPE)	**34.9**	5.0	ug/kg	38	<5.0	90.8	70-130			
Ethylbenzene	**33.1**	2.0	ug/kg	38	1.17	83.0	70-130			
Ethyl-tert-Butyl Ether (ETBE)	**39.4**	5.0	ug/kg	38	<5.0	103	70-130			
Hexachlorobutadiene	**27.4**	10	ug/kg	38	<10	71.1	70-130			
2-Hexanone (MBK)	**23.8**	50	ug/kg	38	<50	61.9	70-130			QM-07
Isopropylbenzene	**35.4**	5.0	ug/kg	38	<5.0	92.1	70-130			
4-Isopropyltoluene	**33.3**	5.0	ug/kg	38	<5.0	86.6	70-130			
Methyl-tert-Butyl Ether (MTBE)	**81.4**	5.0	ug/kg	77	<5.0	106	70-130			
Methylene Chloride	**35.6**	50	ug/kg	38	<50	92.6	70-130			
4-Methyl-2-pentanone (MIBK)	**33.2**	50	ug/kg	38	<50	86.4	70-130			
Naphthalene	**27.0**	10	ug/kg	38	<10	70.2	70-130			
n-Propylbenzene	**33.8**	5.0	ug/kg	38	<5.0	87.8	70-130			
Styrene	**28.9**	5.0	ug/kg	38	<5.0	75.1	70-130			
1,1,1,2-Tetrachloroethane	**36.1**	5.0	ug/kg	38	<5.0	94.0	70-130			
1,1,2,2-Tetrachloroethane	**31.2**	5.0	ug/kg	38	<5.0	81.0	70-130			



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948103
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2925 - EPA 5035										
Matrix Spike (B8F2925-MS1) Continued Source: 8F28009-01 Prepared & Analyzed: 06/29/18										
Tetrachloroethylene (PCE)	**32.6**	5.0	ug/kg	38	<5.0	84.7	70-130			
Toluene	**33.9**	2.0	ug/kg	38	<2.0	88.1	70-130			
1,2,4-Trichlorobenzene	**23.6**	5.0	ug/kg	38	<5.0	61.3	70-130			QM-07
1,2,3-Trichlorobenzene	**22.9**	5.0	ug/kg	38	<5.0	59.6	70-130			QM-07
1,1,2-Trichloroethane	**34.8**	5.0	ug/kg	38	<5.0	90.4	70-130			
1,1,1-Trichloroethane	**39.4**	5.0	ug/kg	38	<5.0	102	70-130			
Trichloroethylene (TCE)	**34.2**	5.0	ug/kg	38	<5.0	88.9	70-130			
Trichlorofluoromethane (R11)	**46.2**	5.0	ug/kg	38	<5.0	120	70-130			
1,2,3-Trichloropropane	**32.3**	5.0	ug/kg	38	<5.0	84.0	70-130			
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	**45.0**	5.0	ug/kg	38	<5.0	117	70-130			
1,3,5-Trimethylbenzene	**34.4**	5.0	ug/kg	38	<5.0	89.5	70-130			
1,2,4-Trimethylbenzene	**34.0**	5.0	ug/kg	38	<5.0	88.3	70-130			
Vinyl chloride	**46.9**	5.0	ug/kg	38	<5.0	122	70-130			
o-Xylene	**31.4**	2.0	ug/kg	38	<2.0	81.7	70-130			
m,p-Xylenes	**63.0**	2.0	ug/kg	77	1.83	79.6	70-130			
Surrogate: 4-Bromofluorobenzene	*101*		*ug/kg*	*96*		*105*	*70-140*			
Surrogate: Dibromofluoromethane	*97.9*		*ug/kg*	*96*		*102*	*70-140*			
Surrogate: Toluene-d8	*97.8*		*ug/kg*	*96*		*102*	*70-140*			
Matrix Spike Dup (B8F2925-MSD1) Source: 8F28009-01 Prepared & Analyzed: 06/29/18										
Acetone	**40.4**	50	ug/kg	40	<50	101	70-130	7.19	40	
tert-Amyl Methyl Ether (TAME)	**39.7**	5.0	ug/kg	40	<5.0	99.3	70-130	12.6	40	
Benzene	**37.2**	2.0	ug/kg	40	<2.0	93.1	70-130	15.8	40	
Bromobenzene	**45.7**	5.0	ug/kg	40	<5.0	114	70-130	21.9	40	
Bromochloromethane	**45.8**	5.0	ug/kg	40	<5.0	115	70-130	6.80	40	
Bromodichloromethane	**43.6**	5.0	ug/kg	40	<5.0	109	70-130	19.9	40	
Bromoform	**41.4**	5.0	ug/kg	40	<5.0	103	70-130	19.2	40	
Bromomethane	**53.9**	5.0	ug/kg	40	<5.0	135	70-130	8.36	40	**
2-Butanone (MEK)	**22.0**	50	ug/kg	40	<50	55.0	70-130	5.95	40	***
tert-Butyl alcohol (TBA)	**213**	20	ug/kg	200	<20	107	70-130	16.1	40	
tert-Butylbenzene	**43.0**	5.0	ug/kg	40	<5.0	108	70-130	20.5	40	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948103
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2925 - EPA 5035										
Matrix Spike Dup (B8F2925-MSD1) Continued				**Source: 8F28009-01**		Prepared & Analyzed: 06/29/18				
sec-Butylbenzene	**40.4**	5.0	ug/kg	40	<5.0	101	70-130	20.7	40	
n-Butylbenzene	**35.6**	5.0	ug/kg	40	<5.0	89.1	70-130	21.6	40	
Carbon Disulfide	**36.5**	5.0	ug/kg	40	<5.0	91.2	70-130	12.7	40	
Carbon Tetrachloride	**44.0**	5.0	ug/kg	40	<5.0	110	70-130	17.0	40	
Chlorobenzene	**40.6**	5.0	ug/kg	40	<5.0	101	70-130	19.7	40	
Chloroethane	**50.2**	5.0	ug/kg	40	<5.0	126	70-130	6.10	40	
Chloroform	**46.2**	5.0	ug/kg	40	<5.0	116	70-130	16.0	40	
Chloromethane	**46.9**	5.0	ug/kg	40	<5.0	117	70-130	6.12	40	
2-Chlorotoluene	**41.9**	5.0	ug/kg	40	<5.0	105	70-130	22.8	40	
4-Chlorotoluene	**41.9**	5.0	ug/kg	40	<5.0	105	70-130	23.1	40	
1,2-Dibromo-3-chloropropane	**43.1**	10	ug/kg	40	<10	108	70-130	19.0	40	
Dibromochloromethane	**45.6**	5.0	ug/kg	40	<5.0	114	70-130	20.5	40	
1,2-Dibromoethane (EDB)	**41.6**	5.0	ug/kg	40	<5.0	104	70-130	16.6	40	
Dibromomethane	**41.6**	5.0	ug/kg	40	<5.0	104	70-130	12.9	40	
1,2-Dichlorobenzene	**42.3**	5.0	ug/kg	40	<5.0	106	70-130	25.9	40	
1,3-Dichlorobenzene	**40.9**	5.0	ug/kg	40	<5.0	102	70-130	25.7	40	
1,4-Dichlorobenzene	**40.7**	5.0	ug/kg	40	<5.0	102	70-130	24.7	40	
Dichlorodifluoromethane (R12)	**34.1**	5.0	ug/kg	40	<5.0	85.2	70-130	4.16	40	
1,1-Dichloroethane	**42.0**	5.0	ug/kg	40	<5.0	105	70-130	10.9	40	
1,2-Dichloroethane (EDC)	**49.0**	5.0	ug/kg	40	<5.0	122	70-130	14.8	40	
trans-1,2-Dichloroethylene	**43.9**	5.0	ug/kg	40	<5.0	110	70-130	14.4	40	
cis-1,2-Dichloroethylene	**42.7**	5.0	ug/kg	40	<5.0	107	70-130	15.1	40	
1,1-Dichloroethylene	**44.2**	5.0	ug/kg	40	<5.0	111	70-130	5.19	40	
1,2-Dichloropropane	**38.5**	5.0	ug/kg	40	<5.0	96.4	70-130	17.3	40	
2,2-Dichloropropane	**41.9**	5.0	ug/kg	40	<5.0	105	70-130	11.1	40	
1,3-Dichloropropane	**40.8**	5.0	ug/kg	40	<5.0	102	70-130	17.6	40	
1,1-Dichloropropylene	**38.9**	5.0	ug/kg	40	<5.0	97.2	70-130	18.8	40	
trans-1,3-Dichloropropylene	**36.4**	5.0	ug/kg	40	<5.0	91.1	70-130	18.0	40	
cis-1,3-Dichloropropylene	**40.9**	5.0	ug/kg	40	<5.0	102	70-130	17.6	40	
Diisopropyl ether (DIPE)	**40.6**	5.0	ug/kg	40	<5.0	102	70-130	15.1	40	
Ethylbenzene	**39.7**	2.0	ug/kg	40	1.17	96.3	70-130	18.2	40	



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948103
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2925 - EPA 5035										
Matrix Spike Dup (B8F2925-MSD1) Continued				**Source: 8F28009-01**		Prepared & Analyzed: 06/29/18				
Ethyl-tert-Butyl Ether (ETBE)	**45.0**	5.0	ug/kg	40	<5.0	113	70-130	13.3	40	
Hexachlorobutadiene	**34.4**	10	ug/kg	40	<10	86.0	70-130	22.7	40	
2-Hexanone (MBK)	**28.2**	50	ug/kg	40	<50	70.6	70-130	17.0	40	
Isopropylbenzene	**43.8**	5.0	ug/kg	40	<5.0	109	70-130	21.1	40	
4-Isopropyltoluene	**41.5**	5.0	ug/kg	40	<5.0	104	70-130	21.8	40	
Methyl-tert-Butyl Ether (MTBE)	**91.2**	5.0	ug/kg	80	<5.0	114	70-130	11.4	40	
Methylene Chloride	**39.9**	50	ug/kg	40	<50	99.7	70-130	11.3	40	
4-Methyl-2-pentanone (MIBK)	**37.2**	50	ug/kg	40	<50	93.0	70-130	11.3	40	
Naphthalene	**38.6**	10	ug/kg	40	<10	96.6	70-130	35.4	40	
n-Propylbenzene	**41.8**	5.0	ug/kg	40	<5.0	105	70-130	21.2	40	
Styrene	**35.9**	5.0	ug/kg	40	<5.0	89.8	70-130	21.7	40	
1,1,1,2-Tetrachloroethane	**44.8**	5.0	ug/kg	40	<5.0	112	70-130	21.5	40	
1,1,2,2-Tetrachloroethane	**36.5**	5.0	ug/kg	40	<5.0	91.2	70-130	15.8	40	
Tetrachloroethylene (PCE)	**38.6**	5.0	ug/kg	40	<5.0	96.6	70-130	17.0	40	
Toluene	**41.2**	2.0	ug/kg	40	<2.0	103	70-130	19.4	40	
1,2,4-Trichlorobenzene	**33.0**	5.0	ug/kg	40	<5.0	82.5	70-130	33.3	40	
1,2,3-Trichlorobenzene	**32.9**	5.0	ug/kg	40	<5.0	82.2	70-130	35.6	40	
1,1,2-Trichloroethane	**41.1**	5.0	ug/kg	40	<5.0	103	70-130	16.7	40	
1,1,1-Trichloroethane	**45.0**	5.0	ug/kg	40	<5.0	112	70-130	13.2	40	
Trichloroethylene (TCE)	**39.9**	5.0	ug/kg	40	<5.0	99.8	70-130	15.5	40	
Trichlorofluoromethane (R11)	**48.1**	5.0	ug/kg	40	<5.0	120	70-130	4.13	40	
1,2,3-Trichloropropane	**37.8**	5.0	ug/kg	40	<5.0	94.4	70-130	15.6	40	
1,1,2-Trichloro-1,2,2-trifluoroethane (R113)	**43.7**	5.0	ug/kg	40	<5.0	109	70-130	2.84	40	
1,3,5-Trimethylbenzene	**41.8**	5.0	ug/kg	40	<5.0	104	70-130	19.3	40	
1,2,4-Trimethylbenzene	**41.7**	5.0	ug/kg	40	<5.0	104	70-130	20.4	40	
Vinyl chloride	**48.5**	5.0	ug/kg	40	<5.0	121	70-130	3.39	40	
o-Xylene	**39.1**	2.0	ug/kg	40	<2.0	97.7	70-130	21.7	40	
m,p-Xylenes	**76.2**	2.0	ug/kg	80	1.83	92.9	70-130	18.9	40	
Surrogate: 4-Bromofluorobenzene	*105*		*ug/kg*	*100*		*105*	*70-140*			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948103
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
VOCs & OXYGENATES by GC/MS - Quality Control										
Batch B8F2925 - EPA 5035										
Matrix Spike Dup (B8F2925-MSD1) Continued				**Source: 8F28009-01**		Prepared & Analyzed: 06/29/18				
Surrogate: Dibromofluoromethane	*102*		*ug/kg*	*100*		*102*	*70-140*			
Surrogate: Toluene-d8	*101*		*ug/kg*	*100*		*101*	*70-140*			
Carbon Chain by GC/FID - Quality Control										
Batch B8F2913 - EPA 3550B										
Blank (B8F2913-BLK1)						Prepared: 06/29/18	Analyzed: 06/30/18			
C6-C8	<1.0	1.0	mg/kg							
C8-C10	<1.0	1.0	mg/kg							
C10-C12	<1.0	1.0	mg/kg							
C12-C14	<1.0	1.0	mg/kg							
C14-C16	<1.0	1.0	mg/kg							
C16-C18	<1.0	1.0	mg/kg							
C18-C20	<1.0	1.0	mg/kg							
C20-C22	<1.0	1.0	mg/kg							
C22-C24	<1.0	1.0	mg/kg							
C24-C26	<1.0	1.0	mg/kg							
C26-C28	<1.0	1.0	mg/kg							
C28-C32	<1.0	1.0	mg/kg							
C32-C34	<1.0	1.0	mg/kg							
C34-C36	<1.0	1.0	mg/kg							
C36-C40	<1.0	1.0	mg/kg							
C40-C44	<1.0	1.0	mg/kg							
TPH (C6-C44)	<10	10	mg/kg							
Gasoline Range Organics (C6-C10)	<5.0	5.0	mg/kg							
Diesel Range Organics (C10-C23)	<5.0	5.0	mg/kg							
Oil Range Organics (C23-C44)	<5.0	5.0	mg/kg							
Surrogate: o-Terphenyl	*8.38*		*mg/kg*	*10*		*83.8*	*50-150*			
LCS (B8F2913-BS1)						Prepared: 06/29/18	Analyzed: 06/30/18			
Diesel Range Organics as Diesel	**163**	10	mg/kg	200		81.7	75-125			
Surrogate: o-Terphenyl	*11.4*		*mg/kg*	*10*		*114*	*50-150*			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948103
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Carbon Chain by GC/FID - Quality Control										
Batch B8F2913 - EPA 3550B										
LCS Dup (B8F2913-BSD1)				Prepared: 06/29/18 Analyzed: 06/30/18						
Diesel Range Organics as Diesel	**164**	10	mg/kg	200		82.2	75-125	0.627	40	
Surrogate: o-Terphenyl	*12.0*		*mg/kg*	*10*		*120*	*50-150*			
Total Metals CAM 17 - Quality Control										
Batch B8F2929 - EPA 3050B										
Blank (B8F2929-BLK1)				Prepared: 06/29/18 Analyzed: 07/02/18						
Antimony	<10	10	mg/kg							
Arsenic	<0.50	0.50	mg/kg							
Barium	<10	10	mg/kg							
Beryllium	<1.0	1.0	mg/kg							
Cadmium	<1.0	1.0	mg/kg							
Chromium	<3.0	3.0	mg/kg							
Cobalt	<3.0	3.0	mg/kg							
Copper	<3.0	3.0	mg/kg							
Lead	<3.0	3.0	mg/kg							
Molybdenum	<5.0	5.0	mg/kg							
Nickel	<3.0	3.0	mg/kg							
Selenium	<0.50	0.50	mg/kg							
Silver	<1.0	1.0	mg/kg							
Thallium	<5.0	5.0	mg/kg							
Vanadium	<10	10	mg/kg							
Zinc	<3.0	3.0	mg/kg							
LCS (B8F2929-BS1)				Prepared: 06/29/18 Analyzed: 07/02/18						
Antimony	**50.8**	10	mg/kg	50		102	80-120			
Arsenic	**50.6**	0.50	mg/kg	50		101	80-120			
Barium	**50.2**	10	mg/kg	50		100	80-120			
Beryllium	**52.3**	1.0	mg/kg	50		105	80-120			
Cadmium	**51.4**	1.0	mg/kg	50		103	80-120			
Chromium	**49.4**	3.0	mg/kg	50		98.8	80-120			
Cobalt	**50.6**	3.0	mg/kg	50		101	80-120			
Copper	**48.2**	3.0	mg/kg	50		96.4	80-120			



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948103
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Total Metals CAM 17 - Quality Control										
Batch B8F2929 - EPA 3050B										
LCS (B8F2929-BS1) Continued				Prepared: 06/29/18 Analyzed: 07/02/18						
Lead	**48.2**	3.0	mg/kg	50		96.4	80-120			
Molybdenum	**49.9**	5.0	mg/kg	50		99.7	80-120			
Nickel	**51.0**	3.0	mg/kg	50		102	80-120			
Selenium	**48.0**	0.50	mg/kg	50		96.1	80-120			
Silver	**50.9**	1.0	mg/kg	50		102	80-120			
Thallium	**59.4**	5.0	mg/kg	50		119	80-120			
Vanadium	**50.4**	10	mg/kg	50		101	80-120			
Zinc	**53.3**	3.0	mg/kg	50		107	80-120			
LCS Dup (B8F2929-BSD1)				Prepared: 06/29/18 Analyzed: 07/02/18						
Antimony	**48.1**	10	mg/kg	50		96.2	80-120	5.56	20	
Arsenic	**47.6**	0.50	mg/kg	50		95.3	80-120	6.15	20	
Barium	**46.6**	10	mg/kg	50		93.2	80-120	7.44	20	
Beryllium	**50.0**	1.0	mg/kg	50		99.9	80-120	4.65	20	
Cadmium	**49.3**	1.0	mg/kg	50		98.6	80-120	4.19	20	
Chromium	**47.0**	3.0	mg/kg	50		94.0	80-120	4.92	20	
Cobalt	**48.0**	3.0	mg/kg	50		96.1	80-120	5.07	20	
Copper	**45.1**	3.0	mg/kg	50		90.3	80-120	6.60	20	
Lead	**46.0**	3.0	mg/kg	50		91.9	80-120	4.80	20	
Molybdenum	**45.9**	5.0	mg/kg	50		91.7	80-120	8.38	20	
Nickel	**48.7**	3.0	mg/kg	50		97.3	80-120	4.74	20	
Selenium	**46.6**	0.50	mg/kg	50		93.1	80-120	3.17	20	
Silver	**46.8**	1.0	mg/kg	50		93.5	80-120	8.46	20	
Thallium	**55.6**	5.0	mg/kg	50		111	80-120	6.62	20	
Vanadium	**47.5**	10	mg/kg	50		95.0	80-120	5.98	20	
Zinc	**54.8**	3.0	mg/kg	50		110	80-120	2.74	20	
Matrix Spike (B8F2929-MS1)			**Source: 8F28009-01**	Prepared: 06/29/18 Analyzed: 07/02/18						
Antimony	**25.4**	10	mg/kg	50	<10	50.9	75-125			QM-07
Arsenic	**50.2**	0.50	mg/kg	50	2.93	94.5	75-125			
Barium	**105**	10	mg/kg	50	51.4	108	75-125			
Beryllium	**47.3**	1.0	mg/kg	50	<1.0	94.5	75-125			
Cadmium	**37.8**	1.0	mg/kg	50	<1.0	75.6	75-125			

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948103
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Total Metals CAM 17 - Quality Control										
Batch B8F2929 - EPA 3050B										
Matrix Spike (B8F2929-MS1) Continued Source: 8F28009-01 Prepared: 06/29/18 Analyzed: 07/02/18										
Chromium	**61.2**	3.0	mg/kg	50	11.0	100	75-125			
Cobalt	**48.6**	3.0	mg/kg	50	3.16	90.9	75-125			
Copper	**58.0**	3.0	mg/kg	50	3.32	109	75-125			
Lead	**79.8**	3.0	mg/kg	50	21.5	117	75-125			
Molybdenum	**48.0**	5.0	mg/kg	50	<5.0	95.9	75-125			
Nickel	**54.8**	3.0	mg/kg	50	9.17	91.2	75-125			
Selenium	**37.6**	0.50	mg/kg	50	<0.50	75.1	75-125			
Silver	**53.2**	1.0	mg/kg	50	<1.0	106	75-125			
Thallium	**48.5**	5.0	mg/kg	50	<5.0	97.1	60-140			
Vanadium	**74.7**	10	mg/kg	50	23.8	102	75-125			
Zinc	**137**	3.0	mg/kg	50	84.2	105	75-125			
Matrix Spike Dup (B8F2929-MSD1) **Source: 8F28009-01** Prepared: 06/29/18 Analyzed: 07/02/18										
Antimony	**26.3**	10	mg/kg	50	<10	52.6	75-125	3.36	40	QM-07
Arsenic	**49.5**	0.50	mg/kg	50	2.93	93.2	75-125	1.30	40	
Barium	**103**	10	mg/kg	50	51.4	103	75-125	2.40	40	
Beryllium	**47.2**	1.0	mg/kg	50	<1.0	94.5	75-125	0.0423	40	
Cadmium	**40.7**	1.0	mg/kg	50	<1.0	81.3	75-125	7.31	40	
Chromium	**60.9**	3.0	mg/kg	50	11.0	99.7	75-125	0.540	40	
Cobalt	**49.2**	3.0	mg/kg	50	3.16	92.2	75-125	1.25	40	
Copper	**61.3**	3.0	mg/kg	50	3.32	116	75-125	5.63	40	
Lead	**69.0**	3.0	mg/kg	50	21.5	94.9	75-125	14.6	40	
Molybdenum	**49.0**	5.0	mg/kg	50	<5.0	98.0	75-125	2.15	40	
Nickel	**56.3**	3.0	mg/kg	50	9.17	94.2	75-125	2.70	40	
Selenium	**38.0**	0.50	mg/kg	50	<0.50	76.0	75-125	1.22	40	
Silver	**52.9**	1.0	mg/kg	50	<1.0	106	75-125	0.547	40	
Thallium	**47.6**	5.0	mg/kg	50	<5.0	95.1	60-140	2.04	40	
Vanadium	**74.7**	10	mg/kg	50	23.8	102	75-125	0.107	40	
Zinc	**180**	3.0	mg/kg	50	84.2	192	75-125	27.4	40	QM-07
Total Metals CAM 17 - Quality Control										
Batch B8G0224 - EPA 7471A Prep										
Blank (B8G0224-BLK1) Prepared & Analyzed: 07/02/18										



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948103
Date Received: 06/28/18
Date Reported: 07/03/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Total Metals CAM 17 - Quality Control										
Batch B8G0224 - EPA 7471A Prep										
Blank (B8G0224-BLK1) Continued				Prepared & Analyzed: 07/02/18						
Mercury	<0.020	0.020	mg/kg							
LCS (B8G0224-BS1)				Prepared & Analyzed: 07/02/18						
Mercury	**0.496**	0.020	mg/kg	0.50		99.3	80-120			
LCS Dup (B8G0224-BSD1)				Prepared & Analyzed: 07/02/18						
Mercury	**0.498**	0.020	mg/kg	0.50		99.5	80-120	0.201	25	
Matrix Spike (B8G0224-MS1)		**Source: 8F28009-01**		Prepared & Analyzed: 07/02/18						
Mercury	**0.586**	0.020	mg/kg	0.50	0.0940	98.4	75-125			
Matrix Spike Dup (B8G0224-MSD1)		**Source: 8F28009-01**		Prepared & Analyzed: 07/02/18						
Mercury	**0.584**	0.020	mg/kg	0.50	0.0940	98.1	75-125	0.256	25	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Soil & GW

AA Project No: A948103
Date Received: 06/28/18
Date Reported: 07/03/18

Special Notes

[1] = ****** : Exceeds upper control limit.

[2] = ******* : Exceeds lower control limit.

[3] = **QM-07** : The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.

Viorel Vasile
Operations Manager

AMERICAN ANALYTICS CHAIN-OF-CUSTODY RECORD

9765 ETON AVE., CHATSWORTH, CA 91311
Tel: 818-998-5547 FAX: 818-998-7258

A.A. COC No.: 15567
70051731
Page 1 of 1

Client: AECOM	Project Name / No.: 128 Hurricane St 60553849	Sampler's Name: A. Vigna
Project Manager: Kaleena Johnson	Site Address:	Sampler's Signature:
Phone:	City: LA	P.O. No.:
Fax:	State & Zip: CA	Quote No.:

TAT Turnaround Codes **

(1) = Same Day Rush
(2) = 24 Hour Rush
(3) = 48 Hour Rush
(4) = 72 Hour Rush
(5) = 5 Day Rush
X = 10 Working Days (Standard TAT)

ANALYSIS REQUESTED (Test Name)

Client I.D.	A.A. I.D.	Date	Time	Sample Matrix	No. of Cont	TPH cc (8015)	VOCs	T22 Metals	Please enter the TAT Turnaround Codes ** below	Special Instructions
Waste062318	18P28009-01	6/28/18	1520	Soil	3	X	X	X		48 Hr TAT

For Laboratory Use

PRIORITY
Rush 48 Hrs SH
Date 6/29/18 Time 0900 Sign

A.A. Project No.: 18P0103/18P28009

Relinquished by	Date	Time	Received by
	6/29/18	1530	
	6-28-18	536	

Note: By relinquishing samples to American Analytics, client agrees to pay for the services requested on this chain of custody form and any additional client-requested analyses performed on this project. Payment for services is due within 30 days from the date of invoice. Sample(s) will be disposed of after 45 days following the submittal of the sample(s) to American Analytics.

Appendix F – Soil Gas Analytical Laboratory Reports and LADBS Form 1

AMERICAN ANALYTICS

9765 Eton Avenue
Chatsworth
California 91311
Tel: (818) 998-5547
Fax: (818) 998-7258

June 28, 2018

Kaleena Johnson

AECOM (LA)

300 S. Grand Ave., Suite 800

Los Angeles, CA 90017

Re : 128 Hurricane - Methane Investigation

A948100 / 8F26021

Enclosed is an analytical report for the above-referenced project. The samples included in this report were received on 06/26/18 10:27 and analyzed in accordance with the attached chain-of-custody.

Unless otherwise noted, all analytical testing was accomplished in accordance with the guidelines established in our Quality Assurance Program Manual, applicable standard operating procedures, and other related documentation. The results in this analytical report are limited to the samples tested and any reproduction thereof must be made in its entirety.

If you have any questions regarding this report or require additional information please call me at American Analytics.

Sincerely,



Viorel Vasile

Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Methane Investigation

AA Project No: A948100
Date Received: 06/26/18
Date Reported: 06/28/18

Sample ID	Laboratory ID	Matrix	TAT	Date Sampled	Date Received
Fixed Gases					
SB-3	8F26021-01	Vapor	2	06/26/18 08:28	06/26/18 10:27
SB-1	8F26021-02	Vapor	2	06/26/18 08:51	06/26/18 10:27

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Methane Investigation
Method: Fixed Gases by TCD

AA Project No: A948100
Date Received: 06/26/18
Date Reported: 06/28/18
Units: % by Volume

Date Sampled:	06/26/18	06/26/18	
Date Prepared:	06/26/18	06/26/18	
Date Analyzed:	06/27/18	06/27/18	
AA ID No:	8F26021-01	8F26021-02	
Client ID No:	SB-3	SB-1	
Matrix:	Vapor	Vapor	
Dilution Factor:	1	1	MRL
Fixed Gases (ASTM D1946M)			
Methane	<0.10	<0.10	0.10
Oxygen	**17**	**17**	0.10
Carbon Dioxide	**1.2**	**2.5**	0.10

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Methane Investigation

AA Project No: A948100
Date Received: 06/26/18
Date Reported: 06/28/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Fixed Gases by TCD - Quality Control										
*Batch B8F2642 - *** DEFAULT PREP ****										
Blank (B8F2642-BLK1)				Prepared: 06/26/18 Analyzed: 06/27/18						
Methane	<0.10	0.10	% by Volume							
Oxygen	<0.10	0.10	% by Volume							
Carbon Dioxide	<0.10	0.10	% by Volume							
LCS (B8F2642-BS1)				Prepared: 06/26/18 Analyzed: 06/27/18						
Methane	**4.08**	0.20	% by Volume	4.5		90.7	75-125			
Oxygen	**4.16**	0.20	% by Volume	4.0		104	75-125			
Carbon Dioxide	**13.7**	0.20	% by Volume	15		91.5	75-125			
LCS Dup (B8F2642-BSD1)				Prepared: 06/26/18 Analyzed: 06/27/18						
Methane	**3.97**	0.20	% by Volume	4.5		88.2	75-125	2.73	30	
Oxygen	**4.09**	0.20	% by Volume	4.0		102	75-125	1.55	30	
Carbon Dioxide	**13.4**	0.20	% by Volume	15		89.5	75-125	2.14	30	
Duplicate (B8F2642-DUP1)				**Source: 8F26021-02** Prepared: 06/26/18 Analyzed: 06/27/18						
Methane	**<0.10**	0.10	% by Volume		<0.10				30	
Oxygen	**17.2**	0.10	% by Volume		17.2			0.145	30	
Carbon Dioxide	**2.40**	0.10	% by Volume		2.50			3.84	30	

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	A948100
Project No:	NA	**Date Received:**	06/26/18
Project Name:	128 Hurricane - Methane Investigation	**Date Reported:**	06/28/18

Special Notes

Viorel Vasile
Operations Manager

AMERICAN ANALYTICS CHAIN-OF-CUSTODY RECORD

9765 ETON AVE., CHATSWORTH, CA 91311
Tel: 818-998-5547 FAX: 818-998-7258

A.A. COC No.: 15945
70051340
Page 1 of 1

Client: AECOM	Project Name / No.: 60553849	Sampler's Name: Juan Rodriguez
Project Manager: Kaleena Johnson	Site Address: 128 Hurricane	Sampler's Signature:
Phone: 831 206 2121	City: Marina DEL Rey	P.O. No.:
Fax:	State & Zip: CA	Quote No.:

TAT Turnaround Codes **

(1) = Same Day Rush
(2) = 24 Hour Rush
(3) = 48 Hour Rush
(4) = 72 Hour Rush
(5) = 5 Day Rush
X = 10 Working Days (Standard TAT)

ANALYSIS REQUESTED (Test Name)

Please enter the TAT Turnaround Codes ** below

Client I.D.	A.A. I.D.	Date	Time	Sample Matrix	No. of Cont	* METHANE	Special Instructions
SB-3	6F26021-01	6/26/18	828	VAPOR	2	X	* Fixed Gases
SB-1	-02	6/26/18	851	VAPOR	2	X	

For Laboratory Use

PRIORITY
Rush ___ Hrs SH ✓
Date 6/26/18 Time 1130 Sign

A.A. Project No.: 6F26021-01, 6F26021-02

	Date	Time	
Relinquished by	6/26/18	900	Received by
Relinquished by	6/26/18	1027	Received by
Relinquished by	Date	Time	Received by

Note: By relinquishing samples to American Analytics, client agrees to pay for the services requested on this chain of custody form and any additional client-requested analyses performed on this project. Payment for services is due within 30 days from the date of invoice. Sample(s) will be disposed of after 45 days following the submittal of the sample(s) to American Analytics.

AMERICAN ANALYTICS

9765 Eton Avenue
Chatsworth
California 91311
Tel: (818) 998-5547
Fax: (818) 998-7258

June 28, 2018

Kaleena Johnson

AECOM (LA)

300 S. Grand Ave., Suite 800

Los Angeles, CA 90017

Re : 128 Hurricane - Methane Investigation

MB948101 / 8F27012

Enclosed is an analytical report for the above-referenced project. The samples included in this report were received on 06/27/18 11:10 and analyzed in accordance with the attached chain-of-custody.

Unless otherwise noted, all analytical testing was accomplished in accordance with the guidelines established in our Quality Assurance Program Manual, applicable standard operating procedures, and other related documentation. The results in this analytical report are limited to the samples tested and any reproduction thereof must be made in its entirety.

If you have any questions regarding this report or require additional information please call me at American Analytics.

Sincerely,



Viorel Vasile

Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Methane Investigation

AA Project No: MB948101
Date Received: 06/27/18
Date Reported: 06/28/18

Sample ID	Laboratory ID	Matrix	TAT	Date Sampled	Date Received
Fixed Gases					
SB-3	8F27012-01	Vapor	2	06/27/18 08:30	06/27/18 11:10
SB-1	8F27012-02	Vapor	2	06/27/18 08:53	06/27/18 11:10

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Methane Investigation
Method: Fixed Gases by TCD

AA Project No: MB948101
Date Received: 06/27/18
Date Reported: 06/28/18
Units: % by Volume

Date Sampled:	06/27/18	06/27/18	
Date Prepared:	06/27/18	06/27/18	
Date Analyzed:	06/27/18	06/27/18	
AA ID No:	8F27012-01	8F27012-02	
Client ID No:	SB-3	SB-1	
Matrix:	Vapor	Vapor	
Dilution Factor:	1	1	MRL
Fixed Gases (ASTM D1946M)			
Methane	<0.10	<0.10	0.10
Oxygen	**19**	**17**	0.10
Carbon Dioxide	**1.3**	**2.6**	0.10

Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client: AECOM (LA)
Project No: NA
Project Name: 128 Hurricane - Methane Investigation

AA Project No: MB948101
Date Received: 06/27/18
Date Reported: 06/28/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Fixed Gases by TCD - Quality Control										
*Batch B8F2733 - *** DEFAULT PREP ****										
Blank (B8F2733-BLK1)				Prepared & Analyzed: 06/27/18						
Methane	<0.10	0.10	% by Volume							
Oxygen	<0.10	0.10	% by Volume							
Carbon Dioxide	<0.10	0.10	% by Volume							
LCS (B8F2733-BS1)				Prepared & Analyzed: 06/27/18						
Methane	**3.80**	0.20	% by Volume	4.5		84.5	75-125			
Oxygen	**3.84**	0.20	% by Volume	4.0		96.0	75-125			
Carbon Dioxide	**12.9**	0.20	% by Volume	15		85.7	75-125			
LCS Dup (B8F2733-BSD1)				Prepared & Analyzed: 06/27/18						
Methane	**3.83**	0.20	% by Volume	4.5		85.1	75-125	0.681	30	
Oxygen	**3.90**	0.20	% by Volume	4.0		97.6	75-125	1.55	30	
Carbon Dioxide	**13.0**	0.20	% by Volume	15		86.4	75-125	0.821	30	
Duplicate (B8F2733-DUP1)				**Source: 8F27012-02** Prepared & Analyzed: 06/27/18						
Methane	**<0.10**	0.10	% by Volume		<0.10				30	
Oxygen	**17.6**	0.10	% by Volume		16.8			4.65	30	
Carbon Dioxide	**2.70**	0.10	% by Volume		2.61			3.50	30	



Viorel Vasile
Operations Manager

LABORATORY ANALYSIS RESULTS

Client:	AECOM (LA)	**AA Project No:**	MB948101
Project No:	NA	**Date Received:**	06/27/18
Project Name:	128 Hurricane - Methane Investigation	**Date Reported:**	06/28/18

Special Notes

Viorel Vasile
Operations Manager

AMERICAN ANALYTICS CHAIN-OF-CUSTODY RECORD

9765 ETON AVE., CHATSWORTH, CA 91311
Tel: 818-998-5547 FAX: 818-998-7258

A.A. COC No.: 15858
70051334
Page 1 of 1

Client: AECOM	**Project Name / No.:** 60553849	**Sampler's Name:** Juan Rodriguez
Project Manager: Kaleena Johnson	**Site Address:** 128 Hurricane st	**Sampler's Signature:**
Phone: 831 206 2121	**City:** Marina del Rey	**P.O. No.:**
Fax:	**State & Zip:** CA	**Quote No.:**

TAT Turnaround Codes **

(1) = Same Day Rush
(2) = 24 Hour Rush
(3) = 48 Hour Rush
(4) = 72 Hour Rush
(5) = 5 Day Rush
X = 10 Working Days (Standard TAT)

ANALYSIS REQUESTED (Test Name)

Please enter the TAT Turnaround Codes ** below

Client I.D.	A.A. I.D.	Date	Time	Sample Matrix	No. of Cont	(A) Methane										Special Instructions
SB-3	4F27012-01	6/27/18	830	VAPOR	2	X										* Final Canisters
SB-1	02	6/27/18	853	VAPOR	2	X										

For Laboratory Use

PRIORITY
Rush ___ Hrs SH ✓
Date 6/27/18 Time 1145 Sign

A.A. Project No.: MB9810 / 4F27012

	Relinquished by	Date	Time	Received by
1		6/27/18	0900	
2		6/27/18	1110	
3		Date	Time	Received by

Note: By relinquishing samples to American Analytics, client agrees to pay for the services requested on this chain of custody form and any additional client-requested analyses performed on this project. Payment for services is due within 30 days from the date of invoice. Sample(s) will be disposed of after 45 days following the submittal of the sample(s) to American Analytics.

FORM 1 - CERTIFICATE OF COMPLIANCE FOR METHANE TEST DATA

Part 1: Certification Sheet

Site Address: 128 Hurricane Street, Marina del Rey, CA
Legal Description: Tract: _____ Lot: Block:
Building Use: Vacant Lot

Architect's, Engineer's or Geologist's Stamp:

Name of Architect, Engineer, or Geologist:
Alexis Bahou
Mailing Address:
300 S. Grand Ave., Suite 800
Los Angeles, CA 90071
Telephone:

Name of Testing Laboratory:
American Analytics
City Test Lab License #: 10215
Telephone: (818) 998-5547

I hereby certify that I have tested the above site for the purpose of methane mitigation and that all procedures were conducted by a City of Los Angeles licensed testing agency in conformity with the requirements of the LADBS Information Bulletin P/BC 2014-101. Where the inspection and testing of all or part of the work above is delegated, full responsibility shall be assumed by the architect, engineer or geologist whose signature is affixed thereon.

Signed: _____ date _____

Required Data:

- Project is in the (Methane Zone) or (Methane Buffer Zone).
- Depth of ground water observed during testing: 4.5 feet below the Impervious Membrane.
- Depth of Historical High Ground Water Table Elevation*: 4.5 feet below the Impervious Membrane.
- Design Methane Concentration**: 0 parts per million in volume (ppmv).
- Design Methane Pressure***: 0 inches of water column.
- Site Design Level: (Level I, Level II, Level III, Level IV, Level V) with 0 inches of water column.

De-watering:

- De-watering (is) (is not) required per Section 7104.3.7. NA
- Pump discharge rate NA cubic feet per minute per reference geology or soil report: NA dated NA.

Additional Investigation:

- Additional investigation (was) (was not) conducted.

Latest Grading on Site:

- Date of last grading on site (was) (was not) more than 30 days before Site Testing.
- See Attached explanation of the effect on soil gas survey results by grading operations.

Notes:

* Historical High Ground Water Table Elevation shall mean the highest recorded elevation of ground water table based on historical records and field investigations as determined by the engineer for the methane mitigation system.

** Design Methane Concentration shall mean the highest recorded measured methane concentration from either Shallow Soil Gas Test or any Gas Probe Set on the site.

*** Design Methane Pressure shall mean the highest total pressure measured from any Gas Probe Set on the site.

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities. For efficient handling of information internally and in the internet, conversion to this new format of code related and administrative information bulletins including MGD and RGA that were previously issued will allow flexibility and timely distribution of information to the public.

FORM 1 (CONTINUED) - CERTIFICATE OF COMPLIANCE FOR METHANE TEST DATA

Part 2: Test Data - Shallow Soil Gas Test and Gas Probe Test

Site Address: 128 Hurricane Street, Marina del Rey, CA
Description of Gas Analysis Instrument(s):
Instrument Name and Model: ASTM D1946M Instrument Accuracy: ± NA ppmv.
City of Los Angeles Testing License #: 10215

Date	Time	Probe Set #	Concentration (ppmv)	Pressure (inches water column)	Probe Depth (feet)	Description / Probe Location
6/26/18	8:12	SB-3	<0.10%	0.00	3.5	Barometric Pressure: 29.96
6/26/18	8:36	SB-1	<0.10%	0.00	4.0	
6/27/18	8:14	SB-3	<0.10%	0.00	3.5	Barometric Pressure: 29.97
6/27/18	8:34	SB-1	<0.10%	0.00	4.0	
						*Probes are set 12 inches
						above the water table.

TABLE 1 - DATA COLLECTION EQUIPMENT

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities. For efficient handling of information internally and in the internet, conversion to this new format of code related and administrative information bulletins including MGD and RGA that were previously issued will allow flexibility and timely distribution of information to the public.

AECOM Imagine it. Delivered.

Removal Action Workplan - Final

128 Hurricane Street
Venice, California 90292

Prepared for:
City of Los Angeles
Bureau of Engineering
Department of Public Works

AECOM Project number: 60553849

Prepared: July 17, 2020

Revised: December 30, 2020 in response to DTSC comments

Finalized: March 29, 2021 to include additional documents generated

SITE CODE: 301916

Prepared for:

City of Los Angeles Bureau of Engineering
1149 S. Broadway St.
Los Angeles, CA 90015

Prepared by:

Samuel Stephens
Staff Geologist
T: (213) 996-2315
E:samuel.stephens@aecom.com

Shapoor Hamid, PhD Principal Scientist
T: (213) 996-2630
E: shapoor.hamid@aecom.com

Andrew Vigna, PG
Senior Geologist
T: (213) 996-2449
E: andrew.vigna@aecom.com

PROFESSIONAL GEOLOGIST
ANDREW VIGNA
No. 8698
Exp. 4/30/21
STATE OF CALIFORNIA

AECOM
One California Plaza
300 South Grand Avenue
Los Angeles, CA 90071

T: +1 (213) 593-8100
F: +1 (213) 593-8178
aecom.com

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Table of Contents

1. INTRODUCTION 1
2. SITE BACKGROUND 1
   2.1 Site Location and Description 1
   2.2 Geological and Hydrogeological Summary 2
   2.3 Summary of Previous Investigations 2
3. CURRENT CITY'S SITE DEVELOPMENT PLAN 3
4. SCOPE 3
5. AMENDMENT TO PHASE II ESA 4
6. REMOVAL ACTION WORKPLAN (RAW) 4
   6.1 Agencies Notification Records 4
   6.2 Excavation and Soil Removal Workplan 5
      6.2.1 Pre-field Activities 5
      6.2.2 Health and Safety Plan 5
      6.2.3 Site Clearing and Debris Removal 5
      6.2.4 Excavation Procedure and Activities 5
      6.2.5 Confirmation Sampling 7
      6.2.6 Contingency for Proposed Remedial Excavation 7
      6.2.7 Backfilling 8
      6.2.8 Soil Profiling and Disposal 8
      6.2.9 Dust Control and Air Monitoring 8
      6.2.10 Asbestos Survey/Abatement Permits 9
      6.2.11 Schedule 9
      6.2.12 Cost Estimate 9
      6.2.13 Assumptions 9
   6.3 Oil Well Status Update 10
      6.3.1 CalGEM Files Review and Records 10
      6.3.2 CalGEM Requirements 10
      6.3.3 Oil Well Re-Abandonment Scope 10
      6.3.4 Oil Well Re-Abandonment Cost Estimate and Schedule 11
   6.4 Methane Mitigation Measures 11
7. REFERENCES 11

Figures

Figure 1 – Site Location Map
Figure 2 – Site Features
Figure 3 – City Development Plan
Figure 4 –Sample Locations
Figure 5 – Amended Proposed Excavation Area
Figure 6 – Proposed Excavation Area and Confirmation Sampling Locations

Tables

Table 1 – Soil Analytical Results
Table 2 – Groundwater Analytical Results
Table 3 – Soil Removal Calculations

Appendices

Appendix A – Application for Voluntary Agency Oversight
Appendix B – Communication Log with Regulatory Agencies
Appendix C – CalGEM Correspondence
Appendix D – Community Update
Appendix E – The Public Notice
Appendix F – CEQA Documents
Appendix G – Administrative Records

1. INTRODUCTION

The City of Los Angeles (LA) Bureau of Engineering prepared a development plan for a vacant lot owned by the City, located at 128 Hurricane Street, Venice also known as 128 Hurricane Street, Marina Del Rey, California 90292 as shown on **Figure 1**. A Phase I Environmental Site Assessment (ESA) was prepared for this site by Ninyo & Moore in 2017 and a Phase II ESA was prepared by AECOM on August 31, 2018.

AECOM's current objective is to provide an amendment to AECOM's Phase II ESA and to prepare a Removal Action Workplan (RAW) including a soil removal workplan based on the City of LA's new development plan for this Site. This RAW will be submitted to the oversight agencies, including the County of Los Angeles Fire Department-Health Hazardous Materials Division (LACFD-HHMD), The City of LA Fire Department, the California Department of Toxic Substances Control (DTSC), the Los Angeles Regional Water Quality Control Board (LARWQCB), and possibly the California Geologic Energy Management Division (CalGEM), for their review and approval to excavate and dispose of shallow residual hydrocarbon-impacted soil, provide a status update on a former on-site oil production well, and to address the methane issues in the soil vadose zone.

2. SITE BACKGROUND

Historically, the Site has been a vacant dirt lot without developed structures since 1928. An oil production well was drilled on the site in 1930 and was abandoned in 1932. Based on information provided in the Division of Oil Gas and Geothermal Resources (DOGGR), currently named CalGEM, website, the oil production well operations likely impacted the soil and might be incompletely abandoned. The surrounding area was developed with oil production facilities from 1938 to 1952 and residential properties from late 1963 to the present (Ninyo & Moore 2016). The sections below provide information regarding the site location and previous investigations and remediation performed.

2.1 Site Location and Description

The Site is approximately 4,230 square feet and is assigned to the Los Angeles County Assessor's Parcel Number 422-5010-016. The Site is bordered to the north and west by residences; to the east by the City of LA Department of Public Works Venice Pumping Plant, and to the south by a walking trail and Ballona Lagoon Grand Canal (**Figure 2)**. The site is currently a vacant dirt lot and was recently used for the storage of vehicles and other miscellaneous items during the various public construction projects (Ninyo & Moore 2016).

The site was recently purchased by the City of LA. The current development plan for this site includes an asphalt parking lot with a picnic area/green area for the surrounding community use. **Figure 3** shows the proposed site development plan.

According to the CalGEM/DOGGR well finder website, the former oil production well on site (referred to as the McDonald 2 well, API 03713842) has a total depth of 5,860 feet below ground surface (bgs). The location of the McDonald 2 well was likely discovered during the geophysical investigation for Phase II ESA and is shown on **Figure 2**. Reportedly, the McDonald 2 well was abandoned in 1932. A permit to re-abandon the well was issued in 2002 and renewed annually from 2004 to 2008. According to CalGEM/DOGGR, the well has not been re-abandoned, and the permit to re-abandon was cancelled.

The Site has not been developed with structures from at least 1928 through the time of this report. The area surrounding the Site was developed with oil production facilities from at least 1938 through 1952, and with residential properties from at least 1963 through the time of this report. The Venice Pumping Plant appeared east of the Site from at least 1963 (Ninyo & Moore 2016). According to a survey of the Site provided by the property owner, two electrical cabinets/concrete vaults were present in the southern portion of the Site, which were later removed by the City of LA. The purpose of the electrical cabinets/concrete vaults was not stated. The approximate locations of the electrical cabinets/concrete vaults are shown on **Figure 2**.

The Site is located in a methane zone and is within the Playa del Rey Oilfield. The nearby area has had oil pipelines, storage tanks and vaults. According to the CalGEM/DOGGR well finder website, numerous other historical oil production wells are also located within the Site vicinity.

2.2 Geological and Hydrogeological Summary

The Site is located at the northwest edge of the Peninsular Ranges Geomorphic Province of California. Landmarks in the vicinity of the Site include the Los Angeles Basin to the east, the Santa Monica Bay to the southwest, and the Santa Monica Mountains to the northwest. According to geologic information provided in the environmental database report, the Site is underlain by Quaternary (recent) alluvium bedrock. The primary underlying material is mostly artificial fill from filling and grading the La Ballona wetlands estuary in the Marina del Rey area (Ninyo & Moore 2016).

The upper 2 feet of soil beneath the Site appears to be fill material consisting of light brown silt and sand. Underlying the fill material, soil is predominantly brown to gray fine sand and silty sand from the surface to maximum depth explored, which was 20 feet bgs. A sandy clay layer was encountered in some borings between 3.5 and 4 feet bgs. Heaving sands were encountered at 5 and 6 feet bgs in the southern portion of the Site. Concrete debris was also encountered in some borings.

The Ballona Lagoon lies adjacent to the Site's southern boundary and the Pacific Ocean is approximately 0.22 miles southwest of the Site. The Site is within the Santa Monica Sub-basin of the Coastal Plain of Los Angeles Groundwater Basin. Groundwater was encountered across the Site from 4.5 to 6 feet bgs during the Phase II ESA. Groundwater was shallowest in the southeast (4 feet bgs) and deepest in the northwest (6 feet bgs). According to a nearby site, the groundwater generally flows in a southwesterly direction toward the Pacific Ocean (Ninyo & Moore 2016).

2.3 Summary of Previous Investigations

Reportedly, a geotechnical investigation was conducted by the City of LA Bureau of Engineering (LA BOE), Geotechnical Services Division, in 2006; the results of the investigation were documented in a report dated July 24, 2006. During the geotechnical investigation, two hand auger borings (B-1 and B-2) were advanced within the vicinity of the on-site electrical cabinets/concrete vaults to evaluate the condition of nearby soils. The borings encountered fill consisting of brown silty sand with some fragments of broken glass up to the maximum depth explored of 2 feet bgs. Soil samples were analyzed for petroleum hydrocarbons, polychlorinated biphenyls, volatile organic compounds (VOCs), and Title 22 Metals. The sample from B-1 was found to contain concentrations of petroleum hydrocarbons at 6,500 parts per million (ppm), and the sample from B-2 was found to contain concentrations of petroleum hydrocarbons at 100 ppm. No impacted soil was removed during the geotechnical investigation (Ninyo & Moore 2016).

In 2016, Ninyo & Moore of Irvine, California, conducted a Phase I ESA on behalf of the LA BOE. Ninyo & Moore reported the following Recognized Environmental Conditions (RECs) in connection with the Site:

- Abandoned former oil production well (McDonald 2, API 03713842) on the Site.
- Site is located within a methane zone.
- The results of geotechnical investigation in 2006 indicated high concentrations of petroleum hydrocarbons in on-site soil.
- The results of the vapor encroachment screening indicated that a possible vapor encroachment concern (VEC) currently exists beneath the Site.

Ninyo & Moore recommended a limited subsurface investigation to evaluate the RECs and VEC.

In August 2018, AECOM performed a Phase II ESA, which included a limited subsurface soil and groundwater sampling and analysis (AECOM 2018). The Phase II ESA report concluded:

- AECOM observed a buried flat concrete structure and a nearby magnetic peak during the geophysical survey. The magnetic peak is believed to be the location of the former oil production well. The concrete feature may require removal and additional investigation and sampling.
- Soil samples exhibited lead and total petroleum hydrocarbons (TPH; primarily weathered diesel and oil fractions). Lead concentrations ranged from 3.4 milligrams per kilogram (mg/kg) (SB-4-5) to 160 mg/kg (SO-2-5). TPH as diesel (TPH-d) concentrations ranged from 6.4 mg/kg (SO-7-5) to 4,600 mg/kg (SO-9-2.5).

TPH as oil (TPH-o) concentrations ranged from 5.0 mg/kg (SO-8-5) to 8,200 mg/kg (SO-9-2.5). The results indicated that past on-site activities related to oil production may have impacted the Site.

- Multiple shallow soil samples (2 and 4 feet bgs) exceeded commercial and/or residential screening levels for TPH-d and TPH as gasoline (TPH-g).
- Shallow soil samples (2 and 5 feet bgs) in the western portion of the Site exhibited elevated levels of lead that exceeded the commercial screening level, but not the residential screening level.
- Groundwater was encountered between 4 and 6 feet bgs. Groundwater quality is poor and not suited for beneficial uses. All groundwater concentrations were below non-drinking water screening levels.
- Methane was not detected from shallow gas probes, which classifies the Site as a Level I Site Design Level. No venting is required for hardscaping, but a passive ventilation system would be required for all future building construction.

3. CURRENT CITY'S SITE DEVELOPMENT PLAN

Proposed development plans at the Site will include development of an asphalt parking lot for employees of the Venice Pumping Plant (VPP). A portion of the Site will incorporate Open Space, as required by the Venice Specific Plan, which will include landscaped areas open to public access.

The City Development Plan (**Figure 3**), shows the proposed development for the Site. Proposed improvements include a total of eight parking spaces; one of which will be American with Disabilities Act accessible and one will be reserved for temporary bike parking. Entrance to the Site will be located along Canal Court. A 3-feet parking wall will be installed along the north and east property lines and a 6-feet decorative wall be installed along the west property line.

The landscaped and vegetated areas for the Site will be located on the south side and along the western property line.

Based on proposed site improvements, the developed conditions for the Site:

- Impervious area, including eight parking spaces and sidewalk, is approximately 3,031 square feet or 0.07 acres.
- Pervious area, including landscaped and open space area, is approximately 1,199 square feet or 0.03 acres.

Additionally, proposed improvements will include installation of a public art on the Site to comply with the City of LA Public Works Improvement Arts Program. The three-dimensional public art will be in the landscaped and open space on the south side of the Site. This area will be open to public access.

The Site will serve as the Laydown Area 1 for Stage 1 of the redevelopment. Access to the Site during construction will be from Hurricane Street.

The redevelopment of the area is anticipated to begin in April 2021 and will last approximately 26 months.

4. SCOPE

The scope of this project consists of the following:

1. Amend the Phase II ESA to reflect the City's new development plan;
2. Prepare a RAW including soil removal workplan for lead and TPH-d-impacted soil where the concentrations exceed residential screening level;
3. Provide a status update for the oil production well based on current CalGEM requirements; and
4. Address methane mitigation measures according to the City's new development plan

5. AMENDMENT TO PHASE II ESA

The 2018 Phase II ESA was completed for a real estate transaction and the development plan for this Site was not determined at that time.

The City of LA recently proposed the current development plan after the Phase II ESA had been submitted. **Table 1** presents soil analytical results, and **Table 2** presents groundwater analytical results. The Phase II ESA was amended according to the City of LA's current development plan and was submitted to the City on April 30, 2020. The following recommendations have been amended:

- Excavation of soil exceeding residential instead of commercial screening levels will be used for determining extent of the soil removal due to area developed as parking lot and landscaped area. Three areas of excavation were identified and are estimated to produce approximately 160 cubic yards (215 tons) of impacted soil. Contingency soil removal due to confirmation sampling is proposed to be 100 cubic yards (135 tons). Total soil to be removed is 260 cubic yards (350 tons) as shown in **Table 3**.
- Incomplete records of proper abandonment of the former production well necessitates uncovering the well casing and conducting a leak test under CalGEM supervision. Depending on leak testing results, CalGEM could require a complete re-abandonment of the production well or allow development over the well casing.
- A passive ventilation system will not be required due to the Site being developed as a hardscape parking lot less than 5,000 square feet and landscaped open space.

6. REMOVAL ACTION WORKPLAN (RAW)

The objective of the RAW is to consider options for remediation and select a course of action based on available data including type and extent of contamination, the threat presented by the contamination, subsurface conditions (geology and hydrogeology), and the extent of remediation required. In many cases, remedial actions are established based on findings of a human health risk assessment (HHRA) or ecological risk (ecorisk) assessment and the risk-based cleanup levels or cleanup criteria developed through fate and transport studies.

The RAW is considering the remediation of this Site to the residential screening level. AECOM assumes that considering the size, nature, and level of contamination and the City's current development plan for this Site, an HHRA or ecorisk assessment is not required and excavation and soil removal is a best-selected remedy for remediation of TPH and Title 22 metals contamination. Therefore, a soil excavation and removal workplan is included in this RAW.

The following sections describe the procedures of RAW implementation.

6.1 Agencies Notification Records

There are no records on GeoTracker or Envirostar for the Site and therefore there is no specific oversight agencies assigned. AECOM communicated with relevant regulatory agencies regarding voluntary oversight and additional requirements for the soil removal workplan. The City of LA and LACFD declined voluntary oversight and did not state additional requirements.

The DTSC and LARWQCB require an application for voluntary oversight to be submitted with the soil removal workplan. The application is included in **Appendix A**. Both agencies will review the application to determine which agency will be the lead regulator.

The South Coast Air Quality Management District (SCAQMD) requires implementing Rules 1166 and 1466 for air monitoring during soil removal, which includes site-specific plans, notification prior to field work, and dust control measures.

The City of LA Department of Building Safety (LADBS) will not require methane mitigation or permitting for the soil removal work plan per our phone conversation. Logs of AECOM communications with different agencies including emails and phone calls are also provided in **Appendix B**.

6.2 Excavation and Soil Removal Workplan

Excavation was chosen as the best cleanup alternative due to the shallow depth and small volume of the lead and TPH-d-impacted residual soil. Presented below is the rationale and proposed scope of work for implementing the excavation activities.

6.2.1 Pre-field Activities

Prior to conducting excavation of impacted soils, the following tasks will be completed:

- Schedule site access for required field activities.
- All proposed excavation areas will be clearly marked with white paint as required by Underground Service Alert (USA). USA will be contacted at least 48 hours in advance to identify the location of on-site utilities. AECOM will mark the located utilities from the previous geophysical survey from the Phase II ESA.
- Update the Site-specific Health and Safety Plan (HASP) prior to field activities.
- A temporary grading permit will be obtained by a qualified subcontractor from the Los Angeles County Department of Public Works Building Safety Department.
- A qualified subcontractor will notify the State of California, Division of Occupational Safety and Health with respect to the excavation/trenching activities as required under the subcontractor's Annual T-1 Trench Permit.
- A waste management plan will be made with the qualified subcontractor to store, transport, and dispose of the hazardous and non-hazardous waste off site.
- Rule 1166 and 1466 require site-specific plans to be submitted to SCAQMD by the qualified subcontractor. Prior to field work implementation, SCAQMD will be notified.

6.2.2 Health and Safety Plan

A Site-specific and Project-specific HASP will be updated to cover field staff health and safety associated with the RAW implementation activities. All field personnel are required to implement the procedures presented in the HASP while conducting on-site field work.

6.2.3 Site Clearing and Debris Removal

Buried concrete and wood debris in excavation areas -1 (EA-1) and EA-2, expected based on Phase II ESA soil borings, should be broken up and removed using a drill attachment on an excavator. Construction debris will be stockpiled separately. Any vegetation will be cleared as necessary.

6.2.4 Excavation Procedure and Activities

Soil will be excavated using a blade attachment on an excavator to prevent mixing of soils during excavation. Soil will be stockpiled in an area outside of the excavation areas. Each excavation area will have its own soil stockpile. If odor or staining is encountered, the soil will be segregated. During excavation, a Photoionization Detector (PID) will be used to monitor the presence and level of organic vapors from the excavation area.

Each excavation area will be excavated to the proposed extent and depth as summarized in the following sections

6.2.4.1 Soil Excavation Activities including Estimate Quantities

There are three proposed EAs. Provided below is a rationale for each EA and a proposed extent of excavation. Recent soil analytical data is presented in **Table 1**. The locations of the proposed excavation areas and historical sample locations are shown on **Figures 4 and 5.**

Any buried concrete pads, debris, and conduit encountered during the shallow soil excavation in the excavation areas, will be delineated within the property boundary, removed, and characterized prior to disposal.

6.2.4.2 Excavation Area-1 (EA-1)

EA-1 is centered around the likely location of the abandoned oil production well as shown in **Figure 5**. The excavation area was chosen due to boring SO-2 concentrations exceeding the California residential screening level for lead of 80 mg/kg; and borings SO-2 and SO-13 concentrations exceeding California residential screening level of 260 and 1,600 mg/kg for TPH-d and TPH-o, respectively. The lateral extent was chosen as approximately 5 feet in all directions based on the nearest sampling location. The excavation was extended to the northwestern and southwestern borders of the Site to ensure removal of impacted soil. The depth of the proposed excavation is estimated to be 3.5 feet bgs, since concentrations were below screening levels at 3.5 feet bgs in SO-13. One boring within EA-1 (SO-2) will require greater depth for excavation. Approximately 60 cubic yards of soil (82 tons) are estimated to be removed and stockpiled from EA-1 (not including the Excavation Sub-Area--1-1 [EA-1-1] discussed below).

Excavation Sub-Area-1-1 (EA-1-1)

Boring SO-2 lead concentration of 160 mg/kg at 5 feet bgs exceeds California residential screening level of 80 mg/kg and requires deeper excavation to 1 foot below the impacted soil sample for a total of 6 feet bgs. Excavation extends to the western site boundary and approximately 5 feet to the northwest, northeast, and southeast. Approximately 22 cubic yards of soil (30 tons) are estimated to be removed and stockpiled from EA-1-1.

6.2.4.3 Excavation Area-2 (EA-2)

EA-2 is centered around AECOM's Phase II ESA (June 2018) soil boring SB-4 and extends to boring SO-4 to connect with EA-1 (**Figure 5**). The excavation area was chosen due to boring SB-4 concentrations exceeding California residential screening levels of 260 and 1,600 mg/kg for TPH-d and TPH-o, respectively (with a concentration of 670 and 2,000 mg/kg, respectively at 3.5 feet bgs). The lateral extent was chosen to connect EA-1 and EA-2, because boring SO-4, between SO-1 and SB-4, has detectable concentrations of TPH-d. The excavation is bounded by borings SO-5 and SO-6 where the concentrations were below screening levels. The depth of the proposed excavation is estimated to be 3.5 feet bgs, as most borings included in the excavation area exhibited non-detections or concentrations below screening levels at 3.5 feet bgs. One boring (SB-4) within EA-2 will require greater depth and is mentioned in the following subsection for Excavation Sub-Area-2-1 (EA-2-1). Approximately 15 cubic yards of soil (20 tons) are estimated to be removed and stockpiled from EA-2 (not including the EA-2-1 discussed below).

Excavation Sub-Area-2-1 (EA-2-1)

Boring SB-4's TPH-d concentration of 670 mg/kg at 3.5 feet bgs exceeds the California residential screening level of 260 mg/kg and requires deeper excavation to 1 foot below the impacted soil sample for a depth of 4.5 feet bgs. The excavation extends 5 feet on either side of the boring. Approximately 19 cubic yards of soil (25 tons) are estimated to be removed and stockpiled from EA-2-1.

6.2.4.4 Excavation Area-3 (EA-3)

The excavation area was chosen due to boring SO-9 concentration exceeding the California residential lead screening level of 80 mg/kg and borings SB-6, SO-8, SO-9, and SO-11 concentrations exceeding California residential screening level of 260 and 1,600 mg/kg for TPH-d and TPH-o, respectively (**Figure 5**). The lateral extent was chosen as approximately 5 to 10 feet based on the nearest boring. It bounds the southwestern Site boundary and goes just beyond SO-11 to the northwest. The depth of the proposed excavation is estimated to be 3.5 feet bgs as most borings included in the excavation exhibited non-detections or concentrations below screening levels at 3.5 feet bgs. Approximately 43 cubic yards of soil (58 tons) are estimated to be removed and stockpiled from EA-3.

6.2.5 Confirmation Sampling

Depending on field observations an estimated forty-six primary soil confirmation samples will be collected, prior to backfilling, to show that no lead or TPH-d impacted soils remain within the newly excavated areas. Five duplicates will be sampled for a total of 51 soil confirmation samples.

6.2.5.1 Samples Locations and Depth by Areas

Provided below is a proposed confirmation sampling plan for each excavation area and shown on **Figure 6**. DTSC recommends sampling on every sidewall and every 50 square feet at the bottom of the excavation. Also, confirmation samples will be collected around any concrete pads, debris, or conduit encountered and removed during excavation.

EA-1

In EA-1, soil samples will be collected from all four sidewalls at a depth of approximately 0.5 feet bgs and 13 excavation floor samples per 7-foot by 7-foot grid at a depth of 3.5 feet. The total number of confirmation samples for EA-1 is 18 samples.

EA-1-1

In EA-1-1, soil samples will be collected from all four sidewalls at a depth of approximately 0.5 feet bgs and two excavation floor samples per 7-foot by 7-foot grid at a depth of 6 feet. The total number of confirmation samples for EA-1-1 is seven samples.

EA-2

In EA-2, soil samples will be collected from all four sidewalls at a depth of approximately 0.5 feet bgs and three excavation floor samples per 7-foot by 7-foot grid at a depth of 3.5 feet. The total number of confirmation samples for EA-2 is eight samples.

EA-2-1

In EA-2-1, soil samples will be collected from all four sidewalls at a depth of approximately 0.5 feet bgs and two excavation floor samples per 7-foot by 7-foot grid at a depth of 5 feet. The total number of confirmation samples for EA-2-1 is seven samples.

EA-3

In excavation area EA-3, soil samples will be collected from all four sidewalls at a depth of approximately 0.5 feet bgs and six excavation floor samples per -foot 7 by 7-foot grid at a depth of 3.5 feet. The total number of confirmation samples for EA-3 is 11 samples.

6.2.5.2 Soil Sample Sampling and Analysis

All soil samples will be collected in eight-ounce jars from the excavation sidewalls or bottom. Samples will be labeled, capped, and stored on ice and submitted to a California-certified laboratory. All samples will be analyzed for TPH-d by United States Environmental Protection Agency (EPA) Method 8015 (M) and total lead by EPA Method 6010B. The laboratory will hold all samples and analyze for Soluble Threshold Limit Concentration (STLC) if the total lead results exceed 10 times the STLC and for Toxicity Characteristic Leaching Procedure (TCLP) if the total lead results exceeds 20 times the STLC.

The excavated areas will be widened and/or deepened, as described below in Section 6.2.6, if the soil confirmation sampling data results show elevated TPH-d and/or lead concentrations exceeding residential screening levels.

6.2.6 Contingency for Proposed Remedial Excavation

Following excavation and soil removal, confirmation sampling should occur on the side walls and base of excavations according to this RAW. A contingency of 100 cubic yards due to confirmation sampling requiring further excavation should be included. This contingency would be approximately 100 cubic yards (135 tons) of additional soil for the proposed remedial excavation areas. No off-site excavation due to sidewall confirmation sampling exceeding

residential screening levels will be conducted. No additional excavation due to floor confirmation sampling exceeding residential screening levels below the water table will be conducted.

The volume of impacted soil to be removed is estimated to be 160 cubic yards or 215 tons (EA-1: 60 cubic yards/82 tons; EA-1-1: 22 cubic yards/30 tons; EA-2: 15 cubic yards/20 tons; EA-2-1: 19 cubic yards/25 tons; EA-3: 43 cubic yards/58 tons).

The total of impacted soil plus contingency to be removed is 260 cubic yard or 350 tons. Total volume and weight of excavated soil is summarized on **Table 3**.

6.2.7 Backfilling

Grading will consist of approved imported fill graded to previous levels according to LA County's temporary guidelines and DTSC's clean fill advisory (DTSC, 2001). Imported soil fill will meet the requirements specified by the client and/or overseeing agencies. Design-based and engineered grading, compaction, or compaction reports are not included.

6.2.8 Soil Profiling and Disposal

All excavated soils will be stockpiled (each EA will have its own soil stockpile) and will be profiled by analyzing one composite sample per approximately 20 cubic yards of soil prior to disposal (approximately 13 composite samples). The composite waste samples will be analyzed for VOCs by EPA method 8260B, TPH-g, -d, and -o by modified EPA method 8015 (M), and Title 22 Metals by EPA method 6010. If a metal concentration exceeds 10 times the Total Threshold Limit Concentration (TTLC), STLC will be run on the sample. If metal concentrations exceed 20 times the TTLC, and/or STLC exceeds the TTLC, TCLP will be run on the sample. Soil will be segregated if it has an odor or stain.

Upon receiving soil profile analytical results for each stockpile, soil and construction debris will be loaded into trucks and transported and disposed of properly by the qualified subcontractor. Soil with acceptable concentrations will be classified and disposed as non-hazardous waste. Non-hazardous waste shall be transported by a licensed hauler to a permitted waste disposal facility. The hazardous waste shall be transported by a licensed hauler to a permitted hazardous waste disposal facility. Prior to leaving the Site, trucks will be inspected to ensure the load is properly covered and clean. A manifest or bill of lading will be prepared for each truck leaving the Site. Due to the small size of all the excavations and the vacancy of the lot, traffic control is not needed for this soil removal workplan.

6.2.9 Dust Control and Air Monitoring

Rules 1166 and 1466 of the SCAQMD will be followed to control VOC emissions and potentially toxic dust generated during excavation, loading, and transportation of impacted soil. A site-specific Rule 1166 plan will be submitted to SCAQMD for the removal of VOC-containing soil. Less than 2,000 cubic yards of VOC impacted soil will be excavated during RAW implementation. Therefore, a various locations Rule 1166 plan will be used for the excavation, grading, and handling of VOC containing soil. A 1166 notification form must be submitted at least 24 hours prior to excavation activities. The operator must submit a Rule 1466 Notification Form, a map outlining the excavation boundaries, soil concentrations, and location of dust monitors. Generation of dust during removal activities will be minimized with the use of water as a dust suppressant. Water will be sprayed prior to daily work activities, during excavation/loading activities, and at truck staging locations. Watering equipment will be continuously available to provide proper dust control. Visqueen sheeting beneath and above stockpiles will be used to control dust from temporary soil stockpile storage areas. A DataRam real-time dust monitor will be used to monitor worker dust exposure. As precautionary measure, if dust levels exceed 25.0 milligrams per cubic meter, work will stop as additional control measures are implemented.

A qualified subcontractor with a multiple-site SCAQMD permit will be used for impacted soil excavation, handling, transportation, and disposal.

Due to the size of excavation (less than 500 cubic yards), level of contamination, dust control with the use of water, and fence with plastic sheets around the property line, the impacted dust generated by field activities will be

minimized. This issue will be discussed with SCAQMD at the time of RAW implementation and active air monitoring may not be necessary.

6.2.10 Asbestos Survey/Abatement Permits

Due to the age of the site, and presence of underground debris, and a linear feature identified during the geophysical survey, there is a chance that asbestos containing materials may be encountered during excavation activities. Encountering asbestos containing materials would require an asbestos survey. Based on the results of the survey, additional SCAQMD permits may be required for abatement of those asbestos containing materials.

6.2.11 Schedule

Upon approval of the soil removal workplan by the regulatory agencies and a notice to proceed from the client, the following schedule maybe implemented:

Pre-field activities including permits ..... 2 weeks

Excavation and Confirmation Sampling Activities ..... 2 weeks

Grading and Disposal ..... 2 weeks

Report Write-up ..... 4 weeks

Time of Completion ..... 12 weeks

6.2.12 Cost Estimate

The budgetary estimated cost for implementation of the soil removal workplan is **$160,000**. A 20% contingency should be added to this budgetary cost that brings the total cost of soil removal to **$192,000**. This proposed cost estimate has been prepared based on readily available site information, typical agency requirements and guidance documents, industry knowledge, and related project experience. This cost estimate is for the pre-field activities, soil excavation, confirmation sampling and laboratory analysis, backfill, waste disposal, and report writing. It assumes the scope will be conducted in accordance with the soil management plan.

A more updated cost estimate will be provided before implementation and after agencies approval of this soil removal workplan.

The oil production well re-abandonment and leak test cost is detailed in section 6.3.4.

6.2.13 Assumptions

The following assumptions are made in preparing the schedule for implementation of this soil removal work plan

- Schedule is dependent upon availability of the subcontractor and oversight agencies approval.
- Standard laboratory turnaround time for confirmation soil sampling and stockpile sampling is assumed.
- Half of confirmation samples (25 samples) will be analyzed for STLC and TCLP.
- Sample duplicates will amount to 10% of the 46 samples (five duplicates) to 51 samples in total for confirmation sampling.
- No excavation off site will occur. No geotechnical work or testing for the construction of the City Development Plan will occur.
- Subcontractor pricing is based on prevailing wage.
- Excavation for remediation purposes does not reach water table. No dewatering of excavations area will occur.
- Engineered compaction testing and reporting are not included.

- Encroachment Permitting/Traffic Planning/ or Storm Water Pollution Prevention Plan are not included. These items will be addressed by the City as part of general site re-development plan.
- SCAQMD Rule 1466 cost is assumed to be determined during RAW implementation with SCAQMD input and is not included.
- Resurfacing of the area is not included.
- Cost is assumed on 2020 rates.
- Subcontractor quoted costs are valid for 60 days.
- Site survey and landscaping are not included.
- Voluntary regulatory agency oversight application will be signed by the City of LA BOE representative. As per City's request, AECOM can submit the application with relevant documents to the oversight agency on the City's behalf.
- All costs related to voluntary regulatory oversight including applications fee are the City's responsibility.
- Asbestos containing materials survey and abatement costs are not included, but can be added as needed, through appropriate change order procedures.

6.3 Oil Well Status Update

Phase I ESA performed in 2016 by Ninyo & Moore for this Site indicated that there is an on-site abandoned former oil production well. According to the CalGEM/DOGGR well finder website, a historical oil production well is present on the site (McDonald 2, API 03713842). Based on a review of documents provided by the user, the "McDonald 2" well was abandoned in 1932. A permit to re-abandon the well was issued in 2002 and renewed annually from 2004 to 2008. According to DOGGR, the well has not been re-abandoned. This represents a REC (Ninyo & Moore 2016).

The Site is in a methane zone and is within the Playa del Rey Oilfield. The nearby area has had oil pipelines, storage tanks and vaults. According to the CalGEM/DOGGR well finder website, numerous other historical oil production wells are located in the Site vicinity.

6.3.1 CalGEM Files Review and Records

According to CalGEM, which replaced DOGGR well finder current website, this historical oil production well has a total depth of 5,860 feet bgs. The well went dry and was abandoned in May 1932. The bottom of the hole was plugged at 2,018 feet bgs. Various cement plugs were placed in the hole from 1,996 to 1,929 feet and 729 to 675 feet bgs. All other spaces were filled with heavy mud. The hole had been cemented at deeper depths prior to this final abandonment.

AECOM contacted CalGEM by emails and phone calls to obtain any recent activities, information, requirements, and a status update for this oil production well. AECOM's email and CalGEM's response is included in **Appendix C**. Location of the oil well is shown in **Figures 3** and **5**.

6.3.2 CalGEM Requirements

CalGEM in their email indicated that the McDonald 2 well, API 03713842, should be re-abandoned according to CalGEM's current requirements. CalGEM also provided their instruction to fill out the application and sent an application for re-abandonment.

6.3.3 Oil Well Re-Abandonment Scope

AECOM will use a qualified subcontractor with expertise in Southern California oil production well drilling and abandonment to re-abandon this oil well according to the current CalGEM requirements.

AECOM proposes the following scope and a rough budgetary cost estimate to re-abandon the oil well at the Site in the Playa Del Rey oil field, as per the current requirements of the CalGEM. The scope consists the following:

1. Pre-field activities and preparation of site-specific HASP.
2. Obtain permit from CalGEM.
3. Excavate around the well and make it safe for the welder and backhoe to install the wellhead to the casing and install the cellar ring around the well.
4. Install wellhead and cellar ring.
5. Mobilize the rig and all drilling equipment.
6. Install blowout preventer equipment approved by CalGEM.
7. Drill out old cement and cleanout the well to a total re-abandon depth.
8. Cement and perforating well per CalGEM Permit to surface.
9. Demobilize rig and equipment.
10. Remove cellar ring, cut casing to a final depth.
11. Gas test install I.D. plate and backfill with compaction wheel.
12. Schedule all required CalGEM inspections.
13. Dispose of waste generated from wells re-abandonment.
14. Complete reporting.

6.3.4 Oil Well Re-Abandonment Cost Estimate and Schedule

The approximate cost to re-abandon the oil production well McDonald 2, API 037-13842, with a total depth 5,860 feet bgs is between **$520,000** to **$640,000** depending on the condition, complexity, and depth of abandonment. This budgetary cost is based on prevailing wage for subcontractors and includes oversight by AECOM. It is assumed that there will be no problem encountered during drilling to a total depth. It should be noted that the total depth of re-abandonment depends on CalGEM's inspection during field activities.

Since there are many unknown factors in an old deep oil production well re-abandonment process, a 25% contingency is usually added to the estimated budgetary costs. This will bring the cost between **$650,000** and **$800,000**.

Bonds, if required, for oil well re-abandonment will be the responsibility of the LA BOE.

It takes approximately four to six months to perform re-abandonment of an oil production well depending on CalGEM inspections and approval.

This cost is based on 2020 rates and subcontractor's cost that expires in 90 days. A more detailed cost estimate and schedule will be provided when the City's new development plan will be implemented.

6.4 Methane Mitigation Measures

Per a phone conversation with LADBS, no methane mitigation is necessary for the development of the parking lot and landscaping due to the size of the lot (less than 5,000 square feet) and the non-detects of methane in soil vapor probes installed during the Phase II ESA. Log of the AECOM phone conversation with LADBS is included in **Appendix B.**

7. REFERENCES

AECOM, 2020. Amended Phase II Environmental Site Assessment, 128 Hurricane Street, Los Angeles, California. April 30.

AECOM, 2018. Phase II Environmental Site Assessment, 128 Hurricane Street, Venice, California. October 2.

California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, 2018. Well Finder website, http://www.conservation.ca.gov/dog/Pages/Wellfinder.aspx.

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Department of Toxic Substances (DTSC), 2001. Information Advisory Clean Imported Fill Material. October.

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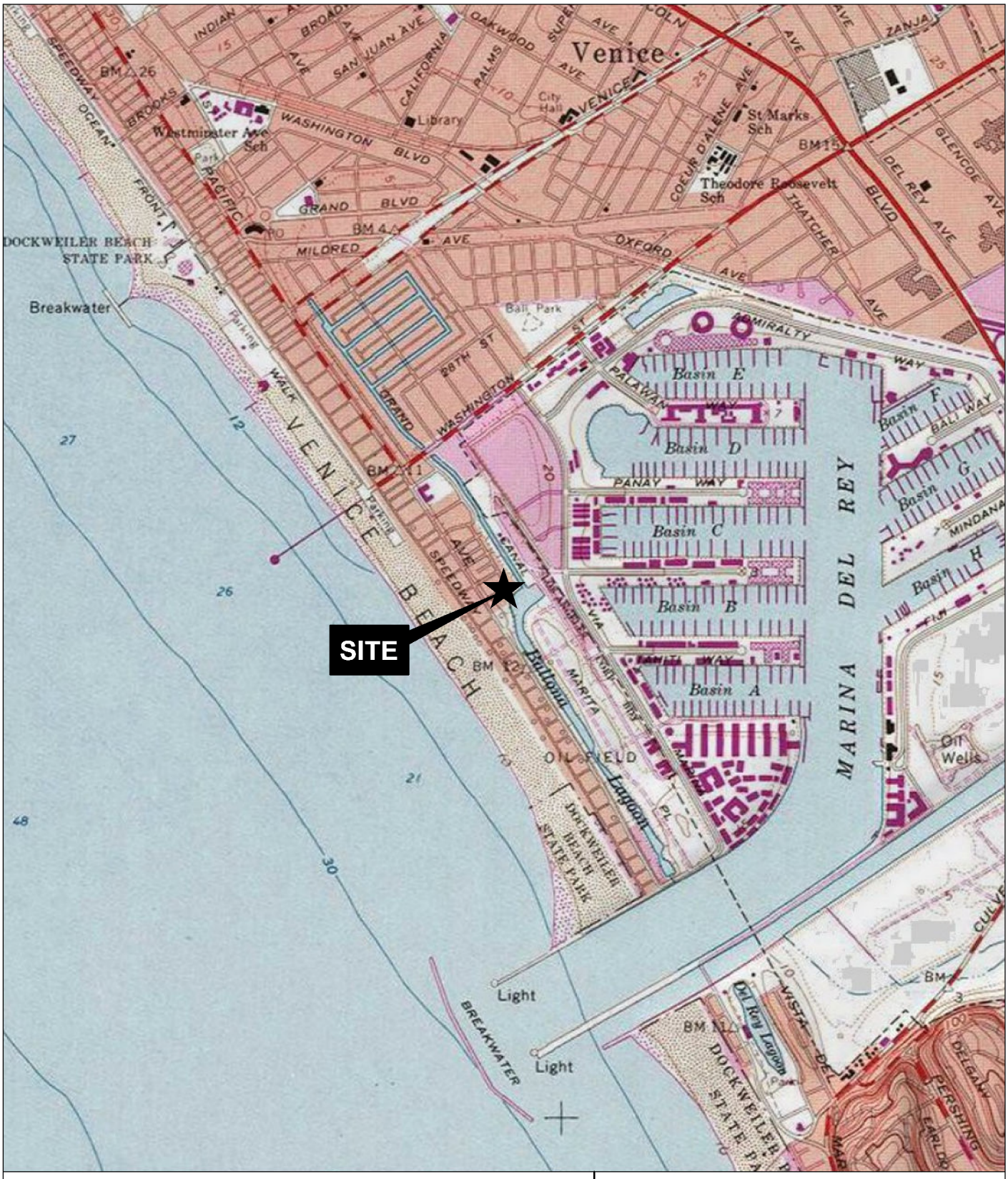
McAlister GeoScience, 2016. 2015 Second Semi-Annual Groundwater Monitoring Program Report, Del Rey Landing, 13800 Bora Bora Way, Marina Del Rey, California, dated February 23.

Ninyo & Moore, 2016. Phase I Environmental Site Assessment, 128 Hurricane Street, Venice, California 90292. June 21.

San Francisco Bay Regional Water Quality Control Board (SFBRWQCB), 2019. Environmental Screening Levels Workbook. January.

United States Environmental Protection Agency (EPA), 2020. Regional Screening Levels – Generic Tables. November.

Figures



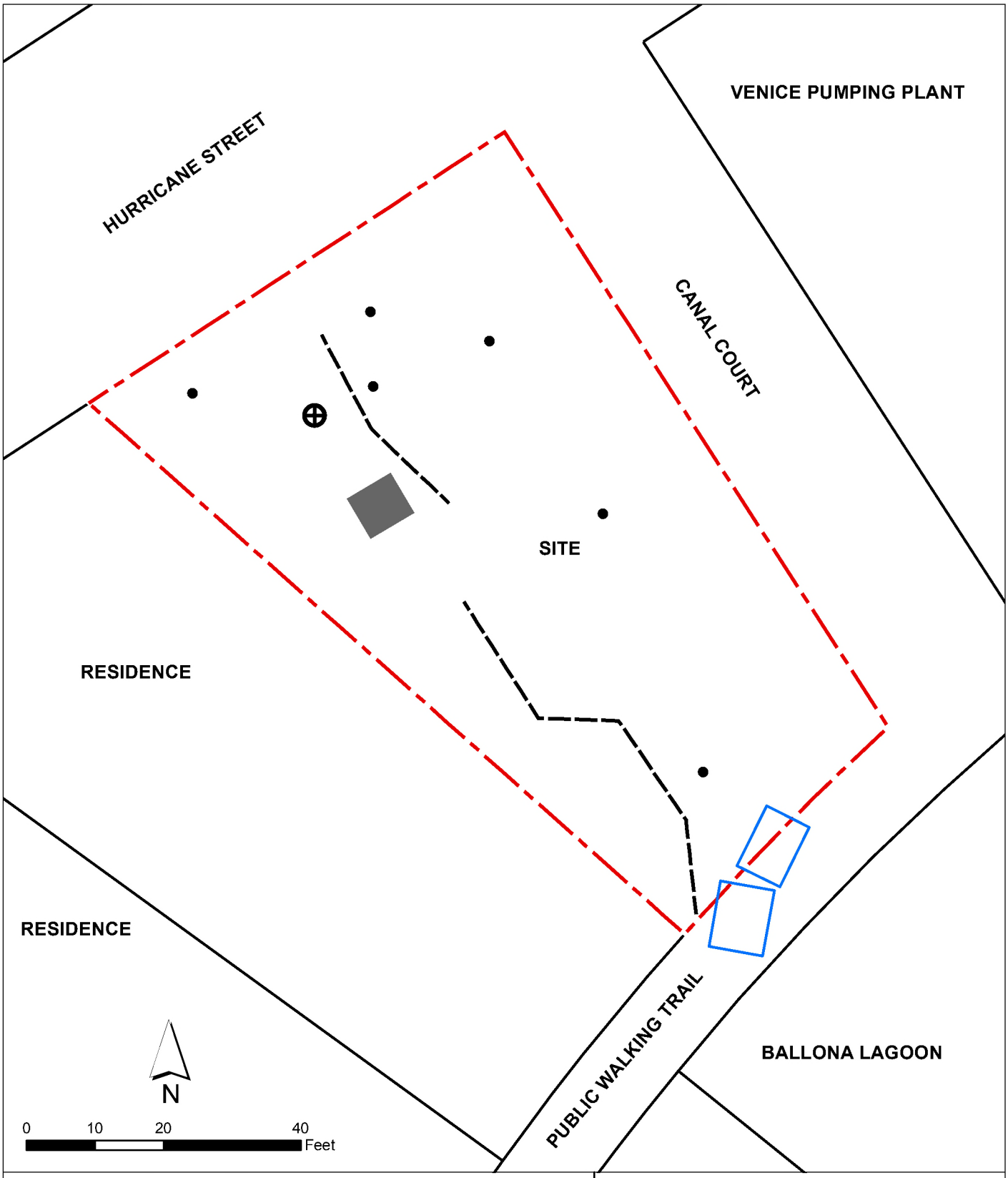
Reference: Topo 2013 National Geographic USGS Map

AECOM

SITE LOCATION MAP

Site:	Figure:
128 Hurricane St. Venice, CA	1
Project: 60553849	Date: 5/6/2020

Path: R:\Projects\ENV\City of LA BOE\60553849_TO5SewerEn\900-CAD-GIS\920-GIS or Graphics\Figure 1 - Site Vicinity.mxd



Legend

- Former Oil Well/Magnetic Peak (Approximate)
- Buried Metal (Approximate)
- Former Electrical Cabinets/Concrete Vaults (Approximate)
- Subsurface Conduits (Approximate)
- Site Boundary
- Concrete Pad
- County Parcels

AECOM

SITE FEATURES

Site: 128 Hurricane St. Venice, CA	Figure: 2
Project: 60553849	Date: 5/6/2020

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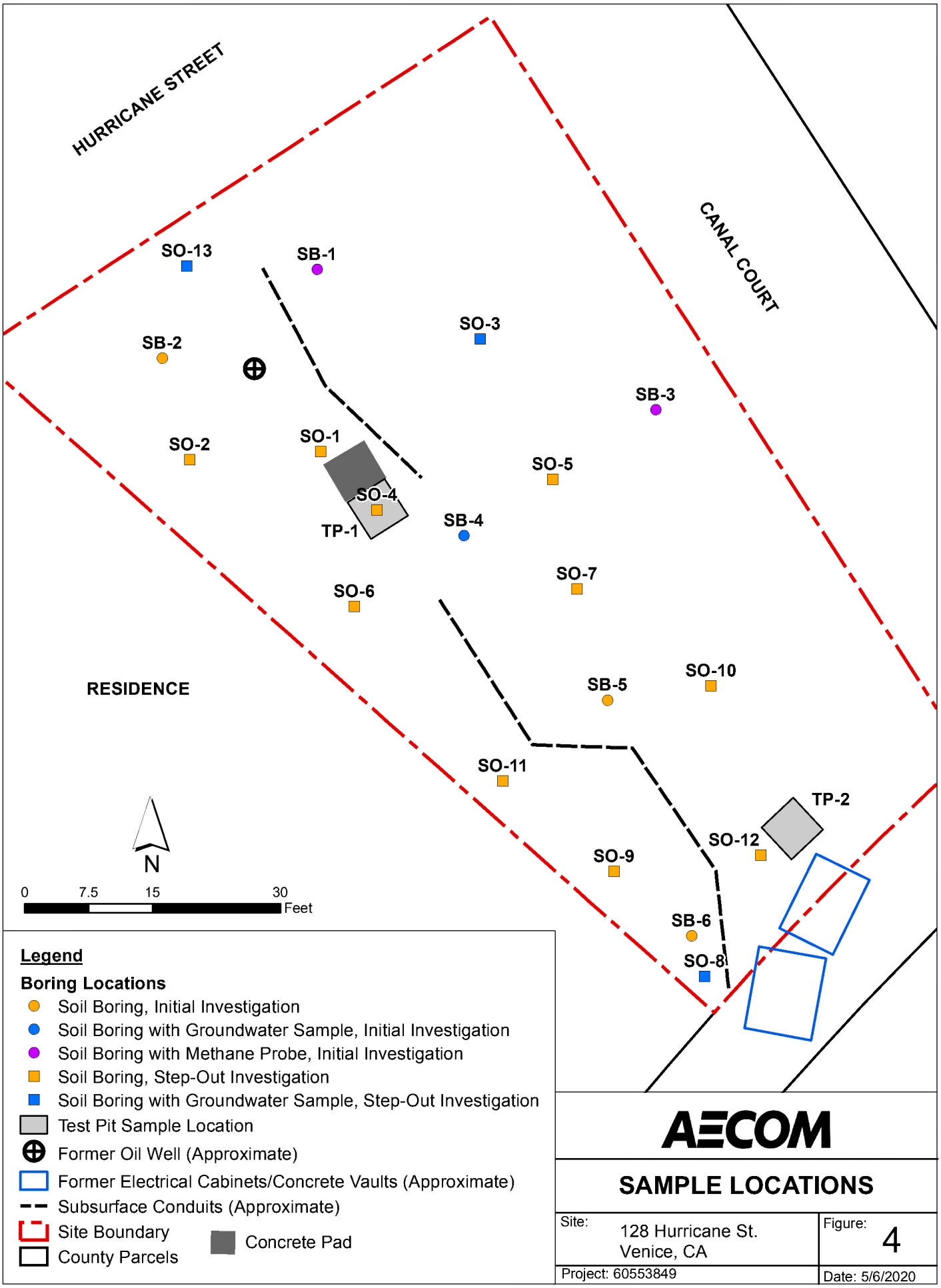
AECOM

CITY DEVELOPMENT PLAN

Site: 128 Hurricane St. Venice, CA	Figure: 3
Project: 60553849	Date: 5/6/2020

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING



AECOM

SAMPLE LOCATIONS

Site: 128 Hurricane St. Venice, CA	Figure: 4
Project: 60553849	Date: 5/6/2020

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CANAL COURT

HURRICANE STREET

PUBLIC WALKING TRAIL

LEGEND

- SITE BOUNDARY
- PROPOSED REMEDIAL AREAS
- ISOCONCENTRATION CONTOUR
- SOIL BORING, INITIAL INVESTIGATION
- SOIL BORING WITH GROUNDWATER SAMPLE, INITIAL INVESTIGATION
- SOIL BORING WITH METHANE PROBE, INITIAL INVESTIGATION
- SOIL BORING, STEP-OUT INVESTIGATION
- SOIL BORING WITH GROUNDWATER SAMPLE, STEP-OUT INVESTIGATION
- APPROXIMATE LOCATION OF FORMER OIL WELL
- TEST PIT SAMPLE LOCATION
- CONCRETE PAD LOCATION

Excavation Area EA-1

Excavation Area EA-1-1

Excavation Area EA-2

Excavation Area EA-2-1

Excavation Area EA-3

SB-1 SB-2 SB-3 SB-4 SB-5 SB-6

SO-1 SO-2 SO-3 SO-4 SO-5 SO-6 SO-7 SO-8 SO-9 SO-10 SO-11 SO-12 SO-13

TP-1

TP-2 ND

SITE REMEDIATION PLAN

4' 0 4' 8'

1" = 4'-0"

AECOM

AMENDED PROPOSED EXCAVATION AREA

Site: 128 Hurricane St. Venice, CA

Figure: 5

Project: 60553849

Date: 5/6/2020

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DEPARTMENT OF PUBLIC WORKS

CITY OF LOS ANGELES

CANAL COURT

HURRICANE STREET

PUBLIC WALKING TRAIL

Excavation Area EA-1

Excavation Area EA-2-1

Excavation Area EA-2

Excavation Area EA-3

Excavation Area EA-1-1

SB-1 SB-2 SB-3 SB-4 SB-5 SB-6

SO-1 SO-2 SO-3 SO-4 SO-5 SO-6 SO-7 SO-8 SO-9 SO-10 SO-11 SO-12 SO-13

TP-1

TP-2 ND

LEGEND

- SITE BOUNDARY
- PROPOSED REMEDIAL AREAS
- ISOCONCENTRATION CONTOUR
- SOIL BORING, INITIAL INVESTIGATION
- SOIL BORING WITH GROUNDWATER SAMPLE, INITIAL INVESTIGATION
- SOIL BORING WITH METHANE PROBE, INITIAL INVESTIGATION
- SOIL BORING, STEP-OUT INVESTIGATION
- SOIL BORING WITH GROUNDWATER SAMPLE, STEP-OUT INVESTIGATION
- PROPOSED CONFIRMATION SAMPLING LOCATIONS
- APPROXIMATE LOCATION OF FORMER OIL WELL
- TEST PIT SAMPLE LOCATION
- CONCRETE PAD LOCATION

SITE REMEDIATION PLAN

4' 0 4' 8'
1" = 4'-0"

AECOM

PROPOSED EXCAVATION AREA AND CONFIRMATION SAMPLING LOCATIONS

Site: 128 Hurricane St. Venice, CA	Figure: 6
Project: 60553849	Date: 5/6/2020

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CITY OF LOS ANGELES

Tables

TABLE 1
SOIL ANALYTICAL RESULTS
128 Hurricane Street
Los Angeles, California

Detected Analytes	California Screening Level Residential	California Screening Level Commercial	Boring ID:	TP-01	TP-01	TP-02	TP-02	TP-02	SB-01	SB-01	SB-01	SB-02	SB-02	SB-02	SB-03	SB-03	SB-03	SB-03	SB-03	SB-04	SB-04	SB-04
			Sample ID:	TP-1-1.5	TP-1-2.5	TP-2-0.5	TP-2-2.5	TP-2-2.5 DUP	SB-1-0.5	SB-1-1	SB-1-2.5	SB-2-0.5	SB-2-1	SB-2-1 DUP	SB-3-0.5	SB-3-1	SB-3-2.5	SB-3-5	SB-3-5 DUP	SB-4-0.5	SB-4-1	SB-4-2.5
			Sample Date:	06/21/18	06/21/18	06/21/18	06/21/18	06/21/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18
			Sample Depth:	1.5	2.5	0.5	2.5	2.5	0.5	1.0	2.5	0.5	1.0	1.0	0.5	1.0	2.5	5.0	5.0	0.5	1.0	2.5
Metals																						
Arsenic	12*	12*	mg/kg	**2.8**	4.3	4.3	2.4	2.2	2.2	-	2.8	2.7	-	-	2.4	-	2.2	-	-	3	-	-
Barium	15000	220000	mg/kg	42	**81**	57	35	51	50	-	39	39	-	-	69	-	83	-	-	54	-	-
Chromium	120000	1800000	mg/kg	12	15	12	11	16	13	-	14	11	-	-	17	-	13	-	-	13	-	-
Cobalt	23	350	mg/kg	3.6	5.4	3.8	ND (<3.0)	4.4	3.3	-	3.5	3.3	-	-	5.3	-	3.8	-	-	3.2	-	-
Copper	3100	47000	mg/kg	3.1	11	3.8	ND (<3.0)	3.4	6.1	-	ND (<3.0)	ND (<3.0)	-	-	3.6	-	ND (<3.0)	-	-	10	-	-
Lead	80	320	mg/kg	28	130	5.2	4.5	ND (<3.0)	37	-	11	7.3	-	-	18	-	5.6	3.8	-	34	6.7	6.8
Mercury	1	4.4	mg/kg	0.079	0.078	0.36	0.027	0.022	0.13	-	0.068	0.080	-	-	0.066	-	0.63	-	-	0.25	-	-
Nickel	820	11000	mg/kg	10	26	8.5	8.8	13	10	-	10	9.4	-	-	10	-	8.9	-	-	9.2	-	-
Vanadium	390	5800	mg/kg	26	51	25	21	30	28	-	26	23	-	-	36	-	24	-	-	25	-	-
Zinc	23000	350000	mg/kg	57	160	20	18	23	73	-	38	23	-	-	42	-	22	-	-	74	-	-
Organochlorine Pesticides																						
alpha-Chlordane*	1.7	6.1	mg/kg	-	-	-	-	-	0.0069	-	-	-	-	-	ND (<0.004)	-	-	-	-	0.018	-	-
Chlordane (technical)	1.7	7.7	mg/kg	-	-	-	-	-	0.035	-	-	-	-	-	ND (<0.02)	-	-	-	-	0.078	-	-
4,4'-DDD	1.9	6.2	mg/kg	-	-	-	-	-	0.004	-	-	-	-	-	ND (<0.004)	-	-	-	-	ND (<0.004)	-	-
4,4'-DDE	2	9.3	mg/kg	-	-	-	-	-	ND (<0.004)	-	-	-	-	-	ND (<0.004)	-	-	-	-	ND (<0.004)	-	-
4,4'-DDT	1.9	7.1	mg/kg	-	-	-	-	-	ND (<0.004)	-	-	-	-	-	ND (<0.004)	-	-	-	-	0.0043	-	-
Dieldrin	0.034	0.093	mg/kg	-	-	-	-	-	0.0062	-	-	-	-	-	0.0055	-	-	-	-	0.031	-	-
Endosulfan II**	470	7000	mg/kg	-	-	-	-	-	ND (<0.004)	-	-	-	-	-	ND (<0.004)	-	-	-	-	ND (<0.004)	-	-
gamma-Chlordane**	1.7	6.1	mg/kg	-	-	-	-	-	ND (<0.004)	-	-	-	-	-	ND (<0.004)	-	-	-	-	0.0092	-	-
Total Petroleum Hydrocarbons																						
Gasoline Range Organics (C6-C10)	100	120	mg/kg	ND (<5.0)	ND (<50)	ND (<25)	ND (<25)	ND (<25)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	-	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)
Diesel Range Organics (C10-C23)	260	260	mg/kg	14	690	ND (<25)	ND (<25)	ND (<25)	5.2	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	-	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)
Oil Range Organics (C23-C44)	1600	1600	mg/kg	220	4300	ND (<25)	ND (<25)	ND (<25)	58	100	63	21	23	23	-	20	33	12	8.7	98	28	47
Volatile Organic Compounds																						
Acetone	61000	670000	mg/kg	-	-	-	-	-	-	ND (<0.05)	-	-	ND (<0.05)	ND (<0.05)	-	ND (<0.05)	-	ND (<0.05)	ND (<0.05)	-	ND (<0.05)	-
Carbon Disulfide	770	3500	mg/kg	-	-	-	-	-	-	ND (<0.005)	-	-	0.005	ND (<0.005)	-	ND (<0.005)	-	ND (<0.005)	ND (<0.005)	-	0.0062	-

Notes

Hierarchy of sources for California screening levels:

1. Department of Toxic Substances Control, Human and Ecological Risk Office, Human Health Risk Assessment Note 3, June 2020

2. United States Environmental Protection Agency Regional Screening Level, November 2020

3. Direct exposure human health environmental screening levels, San Francisco Bay Regional Water Quality Control Board, 2019

* Background concentration for arsenic in Southern California shown for comparison

** Endosulfan and chlordane screening levels used as surrogates for endosulfan II and gamma-chlordane, respectively

Exceeds residential screening level
Exceeds commercial screening level
mg/kg - milligrams per kilogram
ND - not detected
- Not Analyzed
Sample depth in feet below ground surface
Various samples were analyzed for total petroleum carbon chains, full scan VOCs, title 22 metals, SVOCs, herbicides, and organochlorine pesticides (OCPs), and polychlorinated biphenyls (PCBs). Only detected compounds are reported in table.

RSLs:
EPA Regional Screening Levels for Chemical Contaminants at Superfund Sites - Region 9 (11/2020) - Residential RSLs
EPA Regional Screening Levels for Chemical Contaminants at Superfund Sites - Region 9 (11/2020) - Industrial RSLs

HERO Note 3:
DTSC HERO Note 3 (06/2020) - Residential Soil Screening Levels (Cancer Endpoint)
DTSC HERO Note 3 (06/2020) - Residential Soil Screening Levels (Noncancer Endpoint)
DTSC HERO Note 3 (06/2020) - Industrial Soil Screening Levels (Cancer Endpoint)
DTSC HERO Note 3 (06/2020) - Industrial Soil Screening Levels (Noncancer Endpoint)

ESLs:
San Francisco Bay Regional Water Quality Control Board Environmental Screening Levels (ESLs) (01/2019)

TABLE 1
SOIL ANALYTICAL RESULTS
128 Hurricane Street
Los Angeles, California

Detected Analytes	California Screening Level Residential	California Screening Level Commercial	Boring ID:	SB-04	SB-04	SB-04	SB-04	SB-05	SB-05	SB-05	SB-05	SB-06	SB-06	SB-06	SB-06	SO-01	SO-02	SO-02	SO-02	SO-03	SO-03	SO-03	SO-03
			Sample ID:	SB-4-3.5	SB-4-5	SB-4-10	SB-4-15	SB-5-0.5	SB-5-1	SB-5-2.5	SB-5-5	SB-6-0.5	SB-6-1	SB-6-2.5	SB-6-5	SO-1-2.5	SO-2-2.5	SO-2-3.5	SO-2-5	SO-3-2.5	SO-3-3.5	SO-3-5	SO-3-10
			Sample Date:	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/20/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18
			Sample Depth:	3.5	5.0	10.0	15.0	0.5	1.0	2.5	5.0	0.5	1.0	2.5	5.0	2.5	2.5	3.5	5.0	2.5	3.5	5.0	10.0
Metals																							
Arsenic	12*	12*	mg/kg	**3.5**	**2**	**4.1**	-	**2.8**	**3.3**	**4.3**	-	**2.7**	-	**2.9**	-	-	-	-	-	-	-	-	-
Barium	15000	220000	mg/kg	**62**	**10**	**21**	-	**54**	**56**	**92**	-	**60**	-	**81**	-	-	-	-	-	-	-	-	-
Chromium	120000	1800000	mg/kg	**13**	**11**	**10**	-	**10**	**11**	**15**	-	**13**	-	**12**	-	-	-	-	-	-	-	-	-
Cobalt	23	350	mg/kg	**4.0**	ND (<3.0)	ND (<3.0)	-	**3.1**	**3.3**	**3.4**	-	**3.8**	-	**4.0**	-	-	-	-	-	-	-	-	-
Copper	3100	47000	mg/kg	**15**	ND (<3.0)	ND (<3.0)	-	**7.2**	**16**	**5.4**	-	**5.4**	-	**14**	-	-	-	-	-	-	-	-	-
Lead	80	320	mg/kg	**58**	**3.4**	ND (<3.0)	-	**12**	**24**	**17**	-	**17**	-	**40**	**5.1**	**12**	**29**	ND (<3.0)	**160**	**5.0**	ND (<3.0)	**3.6**	ND (<3.0)
Mercury	1	4.4	mg/kg	**0.090**	**0.030**	ND (<0.020)	-	**0.42**	**2.4**	**0.038**	-	**0.19**	-	**0.084**	-	-	-	-	-	-	-	-	-
Nickel	820	11000	mg/kg	**14**	**7.2**	**6.8**	-	**7.5**	**8.9**	**13**	-	**10**	-	**13**	-	-	-	-	-	-	-	-	-
Vanadium	390	5800	mg/kg	**30**	**25**	**23**	-	**22**	**27**	**29**	-	**27**	-	**34**	-	-	-	-	-	-	-	-	-
Zinc	23000	350000	mg/kg	**99**	**7.2**	**8.4**	-	**30**	**51**	**100**	-	**62**	-	**120**	-	-	-	-	-	-	-	-	-
Organochlorine Pesticides																							
alpha-Chlordane*	1.7	6.1	mg/kg	-	-	-	-	-	-	-	-	**0.012**	-	-	-	-	-	-	-	-	-	-	-
Chlordane (technical)	1.7	7.7	mg/kg	-	-	-	-	-	-	-	-	**0.086**	-	-	-	-	-	-	-	-	-	-	-
4,4'-DDD	1.9	6.2	mg/kg	-	-	-	-	-	-	-	-	ND (<0.004)	-	-	-	-	-	-	-	-	-	-	-
4,4'-DDE	2	9.3	mg/kg	-	-	-	-	-	-	-	-	**0.022**	-	-	-	-	-	-	-	-	-	-	-
4,4'-DDT	1.9	7.1	mg/kg	-	-	-	-	-	-	-	-	**0.018**	-	-	-	-	-	-	-	-	-	-	-
Dieldrin	0.034	0.093	mg/kg	-	-	-	-	-	-	-	-	ND (<0.002)	-	-	-	-	-	-	-	-	-	-	-
Endosulfan II**	470	7000	mg/kg	-	-	-	-	-	-	-	-	**0.0063**	-	-	-	-	-	-	-	-	-	-	-
gamma-Chlordane**	1.7	6.1	mg/kg	-	-	-	-	-	-	-	-	**0.0058**	-	-	-	-	-	-	-	-	-	-	-
Total Petroleum Hydrocarbons																							
Gasoline Range Organics (C6-C10)	100	120	mg/kg	ND (<25)	ND (<5.0)	ND (<5.0)	ND (<5.0)	-	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<25)	ND (<5.0)	ND (<5.0)	ND (<50)	ND (<50)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)
Diesel Range Organics (C10-C23)	260	260	mg/kg	**670**	ND (<5.0)	ND (<5.0)	ND (<5.0)	-	ND (<5.0)	**130**	ND (<5.0)	ND (<5.0)	**6.7**	**530**	ND (<5.0)	**11**	**99**	**1300**	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)
Oil Range Organics (C23-C44)	1600	1600	mg/kg	**2000**	**40**	**11**	**11**	-	**80**	**840**	**30**	**61**	**86**	**2600**	**82**	**150**	**1300**	**1900**	**6.6**	**20**	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)
Volatile Organic Compounds																							
Acetone	61000	670000	mg/kg	**0.056**	ND (<0.05)	ND (<0.05)	ND (<0.05)	-	ND (<0.05)	-	ND (<0.05)	-	ND (<0.05)	-	ND (<0.05)	-	-	-	-	-	-	-	-
Carbon Disulfide	770	3500	mg/kg	ND (<0.005)	ND (<0.005)	ND (<0.005)	ND (<0.005)	-	ND (<0.005)	-	ND (<0.005)	-	**0.01**	-	ND (<0.005)	-	-	-	-	-	-	-	-

Notes
Hierarchy of sources for California screening levels:

1. Department of Toxic Substances Control, Human and Ecological Risk Office, Human Health Risk Assessment Note 3, June 2020

2. United States Environmental Protection Agency Regional Screening Level, November 2020

3. Direct exposure human health environmental screening levels, San Francisco Bay Regional Water Quality Control Board, 2019

* Background concentration for arsenic in Southern California shown for comparison

** Endosulfan and chlordane screening levels used as surrogates for endosulfan II and gamma-chlordane, respectively

Exceeds residential screening level
Exceeds commercial screening level
mg/kg - milligrams per kilogram
ND - not detected
- Not Analyzed
Sample depth in feet below ground surface
Various samples were analyzed for total petroleum carbon chains, full scan VOCs, title 22 metals, SVOCs, herbicides, and organochlorine pesticides (OCPs), and polychlorinated biphenyls (PCBs). Only detected compounds are reported in table.

RSLs:
EPA Regional Screening Levels for Chemical Contaminants at Superfund Sites - Region 9 (11/2020) - Residential RSLs
EPA Regional Screening Levels for Chemical Contaminants at Superfund Sites - Region 9 (11/2020) - Industrial RSLs

HERO Note 3:
DTSC HERO Note 3 (06/2020) - Residential Soil Screening Levels (Cancer Endpoint)
DTSC HERO Note 3 (06/2020) - Residential Soil Screening Levels (Noncancer Endpoint)
DTSC HERO Note 3 (06/2020) - Industrial Soil Screening Levels (Cancer Endpoint)
DTSC HERO Note 3 (06/2020) - Industrial Soil Screening Levels (Noncancer Endpoint)

ESLs:
San Francisco Bay Regional Water Quality Control Board Environmental Screening Levels (ESLs) (01/2019)

TABLE 1
SOIL ANALYTICAL RESULTS
128 Hurricane Street
Los Angeles, California

Detected Analytes	California Screening Level Residential	California Screening Level Commercial	Boring ID:	SO-04	SO-04	SO-04	SO-04	SO-05	SO-05	SO-05	SO-06	SO-06	SO-06	SO-06	SO-07	SO-07	SO-07	SO-07	SO-08	SO-08	SO-08	SO-08	SO-09	SO-09
			Sample ID:	SO-4-2.5	SO-4-3.5	SO-4-5	SO-4-5DUP	SO-5-2.5	SO-5-3.5	SO-5-5	SO-6-0.5	SO-6-2.5	SO-6-3.5	SO-6-5	SO-7-2.5	SO-7-3.5	SO-7-5	SO-7-5DUP	SO-8-2.5	SO-8-3.5	SO-8-5	SO-8-10	SO-9-2.5	SO-9-3.5
			Sample Date:	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18
			Sample Depth:	2.5	3.5	5.0	5.0	2.5	3.5	5.0	0.5	2.5	3.5	5.0	2.5	3.5	5.0	5.0	2.5	3.5	5.0	10.0	2.5	3.5
Metals																								
Arsenic	12*	12*	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Barium	15000	220000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Chromium	120000	1800000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Cobalt	23	350	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Copper	3100	47000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Lead	80	320	mg/kg	ND (<3.0)	ND (<3.0)	**10**	**7.1**	**5.2**	**3.5**	**3.5**	**27**	**32**	**8.0**	ND (<3.0)	**7.0**	**7.8**	**6.7**	**8.6**	**46**	ND (<3.0)	ND (<3.0)	ND (<3.0)	**82**	ND (<3.0)
Mercury	1	4.4	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Nickel	820	11000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Vanadium	390	5800	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Zinc	23000	350000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Organochlorine Pesticides																								
alpha-Chlordane*	1.7	6.1	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Chlordane (technical)	1.7	7.7	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4,4´-DDD	1.9	6.2	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4,4´-DDE	2	9.3	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4,4´-DDT	1.9	7.1	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Dieldrin	0.034	0.093	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Endosulfan II**	470	7000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
gamma-Chlordane**	1.7	6.1	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Petroleum Hydrocarbons																								
Gasoline Range Organics (C6-C10)	100	120	mg/kg	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<50)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<50)	ND (<5.0)	ND (<5.0)	ND (<5.0)	**58**	ND (<5.0)
Diesel Range Organics (C10-C23)	260	260	mg/kg	**53**	ND (<5.0)	**11**	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	**180**	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)	**6.4**	ND (<5.0)	**1700**	ND (<5.0)	ND (<5.0)	ND (<5.0)	**4600**	**61**
Oil Range Organics (C23-C44)	1600	1600	mg/kg	**370**	ND (<5.0)	**330**	**7.5**	ND (<5.0)	ND (<5.0)	ND (<5.0)	**78**	**1100**	ND (<5.0)	ND (<5.0)	**6.5**	**9.0**	**39**	**24**	**5100**	**19**	**5.0**	ND (<5.0)	**8200**	**240**
Volatile Organic Compounds																								
Acetone	61000	670000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Carbon Disulfide	770	3500	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Notes
Hierarchy of sources for California screening levels:

1. Department of Toxic Substances Control, Human and Ecological Risk Office, Human Health Risk Assessment Note 3, June 2020

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3. Direct exposure human health environmental screening levels, San Francisco Bay Regional Water Quality Control Board, 2019

* Background concentration for arsenic in Southern California shown for comparison

** Endosulfan and chlordane screening levels used as surrogates for endosulfan II and gamma-chlordane, respectively

Exceeds residential screening level
Exceeds commercial screening level
mg/kg - milligrams per kilogram
ND - not detected
- Not Analyzed
Sample depth in feet below ground surface
Various samples were analyzed for total petroleum carbon chains, full scan VOCs, title 22 metals, SVOCs, herbicides, and organochlorine pesticides (OCPs), and polychlorinated biphenyls (PCBs). Only detected compounds are reported in table.

RSLs:
EPA Regional Screening Levels for Chemical Contaminants at Superfund Sites - Region 9 (11/2020) - Residential RSLs
EPA Regional Screening Levels for Chemical Contaminants at Superfund Sites - Region 9 (11/2020) - Industrial RSLs

HERO Note 3:
DTSC HERO Note 3 (06/2020) - Residential Soil Screening Levels (Cancer Endpoint)
DTSC HERO Note 3 (06/2020) - Residential Soil Screening Levels (Noncancer Endpoint)
DTSC HERO Note 3 (06/2020) - Industrial Soil Screening Levels (Cancer Endpoint)
DTSC HERO Note 3 (06/2020) - Industrial Soil Screening Levels (Noncancer Endpoint)

ESLs:
San Francisco Bay Regional Water Quality Control Board Environmental Screening Levels (ESLs) (01/2019)

TABLE 1
SOIL ANALYTICAL RESULTS
128 Hurricane Street
Los Angeles, California

Detected Analytes	California Screening Level Residential	California Screening Level Commercial	Boring ID:	SO-09	SO-10	SO-10	SO-11	SO-11	SO-12	SO-12	SO-12	SO-13	SO-13	SO-13	SO-13	SO-13
			Sample ID:	SO-9-5	SO-10-2.5	SO-10-3.5	SO-11-2.5	SO-11-3.5	SO-12-2.5	SO-12-3.5	SO-12-5	SO-13-2.5	SO-13-3.5	SO-13-5	SO-13-5DUP	SO-13-10
			Sample Date:	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18	06/28/18
			Sample Depth:	5.0	2.5	3.5	2.5	3.5	2.5	3.5	5.0	2.5	3.5	5.0	5.0	10.0
Metals																
Arsenic	12*	12*	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-
Barium	15000	220000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-
Chromium	120000	1800000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-
Cobalt	23	350	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-
Copper	3100	47000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-
Lead	80	320	mg/kg	ND (<3.0)	**6.2**	**7.0**	**17**	**8.6**	**5.9**	**9.2**	**34**	**4.9**	ND (<3.0)	ND (<3.0)	ND (<3.0)	ND (<3.0)
Mercury	1	4.4	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-
Nickel	820	11000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-
Vanadium	390	5800	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-
Zinc	23000	350000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-
Organochlorine Pesticides																
alpha-Chlordane*	1.7	6.1	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-
Chlordane (technical)	1.7	7.7	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-
4,4´-DDD	1.9	6.2	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-
4,4´-DDE	2	9.3	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-
4,4´-DDT	1.9	7.1	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-
Dieldrin	0.034	0.093	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-
Endosulfan II**	470	7000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-
gamma-Chlordane**	1.7	6.1	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Petroleum Hydrocarbons																
Gasoline Range Organics (C6-C10)	100	120	mg/kg	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<50)	ND (<5.0)	ND (<5.0)	7.4	ND (<5.0)	ND (<50)	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)
Diesel Range Organics (C10-C23)	260	260	mg/kg	ND (<5.0)	ND (<5.0)	ND (<5.0)	**250**	**7.0**	**33**	**150**	**170**	**1900**	ND (<5.0)	ND (<5.0)	ND (<5.0)	ND (<5.0)
Oil Range Organics (C23-C44)	1600	1600	mg/kg	**8.2**	**32**	**7.5**	**1300**	**120**	**890**	**420**	**1600**	**3700**	**9.7**	**6.6**	ND (<5.0)	ND (<5.0)
Volatile Organic Compounds																
Acetone	61000	670000	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-
Carbon Disulfide	770	3500	mg/kg	-	-	-	-	-	-	-	-	-	-	-	-	-

Notes
Hierarchy of sources for California screening levels:

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* Background concentration for arsenic in Southern California shown for comparison

** Endosulfan and chlordane screening levels used as surrogates for endosulfan II and gamma-chlordane, respectively

Exceeds residential screening level
Exceeds commercial screening level
mg/kg - milligrams per kilogram
ND - not detected
- Not Analyzed
Sample depth in feet below ground surface
Various samples were analyzed for total petroleum carbon chains, full scan VOCs, title 22 metals, SVOCs, herbicides, and organochlorine pesticides (OCPs), and polychlorinated biphenyls (PCBs). Only detected compounds are reported in table.

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EPA Regional Screening Levels for Chemical Contaminants at Superfund Sites - Region 9 (11/2020) - Industrial RSLs

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DTSC HERO Note 3 (06/2020) - Industrial Soil Screening Levels (Cancer Endpoint)
DTSC HERO Note 3 (06/2020) - Industrial Soil Screening Levels (Noncancer Endpoint)

ESLs:
San Francisco Bay Regional Water Quality Control Board Environmental Screening Levels (ESLs) (01/2019)

TABLE 2
GROUNDWATER ANALYTICAL RESULTS
128 Hurricane Street
Los Angeles, California

Detected Analytes	MCL	NL	Direct Contact ESL	Boring ID: / Sample ID: / Sample Date:	SB-04 / SB-4 / 06/20/18	SO-03 / SO-3 / 06/28/18	SO-08 / SO-8 / 06/28/18	SO-13 / SO-13 / 06/28/18
General Minerals								
Chloride	500	NA	NA	mg/l	-	**1300**	**3800**	**1400**
Hardness	NA	NA	NA	mg/l	-	**680**	**1600**	**730**
Nitrate as N	10	NA	NA	mg/l	-	**0.56**	**0.60**	**0.37**
pH	NA	NA	NA	ph units	-	**6.5**	**6.5**	**7.0**
Salinity	NA	NA	NA	salinity u	-	**2.8**	**8.1**	**2.8**
Specific Conductance (EC)	1600	NA	NA	umhos/cm	-	**5200**	**14000**	**5200**
Sulfate	500	NA	NA	mg/l	-	**140**	**560**	**160**
Total Dissolved Solids	1000	NA	NA	mg/l	-	**3300**	**8600**	**3300**
Metals								
Arsenic	0.01	NA	50	mg/l	**0.1**	-	-	-
Barium	1	NA	50	mg/l	**0.3**	-	-	-
Chromium	0.05	NA	50	mg/l	**0.026**	-	-	-
Cobalt	NA	NA	50	mg/l	**0.006**	-	-	-
Copper	1.3	NA	50	mg/l	**0.017**	-	-	-
Lead	0.015	NA	50	mg/l	**0.011**	-	-	-
Molybdenum	NA	NA	50	mg/l	**0.06**	-	-	-
Nickel	0.1	NA	50	mg/l	**0.049**	-	-	-
Vanadium	NA	0.05	50	mg/l	**0.035**	-	-	-
Zinc	NA	NA	50	mg/l	**0.046**	-	-	-
Total Petroleum Hydrocarbons								
Diesel Range Organics (C10-C23)	NA	NA	640	ug/l	**190**	**420**	**420**	**250**
Oil Range Organics (C23-C44)	NA	NA	1600	ug/l	**170**	**560**	**230**	**340**

Notes
MCL - Maximum Contaminant Level (primary or secondary)
NL - Notification Level
Gross contamination environmental screening level (ESL), San Francisco Bay Regional Water Quality Control Board, 2019
NA - Not published
- Not analyzed
mg/l - milligrams per liter
ug/l - micrograms per liter
umhos/cm - micromhos per centimeter
Exceeds MCL
Various samples were analyzed for total petroleum carbon chains, full scan VOCs and oxygenates, title 22 metals, and general parameters. Only detected compounds are reported in table.

MCL:
Federal (U.S. EPA 05/2009) and Title 22 California Code of Regulations (SWRCB 04/16/2019) - primary MCLs only (Copper and Lead are Regulatory Action Levels).
https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/Chemicalcontaminants.html
Drinking Water Standards (MWDSC, 2019)
http://www.mwdh2o.com/pdf_about_your_water/2.3.1_annual_water_quality_report.pdf
NL:
Drinking Water Notification Levels (SWRCB 02/06/2020)
https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/NotificationLevels.html

Table 3
Soil Removal Calculations
128 Hurricane Street
Venice, California
1 of 1

Area	Sub-Area	Volume	Volume	Weight
		ft^3	yd^3	tons
EA-1		**1633**	**60**	**82**
	EA-1-1	**600**	**22**	**30**
EA-2		**393**	**15**	**20**
	EA-2-1	**500**	**19**	**25**
EA-3		**1166**	**43**	**58**

All Excavations	***4,292 cubic feet***	***160 cubic yards***	***215 tons***
Contingency	***2,700 cubic feet***	***100 cubic yards***	***135 tons***
Total	***6,992 cubic feet***	***260 cubic yards***	***350 tons***

Formulas:

1 yd^3 = 27 ft^3

Soil density calculation is cubic footage x (100 lb/ft3)/(2000 lb/ton)

Notes and Assumptions:

EA-1 depth chosen as 1 foot below last sample exceeding screening levels (3.5 feet bgs)

EA-1-1 depth chosen as 1 foot below last sample exceeding screening levels (6 feet bgs)

EA-2 depth chosen as 1 foot below last sample exceeding screening levels (3.5 feet bgs)

EA-2-1 depth chosen as 1 foot below last sample exceeding screening levels (4.5 feet bgs)

EA-3 depth chosen as 1 foot below last sample exceeding screening levels (3.5 feet bgs)

Extents of excavation is five feet in each direction from boring sample exceeding screening levels

Contingency volume and weight is for excavation related to confirmation sampling

The numbers are preliminary and were not approved by agencies

The numbers may change after confirmation sampling

Excavations, Contingency, and Total volume in cubic feet/cubic yards/tons is rounded up to the nearest one or nearest ten for total cubic yards

ft = feet

yd = yard

Appendix A – Application for Voluntary Agency Oversight

Request for Agency Oversight Application

The purpose of this application is to provide the Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board (Water Board) sufficient information to determine which agency will be the appropriate lead agency to provide oversight for the assessment and/or remediation of this Brownfield site. The detailed site information requested in this application will also help the appropriate lead agency to expedite the development of a cost recovery agreement, so that the applicant can begin work in a timely and efficient manner.

For a California Land Reuse and Revitalization Act (CLRRA) Agreement or a Prospective Purchaser Agreement, please complete the appropriate Supplemental Attachment since additional information is required for these programs.

SECTION 1
APPLICANT/PRIMARY CONTACT INFORMATION

The Applicant (i.e., individual, business entity, or organization) requesting oversight must possess all necessary rights and access to the site so that it can carry out any and all activities that the oversight agency may require in making its regulatory decisions.

Applicant Name: City of Los Angeles - Bureau of Engineering

Applicant Point of Contact Name: Mr. Sylvester Kueh

E-mail Address: sylvester.kueh@lacity.org

Phone: (213)485-1693

Address, City, County & Zip Code: 1149 S. Broadway Street, Los Angeles, Los Angeles County 90015

Applicant's relationship to site: Current Owner ☒ Operator ☐
Local Agency ☐ Prospective Purchaser ☐ Developer ☐
Other (please describe):

Current Owner (if different from Applicant):

Owner Point of Contact Name:

E-mail Address:

Phone: ( ) -

Address, City, County & Zip Code:

Consulting Firm Name: AECOM (for technical questions only)

Consultant Point of Contact Name: Shapoor Hamid, PhD, Principal Scientist

E-mail Address: shapoor.hamid@aecom.com

Phone: (213)996-2630

Request for Agency Oversight Application

Address, City, County & Zip Code: 300 S. Grand Avenue, Los Angeles, Los Angeles County 90071

Primary Point of Contact for this Site: Applicant Contact ☒ or Consultant Contact ☒ or Owner Contact ☒

Billable Party Information:

Billing Point of Contact Name:

E-mail Address:

Phone: ( ) -

Address, City, County & Zip Code:

Tax ID Number (applicable only to business entities and organizations; please do not provide individual social security numbers):

SECTION 2
SITE INFORMATION

If applicable, the applicant may reference information from an attached Phase 1 Environmental Assessment or other site investigation reports available for the Site.

1. Is this Site listed on Envirostor? Yes ☐ No ☒ and/or Geotracker? Yes ☐ No ☒

2. Name of Site: 128 Hurricane Street - VAPP

3. Address City County ZIP: 128 Hurricane Street, Venice also known as 128 Hurricane Street, Marina Del Rey, CA 90292

4. APN(s): 422-5010-016 Acres: 0.097 Zoning: Mixed

5. Provide a Site Location Map and a Site Diagram showing significant features

6. Describe the current use of the Site and include description of features:
   Vacant Lot

7. Describe the surrounding land use (including proximity to residential housing, schools, churches, etc.):
   Surrounded by Residential housing, and water treatment plant. School within 0.3 miles.

8. Background: Current & Previous Business Operations
   Name: Currently, no business operations. Past business operations was oil production from 1928 to 1932.

Request for Agency Oversight Application

Type: Public Facilities

Years of Operation:4

9. If known, list all previous businesses operating on this Site:
   1. McDonald Petroleum, Ltd.
   2.
   3.
   4.
   5.

10. What hazardous substances, pollutants, or contaminants have been or are being used/stored at the Site?
    Petroleum hydrocarbons

11. What environmental media is/was/may be contaminated (check all that apply)?
    Soil ☒ Air ☐ Groundwater ☐ Surface Water ☐ Unknown ☐

12. Has sampling been conducted? Yes ☒ No ☐ If yes, then identify the contaminants detected, including the maximum concentrations, and contaminants that exceeded screening levels (e.g., Preliminary Remediation Goals or California Human Health Screening Levels).Reports Attached

13. Is there currently a potential of exposure of the community or workers to hazardous substances, pollutants, or contaminants at the Site?
    Yes ☒ No ☐ If yes, then explain. Direct exposure to petroleum hydrocarbons if excavation occurs.

14. Provide a brief summary of removal or remedial activities that have been undertaken or completed at the Site, if any. see attached RAP

15. Provide a description of known or possible water quality impacts at the Site. Also, provide information about the type(s) of water supply for the Site and, if known, any information on municipal, domestic, agricultural or industrial water supply wells that are either on the Site or within a 1-mile radius of the project area.

    Not known

16. Are any Federal, State or Local regulatory agencies currently involved with the Site? Yes ☒ No☐ If yes, describe the regulatory agencies' involvement with the Site, and provide the regulatory agencies' contact names and telephone numbers below.

Agency Involvement Contact Name Phone

Agency	Involvement	Contact Name	Phone Number

Request for Agency Oversight Application

Army Corps of Engineering	**Section 404 Water Permit**	**Deana J. Cummings**	**(213)452-3002**
Los Regional Water Quality	**Section 401 Water Permit**	**Dana Cole**	**(213)576-5733**
Califoria Coastal Commission	**State Coastal Development Permit**	**Shannon Vaughn**	**(562)590-5071**

17. What is the proposed future use of the Site? Develop as parking lot, open space, and landscaping

18. If the Site is not cleaned-up to unrestricted standards, will the owner accept land use restrictions? Yes

19. What oversight service is being requested of the Lead Agency (check all that apply)?

Initial Investigation/Preliminary Endangerment Assessment ☐
Supplemental Investigation ☐
Remedial Investigation/Feasibility Study ☐
Removal Action/Remedial Action ☒
Case Closure ☐
Document Review ☐
Other:

20. Provide a general description of the nature of the proposed redevelopment, including a general timeline for construction: The city plans to develop the vacant lot into a parking lot, open space, and landscaping. Timeline is not known at this time.

21. Provide information about the potential benefits of the proposed redevelopment, if available:

Anticipated number of jobs created/retained: Unknown
Anticipated number of proposed residential units: 0
Anticipated square footage of planned commercial space: 3,031
Anticipated square footage of planned open space: 1,199
Anticipated acres made ready for re-use by proposed Site cleanup: 0.097

22. Provide information on the environmental documents produced for the Site to date. Note that copies may be requested by the designated Lead Agency.

☐ Preliminary Endangerment Assessment, dated
☒ Phase 1 Environmental Assessment, dated June 21,2016

Request for Agency Oversight Application

- ☒ Phase 2 Environmental Assessment, dated August 31, 2018, amended May 2020
- ☐ Health Risk Assessment, dated
- ☒ Other, describe and provide date: Geotechnical Investigation Summary Report dated July 24, 2006
- ☒ Other, describe and provide date: Phase III ESA - Remediation Plan, May 2020
- ☐ Other, describe and provide date

SECTION 3
COMMUNITY PROFILE INFORMATION

1. What are the demographics of the community (e.g., socioeconomic level, ethnic composition, specific language considerations, etc.)?
   As of 2017, Median household income: 106,612; 69.7% white, 9.52% hispanic

2. **Local Interest**: Has there been any media coverage?
   no

3. **Past Public Involvement**: Has there been any past public interest in the Site as reflected by community meetings, ad hoc committees, workshops, fact sheets, newsletters, etc.?
   Yes, the VAPP EIR process and public hearings with the Department of City Planning

4. **Key Issues and Concerns**: Have any specific concerns/issues been raised by the community regarding past operations or present activities at the Site?
   Noise, vibration, traffic

5. Are there any concerns/issues anticipated regarding Site activities?
   No

6. Are there any general environmental concerns/issues in the community relative to neighboring sites?
   Noise, vibration, traffic

7. Describe the visibility of activities and any known interest the Site:
   Activities would be visible from nearby residential buildings and along the walking trail known as the Espanade, but is a low traffic area.

Request for Agency Oversight Application

SECTION 4
CERTIFICATION

The signatory below is an authorized representative of the Applicant and certifies to the best of his/her knowledge and belief that the information contained in this application, including any attachments, is true and complete and accurately describes the Applicant, the Site, and related conditions. The Applicant agrees to promptly inform the agency of any changes that occur in the information contained in this application.

The Applicant agrees to reimburse the lead agency (the Department of Toxic Substances Control or the Regional Water Quality Control Board) for the lead agency's costs in preparing and negotiating the appropriate cost recovery agreement, regardless of whether the agreement is subsequently executed by the Applicant and the lead agency, and, in the event the cost recovery agreement is executed by the parties, for oversight of the activities identified in the Scope of Work of the selected Agreement.

_____	_____	_____
Applicant Representative	Date	Title

Request for Agency Oversight of a Brownfield Site
Supplemental Attachment: California Land Reuse and Revitalization Act (CLRRA) Application

Please complete this form ONLY if you are an eligible entity applying for a California Land Reuse and Revitalization Act (CLRRA) Agreement

Definitions of terms used in the CLRRA Application can be found in Article 2 "Definitions," and Article 6, "Streamlined Site Investigation and Response Plan Agreements," Chapter 6.82, Division 20 of the Health and Safety Code (commencing with section 25395.60).

1. Are you applying as a/an:
   - ☐ Bona fide purchaser (BFP)
   - ☐ Contiguous property owner (CPO)
   - ☐ Innocent landowner (ILO)
   - ☐ Prospective purchaser (PP)
   - ☐ Bona ground tenant (BGT)

2. Is the Site located outside an infill area in an urban area?
   Yes☐ No☐

3. Is the Site solely impacted by petroleum from an underground storage tank and eligible for reimbursement from the Underground Storage Tank Cleanup Fund?
   Yes☐ No☐

   If you answered YES to either question 2 or 3, contact a DTSC Brownfield Coordinator to discuss Site-specific details.

4. Current zoning and planned use of the Site:

5. Do you own the Site? Yes☐ No☐

6. Did (will, in the case of a PP) the owner conduct due diligence or All Appropriate Inquiry (AAI) prior to acquiring Site? Yes☐ No☐

   Date AAI was conducted (will be conducted, in the case of a PP) _____.

7. Did the owner take reasonable steps with regard to contamination at the Site including, as appropriate; stopping continuing releases, preventing threatened releases, and preventing or limiting human, environmental or natural resource exposure to earlier hazardous substance releases? Yes☐ No☐

8. Date the Site was/will be purchased and title was/will be transferred

See attached Addendum for definitions of CLRRA terms used in this Supplemental Attachment.

Request for Agency Oversight of a Brownfield Site
Supplemental Attachment: California Land Reuse and Revitalization Act (CLRRA) Application

Applicant's Disclosure Statement:

In submitting this application, I verify that, to the best of my knowledge, I can meet the requirements for a Bona Fide Purchaser, Contiguous Property Owner Innocent Landowner, Prospective Purchase or Bona Fide Ground Tenant set forth in Division 20, Chapter 6.82 (commencing with section 25395.60) of the Health and Safety Code and, upon request by the oversight agency, will submit documentation that I meet each of the following conditions in accordance with Health and Safety Code section 25395.80:

> *On or before the date of property acquisition, I made "All Appropriate Inquiries" into the previous ownership and uses of the site; and*
>
> *I am not potentially liable or affiliated with any other person who is potentially liable through any direct or indirect familial relationship, or through any contractual, corporate, or financial relationship unless that relationship was created by the instrument by which title or possession to the site was conveyed or financed or was a contract for the sale of goods or services, or through the result of a reorganization of a business entity that was potentially liable for the release or threatened release of hazardous materials at the site.*

The Applicant agrees to reimburse the lead agency (the Department of Toxic Substances Control or the Regional Water Quality Control Board) for the lead agency's costs in preparing and negotiating the CLRRA Agreement, regardless of whether the agreement is subsequently executed by the Applicant and the lead agency, and, in the event a CLRRA Agreement is executed by the parties, for oversight of the activities identified in the agreement.

The signatory below is an authorized representative of the Applicant and certifies to the best of his/her knowledge and belief that the information contained in this application, including any attachments, is true and complete and accurately describes the Applicant, the Property, and related conditions. The Applicant agrees to promptly inform the lead agency of any changes that occur in the information contained in this application.

Signature of Applicant:

_____

Date:

_____ _____

Name & Title:

_____ _____

Address:

_____ _____

Request for Agency Oversight of a Brownfield Site
Supplemental Attachment: Prospective Purchaser Agreement

Please complete this form ONLY if you are an eligible entity applying for a Prospective Purchaser Agreement with DTSC

1. Is the current owner aware of your plans to seek a Prospective Purchaser Agreement with DTSC?
   Yes ☐ No ☐

   a) If "yes," then when do you expect to take title to the Site?

   b) If "no," then what is your proposed interest in the Site and what vehicle will be used to consummate the transaction?

2. Please describe if known, the timing of the proposed property transaction in sufficient detail to give DTSC a sense of your needs and timetable.

3. Attach a copy of the Site map, legal boundary description and Title Report.

4. Describe the "substantial benefit" to the State of California that will result if your proposal is implemented. For example, describe the changes expected in the local and state tax base or other benefits to the community and surrounding neighborhood which could occur as a result of the Site redevelopment.

5. Describe the financing to be used to complete remediation prior to the development of the Site.

6. Briefly describe, in general terms, the removal or remedial activities to be performed in the future.

7. Attach a list of names and addresses of potentially responsible parties, and describe all efforts to identify the potentially responsible parties.

Note: If remediation is occurring during and after construction, such as for groundwater treatment or soil vapor extraction, a separate Operation and Maintenance Agreement must be executed to ensure that remedial activities occur until remedial goals are met.

Request for Agency Oversight of a Brownfield Site
Supplemental Attachment: Prospective Purchaser Agreement

Applicant's Disclosure Statement:

In submitting this application, I verify under penalty of perjury that, to the best of my knowledge, the Applicant is not a responsible party or affiliated with a responsible party for this site.

The Applicant agrees to reimburse the lead agency for its costs in preparing and negotiating the Prospective Purchaser Agreement, regardless of whether the agreement is subsequently executed by the Applicant and the lead agency, and, in the event a Prospective Purchaser Agreement is executed by the parties, for oversight of the activities identified in the agreement.

The signatory below is an authorized representative of the Applicant and certifies to the best of his/her knowledge and belief that the information contained in this application, including any attachments, is true and complete and accurately describes the Applicant, the Property, and related conditions. The Applicant agrees to promptly inform DTSC of any changes that occur in the information contained in this application.

Signature of Applicant:

_____

Date:

Name & Title:

Appendix B – Communication Log with Regulatory Agencies

Table B-1
Agency Contact and Requirements
128 Hurricane Street
Venice, California
1 of 1

Agency	Contact Name	Contact Phone Number	Contact Email	Notes
LA City Fire Department - CUPA	Alvin Dong	213-238-3515	alvin.dong@lacity	Site and scope does not fall under agency jurisdiction.
LA County Fire Department	Richard Clark	213-890-4106	richard.clark@fire.lacounty.gov	Agency is not accepting new applications for voluntary environmental oversight cases due to COVID-19; referred new cases to DTSC.
AQMD	Stephen Boggs	909-396-2141	sboggs@aqmd.gov	Rules 1166 (VOCs) and 1466 (lead) apply to this site. Variable site plan acceptable for 1166. Rule 1466 needs site specific plan.
DTSC	Irena Edwards	714-484-5385	irena.edwards@dtsc.ca.gov	DTSC sent an application for voluntary agency oversight. The application must be submitted with the RAP. It will determine whether the DTSC or LARWQCB will be the lead agency. They had no additional requirements beyond what the current guidance documents prescribe.
LARWQCB	NA	916-341-5272	info@waterboards.ca.gov	Emailed and called; no response; application supplied by DTSC will determine whether DTSC or LARWQCB will assume lead agency.
LADBS	Catherine Nuezca-Gaba	213-473-3231	NA	No methane mitigation is needed for scope of RAP.

Notes:
NA - Not available
LA City Fire Department - CUPA - Los Angeles City Fire Department - Certified Unified Program Agency
LA County Fire Department - Los Angeles County Fire Department - Certified Unified Program Agency
AQMD - Air Quality Management District
DTSC - Department of Toxic Substances and Control
LARWQCB - Los Angeles Regional Water Quality Control Board
LADBS - Los Angeles Department of Building Services
RAP - Remedial Action Plan
VOC - Volatile Organic Compound

Call Logs

Los Angeles City Fire Department – CUPA

AECOM spoke with Alvin Dong over the phone. After discussing the scope and location of the site, Mr. Dong stated that the scope of the RAP does not fall under the agency's jurisdiction. No further action is needed.

LADBS

AECOM spoke with Catherine Nuezca-Gaba over the phone. After discussing the scope and results of the methane investigation, Ms. Nuezca-Gaba stated that no methane mitigation methods need to be implemented under the scope of the RAP. No permits or notifications are necessary during RAP implementation.

LARWQCB

AECOM called and left voicemail. No response via email or phone. Voluntary Agency Application states that it will be shared by DTSC with LARWQCB upon submittal.

Stephens, Samuel

From: Clark, Richard <Richard.Clark@fire.lacounty.gov>
Sent: Tuesday, April 21, 2020 12:03 PM
To: Stephens, Samuel
Subject: [EXTERNAL] Automatic reply: Agency Requirements for Soil Management Plan of TPH-d and Lead Impacted Site

Categories: Important

MARCH 25, 2020 UPDATED (COVID-19) NOTICE: This Department's Site Mitigation Unit (SMU) is an essential government agency. SMU staff are currently working on their environmental oversight cases.

FEBUARY 2020 UPDATED NOTICE: The Site Mitigation Unit (SMU) is currently not accepting any new sites at this time. Nor, is SMU placing any addtional sites on the SMU waiting list at this time, unless you meet one of the EXCEPTIONS addressed below or acquire special circumstance approval - Subject to Review and Approval. **Future Sites** that enter into a voluntary Remedial Action Agreement with SMU will be placed on the GeoTracker Internet Website, and any volatile organic compound (VOC) affected soil/soil vapor will undergo an **initial/preliminary screening** [i.e., attenuation factors (DTSC subslab ~ 0.05); (USEPA residential/commercial ~ 0.03); (DTSC residential/commercial ~ 0.002/0.001)] to screen for the potential of a vapor intrusion pathway. In the meantime, if you are not on the SMU waiting list (or you can't wait any longer), please contact the DTSC or LARWQCB for oversight as discussed below:

NOTICE: Information regarding most SMU oversight cases can be obtained through this Department's Health Hazardous Materials Division (HHMD)/Los Angeles County Certified Unified Program Angency (CUPA) "Public Records Act Request" Internet webpage at the following URL: https:/www.fire.lacounty.gov/hhmd-2/public-records-requests/

The Site Mitigation Unit (SMU) of this Department is not processing any new voluntary environmental oversight case applications at this time. In the meantime, you will have to pursue oversight with the Cal-EPA Department of Toxic Substances Control (DTSC) by contacting Irena Edwards of the DTSC Site Mitigation and Restoration Program either by phone (714-484-5385) and/or by email (irena.edwards@dtsc.ca.gov). You can also contact the Los Angeles Regional Water Quality Control Board (LARWQCB).

There are a few **EXCEPTIONS** to the current "hold-status" on the SMU processing of new oversight cases. Meaning, there are certain exceptions (for certain types of sites) whereby SMU will still pursue oversight. These exceptions include (but are not limited to):

- Active Permitted CUPA hazardous waste facilities
- Active hazardous waste generating facilities requiring a CUPA Permit
- Active Permitted CUPA PBR and/or CA hazardous waste treatment facilities (subject to Corrective Action oversight)
- Inactive Non-Permited CUPA PBR and/or CA hazardous waste treatment facilities (subject to Corrective Action oversight)
- Case by Case Basis: Site evaluation by SMU supervisor

If you believe one of these exceptions apply to your prospective site, please call Perla Garcia at (323) 890- 4035, or email Ms. Garcia at perla.garcia@fire.lacounty.gov and request a site evaluation by the SMU supervisor. Thank you.

Sincerely,

Richard Clark, MS, PE
Deputy Health Officer
Site Mitigation Unit Supervisor
Los Angeles County Fire Department

Stephens, Samuel

From: Stephen Boggs <sboggs@aqmd.gov>
Sent: Tuesday, April 21, 2020 1:28 PM
To: Stephens, Samuel
Cc: Ostensen, Carole; Hamid, Shapoor
Subject: [EXTERNAL] RE: Agency Requirements for Soil Management Plan of TPH-d and Lead Impacted Site

Categories: Important

Good afternoon Samuel,

Thank you for reaching out in regards to your project. Due to the presence of TPH-d, lead, and historical oil production wells at the site, South Coast AQMD Rule 1166 and 1466 seem to apply to this project. Below there is additional information for obtaining a Rule 1166 excavation plan. Rule 1466 pertains to controlling particulate emissions from soils with toxic air contaminants but does not require a plan to be submitted. Since lead has been found at the site, please review and be familiar Rule 1466.

A Rule 1166 plan shall be submitted for the excavation, grading, handling, and treating of VOC containing soil (per Rule 1166(c)(1) on page 1166-2). VOC containing soil is soil that contains VOC (there is no lower limit threshold). VOC stands for volatile organic compounds. Typically VOCs that are encountered may include gasoline, diesel, crude, waste oil, adhesive, paint, solvent, etc., but it could be any other VOC containing material.

There are two types of Rule 1166 plans: 1) Various Locations Plan and 2) Site Specific Plan.

1) A Various Locations Plan is designed for contractors that conduct on a regular basis smaller scale excavations. This plan allows the plan holder to operate at multiple sites under a single plan. A Various Locations Plan may be continuously renewed on an annual basis. A various locations plan may be obtained if:
    - The excavation involves less than 2000 cubic yards of VOC-contaminated soil in any 12 month period at a particular site,
    - Another various locations plan is not being used at the same site within a 12 month period,
    - The excavation site is greater than 1000 feet from the outer boundary of a school, and
    - The excavation does not involve grading, soil treatment or remediation, or landfills.

    Submitting a Rule 1166 Various Locations Plan requires:
    - A signed and completed Form 400-A (please indicate Compliance Plan in Section D7a),
        - Instructions for Form 400-A
    - A signed and completed Applicant's Statement
    - A check in the amount of $322.50

2) A Site Specific Plan is designed for larger excavations and projects that cannot obtain a Various Location Plan. Note that a Site Specific Plan expires two years from the date of issuance, and cannot be renewed beyond two years.

    Submitting a Rule 1166 Site Specific Plan requires:
    - A signed and completed Form 400-A (please indicate Compliance Plan in Section D7a),
        - Instructions for Form 400-A

- A signed and completed Form 400-CEQA
    - Instructions for Form 400-CEQA
    - If a CEQA document has been prepared for the project, include the Notice of Determination and any Air Quality mitigation measures identified in the CEQA document.
- Reasons for excavation or grading.
- A site summary indicating the cause of VOC soil contamination and the site history.
- Description of tanks or piping associated with the soil contamination (if applicable).
- The operating schedule for excavation and removal (hours/day, days/week, weeks/year, or equivalent).
- Description of how the excavation or grading will be conducted.
- Description of mitigation measures for dust, odors, and VOC.
- Details of disposal of VOC contaminated soil, including the name of the facility where contaminated soil will be taken for treatment or disposal.
- Description of monitoring equipment and techniques.
- A plot plan indicating the location of the excavation, with property lines, and surrounding area up to 2500 feet away, and including any schools, residential areas or other sensitive receptors such as hospitals or locations where children or elderly people live or work.
- Designation of a person who can conduct a site inspection with the Executive Officer prior to issuance of the plan.
- The total amount of soil to be excavation in cubic yards under this project.
- The total amount of soil that could be stockpiled on site at any one time in cubic yards under this project.
- Any soil/soil gas analysis that may have been conducted for the site.
- A check in the amount of $725.60

If you need the plan in an expedited fashion, you may want to request for an expedited plan by submitting:

- A signed Form 400-XPP
- An additional 50% more fees from the plan fees listed above.
- Please note that requesting expedited processing does not guarantee that you will receive plan approval within in a certain timeframe, but it will allow dedicated time for our staff to process the plan based on staff availability.

Currently our office is closed to the public, so we are excepting applications by mail or they can be submitted electronically. Applications, along with fees, can be mailed to the address in the top right corner of Form 400-A.

South Coast AQMD
P.O. Box 4944
Diamond Bar, CA 91765-0944

Or

If you would like to submit the application and fees electronically, please submit to PermitServicesOnline@aqmd.gov along with the fee payment voucher receipt. The fees can be paid online using the Permit Application Processing Fee Portal (https://xappprod.aqmd.gov/icafe/startcafe.aspx). Be sure to print out the receipt voucher and include that with the application submittal.

If you plan to request expedited processing, use Option 2 from our Permit Processing Fee Portal page. Option 1, the Online Fee Calculator, does not give the option to select expedited processing for plan applications.

For your information you can check out the Rule 1166 Site Specific and Various Locations Mitigation Plan webpage to see an example of a Sample Rule 1166 Site Specific Plan. 1166 Notification Forms are also available at that location.

Also note that South Coast AQMD is open Tuesday – Friday from 7am-5:30pm. We are closed on Mondays.

Please feel free to contact me with any questions.

Best,

Stephen Boggs
South Coast AQMD
Air Quality Engineer
(909) 396-2141
sboggs@aqmd.gov

From: Stephens, Samuel <Samuel.Stephens@aecom.com>
Sent: Tuesday, April 21, 2020 12:02 PM
To: Stephen Boggs <sboggs@aqmd.gov>
Cc: Ostensen, Carole <carole.ostensen@aecom.com>; Hamid, Shapoor <shapoor.hamid@aecom.com>
Subject: Agency Requirements for Soil Management Plan of TPH-d and Lead Impacted Site

Hello Mr. Boggs,

My name is Samuel Stephens with AECOM, and I am writing a soil management plan for a site in Marina del Rey, California. A Phase II ESA showed a select number of soil samples exhibiting TPH-d and lead concentrations exceeding residential screening levels.

I would like to discuss if there are any requirements and permits for removing the impacted soil. I can be reached via email or phone any time today or tomorrow.

Background: Historically, the Site was a vacant, dirt lot without developed structures since 1928. The Site consisted of an oil production well that was drilled in 1930 and was abandoned in 1932 according to the DOGGR well finder website. The oil production well operations likely impacted the soil and might be incompletely abandoned. The surrounding area was developed with oil production facilities from 1938 to 1952 and residential properties from late 1963 to the present. The Site has not undergone any remediation. The contamination is confined mainly to the western side of the site. Soil samples exceeding residential screening levels occur between 2.5 and 5 feet below ground surface (bgs). Groundwater is encountered between 4 and 6 feet bgs. Groundwater sample concentrations did not exceed environmental screening levels (ESL). The three excavation areas and two sub-areas are estimated to be approximately 160 cubic yards (215 tons).

Please let me know if you need more information. Thank you for your time.

Samuel Stephens, GIT
Staff Geologist, Environment
D +1-213-996-2315
M +1-713-446-9202
samuel.stephens@aecom.com

AECOM
300 S. Grand Avenue
Suite 900
Los Angeles, California 90071, United States
T +1-213-593-8100
aecom.com

Stephens, Samuel

From: Stephens, Samuel
Sent: Thursday, April 30, 2020 4:14 PM
To: Edwards, Irena@DTSC
Subject: Re: Agency Requirements for Soil Management Plan of TPH-d and Lead Impacted Site

I am planning to submit the Phase II ESA with the RAP as an appendix. Thank you for your help in all this.

Samuel Stephens, GIT
Staff Geologist, Environment
D +1-213-996-2315
M +1-713-446-9202
samuel.stephens@aecom.com

AECOM
300 S. Grand Avenue
Suite 900
Los Angeles, California 90071, United States
T +1-213-593-8100
aecom.com

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Staff Geologist, Geoscience Remediation Division
D +1-213-996-2315
M +1-713-446-9202
samuel.stephens@aecom.com

From: Edwards, Irena@DTSC <Irena.Edwards@dtsc.ca.gov>
Sent: Thursday, April 30, 2020 3:38:49 PM
To: Stephens, Samuel <Samuel.Stephens@aecom.com>
Subject: [EXTERNAL] Re: Agency Requirements for Soil Management Plan of TPH-d and Lead Impacted Site

Hi Samuel,

Do you have a site assessment report? If yes, please submit it with the application. It will be easier to prepare a cost estimate for the VCA.

Thanks,
Irena

From: Stephens, Samuel <Samuel.Stephens@aecom.com>
Sent: Thursday, April 30, 2020 1:25 PM
To: Edwards, Irena@DTSC <Irena.Edwards@dtsc.ca.gov>

Cc: Hamid, Shapoor <shapoor.hamid@aecom.com>
Subject: RE: Agency Requirements for Soil Management Plan of TPH-d and Lead Impacted Site

Hello Irena,

Does a Health and Safety Plan need to be submitted with the application and RAP? I found no mention in the application.

Samuel Stephens, GIT
Staff Geologist, Environment
D +1-213-996-2315
M +1-713-446-9202
samuel.stephens@aecom.com

AECOM
300 S. Grand Avenue
Suite 900
Los Angeles, California 90071, United States
T +1-213-593-8100
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From: Edwards, Irena@DTSC <Irena.Edwards@dtsc.ca.gov>
Sent: Tuesday, April 28, 2020 11:57 AM
To: Stephens, Samuel <Samuel.Stephens@aecom.com>
Subject: [EXTERNAL] RE: Agency Requirements for Soil Management Plan of TPH-d and Lead Impacted Site

Dear Samuel,
Please send me the application and the Soil Management Plan and any reports you have. Once DTSC receives the application we'll coordinate with the Waterboard. Takes less than a week.
We can review the Plan while processing the VCA.
Thanks,
Irena Edwards

From: Stephens, Samuel <Samuel.Stephens@aecom.com>
Sent: Tuesday, April 28, 2020 11:42 AM
To: Edwards, Irena@DTSC <Irena.Edwards@dtsc.ca.gov>
Cc: Hamid, Shapoor <shapoor.hamid@aecom.com>
Subject: RE: Agency Requirements for Soil Management Plan of TPH-d and Lead Impacted Site

Hello Irena,

Thank you for the response. I have some clarifying questions:

1. Is this application required prior to submittal of the soil management work plan that I am drafting or is the application due prior to implementation? In other words, will I need to submit the Soil Management Plan to DTSC and the Waterboard?

2. How long is the application approval process?

Samuel Stephens, GIT
Staff Geologist, Environment
D +1-213-996-2315
M +1-713-446-9202
samuel.stephens@aecom.com

AECOM
300 S. Grand Avenue
Suite 900
Los Angeles, California 90071, United States
T +1-213-593-8100
aecom.com

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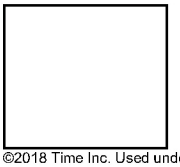

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From: Edwards, Irena@DTSC <Irena.Edwards@dtsc.ca.gov>
Sent: Thursday, April 23, 2020 9:34 AM
To: Stephens, Samuel <Samuel.Stephens@aecom.com>
Subject: [EXTERNAL] Fw: Agency Requirements for Soil Management Plan of TPH-d and Lead Impacted Site

Dear Samuel,

Attached is a VCA application for your client for DTSC to oversee lead soil removal.
You should use all applicable US EPA and California laws, regulations, and guidance documents for cleanup of hazardous waste sites. Please feel free to look them up on DTSC web site.

Sincerely,
Irena Edwards

From: Stephens, Samuel <Samuel.Stephens@aecom.com>
Sent: Tuesday, April 21, 2020 1:40 PM
To: Edwards, Irena@DTSC <Irena.Edwards@dtsc.ca.gov>
Cc: Ostensen, Carole <carole.ostensen@aecom.com>; Hamid, Shapoor <shapoor.hamid@aecom.com>
Subject: Agency Requirements for Soil Management Plan of TPH-d and Lead Impacted Site

Hello Ms. Irena Edwards,

My name is Samuel Stephens with AECOM, and I am writing a soil management plan for a site in Marina del Rey, California. A Phase II ESA showed a select number of soil samples exhibiting TPH-d and lead concentrations exceeding residential screening levels.

I would like to discuss if there are any requirements for removing the impacted soil. I can be reached via email or phone any time today or tomorrow.

Background: Historically, the Site was a vacant, dirt lot without developed structures since 1928. The Site consisted of an oil production well that was drilled in 1930 and was abandoned in 1932 according to the DOGGR well finder website. The oil production well operations likely impacted the soil and might be incompletely abandoned. The surrounding area was developed with oil production facilities from 1938 to 1952 and residential properties from late 1963 to the present. The Site has not undergone any remediation. The contamination is confined mainly to the western side of the site. Soil samples exceeding residential screening levels occur between 2.5 and 5 feet below ground surface (bgs). Groundwater is encountered between 4 and 6 feet bgs. Groundwater sample concentrations did not exceed environmental screening levels (ESL). The three excavation areas and two sub-areas are estimated to be approximately 160 cubic yards (215 tons).

Please let me know if you need more information. Thank you for your time.

Samuel Stephens, GIT
Staff Geologist, Environment
D +1-213-996-2315
M +1-713-446-9202
samuel.stephens@aecom.com

AECOM
300 S. Grand Avenue
Suite 900
Los Angeles, California 90071, United States
T +1-213-593-8100
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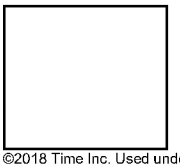

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Appendix C – CalGEM Correspondence

Stephens, Samuel

From: Brandt, Grace@DOC <Grace.Brandt@conservation.ca.gov>
Sent: Wednesday, April 22, 2020 9:18 AM
To: Ostensen, Carole
Subject: [EXTERNAL] RE: Information for McDonald 2 Well (API 03713842)
Attachments: WellSTAR QRG - CSWR.PPT; CSWR Application WSformat (template).pdf; CSWR_Instructions_rev1-2020.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Carole,

CalGEM has a Construction Site Well Review (CSWR) program, which allows a developer to request the appropriate local Division to review the records for wells on a specific property. After review, CalGEM will submit a report to the appropriate land use authority with a copy to the developer, on the current state of abandonment of the well(s) in question. This report gives the land use authority technical information on the well abandonment, including, whether the abandonment meets current Division standards. The land use authority will use this information in their permitting decision-making process.

A well is plugged to current standards if it is in compliance with Public Resources Code (PRC) § 3208 which states in parts that:

"A well is properly abandoned when it has been shown, to the satisfaction of the supervisor, that all proper steps have been taken to isolate all oil-bearing or gas-bearing strata encountered in the well, and to protect underground or surface water suitable for irrigation or farm or domestic purposes from the infiltration or addition of any detrimental substance and to prevent subsequent damage to life, health, property, and other resources."

I have attached CSWR application and instructions along with the WellSTAR's quick reference guide (QRG).

The Construction Site Well Review (CSWR) application can be submitted to this office either by:

- mail
- email
- or through WellSTAR

I've tried to answer your questions below in green. Let me know if you have any additional questions.

Grace P. Brandt
Associate Oil and Gas Engineer
California Geologic Energy Management Division
Southern District
Email: Grace.Brandt@conservation.ca.gov

From: Ostensen, Carole <carole.ostensen@aecom.com>
Sent: Monday, April 20, 2020 10:03 AM

To: CalGEMSouthern@DOC <CalGEMSouthern@conservation.ca.gov>
Cc: Hamid, Shapoor <shapoor.hamid@aecom.com>; Stephens, Samuel <Samuel.Stephens@aecom.com>
Subject: Information for McDonald 2 Well (API 03713842)

To Whom This May Concern,

AECOM is a consulting firm working for the City of Los Angeles at a newly purchased site for redevelopment located at 128 Hurricane Street, Marina del Rey, CA. According to the State of California Geologic Energy Management Division (CalGEM) well finder website, a historical oil production well is present on this Site (Well No. McDonald 2, API 03713842), with a total depth of 5,860 feet below ground surface (bgs). The well went dry, and was abandoned in May 1932. The bottom of the hole was plugged at 2,018 feet bgs. Various cement plugs were emplaced in the hole, from 1996 to 1929 feet and 729 to 675 feet. All other spaces were filled with heavy mud. The hole had been cemented at deeper depths prior to this final abandonment.

The City has plan for redevelopment of this site into a parking lot with picnic area (note that the McDonald 2 well will be located within a parking area not a picnic area). No buildings are being planned.

We would like to get information on the current status of the oil well in relation to the latest CalGEM requirements. Specifically, we have the following questions we were wondering if you could help us with:

Questions:

1. Prior to Site Redevelopment, are there specific requirements for the abandoned oil production well, McDonald 2 (API 03713842) (which was abandoned in 1932 according to our latest information)?

This will be addressed in the CSWR report.

2) It is our understanding that the owners of many older oil production wells received letters in 2017 to re-abandon the wells on their properties according to the new requirements. Is it possible to determine if the abandoned McDonald 2, API 03713842 well received a directive letter in response to the new regulatory requirements?

It depends if the well is leaking and/or if access to the well is impeded.

3) Does an inspection or leak testing need to be conducted or should the well be re-abandoned? If so, what is the criteria and procedures for inspection, leak testing, or re-abandonment (whichever is applicable)?

Yes, CalGEM recommends that the well be leak tested and re-abandoned.

4. What is the latest requirements and criteria for development on a site with an abandoned oil well?

CalGEM recommends that no structure be placed in a manner that will impede access to the oil well, however CalGEM does not have land use authority.

Your assistance in this matter is greatly appreciated.

Sincerely,

Carole M. Ostensen
Geoscience Remediation Division

D 1-213-996-2465 C 1-213-700-9473
Carole.Ostensen@aecom.com

AECOM
300 S. Grand Ave., 8th Floor
Los Angeles, CA 90071
T 1-213-593-8100 F 1-213-593-8604
www.aecom.com

Appendix D – Community Update

Department of Toxic Substances Control

COMMUNITY UPDATE

The mission of DTSC is to protect California's people and environment from harmful effects of toxic substances by restoring contaminated resources, enforcing hazardous waste laws, reducing hazardous waste generation, and encouraging the manufacture of chemically safer products.

February 2021

VENICE AUXILIARY PUMPING PLANT

DRAFT REMEDIAL ACTION WORKPLAN (RAW)

128 HURRICANE STREET, MARINA DEL REY, CALIFORNIA, 90292

The Department of Toxic Substances Control (DTSC) is announcing a public comment period for the Venice Auxiliary Pumping Plant Draft Remedial Action Workplan (RAW). DTSC will be accepting comments on the RAW that proposes the cleanup of soil contaminated with petroleum hydrocarbons from the property located at 128 Hurricane Street, Marina Del Rey.

SITE LOCATION

The site was recently purchased by the City of LA. The current development plan for this site includes an asphalt parking lot with a picnic area/green area for the surrounding community use.
Proposed development plans at the Site will include development of an asphalt parking lot for employees of the Venice Pumping Plant (VPP). A portion of the Site will incorporate Open Space, as required by the Venice Specific Plan, which will include landscaped areas open to public access. Proposed improvements include a total of eight parking spaces; one of which will be American with Disabilities Act accessible and one will be reserved for temporary bike parking.

HOW YOU CAN PARTICIPATE:

Please review the draft RAW and submit comments during the 30-day public comment period. The 30-day public comment period begins February 10, 2021 and ends March 11, 2021. Please submit comments **no later than 11:59 pm on March 11, 2021** and send to: **Viktoriya Anashkina, DTSC Project Manager**, 9211 Oakdale Avenue, Chatsworth, CA 91311, or to her e-mail address at: **Viktoriya.Anashkina@dtsc.ca.gov**. A copy of the draft RAW is available for public review electronically at: https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60003054 , and at the following Information Repositories:

DTSC Chatsworth Regional Records Office (By appointment only)
9211 Oakdale Ave., Chatsworth, CA 91311, Phone: (818) 717-6521

Who to contact at DTSC for more information:

Viktoriya Anashkina
Project Manager
(818) 717-6549
Viktoriya.Anashkina@dtsc.ca.gov

Elsa Lopez
Public Participation Specialist
(818) 717-6566
Elsa.Lopez@dtsc.ca.gov

Appendix E – Public Notice

Department of Toxic Substances Control **February 2021**

Public Notice

The mission of DTSC is to protect California's people and environment from harmful effects of toxic substances by restoring contaminated resources, enforcing hazardous waste laws, reducing hazardous waste generation, and encouraging the manufacture of chemically safer products.

VENICE AUXILIARY PUMPING PLANT
DRAFT REMEDIAL ACTION WORKPLAN (RAW)
128 HURRICANE STREET, MARINA DEL REY, CALIFORNIA, 90292
30-DAY PUBLIC COMMENT PERIOD: FEBRUARY 10, 2021 TO MARCH 11, 2021

Para información español contacte a Elsa Lopez (818) 717-6566

WHAT IS BEING PROPOSED? The Department of Toxic Substances Control (DTSC) is announcing a public comment period for the Venice Auxiliary Pumping Plant Draft Remedial Action Workplan (RAW). DTSC will be accepting comments on the RAW that proposes the cleanup of soil contaminated with petroleum hydrocarbons from the property located at 128 Hurricane Street, Marina Del Rey.

HOW YOU CAN PARTICIPATE: Please review the draft RAW and submit comments during the 30-day public comment period. The 30-day public comment period begins February 10, 2021 and ends March 11, 2021. Please submit comments **no later than 11:59 pm on March 11, 2021** and send to: **Viktoriya Anashkina, DTSC Project Manager,** 9211 Oakdale Avenue, Chatsworth, CA 91311, or to her e-mail address at: **Viktoriya.Anashkina@dtsc.ca.gov.** A copy of the draft RAW is available for public review electronically at: https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60003054, and at the following Information Repositories:

DTSC Regional Records Office
(By appointment only)
9211 Oakdale Ave., Chatsworth, CA 91311
Phone: (818) 717-6521

CONTACT INFORMATION: If you have any questions or concerns, please contact:

Viktoriya Anashkina
Project Manager
(818) 717-6549
Viktoriya.Anashkina@dtsc.ca.gov

Elsa Lopez
Public Participation Specialist
(818) 717-6566
Elsa.Lopez@dtsc.ca.gov

Hearing Impaired Individuals may use the California Relay Service at 711 or 800-855-7100 (TDD).

Appendix F – CEQA Documents

CALIFORNIA ENVIRONMENTAL QUALITY ACT
STATEMENT OF FINDINGS

The Department of Toxic Substances Control (DTSC) has issued Findings for this project pursuant to the California Environmental Quality Act (CEQA; California Public Resources Code, Division 13, Section 21081) and implementing Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15091 et seq.)

A. PROJECT SUBJECT TO DTSC APPROVAL

PROJECT TITLE: Removal Action Workplan for Venice Auxiliary Pumping Plant		SITE CODING:
PROJECT ADDRESS: 128 Hurricane Street	CITY: Marina Del Rey	COUNTY: Los Angeles
PROJECT SPONSOR: City of Los Angeles	CONTACT: Jan Green Rebstock	PHONE/ EMAIL: jan.green.rebstock@lacity.org (213) 485-5671

Approval Action Under Consideration by DTSC:

☒ Removal Action Workplan ☐ Interim Removal ☐ Initial Permit Issuance ☐ Permit Re-Issuance
☐ Corrective Measure Study/Statement of Basis ☐ Permit Modification ☐ Closure Plan
☐ Remedial Action Plan ☐ Regulations
☐ Other (specify):

STATUTORY AUTHORITY:

☐ California H&SC, Chap. 6.5 ☒ California H&SC, Chap. 6.8 ☐ Other (specify):

PROJECT DESCRIPTION: The proposed project activities involve excavation, removal, and offsite disposal of approximately 260 cubic yards (cy) of lead and hydrocarbon-contaminated soil. Project activities would be accomplished through approval of a Removal Action Workplan (RAW) for lead and hydrocarbon-impacted soils at 128 Hurricane Street, Marina Del Rey, California (Site).

Background: The Site is an approximately 4,223 square-foot vacant dirt lot that was recently used for the storage of vehicles and other miscellaneous items during various public construction projects. The Site has been a vacant dirt lot without developed structures since 1928. The Site is bordered to the north and west by residences; to the east by the City of Los Angeles Department of Public Works Venice Pumping Plant, and to the south by a walking trail and Ballona Lagoon Grand Canal. The area surrounding the Site was developed with oil production facilities from at least 1938 through 1952, and with residential properties since at least 1963. The Venice Pumping Plant appeared east of the Site from at least 1963. Two electrical cabinets/concrete vaults were present in the southern portion of the Site, which were later removed by the City of Los Angeles.

Soil samples collected during a 2018 investigation revealed the presence of lead and total petroleum hydrocarbons (TPH; primarily weathered diesel and oil fractions). Lead concentrations ranged from 3.4 milligrams per kilogram (mg/kg) to 160 mg/kg. TPH as diesel (TPH-d) concentrations ranged from 6.4 mg/kg to 4,600 mg/kg.

Project Activities: Excavation of approximately 260 cy of soil with lead and TPH concentrations above residential screening levels was selected as the removal action. Excavation of soil exceeding residential screening levels will be used for determining extent of the soil removal. Three areas of excavation were identified and are estimated to have approximately 160 cy (215 tons) of impacted soil. Excavation also includes a contingency of an additional 100 cy (135 tons) of impacted soil that could be removed and will be determined during soil confirmation. The total maximum amount of impacted soil to be removed is estimated to be 260 cy (350 tons). A total of 37 truck trips occurring over 2 weeks will be required for excavating and transporting the contaminated soil.

Specific project activities consist of the following:

- Breaking up and removal of buried concrete and wood/construction debris, as well as clearing any existing vegetation (e.g., trees, plants);
- Excavating and stockpiling approximately 260 cy of impacted soil from three excavation areas (depth from 1 to 10 feet below ground surface (bgs));

- Conducting confirmation soil sampling to verify the efficacy of the remedial excavation activities and to verify that soils left in place comply with the conditions necessary for case closure;
- Monitoring ambient particulate matter (PM_{10}) on the Site;
- Implementing dust control measures (e.g., use of water as a suppressant, sheeting beneath and above soil stockpiles, real-time dust monitor, fence with plastic sheets around the property line), as needed;
- Providing field-based notifications to the South Coast Air Quality Management District (SCAQMD), as required;
- Transporting the stockpiled soil to an appropriately licensed facility; and
- Importing 260 cy of clean certified fill for use as backfill in the excavation.

DTSC utilized information and analysis in the Venice Auxiliary Pumping Plant Draft Environmental Impact Report (DEIR) to support a final determination about the type of environmental document required to be prepared for the proposed Removal Action Workplan for Venice Auxiliary Pumping Plant as provided by Sections 15162, 15163, and 15164 of the CEQA Guidelines. Specifically, the DEIR analyzed potential impacts related to contaminated soils in Section 3.5 (Geology and Soils) and potential impacts related to grading and construction in Section 3.2 (Air Quality), Section 3.4 (Cultural Resources), Section 3.6 (Greenhouse Gases), Section 3.7 (Hydrology), Section 3.9 (Noise and Vibration), and Section 3.10 (Transportation).

B. LEAD AGENCY ENVIRONMENTAL DOCUMENT REVIEWED

Lead Agency: City of Los Angeles
Lead Agency's Environmental Document: Venice Auxiliary Pumping Plant Draft Environmental Impact Report
Date Certified: August 9, 2017
State Clearinghouse Number: 2015111038

C. STATEMENT OF FINDINGS AND FACTS FOR ADEQUACY OF LEAD AGENCY ENVIRONMENTAL DOCUMENT

Using its independent judgment, DTSC makes the following findings:

☒ The Lead Agency Final Environmental Document includes a description of the Project now before DTSC for decision

☒ The Lead Agency Final Environmental Document adequately analyzed impacts associated with the Project before DTSC for decision.

☒ DTSC concurs with the findings made by the Lead Agency Final Environmental Document relating to the Project before DTSC for decision.

☒ Mitigation measures are included in the Lead Agency Final Environmental Document for the following resources that would potentially be affected by the DTSC project.

☐ Aesthetics	Mitigation Measure: None
☐ Agricultural Resources	Mitigation Measure: None
☒ Air Quality	Mitigation Measure: AQ-1 (refer to Draft Environmental Impact Report (October 2016), see Attachment A)
☐ Agricultural Resources	Mitigation Measure: None
☐ Biological Resources	Mitigation Measure: None

☒ Cultural Resources	Mitigation Measure: CUL-1 (refer to Draft Environmental Impact Report (October 2016), see Attachment A)
☐ Energy	Mitigation Measure: None
☒ Geology / Soils	Mitigation Measure: HAZ-1a (refer to Draft Environmental Impact Report (October 2016), see Attachment A)
☐ Greenhouse Gas Emissions	Mitigation Measure: None
☐ Hazards / Hazardous Materials	Mitigation Measure: None
☐ Hydrology / Water Quality	Mitigation Measure: None
☐ Land Use / Planning	Mitigation Measure: None
☐ Mineral Resources	Mitigation Measure: None
☒ Noise	Mitigation Measure: NOI-1 and NOI-2 (refer to Draft Environmental Impact Report (October 2016), see Attachment A)
☐ Population / Housing	Mitigation Measure: None
☐ Public Services	Mitigation Measure: None
☐ Recreation	Mitigation Measure: None
☒ Transportation / Traffic	Mitigation Measure: TRANS-1 and TRANS-2 (refer to Draft Environmental Impact Report (October 2016), see Attachment A)
☐ Tribal Cultural Resources	Mitigation Measure: None
☐ Utilities / Service Systems	Mitigation Measure: None
☐ Wildfire	Mitigation Measure: None

☒ Mitigation measures identified in the Lead Agency Final Environmental Document have been adopted by DTSC for this Project and will be implemented to avoid, reduce, or substantially lessen the project impacts. No additional mitigation measures are necessary, and no additional mitigation monitoring plan is required pursuant to CEQA.

For each significant environmental effect identified for the Project:

☒ Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the Lead Agency Final Environmental Document.

☒ Such changes or alterations are within the responsibility and jurisdiction of the City of Fountain Valley not DTSC.

☒ Such changes have been adopted by this public agency or can and should be adopted by this public agency.

☐ Mitigation measures included in the Lead Agency Final Environmental Document are infeasible, and therefore, will not be incorporated into the DTSC Project for the following reasons: N/A

BASED ON THE ABOVE FINDINGS, DTSC CONCLUDES:

☒ The proposed Project will not result in significant and unavoidable effects to the environment.

☐ The proposed Project will result in significant and unavoidable effects to the following environmental resources:

☐ Air Quality
☐ Agricultural Resources
☐ Mineral Resources
☐ Noise

☐ Biological Resources	☐ Population/Housing
☐ Cultural Resources	☐ Public Services
☐ Energy	☐ Recreation
☐ Geology/ Soils	☐ Transportation/Traffic
☐ Greenhouse Gas Emissions	☐ Tribal Cultural Resources
☐ Hazards/Hazardous Materials	☐ Utilities/ Service Systems
☐ Hydrology/ Water Quality	☐ Wildfire

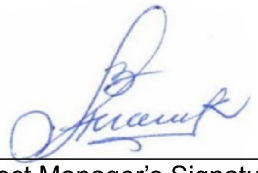
Impacts to these resources would remain significant even after applying mitigation measures described in the Lead Agency Final Environmental Document, or there is no feasible mitigation available.

In accordance with Cal. Code of Regs., title 14, section 15093, a Statement of Overriding Considerations was adopted by the Lead Agency for these resources. DTSC adopts a Statement of Overriding Considerations for these resources having determined that the DTSC Project benefits outweigh the significant environmental effects for the following reasons: The DTSC remedial actions reduce the exposure of contaminated soil, soil gas, and groundwater in order to render it safe for Site occupants. The DTSC remedial project also serves to protect human health and the environment, which are DTSC's responsibilities under the California Health and Safety Code.

☒ None of the conditions requiring a subsequent EIR or Negative Declaration pursuant to Cal. Code Regs., tit. 14 Section 15162 exist.

☒ In accordance with Cal. Code of Regs., title 14, section 15093, a Notice of Determination indicating the results of said Findings will be filed with the Governor's Office of Planning and Research / State Clearinghouse.

D. CERTIFICATION



Project Manager's Signature		**03/16/2021** Date
Viktoriya Anashkina	Environmental Scientist	818-717-6549
Project Manager's Name	Title	Phone #



Branch Chief's Signature		03/23/2021 Date
Haissam Salloum, P.E.	Branch Chief	818-717-6538
Acting Branch Chief's Name	Branch Chief	Phone #

Attachment A

The following mitigation measures are included in the Lead Agency Final Environmental Document would potentially be affected by the DTSC project.

AQ-1: Tier 3 construction equipment.
All off-road diesel-powered construction equipment greater than 50 horsepower will meet Tier 3 emission standards. All construction equipment will be outfitted with ARB best available control technology devices. Any emissions-control device used by the contractor will achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by ARB regulations. A copy of each unit's certified tier specification, best available control technology documentation, and ARB or SCAQMD operating permit will be provided at the time of mobilization of each applicable unit of equipment.

CUL-1: Unanticipated Archaeological and/or Tribal Cultural Resource Discoveries
In the unlikely event that any prehistoric artifact of historic period materials or bone, shell, or nonnative stone is encountered during construction, work shall be immediately stopped, the area secured, and work relocated to another area until the found materials can be assessed by a qualified archaeologist. Examples of such cultural materials might include historical trash pits containing bottles and/or ceramics; or structural remains or concentrations of grinding stone tools such as mortars, bowls, pestles, and manos; chipped stone tools such as projectile points or choppers; and flakes of stone not consistent with the immediate geology such as obsidian or fused shale. If the Archeologist determines that an artifact may qualify as a tribal cultural resource, a Native American monitor shall be consulted. The contractor shall stop construction within 30 feet of the exposure of these finds until a qualified archaeologist can be retained to evaluate the find (see 36 CFR 800.11.1, 14 CCR 15064.5(f) and PRC § 21084.3(b)). If the resources are found to be significant, they shall be avoided or impacts shall be mitigated consistent with Section 106, State Historic Preservation Officer Guidelines, and/or Assembly Bill 52.

HAZ-1a: Soil and Soil Vapor Subsurface Investigation.
Prior to construction, a soil and soil vapor subsurface investigation shall be conducted by a qualified environmental consultant specializing in the identification and handling of hazardous materials. The subsurface investigation may include, but would not be limited to:

- A scope of work consisting of Pre-Field Activities, such as preparation of a Health and Safety Plan (HASP), determining and marking sampling/boring locations and obtaining utility clearance, and Field Activities, such as identifying appropriate sampling procedures, health and safety measures, chemical testing methods, and quality assurance/quality control (QA/QC) procedures in accordance with the ASTM Standard.
- Necessary permits for boring advancement.
- A Sampling and Analysis Plan (SAP) in accordance with the scope of work.
- Laboratory analyses conducted by a State-certified laboratory.
- Disposal process including transport by a State-certified hazardous material hauler to a State-certified disposal or recycling facility licensed to accept and treat hazardous waste.

NOI-1: Prepare and Implement a Construction Noise Control Plan.
To reduce the significant construction noise impacts, the Los Angeles Bureau of Engineering (LABOE) and Contractor shall develop a noise control plan that includes the implementation of the following noise reduction measures during construction.
a) Construction Hours - The operation of construction equipment shall occur only between 8:00 a.m. to 6:00 p.m. Monday through Saturdays. No construction activity shall occur on national holidays or at any time on Sundays. Access to the construction site may occur prior to construction hours for the purpose of set up, conducting safety meetings, etc. The use of the pile driver, grader and jackhammer construction equipment shall be limited to the hours of 9 a.m. to 3:30 p.m. However, specific work related to the VAPP connection the manifold will be exempt from these hours, along with any emergency conditions or unforeseen work that would require the use of this equipment to complete a specific task in one continuous work event. Haul trucks can only access the site through local neighborhood streets from 9 a.m. to 4 p.m. Construction personnel shall not be permitted on the Project Site (including laydown and storage areas) outside of the hours of 7:30 am to 6:00 pm. Material or equipment deliveries and collections shall not occur outside the hours of 8:00 am to 6:00 pm. In addition, no construction worker parking would be allowed along Hurricane Street or on adjacent local streets. Construction workers shall park offsite and arrive by shuttle to the construction site, as arranged by the construction contractor.
b) Piles - All piles, including sheeting, shall be installed and extracted using vibration- and percussive-free methods.
c) Construction Mitigation Coordinator – The City and/or its Contractor shall maintain good communication with the surrounding community regarding the schedule, duration, and progress of construction activities. Residents at properties within 500 feet of construction activities shall be notified 72 hours in advance of the planned activities prior to the start of work. The notification shall advise that there will be loud noise associated with the construction, and shall state the date,

time, and expected duration of the planned activities. The notification shall provide a telephone contact number for affected parties to ask questions or share any concerns. A construction mitigation coordinator for the Project will be required to maintain a call log, so that the City can track resolution and nature of any complaints. These complaints may range from noise, vibration, dust, traffic, etc. The call log shall contain the name and address (if available) of the person making the complaint, i the date and time of the call, and any details regarding the nature of the complaint related to noise, vibration, dust, parking, traffic, etc. related to construction activities. The call log shall be provided to the Public Works Department (Public Affairs Office, LA Sanitation, LABOE) upon request. Residents shall be informed of the construction mitigation coordinator and on-site construction supervisor contact information by posting of the phone number on the construction site. Signage should be visible from Canal Court, the Esplanade, Via Dolce, and Hurricane Street.

d) Noise barriers - To the extent practicable, temporary noise barriers with a minimum height of 20 feet shall be employed around the Project Site. Openings in the barriers shall be kept to the minimum necessary for access of vehicles, equipment, and construction material. These barriers shall be constructed as follows.

From commercially available acoustical panels lined with sound-absorbing material (the sound-absorptive faces of the panels shall face the construction equipment); or,

From acoustical blankets hung over or from a supporting frame. The blankets shall provide a minimum sound transmission class rating of 28 and a minimum noise-reduction coefficient of 0.80 and shall be firmly secured to the framework with the sound-absorptive side of the blankets oriented toward the construction equipment. The blankets shall be overlapped by at least 6 inches at seams and taped so that no gaps exist. The largest blankets available shall be used in order to minimize the number of seams. The blankets shall be draped to the ground to eliminate any gaps at the base of the barrier.

e) For noise-generating equipment that cannot be shielded by site perimeter barriers, localized noise barriers or enclosures shall be employed wherever feasible. The height and location of these barriers/enclosures shall be designed to block the line of sight between the equipment and the surrounding homes.

f) Noise Monitoring Plan - LABOE/Contractor shall retain the services of an acoustical/noise consultant to prepare a Noise Monitoring Plan. The plan shall be site-specific for monitoring and reporting construction noise levels in the community to evaluate the Contractor's performance. Based on details of the Contractor's specific construction schedule, the plan shall develop construction noise goals, in terms of 1-hour Leq, that should be achieved for each phase of construction with the inclusion of feasible and practicable noise abatement measures. If noise monitoring indicates the applicable noise goals have been exceeded, steps shall be taken to promptly implement any additional effective abatement measures that are feasible and/or practicable.

g) Quiet construction equipment - To the fullest extent practicable, the quietest available type of construction equipment shall be used. Newer equipment is generally quieter than older equipment. The use of electric-powered equipment is typically quieter than diesel- or gasoline-powered equipment, and hydraulic-powered equipment is typically quieter than pneumatic-powered equipment.

h) Construction equipment noise compliance - All construction equipment used on the proposed Project that is regulated for noise output by a local, state, or federal agency shall comply with such regulation while in the course of Project activity and use on site.

i) Proper maintenance - All construction equipment shall be properly maintained, as poor maintenance of equipment may cause excessive noise levels.

j) Equipment mufflers, shrouds and shields - All construction equipment shall be equipped with properly operating and maintained mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features that meet or exceed original factory specifications.

k) No idling - All construction equipment shall be operated only when necessary, and shall be switched off when not in use. Idling inactive construction equipment for prolonged periods (i.e., more than 2 minutes) shall not be permitted.

l) Minimum use of audible safety warnings - The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only.

m) NoProject-relatedpublicaddressormusicsystemshallbeaudibleatanyadjacent residential receptor.

n) Construction work training - Construction employees shall be trained in the proper operation and use of the equipment. Careless or improper operation or inappropriate use of equipment can increase noise levels. Poor loading, unloading, excavation, and hauling techniques are examples of how a lack of adequate guidance and training may lead to increased noise levels.

o) Generator and compressor placement - Stationary noise sources such as generators and compressors shall be positioned as far as possible from noise sensitive areas.

p) Construction equipment storage – Construction equipment shall be stored on the Project Site or designated laydown areas while in use, to the extent feasible. This will eliminate noise associated with repeated transportation of the equipment to and from the site.

NOI-2: Implement ground-borne vibration control measures to reduce construction- generated vibration.
To reduce the significant construction vibration impacts, LABOE/Contractor shall implement the following vibration reduction measures during project construction:
All piles, including sheeting, shall be installed and extracted using vibration- and percussive-free methods.
LABOE and/or Contractor shall retain a qualified structural or geotechnical engineer to conduct pre-construction surveys of adjacent neighboring structures (including photographing and/or videotaping) to document existing building conditions for future comparison if any vibration- related damage is suspected or results from construction-related activities.
If considered appropriate by the structural/geotechnical engineer, monitoring shall be conducted during construction to check for vibration-related damage from equipment during its use. Such monitoring may include vibration measurements obtained inside or outside of the buildings, or other tests and observations deemed necessary.

TRANS-1: Construction Worker Shuttles
Construction workers would park at an off-site location and be shuttled to and from the Project Site each workday on 10 to 15-passenger shuttles or vans. While no specific off-site location has been identified at this time, it would likely lie within five miles of the Project Site. The selected contractor would be required to identify and secure a suitable location.

TRANS-2. Coordination with Emergency Service Providers
To minimize impacts on emergency access to the site during construction, the contractor, on behalf of the LABOE, shall coordinate with emergency service providers (police, fire, ambulance and paramedic services), prior to initiating construction, to provide advance notice of any lane closures, construction hours, and changes to local access and to identify alternative routes where appropriate.

CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF DETERMINATION

To: Office of Planning and Research
State Clearinghouse
P.O. Box 3044, 1400 Tenth Street, Room 212
Sacramento, CA 95812-3044

From: Department of Toxic Substances Control
Site Mitigation and Restoration Program
9211 Oakdale Avenue
Chatsworth, CA 91311

Subject: FILING OF NOTICE OF DETERMINATION IN COMPLIANCE WITH SECTION 21108 OF THE PUBLIC RESOURCES CODE

Project Title: Removal Action Workplan for Venice Auxiliary Pumping Plant

State Clearinghouse Number: 2015111038

Project Location: 128 Hurricane Street, Marina Del Rey

County: Los Angeles

Project Applicant: City of Los Angeles

Project Description: The proposed project activities involve excavation, removal, and offsite disposal of approximately 260 cubic yards (cy) of lead and hydrocarbon-contaminated soil. Project activities would be accomplished through approval of a Removal Action Workplan (RAW) for lead and hydrocarbon-impacted soils at 128 Hurricane Street, Marina Del Rey, California (Site).

Excavation of approximately 260 cy of soil with lead and TPH concentrations above residential screening levels was selected as the removal action. Excavation of soil exceeding residential screening levels will be used for determining extent of the soil removal. Three areas of excavation were identified and are estimated to have approximately 160 cy (215 tons) of impacted soil. Excavation also includes a contingency of an additional 100 cy (135 tons) of impacted soil that could be removed and will be determined during soil confirmation. The total maximum amount of impacted soil to be removed is estimated to be 260 cy (350 tons). A total of 37 truck trips occurring over 2 weeks will be required for excavating and transporting the contaminated soil.

Specific project activities consist of the following:

- Breaking up and removal of buried concrete and wood/construction debris, as well as clearing any existing vegetation (e.g., trees, plants);
- Excavating and stockpiling approximately 260 cy of impacted soil from three excavation areas (depth from 1 to 10 feet below ground surface (bgs));
- Conducting confirmation soil sampling to verify the efficacy of the remedial excavation activities and to verify that soils left in place comply with the conditions necessary for case closure;
- Monitoring ambient particulate matter (PM_{10}) on the Site;
- Implementing dust control measures (e.g., use of water as a suppressant, sheeting beneath and above soil stockpiles, real-time dust monitor, fence with plastic sheets around the property line), as needed;
- Providing field-based notifications to the South Coast Air Quality Management District (SCAQMD), as required;
- Transporting the stockpiled soil to an appropriately licensed facility; and
- Importing 260 cy of clean certified fill for use as backfill in the excavation.

The Department of Toxic Substances Control (DTSC) utilized information and analysis in the Venice Auxiliary Pumping Plant Draft Environmental Impact Report (DEIR) to support a final determination about the type of environmental document required to be prepared for the Removal Action Workplan for Venice Auxiliary Pumping Plant Project as provided by Sections 15162, 15163, and 15164 of the CEQA Guidelines. The DEIR was adopted by the City of Los Angeles on August 9, 2017. The DEIR evaluated the potential environmental effects of the RAW, specifically the cleanup and haul away of contaminated soils associated with the proposed remediation action of the Site.

As Responsible Agency under the California Environmental Quality Act (CEQA), DTSC approved the above-described project on March 19, 2021 and has made the following determinations:

1. The project will not have a significant effect on the environment.
2. A Mitigated Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures were made a condition of project approval.

4. A Statement of Overriding Considerations was not adopted for this project.
5. Findings were made pursuant to the provisions of CEQA.

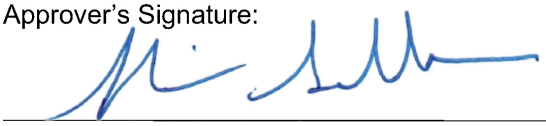
The administrative record for this project is available to the public by appointment at the following location:

Department of Toxic Substances Control
Site Mitigation and Restoration Program
9211 Oakdale Avenue
Chatsworth, CA 91311

Additional project information is available on EnviroStor:
www.envirostor.dtsc.ca.gov/public/profile_report?global_id=60003054

Contact Person	Contact Title	Phone Number
Viktoriya Anashkina	Environmental Scientist	(818) 717-6549

Approver's Signature:



Date:

March 19, 2021

Approver's Name	Approver's Title	Approver's Phone Number
Haissam Y. Salloum, P.E.	Branch Chief	818-717-6538

TO BE COMPLETED BY OPR ONLY

Date Received for Filing and Posting at OPR:

Appendix G – Administrative Records

Department of Toxic Substances Control

Jared Blumenfeld
Secretary for
Environmental Protection

Meredith Williams, Ph.D., Director
9211 Oakdale Avenue
Chatsworth, California 91311

Gavin Newsom
Governor

Sent Via Email Only

March 19, 2021

Mr. Sylvester Kueh
City of Los Angeles
Bureau of Engineering
1149 South Broadway
Los Angeles, California 90015

APPROVAL OF REMOVAL ACTION WORK PLAN FOR VENICE AUXILIARY PUMPING PLANT, 128 HURRICANE STREET, MARINA DEL REY, CALIFORNIA 90292 (SITE CODE: 301916)

Dear Mr. Kueh:

The Department of Toxic Substances Control (DTSC) hereby approves the Removal Action Work Plan (RAW) for the subject property (Site) for implementation. The RAW was reviewed pursuant to the Standard Voluntary Agreement (Docket No. HSA-FY20/21-058) between DTSC and the City of Los Angeles Bureau of Engineering.

The Site is approximately 4,230 square feet and is identified by Los Angeles County Assessor Identification Number 4225-010-016. The Site is currently a vacant dirt lot and was recently used for storage of vehicles and miscellaneous items during various public construction projects. The City plans to construct an asphalt parking lot with a picnic/green area for the surrounding community use.

The RAW proposes excavation and off-site disposal of soil contaminated with petroleum hydrocarbons and metals. DTSC held a public comment period from February 10, 2021 to March 11, 2021. No comments were received on the proposed RAW. DTSC will file a California Environmental Quality Act (CEQA) Notice of Determination and a Statement of Findings with the State Clearinghouse shortly after this RAW approval.

Please submit a final version of the RAW that includes the Community Update, the Public Notice, CEQA documents and the administrative record for this Site as appendices to the document.

Please notify DTSC of the field schedule seven (7) days prior to start of fieldwork. If you have any questions regarding the project, please contact Ms. Viktoriya Anashkina, Project Manager at (818) 717-6549 or email at Viktoriya.Anashkina@dtsc.ca.gov.

Sincerely,

Haissam Y. Salloum, P.E.
Branch Chief
Site Mitigation and Restoration Program - Chatsworth

cc: Ms. Viktoriya Anashkina (via e-mail)
Project Manager
Site Mitigation and Restoration Program
Department of Toxic Substances Control
Chatsworth, California 91311
Viktoriya.Anashkina@dtsc.ca.gov

Jose Diaz (via e-mail)
Unit Chief
Site Mitigation and Restoration Program
Department of Toxic Substances Control
Chatsworth, California 91311
Jose.Diaz@dtsc.ca.gov

William Jones (via e-mail)
Environmental Supervisor II
City of Los Angeles Department of Public Works
Bureau of Engineering, EMG
1149 South Broadway, 9th Floor
Los Angeles, California 90015
william.jones@lacity.org

Eileen Schoetzow (via e-mail)
Environmental Supervisor I
City of Los Angeles Department of Public Works
Bureau of Engineering, EMG
1149 South Broadway, 9th Floor
Los Angeles, California 90015
eileen.schoetzow@lacity.org

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From: **Anashkina, Viktoriya@DTSC** <Viktoriya.Anashkina@dtsc.ca.gov>
Date: Tue, Mar 23, 2021 at 2:46 PM
Subject: Removal Action Workplan Approval: 128 Hurricane Street, Marina Del Rey, CA
To: Sylvester Kueh <Sylvester.Kueh@lacity.org>
Cc: Diaz, Jose@DTSC <Jose.Diaz@dtsc.ca.gov>, William Jones <william.jones@lacity.org>, Eileen Schoetzow <eileen.schoetzow@lacity.org>

Hello Sylvester

DTSC has reviewed the Removal Action Workplan (RAW) prepared by AECOM for the above-referenced site, dated July 17, 2020. The RAW is hereby approved – please find the official letter and additional documentation attached. Furthermore, please review DTSC comments regarding the RAW report that should be addressed during the implementation/in the Removal Action Completion Report.

Please let me know if you have any questions or concerns.

Thank you,

Viktoriya Anashkina
Environmental Scientist
Department of Toxic Substances Control
9211 Oakdale Avenue
Chatsworth, CA 91311
Office: (818) 717-6549

Viktoriya.Anashkina@dtsc.ca.gov

Department of Toxic Substances Control

Jared Blumenfeld
Secretary for
Environmental Protection

Meredith Williams, Ph.D.
Director
5796 Corporate Avenue
Cypress, California 90630

Gavin Newsom
Governor

MEMORANDUM

TO: Viktoriya Anashkina
Project Manager
Site Mitigation and Restoration Program
Chatsworth, California

FROM: Efrem A.H. Neuwirth, Ph.D., DABT
Staff Toxicologist
Human and Ecological Risk Office

DATE: **Draft** January 13, 2021

SUBJECT: "Amendment to Phase II Environmental Site Assessment" and " Remedial Action Plan Including Soil Removal Workplan", 128 Hurricane Street, Venice, California 90292

Activity Code: 12018 Site Code: 301916-11 MPC: SI-CR and PS-R

The Human and Ecological Risk Office (HERO) reviewed the revised report titled "Amendment to Phase II Environmental Site Assessment" (Revised Report) and the revised workplan titled "Remedial Action Plan Including Soil Removal Workplan" (Revised RAP) for the property at 128 Hurricane Street in Venice, CA (DTSC Site Code 301916-11, MPC's SI-CR and PS-R).

Both documents were prepared by AECOM for the City of Los Angeles, Bureau of Engineering, Department of Public Works. Despite an address of Venice, California, the property is located in the adjacent unincorporated community of Marina Del Rey. The Revised Report is dated April 30, 2020, and the Revised RAP is dated July 27, 2020. These are the dates of the original (unrevised) Report and RAP which were previously reviewed by HERO and commented upon in a memorandum dated December 2, 2020. The dates were not updated in the Revised Report and Workplan.

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Scope of Review

The Revised Report and Revised RAP were only reviewed for the changes which were previously recommended, with emphasis on those aspects of the report which may influence assessment of human and ecological health. Comments on the document are described below.

Comments

1) In response to HERO Specific Comment 1, some risk based screening levels (RBSLs) were revised to reflect the most recent versions of DTSC's Human Health Risk Assessment (HHRA) Note Number 3, US EPA Regional Screening Levels (RSLs) or San Francisco Regional Water Quality Control Board (SFRWQCB) Environmental Screening Levels (ESLs). The most important example is the Total Petroleum Hydrocarbons (TPH) in the diesel range which is the primary chemical of potential concern identified in soil that is the basis for the excavation planned in the Revised RAP. However, HERO notes that other RBSLs were not updated (as one example, DDT), or were update using a non-human health risk based screening level (ESLs for TPH in the gasoline range and oil range). None of the chemicals utilizing out of date screening levels are above their residential human health RBSLs. In regards to the TPH ESLs, the ESL of 100 mg/kg for the TPH-gasoline is for nuisance odors while the residential human health risk ESL is 430 mg/kg. The TPH-oil ESL of 1600 mg/kg is for terrestrial habitat while the residential human health risk ESL is 12000 mg/kg. It is acceptable to utilize these lower screening levels for the TPH-gasoline and TPH-oil or to modify them again to reflect the human health residential ESLs which are recommended by HERO. The TPH fractions are collocated and remediation of the TPH-diesel will likely lead to removal of all the TPH.

2) HERO recommended in Specific Comment 4 adding RBSLs for the direct contact with chemicals in groundwater where there is no Maximum Contaminant Level (MCL). The changes made to the groundwater tables were to rename the column of concentrations from "gross contamination ESL" to direct contact ESLs". The tapwater RBSLs provided for the metals however are still the same gross contamination ESLs rather the tapwater RBSLs recommended in DTSC's HHRA Note Number 3 or as appropriate the US EPA RSLs. The ESLs for the TPH-diesel and oil range provided were an aquatic habitat risk based goal for the diesel (640 μg/L) and for the oil the source of the screening level is unclear (1600 μg/L). HERO recommends correcting the tables to provide the human health RBSLs for metals and TPH in groundwater as was intended from HERO's Specific Comment 4. The direct exposure (tapwater) human health ESL for the TPH-

diesel is 200 μg/L. The ESL for the TPH- hydrocarbon oxidation products (HOPs) which HERO recommended using for the insoluble oil range fraction is 410 μg/L. The source of the screening levels should also be updated in the table footnotes as appropriate.

HERO is also attaching the most recent SFRWQCB ESL tables to this memorandum since it is not currently available on the SFRWQCB web site.

HERO notes that the recommendations made in this memorandum are site specific and should not be construed as a policy decision applicable to other sites. If you have additional questions, please contact me at (714) 484-5421 or efrem.neuwirth@dtsc.ca.gov.

Review/concur:

Shukla Roy-Semmen, Ph.D.
Senior Toxicologist
Southern California Unit Chief
Human and Ecological Risk Office

Department of Toxic Substances Control

Jared Blumenfeld
Secretary for
Environmental Protection

Meredith Williams, Ph.D., Director
9211 Oakdale Avenue
Chatsworth, California 91311

Gavin Newsom
Governor

M E M O R A N D U M

TO: Ms. Viktoriya Anashkina
Project Manager
Site Mitigation and Restoration Program – Chatsworth Office

FROM: Maia Bachman, P.G.,
Engineering Geologist
Chatsworth Geological Services Unit

PROFESSIONAL GEOLOGIST
MAIA A. BACHMAN
9792
STATE OF CALIFORNIA

DATE: March 4, 2021

SUBJECT: 128 HURRICANE STREET, VENICE (or MARINA DEL REY), REVISED AMENDMENT TO PHASE II ENVIRONMENTAL SITE ASSESSMENT (ESA) REPORT, APRIL 30, 2020 and REMOVAL ACTION WORKPLAN (RAW) (Including Soil Removal Workplan) REPORT, JULY 27, 2020.

PCA: 12018 Site Code: DTSC301916 -11 Work Request #20072322

As requested, the Department of Toxic Substances Control (DTSC) Geological Services Unit (GSU) has reviewed the revised, "Amendment to Phase II Environmental Site Assessment (ESA) Report, April 30, 2020, and Removal Action Workplan, July 20, 2020" (Phase II and RAW, respectively) prepared by AECOM, for the property located at 128 Hurricane Street in Venice (also known as 128 Hurricane Street, Marina del Rey) (Site). The Report was prepared on behalf of the City of Los Angeles Bureau of Engineering (City of LA BOE).

The Phase II and RAW were amended in part to address comments presented in a GSU Memo prepared dated December 7, 2020. Comments in the GSU Memo requested clarification on portions of the sampling procedures and protocol, and requests for clarity on Figures.

Revisions made to the Phase II adequately address many of my comments. GSU had requested language explaining how the conduit portions that extend beyond the excavation extents will be removed and confirmatory sampled. Both Reports state: *"any*

buried concrete pads, debris, and conduit encountered during the shallow soil excavation in the excavation areas, will be delineated within the property boundary, removed, and characterized prior to disposal." This language suggests that the portion of the conduits outside the excavation areas will not be handled in a defined manner. Procedures for managing conduits that extend outside the excavation areas should be described.

While the ESA has been revised, it is not designated as a revised document and it is dated the same as the original document. The ESA title should be updated to indicate that it is a revised document, and to include the revision date. Once these changes are made DTSC GSU recommends accepting the Phase II Report and requesting outstanding comments be addressed in the final amended Removal Action Workplan.

If there are any questions or comments, please call me at (818) 717-6624 or e-mail me at maia.bachman@dtsc.ca.gov.

Reviewed by John Naginis: J.N.

Department of Toxic Substances Control

Meredith Williams, Ph.D., Director
9211 Oakdale Avenue
Chatsworth, California 91311

Jared Blumenfeld
Secretary for
Environmental Protection

Gavin Newsom
Governor

Sent Via E-mail Only

December 8, 2020

Mr. Sylvester Kueh
City of Los Angeles,
Bureau of Engineering
1149 South Broadway,
Los Angeles, CA 90015

SITE CHARACTERIZATION REPORT AND REMEDIAL ACTION WORK PLAN VENICE AUXILIARY PUMPING PLANT, 128 HURRICANE STREET, MARINA DEL REY, CALIFORNIA 90292 (SITE CODE: 301916)

Dear Mr. Kueh:

The Department of Toxic Substances Control (DTSC) has reviewed the Amendment to Phase II Environmental Site Assessment (Report) dated April 30, 2020 and the Remedial Action Plan Including Soil Removal Workplan (RAP) dated July 27, 2020 prepared by Aecom for the subject property (Site). The Report and the RAP were reviewed pursuant to the Standard Voluntary Agreement (Docket No. HSA-FY20/21-058) between DTSC and City of Los Angeles Bureau of Engineering (City).

The Site is approximately 4,230 square feet and is identified by Los Angeles County Assessor Identification Number 4225-010-016. The Site is bordered to the north and west by residences, to the east by the City of Los Angeles Department of Public Works Venice Pumping Plant, and to the south by a waling train and Ballona Lagoon Grand Canal. The Site is currently a vacant dirt lot and was recently used for storage of vehicles and miscellaneous items during various public construction projects.

The lot has had no structures going back to at least 1928. Between approximately 1938 and 1952 the surrounding properties contained oil production facilities. In 1963 the Venice Pumping Plant was constructed. The City plans to construct an asphalt parking lot with a picnic/green area for the surrounding community use.

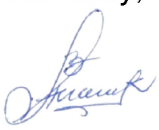
Soil samples were analyzed for total petroleum hydrocarbons (TPH), metals, volatile organic compounds, polycyclic aromatic hydrocarbons, organochlorine pesticides (OCPs), herbicides, and polychlorinated biphenyls. TPH, lead, and some OCPs were

detected above screening levels in soil. TPH and arsenic were detected in groundwater above their respective screening levels or maximum contaminant levels. The Report and RAP propose to clean up the Site soils to meet residential land use.

DTSC hereby approves the Report as presented. Enclosed please find comments requiring responses that should be incorporated into the RAP document. According to estimates included in the RAP, the cost to implement the proposed remedy is less than two million dollars; therefore, the document should be relabeled and presented as Removal Action Workplan (RAW).

Please contact me at (818) 717-6549 or at email Viktoriya.Anashkina@dtsc.ca.gov with any questions.

Sincerely,



Viktoriya Anashkina
Project Manager
Site Mitigation and Restoration Program - Chatsworth

Enclosures (3)

cc: William Jones (via e-mail)
Environmental Supervisor II
City of Los Angeles Department of Public Works
Bureau of Engineering, EMG
1149 South Broadway, 9th Floor
Los Angeles, California 90015
william.jones@lacity.org

Eileen Schoetzow (via e-mail)
Environmental Supervisor I
City of Los Angeles Department of Public Works
Bureau of Engineering, EMG
1149 South Broadway, 9th Floor
Los Angeles, California 90015
eileen.schoetzow@lacity.org

Jose Diaz (via e-mail)
Unit Chief
Site Mitigation and Restoration Program
Department of Toxic Substances Control

Chatsworth, California 91311
Jose.Diaz@dtsc.ca.gov

Department of Toxic Substances Control

Meredith Williams, Ph.D., Director
9211 Oakdale Avenue
Chatsworth, California 91311

Jared Blumenfeld
Secretary for
Environmental Protection

Gavin Newsom
Governor

M E M O R A N D U M

TO: Ms. Viktoriya Anashkina
Project Manager

Brownfields Restoration & School Evaluation Branch
Site Mitigation and Restoration Program – Chatsworth Office

FROM: Maia Bachman, P.G.,
Engineering Geologist
Chatsworth Geological Services Unit

PROFESSIONAL GEOLOGIST
MAIA A. BACHMAN
9792
STATE OF CALIFORNIA

DATE: December 7, 2020

SUBJECT: 128 HURRICANE STREET, VENICE (or MARINA DEL REY), AMENDMENT TO PHASE II ENVIRONMENTAL SITE ASSESSMENT (ESA) REPORT, APRIL 30, 2020 and REMEDIAL ACTION PLAN (RAP) (Including Soil Removal Workplan) REPORT, JULY 27, 2020.

PCA: 12018 Site Code: DTSC301916 -11
Work Request # 20070496 and 20070498

As requested, the Department of Toxic Substances Control (DTSC) Geological Services Unit (GSU) has reviewed the, "Amendment to Phase II Environmental Site Assessment (ESA) Report, April 30, 2020" (Report) prepared by AECOM, for the property located at 128 Hurricane Street in Venice (also known as 128 Hurricane Street, Marina del Rey) (Site). The Report was prepared on behalf of the City of Los Angeles Bureau of Engineering (City of LA BOE).

This Site has been generally vacant, though a historical oil production well is present on the Site. This well, at 5,860 feet below ground surface (bgs), was planned for abandonment in 1932, but the well is still present, and will require re-abandonment. This Site has been used as a storage yard/lay-down yard for various construction projects, as well as for two electrical cabinets/concrete vaults, which were later removed. The previous geotechnical borings found debris/refuse in the top two feet of soil at the Site.

Previous investigations indicate the possible presence of total petroleum hydrocarbon (TPH) ranges due to the oil production well, and the vague historical use for storage. Soil data indicate the presence of total petroleum hydrocarbons, as well as lead, in the subsurface.

Further work includes excavation of the TPH- and lead-impacted soil.

DTSC GSU recommends accepting the Phase II Report and requesting all comments be addressed in an amended Remedial Action Plan.

Comments

Phase II:

1. Page 12, Section 3.3.1 – General Minerals – When discussing the groundwater results, the State Water Resources Control Board's (SWRCB's) Resolution No. 88-63, "Sources of Drinking Water Policy exception for water with high total dissolved solids (TDS)" is used to compare against the groundwater data. Has this area been designated 'MUN' by the SWRCB in the Basin Plan? If so, just being brackish may not be enough to be de-designated. If the water has not been de-designated, then drinking water standards will need to be used.

2. Page 15, Section 5 – Proposed Remedial Excavation – Excavation Area EA-1 – The Report states: *"Part of the excavation may include buried concrete and debris removal."* Will this excavation include the removal of the concrete pad at depth (encountered during the shallow soil investigation)? If not, what is the plan for the concrete at depth? If the concrete will be part of the excavation, it will need to be appropriately characterized for disposal. If it will be abandoned in place, soil samples need to be taken above and below it, as well as concrete chip samples to ensure it is not an environmental hazard. If it is to be left in place, then the full extent of the pad would need to be delineated.

3. Figures – Please show an approximate location of the assumed concrete pad that was encountered during the subsurface investigation.

4. Figures – The subsurface conduits shown on Figures 3 and 4, discovered during the geophysical survey, could be conduits for groundwater and soil vapor migration. The majority of the conduits lie within planned excavation extents. Please discuss how the conduit portions that extend beyond the excavation extents will be removed and confirmatory sampled.

Remedial Action Plan:

1. Page 5, Section 6.2.4.2 – Excavation Area-1 (EA-1) – The Report states: *"Part of the excavation may include buried concrete and debris removal."* Will this excavation include the removal of the concrete pad at depth (encountered during the shallow soil investigation)? If not, what is the plan for the concrete at depth? If the concrete will be part of the excavation, it will need to be appropriately characterized for disposal. If it will be abandoned in place, soil samples need to be taken above and below it, as well as concrete chip samples to ensure it is not an environmental hazard. If it is to be left in place, then the full extent of the pad would need to be delineated.

2. Page 7, Section 6.2.5.2 – Soil Sample Sampling and Analysis – The Report states: *"All soil samples will be collected in eight-ounce jars from the bucket of the excavator."* Confirmation samples should be collected directly from the excavation sidewall or bottom, not from the bucket.

3. Page 8, Section 6.2.8 – Soil Profiling and Disposal – The report states: "*All excavated soils will be stockpiled (each EA will have its own soil stockpile) and will be profiled by analyzing a composite sample prior to disposal."* This language is ambiguous as to how many samples will be collected. One soil waste characterization sample should be collected for approximately every 20 cubic yards of soil.

4. Figures – Please show an approximate location of the assumed concrete pad that was encountered during the subsurface investigation.

If there are any questions or comments, please call me at (818) 717-6624 or e-mail me at maia.bachman@dtsc.ca.gov.

Reviewed by Tanya Brosnan: ___T.B._____

Department of Toxic Substances Control

Jared Blumenfeld
Secretary for
Environmental Protection

Meredith Williams, Ph.D.
Director
5796 Corporate Avenue
Cypress, California 90630

Gavin Newsom
Governor

MEMORANDUM

TO: Viktoriya Anashkina
Project Manager
Site Mitigation and Restoration Program
Chatsworth, California

FROM: Efrem A.H. Neuwirth, Ph.D., DABT
Staff Toxicologist
Human and Ecological Risk Office

DATE: December 2, 20120

SUBJECT: "AMENDMENT TO PHASE II ENVIRONMENTAL SITE ASSESSMENT" AND "REMEDIAL ACTION PLAN INCLUDING SOIL REMOVAL WORKPLAN", 128 HURRICANE STREET, VENICE, CALIFORNIA 90292

Activity Code: 12018 Site Code: 301916-11 MPC: SI-CR and PS-R

The Human and Ecological Risk Office (HERO) reviewed the report titled "Amendment to Phase II Environmental Site Assessment" (Report) and the workplan titled "Remedial Action Plan Including Soil Removal Workplan" (RAP) for the property at 128 Hurricane Street. Despite an address of Venice, California, the property is located in the adjacent unincorporated community of Marina Del Rey. The Report is dated April 30, 2020, and the RAP is dated July 27, 2020. Both documents were prepared by AECOM for the City of Los Angeles, Bureau of Engineering, Department of Public Works.

Background

The Site is on the narrow peninsula between the marina of Marina Del Rey and the Pacific Ocean. The Site is a very small vacant lot (4,230 square feet/0.1 acres) which is intended to be a parking lot for the adjacent Venice Pumping Station with a green area for use by the surrounding community. The lot is also adjacent to residences and a pedestrian pathway adjacent to the Ballona Lagoon. According to the Report, the lot has had no structures going

back to at least 1928. Between approximately 1938 and 1952 the surrounding properties contained oil production facilities. In 1963 the Venice Pumping Plant was constructed. An oil well on the Site was abandoned in 1932, which still needs to be re-evaluated to determine if the well was properly abandoned. Two electric cabinets/concrete vaults were once present on the Site and were removed by the City of Los Angeles (date not provided). No other historical activities or structures are identified in the Report.

Soil has been most extensively sampled and analyzed for lead and total petroleum hydrocarbons (TPH) with carbon chain breakdown. Soil has also been sampled for 9 other metals, VOCs including fuel oxygenates, and limited samples for other chemicals of potential concern including, semi-volatile organic compounds (SVOCs) including the polycyclic aromatic hydrocarbons (PAHs), organochlorine pesticides (OCPs), herbicides, and polychlorinated biphenyls.

Four grab groundwater samples were analyzed for the TPH. One groundwater sample was also analyzed for metals and for VOCs where TPH was present at 3.5 ft bgs. Static groundwater levels were measured at 4-5 ft bgs depending on the four locations. Soil vapor was sampled for methane. Groundwater samples were also sampled for mineral content which is an indicator of whether the groundwater may have beneficial uses.

The chemicals of potential concern identified in soil are the TPH in the diesel range above the San Francisco Regional Water Quality Control Board (SFRWQCB), environmental screening level (ESLs) for TPH in soil. Three sample for lead were also found above residential screening level of 80 mg/kg (maximum detected concentration of 160 mg/kg). The other metals in soil are low in concentrations and are below risk-based concertation or appear consistent with typical background levels (arsenic). OCPs were also detected below risk-based screening levels. Only one OCP (dieldrin) was present in at a level near the cancer risk-based screening level in one of four samples. Other OCPs detected were greater than 10-fold lower than current risk based screening levels.

Low levels of TPH in the diesel and oil ranges were measured in groundwater. VOCs were non-detect. Groundwater concentrations were compared to drinking maximum contaminant limits and SFRWQCB ESL gross contamination levels. Arsenic was present above MCLs.

A comparison with screening levels is the only risk assessment, provided for the Site. The Report and RAW propose cleanup of Site soils to meet residential land use. The RAW targets all soil with diesel range -TPH greater than the 2016 San Francisco Regional Water Quality

Control Board (SFRWQCB), environmental screen level (ESL) of 230 mg/kg, and lead above the DTSC screening level of 80 mg/kg.

Scope of Review

The Report and RAW were reviewed for major scientific and technical deficiencies only, with emphasis on those aspects of the report which may influence assessment of human and ecological health. Comments on the document are described below.

General Comments

1) The Phase I Report (Ninyo & Moore, 2016. Phase I Environmental Site Assessment, 128 Hurricane Street, Venice, California 90292) was not presented to the DTSC for review. HERO defers to the DTSC Project Manager to determine whether the necessary review of the Site history has been performed to ensure the adequate characterization of the Site.

2) HERO defers to the DTSC Project Manager to determine whether the site will be acceptable for unrestricted land uses. Although the RAP proposes to remove contaminated soils to residential risk-based screening levels, groundwater concentrations of chemicals of potential concern were measured above drinking water standards (arsenic) or risk based levels (TPH). According to the Report, the level of dissolved solids present indicates that the water is unlikely to have beneficial uses according to the California State Water Resources Control Board.

Specific Comments

1) Report and RAP: The Report and RAP utilize screening levels from the DTSC (HHRA Note Number 3, June 2018), USEPA Regional Screening Levels (May 2018) and the SFRWQCB (2016), that include values which are out of date. The most current human health risk-based screening level for diesel range organics (SFRWQCB, 2019) in soil is 260 mg/kg rather than the 230 mg/kg used in the Report and the RAP. Since the screening level used in the RAP is more protective, changes do not need to be made, however, the option is provided to use the current screening level. However, HERO does recommend that data from the post remedy confirmation sampling proposed in the RAP, as well as fill material imported to the Site should be compared to the most current risk based screening levels from the DTSC, USEPA and the SFRWQCB.

2) Report, Section 3.2: HERO recommends adding a description of the SVOC analysis results (which were non-detect) to section 3.2 of the Report.

3) Report, Table 2 and 3: HERO recommends adding footnotes or otherwise modifying the sample analysis results tables to describe the analyses which were not presented due to a lack of detections.

4) Report Table 3: HERO recommends adding risk-based goals to Table 3 for those chemicals which lack MCLs. For the TPH, HERO recommends using the ESLs for direct contact with groundwater. TPH in the oil range can conservatively be compared to the ESLs for Hydrocarbon Oxidation Products since oil range TPH are insoluble.

5) RAP: HERO recommends referencing in the RAP, DTSC's (2001) clean fill advisory, for guidance on evaluating soil for import following the proposed excavations of lead and TPH impacted soil (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/SMP_FS_Cleanfill-Schools.pdf).

HERO notes that the recommendations made in this memorandum are site specific and should not be construed as a policy decision applicable to other sites. If you have additional questions, please contact me at (714) 484-5421 or efrem.neuwirth@dtsc.ca.gov.

Review/concur:

Shukla Roy-Semmen, Ph.D.
Senior Toxicologist
Southern California Unit Chief
Human and Ecological Risk Office

Shukla Roy-Semmen

STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF TOXIC SUBSTANCES CONTROL

In the Matter of: 128 Hurricane Street -Venice Auxiliary Pumping Plant (VAPP) 128 Hurricane Street Venice, California 90292 Proponent: City of Los Angeles Bureau of Engineering 1149 South Broadway Los Angeles, California 90015	Docket No. HSA-FY20/21-058 Standard Voluntary Agreement Health and Safety Code Section 25355.5(a)(1)(C)

The California Department of Toxic Substances Control (DTSC) and the City of Los Angeles Bureau of Engineering, (Proponent) enter into this Standard Voluntary Agreement (Agreement) and agree as follows:

1. Site. This Agreement applies to the Site located at 128 Hurricane Street in Los Angeles County, California 91723 (Site), identified by Los Angeles Assessor's Parcel Number(s) 422-5010-016, and any off-site area to which hazardous substances have or may have migrated from the Site. The Site is approximately 0.097 acres in size and is bordered by Hurricane Street on the southwest and Canal Court on the southeast. There are no structures on the Site. The property was used for oil production from 1928 to 1932. The Site is surrounding by residential housing, a waste water pumping plant. Site location map and a Site diagram are attached as Exhibits A and B.

2. Jurisdiction. This Agreement is entered into by DTSC and Proponent pursuant to Health and Safety Code section 25201.9, which authorizes DTSC to provide assistance to a person in complying with Health and Safety Code chapter 6.8 and its implementing regulations.

3. Purpose. The purpose of this Agreement is for the Proponent to investigate, remediate, and/or evaluate a release, a threatened release, or a potential release of any hazardous substance at or from the Site under the oversight of DTSC. The purpose of this Agreement is also for DTSC to obtain reimbursement from Proponent for DTSC's oversight costs incurred pursuant to this Agreement.

4. Ownership and Notification.

4.1. The Site is owned by the City of Los Angeles.

4.2. Prior to DTSC providing oversight or review or comment on any document, Proponent shall provide DTSC with all of the following: (a) proof of the identity of all current record owners of fee title to the Site and their mailing addresses; (b) written evidence that the owners of record have been sent a notice that describes the actions completed or proposed by Proponent; and (c) an acknowledgment of the receipt of the notice required in subparagraph (b) from the property owners or proof that Proponent has made reasonable efforts to deliver the notice to the property owner and was unable to do so.

4.3. Proponent shall notify DTSC of any changes in ownership of the Site subsequent to the Effective Date of this Agreement and provide written evidence that Proponent notified the new owner(s) of record of the actions completed or proposed by Proponent under this Agreement.

5. Substances Found at the Site. Based on the information available to DTSC and Proponent, the Site is or may be contaminated with hazardous substances, including total petroleum hydrocarbons.

6. Scope of Work and DTSC Oversight. DTSC shall review and provide Proponent with written comments on all Proponent's deliverables as described in Exhibit C (Scope of Work) and other documents applicable to the scope of the project. DTSC shall provide oversight of field activities, including sampling and remedial activities, as appropriate. Proponent agrees to perform all the work required by this Agreement. Proponent shall perform the work in accordance with applicable local, state and federal statutes, regulations, ordinances, rules and guidance documents, in particular, Health and Safety Code section 25300 et seq., as amended.

7. Additional Activities. DTSC and Proponent may amend this Agreement to include additional activities in accordance with Paragraph 17 of this Agreement. If DTSC expects to incur additional oversight costs for these additional activities, it will provide an estimate of the additional oversight costs to Proponent.

8. Endangerment During Implementation.

8.1 Proponent shall notify DTSC's Project Manager immediately upon learning of any condition that may pose an immediate threat to public health or safety or the environment. Within seven days of the onset of such a condition, Proponent shall

furnish a report to DTSC, signed by Proponent's Project Manager, setting forth the conditions and events that occurred and the measures taken in response thereto.

8.2 In the event DTSC determines that any activity (whether or not pursued in compliance with this Agreement) may pose an imminent or substantial endangerment to the health or safety of people on the Site or in the surrounding area or to the environment, DTSC may order Proponent to conduct additional activities in accordance with Paragraph 7 of this Agreement or to stop further implementation of this Agreement for such period of time as may be needed to abate the endangerment. DTSC may request that Proponent implement interim measures to address any immediate threat or imminent or substantial endangerment.

9. Access. Proponent shall provide, and/or obtain access to the Site and take all reasonable efforts to obtain access to offsite areas to which access is necessary to implement the Agreement. Such access shall be provided to DTSC's employees, contractors, and consultants at all reasonable times. Nothing in this paragraph is intended or shall be construed to limit in any way the right of entry or inspection that DTSC or any other agency may otherwise have by operation of law.

10. Sampling, Data and Document Availability. When requested by DTSC, Proponent shall make available for DTSC's inspection, and shall provide copies of, all data and information concerning contamination at or from the Site, including technical records and contractual documents, sampling and monitoring information and photographs and maps, whether or not such data and information was developed pursuant to this Agreement. For all final reports, Proponent shall submit one hard (paper) copy and one electronic copy with all applicable signatures and certification stamps as a text-readable Portable Document Formatted (pdf) file compatible with Adobe Acrobat or a formatted file compatible with Microsoft Word.

11. Record Preservation. Proponent shall retain, during the implementation of this Agreement and for a minimum of six years after its termination, all data, reports, and other documents that relate to the performance of this Agreement. If DTSC requests that some or all of these documents be preserved for a longer period of time, Proponent shall either comply with the request, deliver the documents to DTSC, or permit DTSC to copy the documents at Proponent's expense prior to destruction.

12. Notification of Field Activities. Proponent shall inform DTSC at least seven days in advance of all field activities pursuant to this Agreement and shall allow DTSC and its authorized representatives to take duplicates of any samples collected by Proponent pursuant to this Agreement.

13. Project Managers. Within 14 days of the effective date of this Agreement, DTSC and Proponent shall each designate a Project Manager and shall notify each other in writing of the Project Manager selected. The Proponent's Project Manager shall have the technical expertise in project management, regulatory compliance, and hazardous substance site investigation and remediation sufficient to fulfill his or her responsibilities. Each Project Manager shall be responsible for overseeing the implementation of this Agreement and for designating a person to act in his/her absence. All communications between DTSC and Proponent, and all notices, documents and correspondence concerning the activities performed pursuant to this Agreement shall be directed through the Project Managers. Each party may change its Project Manager with at least seven days prior written notice.

14. Proponent's Consultant and Contractor. All engineering work performed pursuant to this Agreement shall be under the direction and supervision of a registered professional engineer licensed in California, with expertise in hazardous substance site investigation and remediation. All geological work performed pursuant to this Agreement shall be under the direction and supervision of a registered professional geologist licensed in California, with expertise in hazardous substance site investigation and remediation. Proponent's contractors and consultants shall have the technical expertise sufficient to fulfill his or her responsibilities. Within 14 days of the effective date of this Agreement, Proponent shall notify DTSC's Project Manager in writing of the name, title, and qualifications of the registered professional engineer and/or professional geologist and of any contractors or consultants and their personnel to be used in carrying out the work under this Agreement in conformance with applicable state law, including but not limited to, Business and Professions Code sections 6735 and 7835.

15. DTSC Review and Approval. All work performed pursuant to this Agreement is subject to DTSC's review and approval. If DTSC determines that any report, plan, schedule or other document submitted for approval pursuant to this Agreement fails to comply with this Agreement or fails to protect public health or safety or the environment, DTSC may (a) return comments to Proponent with recommended changes and a date by which the Proponent must submit to DTSC a revised document incorporating or addressing the recommended changes; or (b) modify the document in consultation with Proponent and approve the document as modified. All DTSC approvals and decisions made regarding submittals and notifications will be communicated to Proponent in writing by DTSC's Branch Chief or his/her designee. No informal advice, guidance, suggestions or comments by DTSC regarding reports, plans, specifications, schedules or any other writings by the Proponent shall be construed to relieve Proponent of the obligation to obtain such written approvals.

16. Payment.

16.1 Proponent is required to pay (a) all costs incurred by DTSC in association with preparation of this Agreement, and for oversight activities, including review of documents, conducted prior to the effective date of this Agreement; and (b) all costs incurred by DTSC in providing oversight pursuant to this Agreement, including review of the documents and activities described in Exhibit C and associated documents, and oversight of field activities. Costs incurred include interest on unpaid amounts that are billed and outstanding more than 60 days from the date of the invoice.

16.2 An estimate of DTSC's oversight costs is attached as Exhibit D. It is understood by the parties that Exhibit D is an estimate and cannot be relied upon as the final cost figure. DTSC may provide an adjusted cost estimate as the work progresses. Prior to adjusting the cost estimate, DTSC will provide Proponent with a written notice and a detailed explanation of the change to the cost estimate. DTSC will bill Proponent quarterly. Proponent agrees to make payment within 30 days of receipt of DTSC's billing. Such billings will reflect any amounts that have been advanced to DTSC by Proponent.

16.3 In anticipation of oversight activities to be conducted, Proponent shall make an advance payment of $19,142.00 to DTSC no later than 10 days after this Agreement is fully executed. It is expressly understood and agreed that DTSC's receipt of the entire advance payment as provided in this paragraph is a condition precedent to DTSC's obligation to provide oversight, review of or comment on documents. DTSC will draw-down from the advance payment, which will be documented in DTSC's invoice. When the advance payment is depleted, DTSC will continue to request payment through the invoice process.

16.4 All payments made by Proponent pursuant to this Agreement shall be by check payable to the "Department of Toxic Substances Control" and bearing on its face the project code for the Site (Site # 301916) and the docket number HSA-FY20/21-058 of this Agreement. Upon request by Proponent, DTSC may accept payments made by credit cards or electronic funds transfer. Payments by check shall be sent to:

Accounting Office
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

A photocopy of the check shall be sent concurrently to DTSC's Project Manager.

16.5 DTSC shall retain all cost records associated with the work performed under this Agreement as may be required by state law. DTSC will make all documents

that support DTSC's cost determination available for inspection upon request in accordance with the Public Records Act, Government Code section 6250 et seq.

17. Amendments. This Agreement may be amended in writing by mutual agreement of DTSC and Proponent. Such amendment shall be effective the third business day following the day the last party signing the amendment sends its notification of signing to the other party. The parties may agree to a different effective date.

18. Termination for Convenience.

18.1 Except as otherwise provided in this paragraph, each party to this Agreement reserves the right to unilaterally terminate this Agreement for any reason. Termination may be accomplished by giving a 30-day advance written notice of the election to terminate this Agreement to the other party. In the event that this Agreement is terminated under Paragraph 18.1, Proponent shall be responsible for DTSC costs through the effective date of termination.

18.2 If operation and maintenance activities are required for the final remedy, Proponent may not terminate the Agreement under Paragraph 18.1 upon DTSC's approval of an Operation and Maintenance Plan as proposed by Proponent, unless an Operation and Maintenance Agreement is entered into between DTSC and Proponent or between DTSC and a party responsible for the required operation and maintenance activities.

19. Calendar of Tasks and Schedules. The attached Exhibit E (Calendar of Tasks and Schedules) is merely for the convenience of listing in one location the submittals required by this Agreement. The Calendar of Tasks and Schedules lists activities specific to this project based on the available information. DTSC and Proponent shall make a reasonable effort to complete the activity within the schedule outlined in Exhibit E. A schedule for each related activity shall be established as part of this Agreement.

If Proponent is unable to meet the activity's schedule, Proponent will notify DTSC's Project Manager 10 days prior to the scheduled action or submittal date. If DTSC is unable to meet the activity's schedule, DTSC will notify Proponent 10 days prior to the scheduled action or submittal date.

20. Incorporation of Exhibits, Plans and Reports. All exhibits are incorporated into this Agreement by reference. All plans, schedules and reports that require DTSC's approval and are submitted by Proponent pursuant to this Agreement are incorporated in this Agreement upon DTSC's approval.

21. Reservation of Rights. DTSC reserves all of its statutory and regulatory powers, authorities, rights, and remedies under applicable laws to protect public health or the environment, including the right to recover its costs incurred therefor. Proponent reserves all of its statutory and regulatory rights, defenses and remedies available to the Proponent under applicable laws.

22. Non-Admission of Liability. By entering into this Agreement, Proponent does not admit to any finding of fact or conclusion of law set forth in this Agreement or any fault or liability under applicable laws.

23. Proponent Liabilities. Nothing in this Agreement shall constitute or be considered a covenant not to sue, release or satisfaction from liability by DTSC for any condition or claim arising as a result of Proponent's past, current, or future operations or ownership of the Site.

24. Government Liabilities. The State of California or DTSC shall not be liable for any injuries or damages to persons or the Site resulting from acts or omissions by Proponent or by related parties in carrying out activities pursuant to this Agreement, nor shall the State of California or DTSC be held as a party to any contract entered into by Proponent or its agents in carrying out the activities pursuant to this Agreement.

25. Third Party Actions. In the event that Proponent is a party to any suit or claim for damages or contribution relating to the Site to which DTSC is not a party, Proponent shall notify DTSC in writing within 10 days after service of the complaint in the third-party action. Proponent shall pay all costs incurred by DTSC relating to such third-party actions, including but not limited to responding to subpoenas.

26. California Law. This Agreement shall be governed, performed and interpreted under the laws of the State of California.

27. Severability. If any portion of this Agreement is ultimately determined not to be enforceable, that portion will be severed from the Agreement and the severability shall not affect the enforceability of the remaining provisions of the Agreement.

28. Parties Bound. This Agreement applies to and is binding, jointly and severally, upon Proponent and its agents, receivers, trustees, successors and assignees, and upon DTSC and any successor agency that may have responsibility for and jurisdiction over the subject matter of this Agreement. Proponent shall ensure that its contractors, subcontractors and agents receive a copy of this Agreement and comply with this Agreement.

29. Effective Date. The effective date of this Agreement is the date of signature by DTSC's authorized representative after this Agreement is first signed by Proponent's authorized representative. Except as otherwise specified, "days" means calendar days.

30. Representative Authority. Each undersigned representative of the party to this Agreement certifies that she or he is fully authorized to enter into the terms and conditions of this Agreement and to execute and legally bind the party to this Agreement.

31. Counterparts. This Agreement may be executed and delivered in any number of counterparts, each of which when executed and delivered shall be deemed to be an original, but such counterparts shall together constitute one and the same document. This Agreement and documents related to it may be executed and transmitted by facsimile or pdf copy, which copies shall be deemed to be, and utilized in all respects as, an original. However, Proponent must provide the wet-inked signed original of each counterpart to DTSC by mail within 14 calendar days of signing.

Date: 10/23/2020

Haissam Y. Salloum, P.E.
Branch Chief
Site Mitigation and Restoration Program
Chatsworth Office
Department of Toxic Substances Control

Sylvester Kueh

Date: 10/22/2020

Sylvester Kueh
City of Los Angeles

ESSENTIAL FISH HABITAT ASSESSMENT FOR THE VENICE AUXILIARY PUMPING PLANT



Prepared for

City of Los Angeles
Department of Public Works
Bureau of Engineering – Wastewater Conveyance Engineering Division

April 2019

AECOM

300 Lakeside Drive, Suite 400
Oakland, CA 94612

Sub-Task Order No. 5-021

TABLE OF CONTENTS

1 DESCRIPTION OF THE PROPOSED PROJECT 1
1.1 PURPOSE AND NEED 1
1.2 PROJECT LOCATION 1
1.3 PROPOSED ACTION 5
1.3.1 Cofferdam Installation 6
1.3.2 Excavation 7
1.3.3 Backfill and Restoration 7
1.3.4 Operations 7

2 DESCRIPTION OF ESSENTIAL FISH HABITAT 7
2.1 STUDY METHODS 7
2.2 ENVIRONMENTAL SETTING 8
2.3 ESSENTIAL FISH HABITAT 12

3 POTENTIAL EFFECTS TO ESSENTIAL FISH HABITAT 16
3.1 COFFERDAM INSTALLATION 16
3.2 DEWATERING AND EXCAVATION 17
3.3 INSTALLATION OF BELOW GRADE STRUCTURES 17
3.4 COFFERDAM REMOVAL AND SITE RESTORATION 17
3.5 MITIGATION MEASURES 18

4 CONCLUSIONS 19

5 REFERENCES 19

Appendix

A VAPP Design Drawings

Figures

Figure 1	Project Location
Figure 2	Project Footprint
Figure 3	Extent of EFH within the Action Area

Tables

Table 1	Commercially or Ecologically Important Fish Species Potentially Occurring in Ballona Lagoon and Grand Canal

Photographs

Photograph 1	Ballona Lagoon, South of the Project
Photograph 2	Grand Canal, North of the Project
Photograph 3	Cofferdam Installation Site on Western Bank of Grand Canal
Photograph 4	Debris Racks on Pacific Ocean Side of Tide Gate Facility
Photograph 5	Tide Gate Structures (Two Slide Gates, One Flap Gate) on Pacific Ocean Side of Facility
Photograph 6	Lone Debris Rack on Ballona Lagoon Side of Tide Gate Facility, Water Surface Elevation Drop on an Outgoing Tide
Photograph 7	Horn Snails on Intertidal Substrate in Grand Canal at Project Location

List of Acronyms and Abbreviations

°C	degrees Celsius
CCC	California Coastal Commission
CIS	Coastal Interceptor Sewer
EEZ	Economic Exclusion Zone
EFH	Essential Fish Habitat
°F	degrees Fahrenheit
FMP	Fisheries Management Plan
HAPC	Habitat Areas of Particular Concern
mgd	Millions of Gallons per Day
MHHW	Mean Higher High Water Level
MMRP	Mitigation and Monitoring Reporting Program
NMFS	National Marine Fisheries Service
RWQCB	Regional Water Quality Control Board
SWPPP	Stormwater Pollution Prevention Plan
USACE	United States Army Corps of Engineers
VPP	Venice Pumping Plant
VAPP	Venice Auxiliary Pumping Plant

1 DESCRIPTION OF THE PROPOSED PROJECT

This essential fish habitat (EFH) assessment provides a technical analysis of the potential adverse effects that the proposed Venice Auxiliary Pumping Plant (VAPP) Project (Project) may have on EFH, including consideration of the mitigation measures and best management practices established for the VAPP Project in the Final Environmental Impact Report. The consultation requirements of Section 305(b) of the Magnuson-Stevens Fishery Conservation and Management Act (16 United States Code 1855(b)) provide that Federal agencies (in this case, the U.S. Army Corps of Engineers [USACE]) must consult with the National Marine Fisheries Service (NMFS) on all actions, or proposed actions, authorized, funded, or undertaken by the agency, that may adversely affect EFH. Generally, EFH consultation consists of a Federal agency notifying NMFS regarding an action that may adversely affect EFH, and providing NMFS with an EFH Assessment; NMFS providing EFH Conservation Recommendations to avoid and/or minimize adverse effects to EFH; and the Federal agency responding to National Oceanic and Atmospheric Administration Fisheries' EFH Conservation Recommendations if needed. If the Federal agency determines that a project would not adversely affect EFH, no consultation is required.

1.1 PURPOSE AND NEED

The City of Los Angeles (City) currently owns and operates the Venice Pumping Plant (VPP) adjacent to the Ballona Lagoon and close to Venice Beach (Figure 1). The pumping plant is the City's largest pumping plant, and is considered a critical facility to convey wastewater from its tributary area. Wastewater from the surrounding urban area collects in the Coastal Interceptor Sewer (CIS) and is then pumped uphill by the VPP to the City's Hyperion wastewater reclamation facility. There have been several occasions, beginning in the 1990s and extending through the early 2000s, when influent flows during periods of wet weather nearly exceeded the combined pumping capacity (90 million gallons per day [mgd]) of all five operating VPP pumps. This resulted in a near miss of sewage spill into the Grand Canal and Ballona Lagoon because the wet wells and pumps were almost entirely inundated by sewage. Exceeded sewer capacity would have required emergency discharges directly to the Grand Canal and Ballona Lagoon, or overflows into the surrounding street network. Because of these conditions, the City began planning and designing projects that would upgrade and enhance the CIS and VPP. The City proposes to construct an auxiliary pumping plant and make additional upgrades to the existing facilities to increase reliability and capacity at VPP. Along with other environmental reviews and permitting, the City has applied for a Section 404 permit from the USACE for the VAPP Project, and the USACE advised the City that this EFH Assessment is required to complete the Section 404 permit application.

1.2 PROJECT LOCATION

The Project location is in a highly urbanized area, within the Ballona Lagoon West sub-area of Venice, east of Canal Court (Figure 2). It contains a mix of residential, open space, and public facility land uses. Single-and multi-family residential development lines Ballona Lagoon and the Grand Canal. The new VAPP facility would be sited at 139 Hurricane Street, which is bounded by the Grand Canal to the east (Photograph 1), Hurricane Street and the VPP to the south, multi-family residential to the north, and Canal Court to the west. The Project is situated at the point where Ballona Lagoon ends and Grand Canal begins. Both waterways are tidal, with tidal control at a tide gate at the southern end of Ballona Lagoon, but Grand Canal is narrower and more channelized than Ballona Lagoon (Photograph 2). A narrow band of open space, primarily a walking path providing public access, runs along the banks of Ballona Lagoon, and some tidal wetlands are present along its border.



AECOM

City of Los Angeles

Venice Auxiliary Pumping Plant EFH Assesment

FIGURE 1

Project Location

AECOM Oakland CA 3/27/2019 USER:caitlin.jensen PATH:L:\Projects\GIS\Projects\City_of_Los_Angeles\Venice_Auxiliary_Pumping_Plant_EFH\02_Maps\02_Map_Production_and_Reports\Fig2_Project_Footprint.mxd

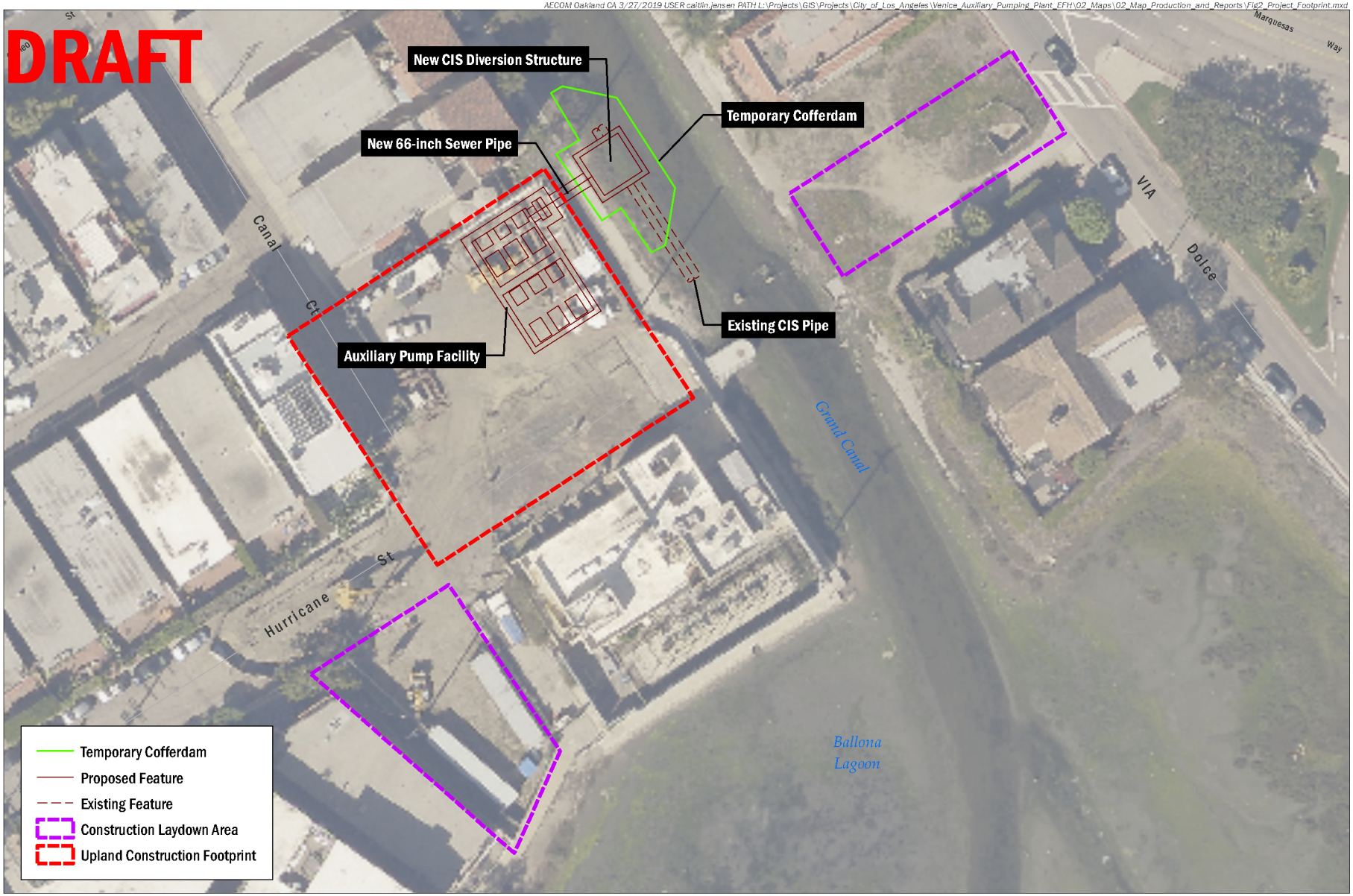


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FIGURE 2

Project Footprint



Photograph 1
Ballona Lagoon, South of the Project



Photograph 2
Grand Canal, West and North of the Project

1.3 PROPOSED ACTION

The Proposed Action, or the Project, would be built on three vacant lots with a total combined area of approximately 15,000 square feet, and would also include construction in the Grand Canal. As shown on Figure 2, and in the design drawings in Appendix A, the Project would include a number of components:

- Auxiliary Pump Facility, including:
  - One two-story building, approximately 32 feet in height, with a total of 2,500 square feet, that would house the operational control center for the plant, related electrical equipment, and employee workstations;
  - Three 18-mgd wet-pit submersible pumps, constructed underground in an upland area;
  - Concrete wet well, influent piping, and a sluice gate associated with the three new pumps (within the footprint of the new Auxiliary Pump Facility);
  - Electrical equipment, utility connections, instrumentation and controls, transformers, and generators;
  - Fencing with blinds and vegetation for screening the VAPP building; and
  - Eight parking spaces at 128 Hurricane Street to allow for employee, delivery, visitor, and Beach Impact Zone parking.
- A 17-foot by 17-foot submerged diversion structure on the existing CIS, the top of which would be buried approximately 18 feet below the bottom grade in the Grand Canal.
- A new 66-inch sewer pipe, connecting the wet well associated with the 18-mgd pumps to the new diversion structure on the existing CIS.
- Two temporary construction laydown areas.
- Construction of the new CIS diversion structure and new 66-inch sewer pipe would require dewatering a portion of Grand Canal along the western bank adjacent to the VAPP.

Ground-disturbing work for the proposed project is preliminarily scheduled to begin in the fall of 2020, with full project completion expected in summer of 2022. Construction activities in the footprint of the Auxiliary Pump Facility and the temporary construction laydown areas (Figure 2) have been ongoing for other wastewater system upgrades. The majority of these activities would occur above the Mean Higher High Water (MHHW) level in urban areas, and Stormwater Pollution Prevention Plan (SWPPP) measures would be implemented to prevent erosion and sedimentation into nearby waters. Because those activities would not have effects on EFH, they will not be discussed in detail.

As noted above, the existing 66-inch CIS sewer pipe that serves the existing VPP is under the Grand Canal. To minimize operational disruptions, the submerged diversion structure would be constructed to allow flows to be diverted from the VPP to the VAPP. The top surface of the diversion structure would be below the grade of the Grand Canal, by approximately 18 feet, and would not protrude aboveground into Grand Canal. This new diversion structure would be connected to the new auxiliary pumps by a 66-inch sewer pipe approximately 25 feet long. Construction of the diversion structure and 66-inch sewer connection would require installation of a cofferdam and dewatering of a small portion of the Grand Canal. Details of the construction

activities that would result in effects on waters potentially supporting EFH are provided in the following subsections.

1.3.1 COFFERDAM INSTALLATION

To provide a dry work area to install the below-ground facilities, a cofferdam would be installed along the western bank of Grand Canal (Figure 2; Photograph 3). Up to 80 linear feet of waters of the U.S. in Grand Canal would be enclosed in the cofferdam, which would extend about halfway across the canal. The remaining portion of the cofferdam would be installed in upland areas outside waters of the U.S. The cofferdam would be constructed using soldier piles and sheeting. Soldier piles would be driven into the Canal using a vibratory hammer, or hydraulically pushed into the canal substrate. Sheet piles would then be installed between the soldier piles and the area in the cofferdam that would then be dewatered. Instillation of the cofferdam is preliminarily scheduled to occur in the spring of 2021.



Photograph 3
Cofferdam Installation Site on Western Bank of Grand Canal

In the Grand Canal, the cofferdam is expected to remain in place for up to 6 months. During this time, upstream and downstream flows in the Canal would be maintained because the cofferdam would only occupy 50 percent or less of the width of the Canal. The area in the cofferdam would be dewatered continuously throughout construction. A pump, situated in the cofferdam area, would pump water from the cofferdam. Pumped water would be treated for discharge.

1.3.2 EXCAVATION

Once the cofferdam is in place, excavation would occur. In Grand Canal, an excavator situated on the upland bank area adjacent to Grand Canal would excavate to approximately 25 feet below the ground surface. Approximately 400 cubic yards of material would be excavated to install the diversion structure. Excavated materials would be stockpiled either at one of the established Laydown Areas for later use to backfill in the Grand Canal, or off-hauled to an appropriate landfill. Disposition of the excavated sediment would occur in accordance with the requirements of the Project's Clean Water Act permits.

1.3.3 BACKFILL AND RESTORATION

Backfilling of the Grand Canal would be done using the excavation material temporarily stockpiled. Once the diversion structure and associated pipe connections have been constructed and Grand Canal bottom has been backfilled and compacted to pre-project elevations, the cofferdam piles and sheeting would be removed using a crane situated in the upland bank area adjacent to Grand Canal. Removal of the cofferdam would likely occur in the summer of 2021, a few months after its installation. The western bank of Grand Canal would be restored and recontoured to pre-project elevation. Upland and wetland vegetation removed during construction would be replaced either by seeding, cuttings, or container plants. A habitat restoration and monitoring plan (prepared by a qualified restoration ecologist) will be required by, and submitted to, the Coastal Commission for approval.

1.3.4 OPERATIONS

The three new submersible pumps would withdraw sewage from a wet well through a new 66-inch sewer pipe and discharge into a common header that would serve both the VPP and VAPP. Under normal operations, the VAPP and VPP would operate as a single functional pump station, with their respective wet wells hydraulically linked through similar elevations and an even flow split. Sealed hatches would provide access for maintenance of the new facilities. Installed valves would allow flows to be diverted to either the VAPP or VPP, as needed. A gate would also be provided at the inlet of the VAPP to allow isolation for maintenance purposes. The VAPP would not discharge to or intake any water from the Grand Canal or Ballona Lagoon, and the system would continue to operate in isolation from surface waters.

2 DESCRIPTION OF ESSENTIAL FISH HABITAT

2.1 STUDY METHODS

The potential for EFH and associated Pacific Coast Groundfish and Coastal Pelagic Species to be present in the Action Area[1] was evaluated based on a review of existing data and a reconnaissance survey. Sources of existing data reviewed included:

[1] The Action Area includes the extent of Project construction activities, as well as areas nearby that could be affected during construction. In this case, the extent of the Action Area was determined in part based on the extent over which in-water construction noise may propagate.

- Venice Auxiliary Pumping Plant Final Environmental Impact Report (City of Los Angeles 2017)
- Biological Assessment Report for ESR-Hurricane Street/Grand Canal Esplanade Maintenance Hole (Jones 2012)
- National Marine Fisheries Service (NMFS) Essential Fish Habitat Consultation Guidance (NMFS 2004)
- National Marine Fisheries Service (NMFS) Essential Fish Habitat Mapper v3.0 (NMFS 2016)
- Coastal Pelagic Species Fishery Management Plan (Pacific Fishery Management Council 2018)
- Pacific Coast Groundfish Fishery Management Plan for the California, Oregon, and Washington Groundfish Fishery (Pacific Fishery Management Council 2016)
- Essential Fish Habitat in Santa Monica Bay, San Pedro Bay, and San Diego Bay: A Reference Guide for Managers (Robbins 2006)
- Ballona Lagoon 7.5-Foot Quadrangle Resource Summary (State of California 2007)
- Annual Weather Averages in Santa Monica, California (U.S. Climate Data 2019)

An AECOM biologist conducted a reconnaissance survey of the Action Area on March 7, 2019. The survey included examining the Action Area and surrounding reaches of the Grand Canal, Ballona Lagoon, and the tide gate structure that connects Ballona Lagoon (and Grand Canal) to the Pacific Ocean. The biologist walked the entire length of Ballona Lagoon and Grand Canal from Ballona Lagoon to West Washington Boulevard, paying special attention to the areas near the Project. Important habitat features were noted, including hydrological and ecological parameters useful for determining the presence of EFH. City staff met AECOM's biologist at the Project, and together they reviewed key project information.

Information collected from desktop review and the reconnaissance survey was supplemented by the Biological Assessment Report for the ESR-Hurricane Street/Grand Canal Esplanade Maintenance Hole Project from 2012, prepared by the City (Jones 2012). This maintenance project occurred in the Action Area of the proposed VAPP Project.

2.2 ENVIRONMENTAL SETTING

Ballona Lagoon and the Grand Canal lie within the neighborhood of Venice in Los Angeles, California, and are muted tidal, nearshore estuarine waters connected to Marina del Rey near its terminus in Santa Monica Bay (Figure 1). The community of Venice experiences a mean annual temperature of 63 degrees Fahrenheit (°F; 17.2 Celsius [°C]), with a mean annual precipitation of approximately 13 inches (U.S. Climate Data 2019). Elevations in the Action Area, approximately where Ballona Lagoon, Grand Canal, and Hurricane Street come together, range from near sea level to 20 feet above sea level. Some portions of the Project footprint shown in Figure 2, including the entire Upland Construction Footprint and most of the Construction Laydown Area, are already in use as construction laydown areas for other City projects, although this condition is not shown in Figure 2. Although surrounded by development, aquatic features and their margins

in the Action Area are primarily preserved open space with minimal-impact infrastructure (such as maintenance access holes and concrete channel walls, as shown in Photographs 1 through 3.

The Project is approximately 0.75 mile upstream (north-northwest) of the Marina del Rey Channel and is at Grand Canal, just beyond where Ballona Lagoon transitions into the canal (Figure 1). Tidal exchange into Ballona Lagoon and Grand Canal occurs through three tide gates that pass underneath Via Marina and link the lagoon and the canal to the Pacific Ocean via the Marina Del Rey Channel. According to an older document from the State of California's Natural Resources Agency that is available online, one of the three gates is maintained in the open position, and the average tidal regime is restricted, and ranges from approximately -2 feet to +2.5 feet National Geodetic Vertical Datum (State of California 2007). Debris racks with an approximately 2-inch grid on the inside and outside of the gate facility protect it from debris, effectively preventing larger fish from passing through. All of the fresh water entering Ballona Lagoon and Grand Canal is urban run-off; these features have been isolated from Ballona Creek.

The debris racks that control tidal flow to the Project were inspected on March 7, 2019, and found to have considerable potential to limit the movement of fishes. On the Pacific Ocean side of the gate facility, the debris rack spans all three tide gates (Photograph 4). Two of the gates are slide gates, and one is a flap gate (Photograph 5). On the Ballona Lagoon side of the facility, only the flap gate is protected by a debris rack, and the two bays leading to the slide gates are unprotected, open culverts. When the facility was observed, on an outgoing tide, substantial flow was traveling out of the lagoon through the flap gate, and there was a drop at the interior debris rack between the water surface in the lagoon and that in the Pacific Ocean (Photograph 6). In addition to the 2-inch grid, depending on gate operation, fish movement through this facility could also be limited by water velocities, water surface drops (or jump heights), and passage through the flap gate, if that is the gate primarily used.

South of the Project, Ballona Lagoon is approximately 25 meters wide and includes approximately 14.5 acres of open water habitat and approximately 1.5 acre of intertidal habitat (State of California 2007). Grand Canal, at the Project and to the north, is a narrower channel that, due to its uniform width and banks, appears artificially excavated (Photograph 2). It links the Venice Canals with the Pacific Ocean via Ballona Lagoon, and then the Marina del Rey Channel. The lagoon and canal floors are composed of soft mud and varying amounts of sand and gravel (Jones 2012). In the Ballona Lagoon-Grand Canal transition, the waterway substrate is characterized by sandy silts mixed with clay (State of California 2007). The Grand Canal channel itself is 48 feet (14.6 meters) in width at its floor, and between 0 and 3.5 feet (1.7 meters) in depth (Jones 2012).

The Ballona Lagoon ecosystem supports narrow bands of coastal strand and coastal salt marsh vegetation communities and intertidal and subtidal soft-bottom communities. Residential development with heavy nearby commercial activity is the predominant land use type adjacent to the Grand Canal and Ballona Lagoon. The wetlands and tidal ecosystem of Ballona Lagoon is a valuable stopover for migratory birds, and possesses potential rearing grounds for smaller fish.



Photograph 4
Debris Racks on Pacific Ocean Side of Tide Gate Facility



Photograph 5
Tide Gate Structures (Two Slide Gates, One Flap Gate) on Pacific Ocean Side of Facility



Photograph 6
Lone Debris Rack on Ballona Lagoon Side of Tide Gate Facility, Water Surface Elevation Drop on an Outgoing Tide

2.3 ESSENTIAL FISH HABITAT

Unless the responsible federal agency confirms otherwise, Ballona Lagoon and the Grand Canal should be considered EFH for Pacific Coast Groundfish and Coastal Pelagic Species (NMFS 2004, Pacific Fishery Management Council 2016, 2018). The extent of EFH for these commercially important species is designated in the Pacific Coast Groundfish Fishery Management Plan (FMP) and the Coastal Pelagic Species FMP, and defined as follows:

1. The overall extent of Pacific Coast Groundfish EFH is identified as all waters and substrate within the following areas:

    - Depths less than or equal to 1,914 fathoms (3,500 meters) to MHHW or the upriver extent of saltwater intrusion, defined as upstream and landward to where ocean-derived salts measure less than 0.5 part per thousand during the period of average annual low flow.

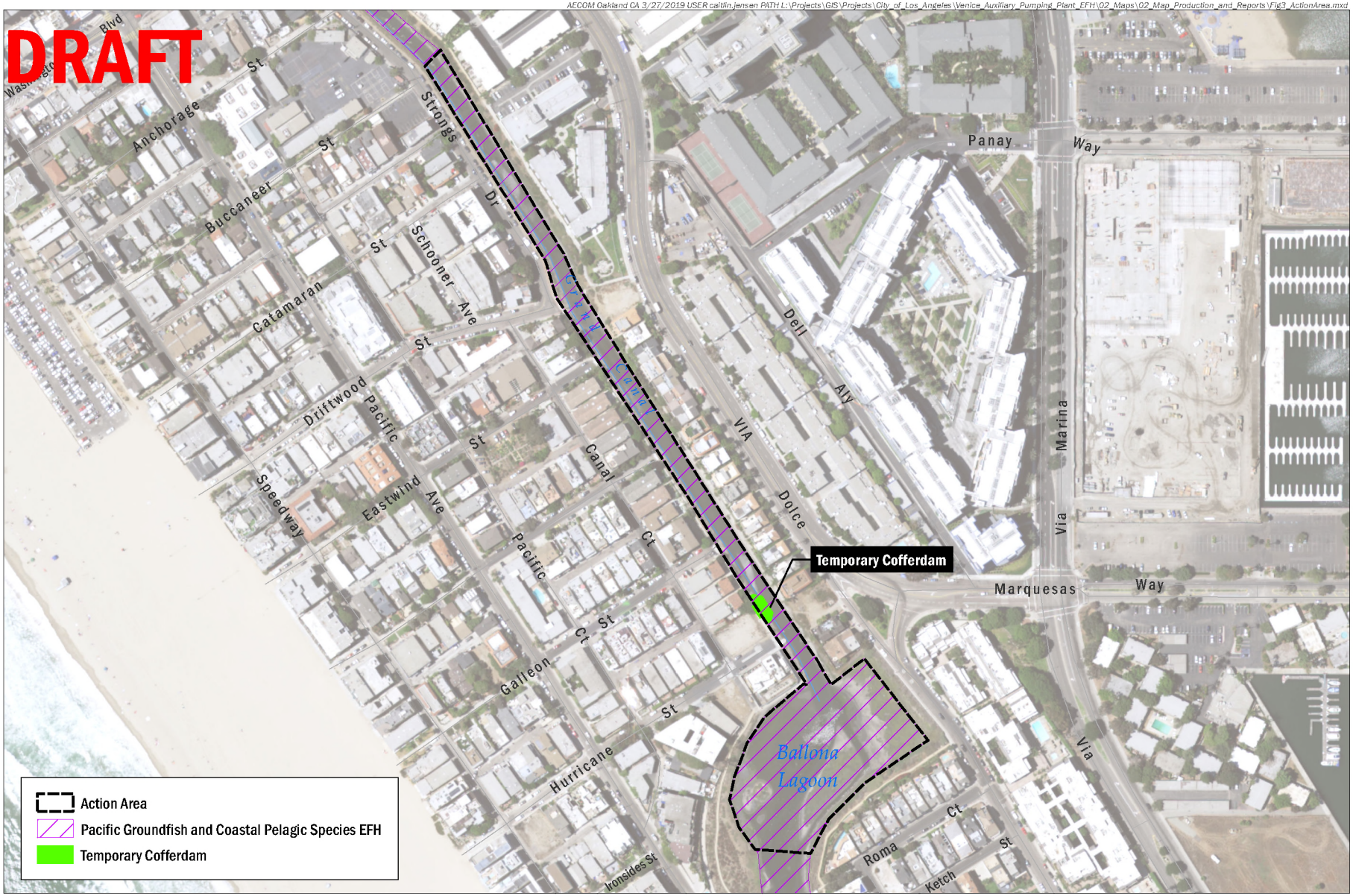
    - Seamounts in depths greater than 3,500 meters as mapped in the EFH assessment GIS.

    Areas designated as Habitat Areas of Particular Concern (HAPCs) not already identified by the above criteria.

2. The overall extent of Coastal Pelagic Species EFH is tied to sea surface water temperatures within the Economic Exclusion Zone (EEZ) of U.S. Waters. The east-west geographic boundary of EFH for each individual coastal pelagic finfish and market squid is defined to be all marine and estuarine waters from the shoreline along the coasts of California, Oregon, and Washington offshore to the limits of the EEZ, and above the thermocline where sea surface temperatures range between 50°F to 79°F (10°C to 26°C).

Potential EFH in the Action Area is shown in Figure 3. The extent of the Action Area was determined in part based on the linear distance over which in-water construction noise may propagate (see Section 3.1.1 for more information regarding underwater noise). Grand Canal and Ballona Lagoon are tidal, predominantly saline, and may be accessible to some life stages of species managed under the Pacific Coast Groundfish and Coastal Pelagic FMPs. The potential EFH in the Action Area includes all areas below MHHW, and is characterized as having predominantly sandy and silty substrates, although in some areas hardened, manmade surfaces are present. Ballona Lagoon and Grand Canal do not have any substantial inputs from freshwater tributaries, except urban runoff during storms. Water in the system is predominantly marine in origin, which presumably maintains the salinity at an average level that is close to seawater.

During the site visit, we noted abundant California horn snails (*Cerithidea californica*) (Photograph 7), diverse foraging shorebirds and ducks, and disturbances at the water surface likely to have been made by fishes, which may be indicators of productive benthic habitat in Ballona Lagoon and Grand Canal. We did not observe eelgrass or other submerged aquatic vegetation. Life stages of some species that may inhabit Grand Canal or Ballona Lagoon are provided in Table 1. These species may use the estuarine waters of the Action Area during at least one life stage; engaging in rearing, foraging, and growth in these tidal channels. Estuarine areas are also considered to be HAPCs, as identified in EFH for Pacific Coast Groundfish (Pacific Fishery Management Council 2016).



Note: The lateral extent of potential EFH in the Action Area is mean higher high water, visually approximated on this figure.

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FIGURE 3

Extent of EFH in the Action Area



Photograph 7
Horn Snails on Intertidal Substrate in Grand Canal at Project Location

Table 1
Commercially or Ecologically Important Fish Species Potentially Occurring in Ballona Lagoon and Grand Canal

Species	Life Stage	Habitat Association	FMP Association
Brown rockfish (*Sebastes auriculatus*)	juvenile	shallow bays/ estuaries with soft bottom/hard bottom interfaces	Pacific Coast Groundfish
English sole (*Pleuronectes vetulus*)	juvenile	intertidal areas in estuaries	Pacific Coast Groundfish
Northern anchovy (*Engraulis mordax*)	juvenile, adult	near surface in bays and estuaries	Coastal Pelagic Species
Pacific sanddab (*Citharichthys sordidus*)	juvenile	estuarine and nearshore soft-bottom substrate	Pacific Coast Groundfish
Rex sole (*Errex zachirus*)	juvenile	estuarine soft-bottom substrate	Pacific Coast Groundfish
Starry flounder (*Platichthys stellatus*)	eggs, larvae, juveniles	estuarine soft-bottom substrate	Pacific Coast Groundfish
Arrow goby (*Clevelandia ios*)	all life stages	estuarine soft-bottom substrate	NA – estuarine prey species
Bay goby (*Lepidogobius lepidus*)	all life stages	estuarine soft-bottom substrate	NA – estuarine prey species
Longjaw mudsucker (*Gillichthys mirabilis*)	all life stages	estuarine soft-bottom substrate	NA – estuarine prey species
Pacific staghorn sculpin (*Leptocottus armatus*)	all life stages	estuarine soft-bottom substrate	NA – estuarine prey species
Shiner perch (*Cymatogaster aggregata*)	all life stages	estuarine and nearshore soft-bottom substrate	NA – estuarine prey species
Slough anchovy (*Anchoa delicatissima*)	all life stages	estuarine shallow waters near surface	NA – estuarine prey species
Topsmelt (*Atherinops affinis*)	all life stages	estuarine shallow waters near surface	NA – estuarine prey species

Sources: Robbins 2006, NMFS 2016.

3 POTENTIAL EFFECTS TO ESSENTIAL FISH HABITAT

The Proposed Action, with respect to potential effects to EFH, can be described in four phases: in-water cofferdam installation; dewatering and excavation in the cofferdam; installation of below-grade structures; and cofferdam removal and site restoration. Construction activities in upland areas would not have appreciable effects on EFH because implementation of the SWPPP would protect EFH from contaminated runoff or siltation.

3.1 COFFERDAM INSTALLATION

Installation of the cofferdam would produce the majority of the Project effects on EFH, although said effects are mostly minimal and temporary. Activities expected to affect EFH during the cofferdam installation are pile driving of soldier piles and sheet piles into the substrate, and dewatering of the area in the cofferdam. The footprint of the cofferdam contains 0.92 acre of tidal waters and 0.012 acre of tidal wetland. Pile driving would disturb the sediment in Grand Canal, increase turbidity; and produce underwater noise, temporarily affecting EFH outside of the cofferdam area. These effects are expected to occur for less than 1 week. Figure 3 displays the extent of the Action Area over which noise and turbidity increases may temporarily affect EFH, as described below. This area is approximately 3.8 acres in size.

Increased turbidity from pile placement may temporarily impact fish foraging and reduce algal photosynthesis, but suspended particulates would settle soon after completion of the cofferdam. Water quality monitoring would be conducted during construction to maintain turbidity within parameters established by the Regional Water Quality Control Board (RWQCB) in their Section 401 Certification. Localized turbidity may temporarily deter fish from foraging in the Action Area (Figure 3) until the cessation of cofferdam construction.

Piles for cofferdam construction would be installed using a vibratory driver or hydraulic push methods. Hydraulic push methods do not generate intense underwater noise, vibratory drivers produce less intense underwater noise than impact drivers, and noise from vibratory drivers are not expected to cause barotrauma to fish (Caltrans 2015). However, underwater noise from pile driving may still cause temporary hearing shifts or behavioral changes in fish. During vibratory pile driving, the areas of Grand Canal and Ballona Lagoon that are exposed to pile driving noise may be used by fish at a lower rate, or abandoned altogether as fish move away from the noise source. When considering underwater noise impacts, the areas affected are typically limited to the areas where the sound can propagate in a straight line from the source. Because there is a corner in the waterway where the Grand Canal meets Ballona Lagoon, underwater noise would not effectively propagate much south of the pile-driving location (Figure 3). In Grand Canal, a series of slight bends would limit noise propagation to the area extending approximately 1,600 feet (500 meters) to the north. Following the completion of pile-driving activity, fish are expected to resume use of the area affected by pile-driving noise emissions.

Minor hydrological changes to the constricted channel outside of the cofferdam are expected. With the width of the Grand Canal reduced by the cofferdam, flow velocity in the remaining channel width is likely to increase. Should the velocity increase enough, the eastern bank may experience cutting and erosion, causing sediment deposition into the canal. However, the tide gate at the mouth of Ballona Lagoon restricts tidal flows through the Action Area; and based on observations made during the site visit, Grand Canal and Ballona Lagoon typically do not flow fast enough to resuspend sediments, even with some constriction of the channel. Upstream and

downstream flows in the Canal would pass through the half of the waterway's width not obstructed by the cofferdam, and therefore still allow the movement of fish, transport of nutrients, and persistence of hydrological parameters, such as temperature, salinity, and tidal flows.

3.2 DEWATERING AND EXCAVATION

Following completion of the cofferdam, any impounded water would be pumped out, and the substrate in the cofferdam excavated. During this process, any fish or invertebrates in the cofferdam area would likely be killed. Water pumped from the cofferdam would most likely be discharged into the sanitary sewer system as permitted though an industrial waste permit from the City. If there are any discharges to surface waters, they would occur in accordance with the requirements of RWQCB permitting, and therefore would not adversely affect EFH.

Dewatering and excavation would cause benthic macroinvertebrate losses in the cofferdam (0.092 acre of tidal waters and 0.012 acre of tidal wetland), but because the area is very small in relation to the overall tidal waters of Grand Canal and Ballona Lagoon (approximately 30 acres), this loss would not significantly affect forage for Pacific Coast Groundfish or Coastal Pelagic Species. Excavation into the EFH substrate would further cause macroinvertebrate mortality; however, these impacts, like those of the dewatering, would be temporary.

3.3 INSTALLATION OF BELOW GRADE STRUCTURES

Once the excavated pit is dewatered, concrete grout may be jetted into the soil at the bottom of the pit to reduce groundwater percolation and to create a stable surface capable of supporting the new diversion structures, if needed. The new diversion structure would then be installed, along with the 66-inch connector, and the new diversion structure would be tied into the existing CIS. Because these concrete structures would be buried under 18 feet or more of sediment, they would have no direct interaction with the waters of Grand Canal or Ballona Lagoon, and would not affect water quality or EFH.

3.4 COFFERDAM REMOVAL AND SITE RESTORATION

Prior to removal of the cofferdam, stockpiled material would be returned to the excavation. During the removal of the cofferdam, during which the piles are expected to be direct-pulled with a crane from upland areas and surface flows restored to the dewatered area, some resuspension of sediment and temporary increases in turbidity may occur. The magnitude of these effects is expected to be no greater than those discussed for cofferdam installation (Section 3.1.1), and would be more limited in duration, because removal of the cofferdam would only take 1 or 2 days.

Following removal of the cofferdam, the benthic macroinvertebrate community prey base would recolonize and stabilize in the affected area. Although this prey base would take time to recolonize, the area is very small, and prey base in the remainder of Grand Canal and Ballona Lagoon would continue to support EFH. Because the completed diversion structure would not protrude above the grade of the canal, and would be deep enough to avoid any long-term change to the substrate, there is no permanent alteration of EFH associated with the Proposed Action. As described above, restoration of the Action Area would be supported by revegetation and recontouring the grade of the western bank. Therefore, the Proposed Action's minimal lasting effects would be ameliorated by natural and facilitated restoration.

Finally, there are no operational effects to estuarine waters or EFH expected. The new wastewater facility is a closed system that would be better suited to handle increased wastewater surges than the current system. Therefore, its installation represents the most responsible measure to prevent future wastewater discharges into Grand Canal and Ballona Lagoon.

3.5 MITIGATION MEASURES

The Environmental Impact Report for the VAPP Project (City of Los Angeles 2017) committed the City to a Mitigation and Monitoring Reporting Program (MMRP) that includes measures that would reduce the potential adverse effects the Proposed Action may have on EFH. Specifically, the following Mitigation Measures excerpted from the MMRP would reduce and offset the potential effects of the Proposed Action on EFH:

MM BIO-3: Restoration of Vegetation within Grand Canal. Regarding the disturbance footprint within the Grand Canal, habitat along the bank shall be restored to its original condition by seeding, cuttings, and/or container plant installation following construction. Habitat restoration shall be performed in coordination with regulating agencies (California Coastal Commission [CCC], USACE, and RWQCB) and as required by agency permits. A Habitat Restoration Plan shall be prepared by a qualified restoration ecologist/biologist, and submitted to the City for review and approval, prior to submittal to the agencies. The plan will include a native plant palette, and establishment period, as well as success criteria and monitoring requirements. In addition, a monetary contribution may be provided to the Grand Canal Restoration Project fund for wider restoration of the canal banks.

MM BIO-5: Water Quality Monitoring during Construction. Water quality shall be monitored by the qualified biologist or a water quality specialist to ensure that no substantial increases in turbidity occur during construction, and that no erosion occurs on the west bank during in-water construction activities. The contractor shall ensure compliance with RWQCB Section 401 Water Quality Certification, USACE Section 404 authorization, applicable water-quality related best management practices, and the Storm Water Pollution Prevention Plan.

MM BIO-7: Silt Fencing at Construction Limits. (a) Construction limits shall be identified using silt fencing, which shall be installed under the supervision of a qualified biologist prior to commencement of work. (b) Construction personnel shall strictly limit their activities, vehicles, equipment, and construction materials to the construction footprint, including designated laydown and staging areas, and routes of travel. (c) The construction areas shall consist of the minimal area necessary to complete the Proposed Action. (d) The fencing shall remain in place until the completion of all construction activities.

MM BIO-8: Environmentally Sensitive Habitat Area (ESHA) Protection. Existing functions and values in ESHA shall be protected, enhanced, and restored as necessary to previous undisturbed conditions in accordance with applicable USACE, RWQCB, CCC, or City of Los Angeles requirements.

MM BIO-9: Restoration of Mudflats within Grand Canal. The temporary work area in the Grand Canal within mudflat/open water shall be returned to pre-construction grade and contours following construction.

4 CONCLUSIONS

The Action Area contains potential EFH for Pacific Coast Groundfish and Coastal Pelagic Species. Although debris racks on the tide gates connecting Ballona Lagoon and Grand Canal to open water in the Marina del Ray Channel and Pacific Ocean would prevent adults of larger fish species from using the Action Area, smaller fish would have access, and may use the Action Area for foraging and rearing.

As described in Section 3, the Proposed Action would have adverse effects on EFH designated by the Pacific Coast Groundfish and Coastal Pelagic Species FMPs, such as:

- Temporary habitat alteration from increases in turbidity and pile-driving noise (3.8 acres);
- Temporary loss of tidal waters and wetlands (0.092 and 0.012 acre, respectively) in the cofferdam area; and
- Temporary loss of benthic invertebrates following excavation of intertidal habitat in the cofferdam area (an area of 0.104 acre).

The temporary effects from underwater noise and increase in turbidity would be very brief in duration: on the order of days. The temporary loss of tidal waters and wetlands would be of a longer duration (on the order of months), but would affect a very small portion of EFH available in the region. There would be no permanent effects to EFH in the Action Area. With these considerations in mind, the adverse effects to EFH that are anticipated would not be substantial. With implementation of the Avoidance and Minimization Measures provided in Section 3.1.4, no additional conservation measures for EFH are recommended.

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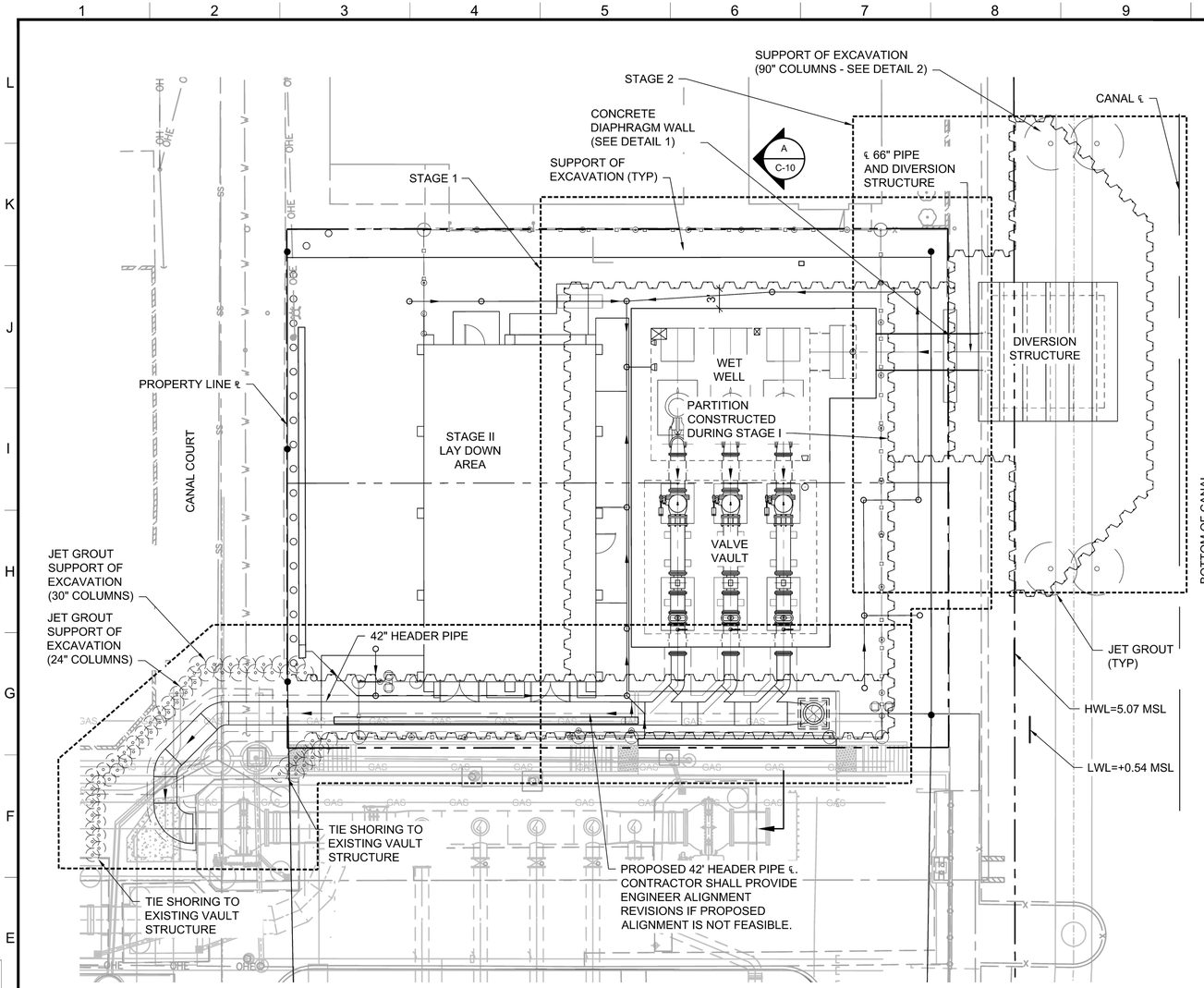
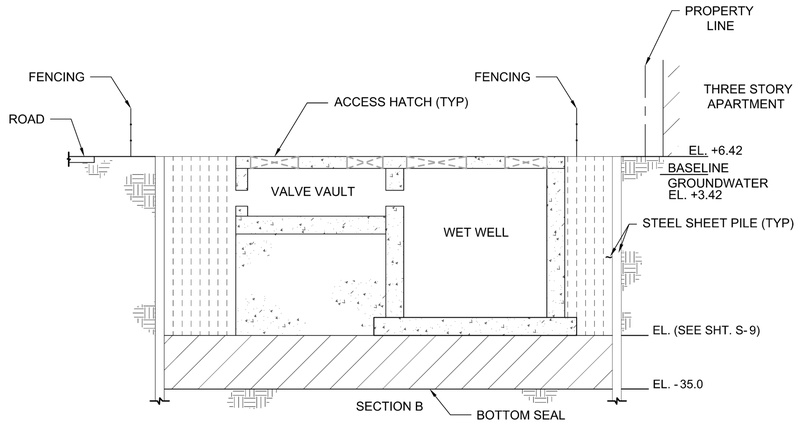
Appendix A

VAPP Design Drawings



PLAN

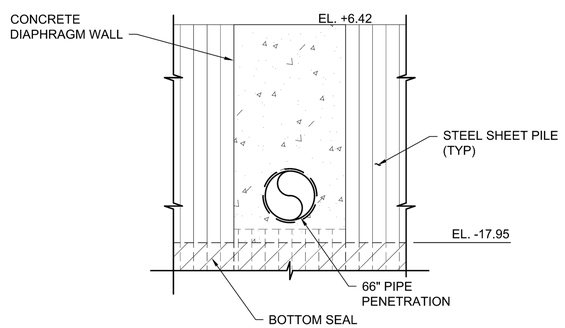
SCALE: 1" = 10'



C-10	SECTION A
SCALE: NOT TO SCALE	C-10

NOTES

1. THE CONTRACTOR IS RESPONSIBLE FOR THE DESIGN OF THE SUPPORT OF EXCAVATION.
2. THE SUPPORT OF EXCAVATION ITEMS SHOWN ARE SCHEMATIC OPTIONS FOR SUPPORT OF EXCAVATION.
3. PROVIDE ACCESS AND BARRICADES PER CAL OSHA AND LOS ANGELES DOT REQUIREMENTS. SPLASH SCREENS SHALL BE ERECTED ON TOP OF THE BARRICADES TO A MINIMUM HEIGHT OF 8-FT IN THE VICINITY OF ANY EXCAVATION TO BE PERFORMED IN THE "WET". THE CONTRACTOR SHALL REPLACE OR REPAIR THE SPLASH SCREEN WHEN DAMAGED.
4. DESIGN THE WATER-TIGHT EXCAVATION SUPPORT SYSTEMS PER REQUIREMENTS IN THE SPECIFICATIONS. SUBMIT ALL REQUIRED DESIGN DETAILS TO THE CITY FOR APPROVAL. ALL ENGINEERING CALCULATIONS, DESIGN DRAWINGS, AND WORK PLANS SHALL BE PREPARED AND STAMPED BY PROFESSIONAL CIVIL OR STRUCTURAL ENGINEER(S) REGISTERED IN THE STATE OF CALIFORNIA.
5. DESIGN GROUNDWATER TABLE ELEVATIONS SHALL BE TAKEN FROM THE GEOTECHNICAL REPORT DATED DECEMBER 14, 2015 AND SUPPLEMENTAL REPORT DATED JUNE 27, 2016. UNLESS OTHERWISE NOTED, ALL ELEVATIONS SHOWN REFERENCE THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD88).
6. INSIDE BRACING (IF REQUIRED) NOT SHOWN FOR CLARITY.
7. THE CONTRACTOR SHALL COORDINATE THE SHORING METHOD AND SEQUENCING OF SHORING INSTALLATION AND REMOVAL WITH THE INSTALLATION OF ELECTRICAL CONDUIT RUNS AND OTHER FEATURES TO BE INSTALLED CONCURRENT WITH AND SUBSEQUENT TO THE CONSTRUCTION OF THE BURIED STRUCTURES.
8. SHORING SYSTEMS (IF REQUIRED) FOR ELECTRICAL BUILDING, ELECTRICAL EQUIPMENT, AND OTHER SUBSURFACE WORK NOT SHOWN.
9. A PRE-DRILL MEETING SHALL BE REQUIRED WITH INSPECTOR, SOIL ENGINEER, CONTRACTOR, AND CONSTRUCTION MANAGER PRIOR TO DRILLING.



DETAIL 1

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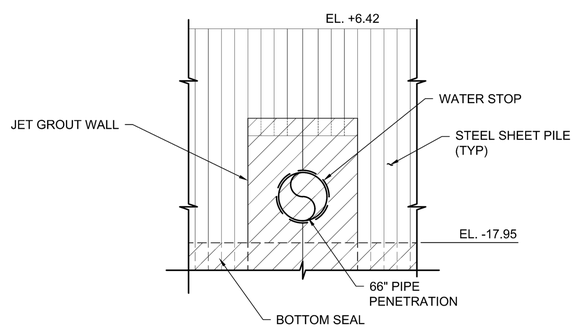

DETAIL 2

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BUREAU OF ENGINEERING

ENGINEERING — CITY OF LOS ANGELES

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CIP NO. C922

INDEX NO. D-31898

THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED

DAVID L. FULKS — PROFESSIONAL ENGINEER — C85093 — CIVIL ENGINEERING — STATE OF CALIFORNIA — 6/7/2018

GARY LEE MOORE, P.E. — CITY ENGINEER

		DATE:
ENGINEER:	DAVID FULKS	8/31/17
	LIC. NO. CA-85093	8/31/17
DESIGNED BY:	MANUEL ALVAREZ	8/31/17
DRAWN BY:	JENA PRIOR	8/31/17
CHECKED BY:	GREG BASYDOLA	8/31/17
APPROVED BY:	VENU KOLLI	8/31/17

DESIGN GROUP

VERTICAL CONTROL: NAVD 88 (2000)
HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

SHEET TITLE: SHEET PILE EXCAVATION SUPPORT PLAN

PROJECT: VENICE AUXILIARY PUMPING PLANT

ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA

ARCADIS
LEGAL ENTITY:
ARCADIS U.S., INC.
445 S. FIGUEROA ST.
SUITE 3650
LOS ANGELES
CA 90071

WORK ORDER NO. SZC12923

DRAWING NO. C-10

SHEET 16 OF 128 SHEETS

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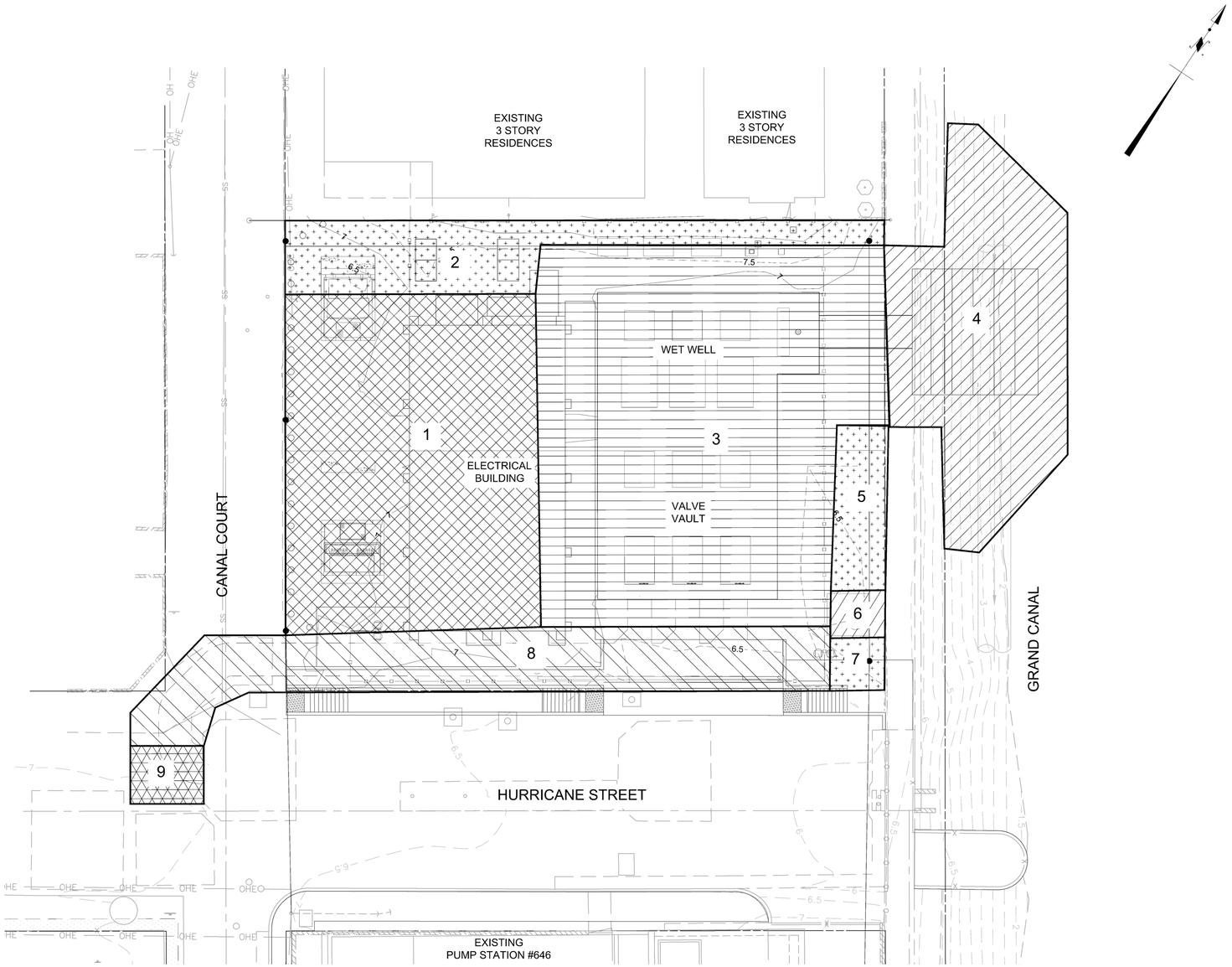

EXCAVATION LEGEND

- EXCAVATION DEPTH 0-6 FT
- EXCAVATION DEPTH 6-7 FT
- EXCAVATION DEPTH 11-12 FT
- EXCAVATION DEPTH 14-15 FT
- EXCAVATION DEPTH 23-24 FT
- EXCAVATION DEPTH 29-30 FT

CUT AND FILL ESTIMATE

SURFACE ESTIMATE

CUT: 69 CY
FILL: 10 CY
NET: 59 CY CUT

OVERALL EXCAVATION ESTIMATE

	CUT	FILL	NET CUT/FILL
AREA 1:	1,850 CY	770 CY	1,080 CY CUT
AREA 2:	510 CY	510 CY	0 CY
AREA 3:	11,340 CY	5,360 CY	5,980 CY CUT
AREA 4:	5,730 CY	2,030 CY	3,700 CY CUT
AREA 5:	20 CY	10 CY	10 CY CUT
AREA 6:	30 CY	30 CY	0 CY
AREA 7:	N/A	N/A	N/A
AREA 8:	1,530 CY	560 CY	970 CY CUT
AREA 9:	1,080 CY	175 CY	905 CY CUT

TOTAL: 17,290 CY 8,580 CY 8,710 CY CUT

NOTES:

1. FILL ESTIMATE IS NATIVE FILL. ENGINEERED FILL IS NOT ESTIMATED IN THIS ESTIMATE.
2. EXCAVATION IN TRENCHES WILL BE BACKFILLED WITH PIPE BEDDING AS INDICATED IN THESE PLANS AND NATIVE FILL.
3. SURFACE ESTIMATE IS SURFACE GRADING ONLY AND NOT EXCAVATION.
4. ESTIMATES DO NOT INCLUDE ANY ADJUSTMENT FACTORS.

0 5' 10' 20'
SCALE: 1" = 10'

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LEGAL ENTITY:
ARCADIS U.S., INC.
445 S. FIGUEROA ST.
SUITE 3650
LOS ANGELES
CA 90071

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING

ENGINEERING
CITY OF LOS ANGELES

NO.	REVISIONS:	DATE:	BY:

INDEX NO. D-31898

CIP NO. C922

THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED.

REGISTERED PROFESSIONAL ENGINEER JENA L. PRIOR 79699 CIVIL STATE OF CALIFORNIA 6/5/18

GARY LEE MOORE, P.E. CITY ENGINEER

	DESIGN GROUP	DATE:
ENGINEER:	JENA PRIOR	8/31/17
DESIGNED BY:	MANUEL ALVAREZ	8/31/17
DRAWN BY:	JENA PRIOR	8/31/17
CHECKED BY:	GREG BASYDOLA	8/31/17
APPROVED BY:	VENU KOLLI	8/31/17

LIC. NO. CA-79699

VERTICAL CONTROL: NAVD 88 (2000)
HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

SHEET TITLE: CUT AND FILL EXHIBIT

PROJECT: VENICE AUXILIARY PUMPING PLANT

ADDRESS: 133 HURRICANE STREET
LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923

DRAWING NO. C-16

SHEET 24 OF 140 SHEETS

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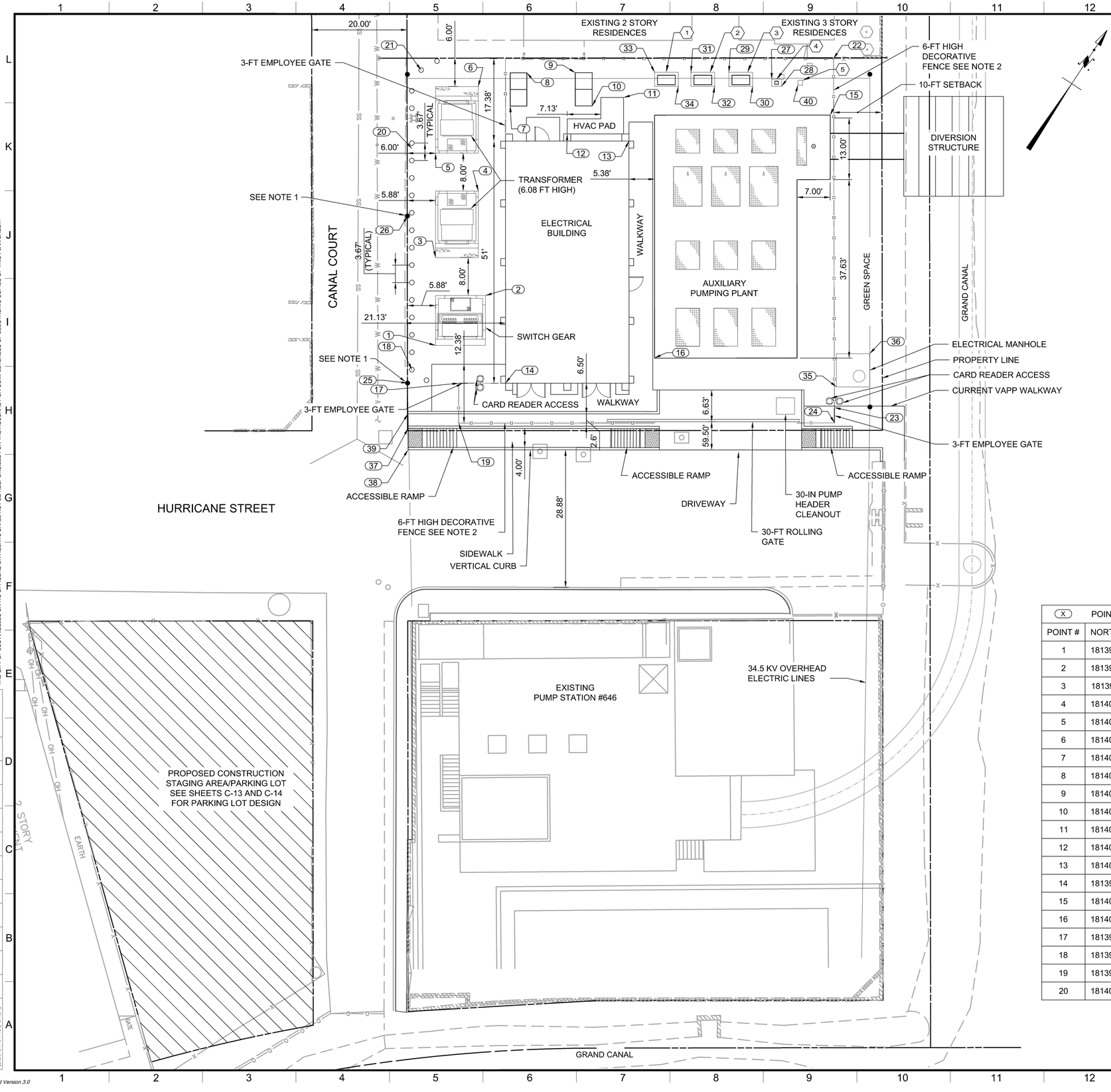

NOTES

1. CONTRACTOR SHALL VERIFY LOCATION OF NEW POWER POLE AND AVOID CONFLICT WITH OTHER SITE FEATURES.
2. DECORATIVE FENCE SHALL BE A MAXIMUM OF 6-FT IN HEIGHT FROM GROUND LEVEL.

SHEET KEYNOTES

1. TERMINATION BOX: TB-P6, PULLBOX: TB-P6A.
2. TERMINATION BOX: TB-P7, PULLBOX: TB-P7A.
3. TERMINATION BOX: TB-P8, PULLBOX: TB-P8A.
4. TOD: 2' BG, APPROXIMATE DIMENSIONS: 0.61'H X 1.18'W
5. COMBUSTIBLE GAS PANEL 1:CGP1

STORMWATER POLLUTION PREVENTION PLAN AND BEST MANAGEMENT PRACTICE NOTES:

1. THE CONTRACTOR WILL REDUCE CONSTRUCTION STORMWATER DISCHARGES TO THE MAXIMUM EXTENT PRACTICABLE IN ACCORDANCE WITH THE LOS ANGELES COUNTY MS4 PERMIT FOR THE LANDSIDE PORTIONS OF THE PROPOSED PROJECT. THE FOLLOWING BMPS FOR EROSION CONTROL, SEDIMENT CONTROL, NON-STORMWATER MANAGEMENT, AND WASTE MANAGEMENT DURING CONSTRUCTION WILL BE IMPLEMENTED AS PART OF THE PROPOSED PROJECT.
2. OTHER STANDARD OPERATING PROCEDURES AND BMPS FOR CITY CONSTRUCTION PROJECTS WILL BE IMPLEMENTED, INCLUDING: BMPS FOR IN WATER WORK, SUCH AS TURBIDITY CURTAINS AND TRASH BOOMS.
3. THE CONTRACTOR WILL PERFORM CONSTRUCTION ACTIVITIES WITHIN THE GRAND CANAL (A NAVIGABLE WATER OF THE UNITED STATES) IN ACCORDANCE WITH PROVISIONS OF SECTION 404 (OF THE CWA), AND SECTION 10 (OF THE RHA) PERMIT FROM THE USACE.
4. ARCADIS WILL SECURE A SECTION 401 (OF THE CWA) WATER QUALITY CERTIFICATION FROM THE LARWQCB FOR CONSTRUCTION ACTIVITIES WITHIN THE GRAND CANAL AND WILL COMPLY WITH CONDITIONS OF THAT CERTIFICATION, INCLUDING STANDARD WDRS.
5. THE CONTRACTOR WILL ALSO COMPLY WITH GENERAL WASTE DISCHARGE REQUIREMENTS FOR DISCHARGES OF GROUNDWATER FROM CONSTRUCTION AND PROJECT DEWATERING TO SURFACE WATERS IN COASTAL WATERSHEDS OF LOS ANGELES AND VENTURA COUNTIES (NPDES) PLEASE REFER TO SPECIFICATION 01571 FOR ADDITIONAL STORMWATER POLLUTION CONTROL REQUIREMENTS.

(X)	POINT TABLE	
POINT #	NORTHING	EASTING
1	1813982.63	6421784.63
2	1813997.14	6421787.80
3	1813998.21	6421774.65
4	1814014.85	6421774.67
5	1814016.73	6421762.77
6	1814033.37	6421762.79
7	1814033.56	6421770.66
8	1814041.34	6421769.82
9	1814046.85	6421778.42
10	1814042.88	6421785.19
11	1814047.95	6421789.79
12	1814035.08	6421783.93
13	1814040.84	6421795.68
14	1813983.87	6421801.32
15	1814068.30	6421828.42
16	1814005.28	6421824.88
17	1813978.54	6421793.01
18	1813975.63	6421783.17
19	1813971.49	6421797.54
20	1814014.85	6421758.04

(X)	POINT TABLE	
POINT #	NORTHING	EASTING
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24	1814014.21	6421864.15
25	1813972.77	6421783.94
26	1814002.38	6421764.94
27	1814068.02	6421813.98
28	1814067.88	6421816.52
29	1814064.38	6421805.60
30	1814064.59	6421811.41
31	1814060.07	6421798.86
32	1814060.28	6421804.67
33	1814055.93	6421792.42
34	1814056.14	6421798.22
35	1814020.82	6421860.40
36	1814030.49	6421862.52
37	1813964.80	6421789.16
38	1813960.99	6421791.60
39	1813967.39	6421787.51

ARCADIS
LEGAL ENTITY:
ARCADIS U.S., INC.
445 S. FIGUEROA ST.
SUITE 3650
LOS ANGELES
CA 90071

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING

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CIP NO. C922

INDEX NO. D-31898

REGISTERED PROFESSIONAL ENGINEER
VENU KOLLI
79699
CIVIL
STATE OF CALIFORNIA
3/31/19

GARY LEE MOORE, P.E. CITY ENGINEER

DESIGN GROUP		DATE:
ENGINEER:	JENA PRIOR	8/31/17
	LIC. NO. CA-79699	
DESIGNED BY:	MANUEL ALVAREZ	8/31/17
DRAWN BY:	JENA PRIOR	8/31/17
CHECKED BY:	GREG BASYOOLA	8/31/17
APPROVED BY:	VENU KOLLI	8/31/17

VERTICAL CONTROL: NAVD 88 (2000)
HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

SHEET TITLE: CONSTRUCTION STAGING PLAN

PROJECT: VENICE AUXILIARY PUMPING PLANT

ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923

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HABITAT MITIGATION AND MONITORING PLAN FOR TEMPORARY IMPACTS ASSOCIATED WITH THE VENICE AUXILIARY PUMPING PLANT PROJECT
LOS ANGELES COUNTY, CALIFORNIA

USACE Section 404 Individual Permit (Pending - SPL-2015-00893)

RWQCB Section 401 Water Quality Certification (Pending)

CCC Coastal Development Permit (Pending)

PREPARED FOR:

City of Los Angeles Department of Public Works
Bureau of Engineering, Environmental Management Group
1149 S. Broadway, Suite 600
Los Angeles, CA 90015
Contact: Eileen Schoetzow, Environmental Supervisor I
213-485-5751

PREPARED BY:

ICF
49 Discovery, Suite 250
Irvine, CA 92618
Contact: Paul Schwartz
949.333.6634

May 2019

ICF. 2019. (Draft) Habitat Mitigation and Monitoring Plan for Temporary Impacts Associated with the Venice Auxiliary Pumping Plant Project, Los Angeles County, California. May 2019. (ICF 00279.18) Irvine, CA. Prepared for the City of Los Angeles Department of Public Works Bureau of Engineering, Environmental Management Group.

Plan Distribution

Add Applicable Plan Recipients

Contents

List of Tables and Figures iii
List of Acronyms and Abbreviations iv
Chapter 1 **Project Information** **1-1**
1.1 Project Location, HMMP Purpose 1-1
1.2 Project Background and Project Site Ownership 1-3
1.3 Project Description 1-3
1.3.1 Cofferdam 1-4
1.3.2 Excavation 1-4
1.3.3 Diversion Structure and Connections 1-4
1.3.4 Recontour and Revegetation 1-5
1.4 Project Impacts 1-5
1.5 Project Permits 1-5
1.6 Location of Proposed Mitigation 1-5
1.7 Description of Mitigation Activities 1-5
Chapter 2 **Baseline Information and Impacts** **2-1**
2.1 Project Site Description 2-1
2.2 Vegetation Types 2-1
2.2.1 Developed 2-1
2.2.2 Disturbed/Ruderal 2-2
2.2.3 Open Water 2-2
2.2.4 Southern Coastal Salt Marsh (Holland 52120) 2-2
2.2.5 Coastal Brackish Marsh (Holland 52200) 2-2
2.2.6 Southern Foredunes (Holland 21230) 2-2
2.2.7 Southern Coastal Bluff Scrub (Holland 31200) 2-3
2.3 Plants 2-3
2.4 Wildlife 2-3
2.5 Jurisdictional Waters and Wetlands 2-4
2.6 Vegetation Impacts 2-4
2.7 Jurisdictional Waters and Wetlands Impacts 2-5
Chapter 3 **Mitigation Requirements and Work Plan** **3-1**
3.1 Determination of Required Mitigation 3-1
3.2 Mitigation Requirements 3-1
3.3 Responsible Parties 3-1
3.3.1 Owner/Operator 3-2

3.3.2 Restoration Ecologist 3-2
3.3.3 Restoration Maintenance Contractor 3-2
3.4 Pre-Construction Project Activities 3-2
3.4.1 Pre-Construction Plant Survey, Nesting Bird Survey, and Biological Monitoring of Vegetation Removal 3-2
3.4.2 Construction Fencing 3-3
3.5 Project Mitigation Area Site Preparation and Installation 3-4
3.5.1 Excavation, Stockpiling and Grading 3-4
3.5.2 Trash Removal and Non-Native Plant Removal 3-4
3.5.3 Irrigation/Watering 3-4
3.5.4 Planting Plan 3-5
3.5.6 Signage 3-6
3.5.7 Protective Caging 3-6
Chapter 4 **Maintenance Plan and Activities** **4-1**
Chapter 5 **Monitoring Plan** **5-1**
5.1 Qualitative Monitoring 5-1
5.2 Annual Quantitative Performance Monitoring 5-1
5.3 Performance Standards and Final Success Criteria 5-2
5.4 Adaptive Management 5-2
5.5 Annual Monitoring Reports 5-3
5.6 Project Completion and Agency Confirmation 5-3
Chapter 6 **Site Protection, Long-Term Management and Financial Assurances** **6-1**
6.1 Site Protection 6-1
6.2 Long-term Management 6-1
6.3 Financial Assurances 6-1

List of Tables and Figures

Table		Page
Table 1.	Vegetation Communities/Land Use within the 500 feet of the Project Site	2-1
Table 2.	Jurisdictional Delineation Summary (acres)	2-4
Table 3.	Temporary Impacts to Vegetation Communities/Land Uses	2-5
Table 4.	Temporary Impacts to Aquatic Resources (acres)	2-5
Table 5.	Vegetation Communities and Aquatic Resources to be Restored	3-1
Table 6.	Southern Coastal Salt Marsh Mitigation Area Planting Palette	3-5
Table 7.	Southern Coastal Salt Marsh Mitigation AreaSeed Mix	3-6
Table 8.	Mitigation Site Maintenance Schedule	4-1
Table 9.	Mitigation Site Monitoring Schedule	5-1
Table 10.	Performance Standards and Final Success Criteria for Southern Coastal Salt Marsh Mitigation Area	5-2

Figures

Figure 1	Location Map
Figure 2	USGS Quadrangle
Figure 3	Project Design
Figure 4	Project Design
Figure 5	Project Design
Figure 6a	USACE Jurisdictional Delineation Results and Impacts Map
Figure 6b	CCC Jurisdictional Delineation Results and Impacts Map
Figure 7	Vegetation Impacts
Figure 8	Project Mitigation Map

List of Acronyms and Abbreviations

Amsl	above mean sea level
APN	Assessor's Parcel Numbers
CCC	California Coastal Commision
CDFW	California Department of Fish and Wildlife
CNPS	California Native Plant Society
CRPR	California Rare Plant Rank
HMMP	Habitat Mitigation and Monitoring Plan
LABOE	Los Angeles Bureau of Engineers
mgd	Millons of gallons per day
RWQCB	Regional Water Quality Control Board
USACE	U.S. Army Corps of Engineers
USGS	U.S. Geological Survey
VAPP	Venice Auxiliary Pumping Plant
VPP	Venice Pumping Plant

Chapter 1
Project Information

1.1 Project Location, HMMP Purpose

This Habitat Mitigation and Monitoring Plan (HMMP) has been prepared for the Venice Auxiliary Pumping Plant (VAPP) project (Project) on behalf of Los Angeles Bureau of Engineers (LABOE). The project is located at the northeast corner of Hurricane Street and Canal Court in the community of Venice, Los Angeles County, CA (Figure 1). The project site is mapped in Township 2 South, Range 15 West, Section 21 U.S. Geological Survey (USGS) 7.5-minute "Venice" quadrangle map (USGS 1964) (Figure 2).

The Venice Auxiliary Pumping Plant project will occur on a City of Los Angeles owned vacant lot (Assessor's Parcel Numbers [APN] 4225-008-904 located immediately north of the existing Venice Pumping Plant. In addition, the project will require the use of up to two laydown areas located on vacant lots in the vicinity. Laydown area 1 (APN 4225-010-016) is located immediately south of the proposed VAPP location. Laydown area 2 consists of two lots (APNs 4225-013-904 and 4225-013-153) located on the east side of the channel across from the proposed VAPP location. The project site and two laydown areas are identified on Figure 3.

The purpose of this HMMP is to outline the implementation, maintenance, monitoring and management of waters and habitats provided as mitigation to offset temporary construction impacts associated with the project. This plan was prepared in anticipation of permit requirements of the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and California Coastal Commission (CCC). Once permits have been issued, this HMMP will be updated in accordance with applicable permit conditions.

This HMMP follows the USACE regulatory requirements for the preparation of mitigation plans pursuant to *2008 Clean Water Act (CWA) Section 404 Final Compensatory Mitigation Rule (33 CFR 332.4(c)). Pursuant to 33 CFR 332.4(c) t*he mitigation plan addresses the following:

1. Objectives. A description of the resource type(s) and amount(s) that will be provided, the method of compensation (restoration, establishment, preservation etc.), and how the anticipated functions of the mitigation project will address watershed needs.
2. Site selection. A description of the factors considered during the site selection process. This should include consideration of watershed needs, onsite alternatives where applicable, and practicability of accomplishing ecologically self-sustaining aquatic resource restoration, establishment, enhancement, and/or preservation at the mitigation project site.
3. Site protection instrument. A description of the legal arrangements and instrument including site ownership that will be used to ensure the long-term protection of the mitigation project site.
4. Baseline information. A description of the ecological characteristics of the proposed mitigation project site, in the case of an application for a DA permit, the impact site. This may include descriptions of historic and existing plant communities, historic and existing hydrology, soil conditions, a map showing the locations of the impact and mitigation site(s) or the geographic coordinates for those site(s), and other characteristics appropriate to the

type of resource proposed as compensation. The baseline information should include a delineation of waters of the United States on the proposed mitigation project site. A prospective permittee planning to secure credits from an approved mitigation bank or in-lieu fee program only needs to provide baseline information about the impact site.

5. Determination of credits. A description of the number of credits to be provided including a brief explanation of the rationale for this determination.
    - For permittee-responsible mitigation, this should include an explanation of how the mitigation project will provide the required compensation for unavoidable impacts to aquatic resources resulting from the permitted activity.
    - For permittees intending to secure credits from an approved mitigation bank or in-lieu fee program, it should include the number and resource type of credits to be secured and how these were determined.
6. Mitigation work plan. Detailed written specifications and work descriptions for the mitigation project, including: the geographic boundaries of the project; construction methods, timing, and sequence; source(s) of water; methods for establishing the desired plant community; plans to control invasive plant species; proposed grading plan; soil management; and erosion control measures. For stream mitigation projects, the mitigation work plan may also include other relevant information, such as planform geometry, channel form (e.g., typical channel cross-sections), watershed size, design discharge, and riparian area plantings.
7. Maintenance plan. A description and schedule of maintenance requirements to ensure the continued viability of the resource once initial construction is completed.
8. Performance standards. Ecologically-based standards that will be used to determine whether the mitigation project is achieving its objectives.
9. Monitoring requirements. A description of parameters monitored to determine whether the mitigation project is on track to meet performance standards and if adaptive management is needed. A schedule for monitoring and reporting monitoring results must be included.
10. Long-term management plan. A description of how the mitigation project will be managed after performance standards have been achieved to ensure the long-term sustainability of the resource, including long-term financing mechanisms and the party responsible for long-term management.
11. Adaptive management plan. A management strategy to address unforeseen changes in site conditions or other components of the mitigation project, including the party or parties responsible for implementing adaptive management measures.
12. Financial assurances. A description of financial assurances that will be provided and how they are sufficient to ensure a high level of confidence that the mitigation project will be successfully completed, in accordance with its performance standards.

1.2 Project Background and Project Site Ownership

The City of Los Angeles currently owns and operates the existing Venice Pumping Plant (VPP) located on Hurricane Street where Grand Canal confluences with Ballona Lagoon in the community of Venice (Figure 3). The pumping plant is the City's largest pumping plant and is considered a critical facility to convey wastewater from its tributary area. There have been several occasions, beginning in the 1990s and extending through the early 2000s, when influent flows to the VPP during periods of wet weather nearly exceeded the combined pumping capacity (90 mgd) of all five pumps while working simultaneously. This resulted in a near miss of sewage spill into the Grand Canal and Ballona Lagoon because the wet wells and pumps were almost entirely inundated. Exceeded sewer capacity would require emergency discharges directly to the Grand Canal and Ballona Lagoon or overflows into the surrounding street network. Because of these conditions, the City and LABOE, began planning and designing projects that will upgrade and enhance the VPP. The City proposes to construct an auxiliary pumping plant adjacent to the existing VPP and make additional upgrades to the existing facilities to increase reliability and capacity at VPP.

Property Ownership Contact Information:

City of Los Angeles
1149 Broadway Avenue, Suite 700
Los Angeles, CA 90015
Contact: Gary Lee Moore
Phone: (213) 485-4935
Email: Gary.lee.moore@lacity.org

1.3 Project Description

The Proposed Project will be built on three vacant lots with a total combined area of approximately 15,000 square feet. As shown in Figure 2, the project will include a number of components:

- One building, two stories and approximately 32 feet in height, with a total of 2,500 square feet that will house the operational control center for the plant, related electrical equipment, and employee workstations;
- Three 18 mgd wet-pit submersible pumps, constructed underground;
- Electrical equipment, utility connections, instrumentation and controls, transformers, and generators;
- A (17- by 17-foot) submerged diversion structure on the existing Coastal Interceptor Sewer (CIS), the top of which will buried (depth) below the lowest elevation of the Grand Canal's bed;
- Concrete wet well, influent piping and a sluice gate;
- A new 66-inch diameter sewer segment to connect VAPP to the new diversion structure;
- Fencing with blinds and vegetation for screening the VAPP building;

- Parking – a total of eight parking spaces will be provided at 128 Hurricane Street to allow for Project required employee, delivery/visitor, and Beach Impact Zone parking, and public parking, including the relocation of coastal parking; and
- Construction of the new diversion structure and new 66-inch sewer pipe will require the dewatering of a portion of Grand Canal along the western bank adjacent to the VAPP.

1.3.1 Cofferdam

To provide a dry work area, a cofferdam will be installed along the western bank of the Grand Canal as show in Figure 3. The cofferdam within the Grand Canal will be part of a two-celled cofferdam system required to install the below-ground facilities. Up 6,000 square feet of cofferdam will be installed within waters of the U.S. within the Grand Canal. The remaining portion will be installed in upland areas outside waters of the U.S. Within the Grand Canal, the cofferdam is expected to remain in place for up to six months. During this time, upstream and downsteam flows within the Canal will be maintained. The area within the cofferdam will be dewatered continuously throughout construction. A pump, situated within the cofferdam area will pump water from the cofferdam. Pumpwater will be treated, then discharged.

The cofferdam will be constructed using soldier piles and sheeting. Soldier piles will be driven into the Canal using a vibratory hammer or hydraulically pushed into the canal substrate. Sheet piles will then be installed between the soldier piles and the area within the cofferdam will be dewatered.

1.3.2 Excavation

Once the cofferdam is in place, excavation will occur. Within Grand Canal, an excavator situated on the upland area adjacent to Grand Canal will excavate to approximately 18 feet below the ground surface. Approximately 400 cubic yards will be excavated to install the diversion structure. Excavated materials will be stockpiled at one of the established Laydown Areas for later use to backfill within the Grand Canal or off-hauled to an appropriate landfill.

1.3.3 Diversion Structure and Connections

The diversion structure and new 66-inch sewer connection will be installed beneath Grand Canal. All work will occur within the cofferdam area. The diversion structure is 17 feet by 17 feet and will be located along the western bank of Grand Canal (Figure 4). The diversion structure will be constructed to allow flows to be diverted to the VAPP. The diversion structure will be below the grade of the Grand Canal's bed, by approximately 18 feet, and will not protrude aboveground into the Canal and will be buried beneath it. The diversion structure will allow flows to be diverted to either the VAPP or VPP depending on need. A gate will also be provided at the inlet of the VAPP to allow isolation for maintenance purposes.

A new, 66-inch pipe segment will be installed from the new diversion structure to the new wet well. The existing 66-inch pipe will connect the new diversion structure to VPP (Figure 5). The VAPP piping will connect to the new VPP replacement manifold that was recently constructed in Hurricane Street with use of a 42--inch flange at its west end. From there, the piping will continue back to the new valve vault at the VAPP.

1.3.4 Recontour and Revegetation

Once the diversion structure and associated pipe connections have been constructed and Grand Canal bottom has been backfilled and compacted to pre-project conditions. Backfilling of the Grand Canal will be done with the material that was temporarily stockpiled. The cofferdam piles and sheeting will be removed using a crane situated in the upland area adjacent to Grand Canal. The western bank of Grand Canal will be restored and recontoured to pre-project elevation and vegetation will be restored pursuant to the HMMP.

1.4 Project Impacts

The project was designed to minimize impacts to jurisdictional resources to the extent feasible. The cofferdam is the minimum size necessary to complete the construction of the diversion structure and piping. The project will temporarily impact the following as depicted on Figures 6a and 6b:

- 0.028 acre of USACE Section 404 Non-wetland Waters of the U.S. (WoUS)
- 0.003 acre of USACE Section 404 Wetlands
- 0.025 acre of USACE Section 10 Navigable Waters
- 0.004 acre of CCC Environmentally Sensitive Habitat Areas (ESHA) 1-parameter wetlands

Mitigation for temporary impacts to USACE Non-wetland WoUS, and Navigable Waters is being accomplished through backfilling and re-grading the temporarily impacted portions of the Grand Canal channel bed to pre-project contours, and by restoring a combined 0.004 acre of USACE wetland and southern coastal salt marsh habitat on the west bank of Grand Canal.

1.5 Project Permits

This HMMP was prepared to address the terms, mitigation measures, and conditions anticipated in the following regulatory permits:

- USACE Section 404 Individual Permit (Pending - SPL-2015-00893)
- RWQCB Section 401 Water Quality Certification (Pending)
- CCC Coastal Development Permit (Pending)

1.6 Location of Proposed Mitigation

All mitigation will be conducted onsite within the temporary impact areas as described above and depicted in Figure 6a, 6b and 8.

1.7 Description of Mitigation Activities

Describe activities (back filling and recontouring of canal bed, recontouring west bank, seeding and planting of west bank, irrigation, monitoring, reporting.

Chapter 2
Baseline Information and Impacts

2.1 Project Site Description

The project is located within an urban area within the City of Los Angeles community of Venice. The project area is surrounded on the north, west, and south by residential land uses and to the east by the Grand Canal. The Grand Canal confluences with the Ballona Lagoon, located to the south and southeast. Residential land uses are also located immediately east of the Grand Canal.

The project will occur on two undeveloped parcels that are currently surrounded by a chain link fence. Two other undeveloped lots will function as laydown areas during construction. Elevations within the study area range from approximately 0 feet to approximately 10 feet above mean sea level (MSL).

2.2 Vegetation Types

Vegetation in the project area and vicinity (within 500 feet of the project site) consists of ornamental vegetation associated with developed and/or disturbed lots surrounding the Grand Canal and Ballona Lagoon as well as native and non-native vegetation communities. Vegetation types/land uses within the vicinity of the project are identified below in Table 1. Figure 7 depicts the location of each vegetation community within the study area. A short description of each vegetation type is provided below the table.

Table 1. Vegetation Communities/Land Use/Land Condition within the 500 feet of the Project Site

Vegetation Community/Land Use/Land Condition	Acres
Developed	24.60
Disturbed/Ruderal	0.18
Open Water	3.13
Southern Coastal Salt Marsh	0.90
Coastal Brackish Marsh	0.16
Southern Foredunes	0.43
Southern Coastal Bluff Scrub	0.35
Total	29.74

2.2.1 Developed

Developed lands were mapped in association with the residential structures and surface roads include ornamental vegetation typically associated with the developed areas such as Mexican fan palm (*Washingtonis robusta*), acacia (*Acacia* sp.), eucalyptus (*Eucalyptus* sp.), Peruvian pepper tree (*Schinus molle*), iceplant (*Carpobrotus* sp.), and myoporum (*Myoporum* sp.).

2.2.2 Disturbed/Ruderal

Disturbed/ruderal lands were mapped on the eastern side of the Grand Canal associated with a vacant lot surrounded by developed lands to the north, east, and south. The area contains a small footpath leading from the sidewalk adjacent to the Grand Canal to the Via Dolce surface street. This area is dominated by non-native and native annual and perennial species such as iceplant, garland chrysanthemum (*Glebionis coronaria*), telegraphweed (*Heterotheca grandiflolia*), cheeseweed (*Malva parviflora*), Bermuda grass (*Cynodon dactylon*), and Australian saltbush (*Atriplex semibaccata*).

2.2.3 Open Water

Open Water consists of the tidal influenced Ballona Lagoon and within the Grand Canal. Ballona Lagoon connects to Marina del Rey harbor, approximately 4,000 feet to the south of the project site, through a flood gate system under Via Marina street. Mudflats occur within the tidal-influenced portions of Ballona Lagoon and exposed areas of mudflats fluctuate with tide.

2.2.4 Southern Coastal Salt Marsh (Holland 52120)

This vegetation type was mapped along the edges of the Grand Canal and Ballona Lagoon. This area is dominated by native wetland species such as Pacific pickleweed (*Sarcocornia pacifica*), batis (*Batis maritima*), wooly seablight (*Suaeda taxifolia*, California Native Plant Society [CNPS] California Rare Plant Rank [CRPR] 4.2), spearscale (*Atriplex prostrata*), and fleshy jaumea (*Jaumea carnosa*). The upper portions of this area support species such as salt grass (*Distichilis spicata*), five-hooked bassia (*Bassia hyssopifolia*), beach bur (*Ambrosia chamissonis*), and alkali heath (*Frankenia salina*) indicating the start of the wetland-upland interface. Two "islands" with some coastal salt marsh vegetation were mapped within the Ballona Lagoon that are periodically submerged by tidal waters each day.

2.2.5 Coastal Brackish Marsh (Holland 52200)

This vegetation type was mapped immediately above the tidal zone of the Grand Canal and Ballona Lagoon. This area is dominated by species such as alkali heath, salt grass, five-hooked bassia, woolly seablight, beach bur, alkali heliotrope (*Heliotropium curassavicum*), and deerweed (*Acmispon glaber*). The lower portion of this area transitions to wetland species such as pickleweed, batis, and fleshy jaumea.

2.2.6 Southern Foredunes (Holland 21230)

This area was mapped on the western side of Ballona Lagoon within the southwestern portion of the study area. This area is dominated by upland coastal dune and maritime sage scrub species. Dominant species observed on the western side of the lagoon include beach bur, deerweed, bluff buckwheat (*Eriogonum parviflora*), red sand verbena (*Abronia maritima*, CNPS CRPR 4.2), beach evening primrose (*Camissonia cheiranthifolia*), southwestern spiny rush (*Juncus acutus* ssp. *leopoldii*, CNPS CRPR 4.2), telegraphweed, and Watson's saltbush (*Atriplex watsonii*).

2.2.7 Southern Coastal Bluff Scrub (Holland 31200)

This area was mapped on the eastern side of Ballona Lagoon. Dominant species observed in this area include southwestern spiny rush, California encelia (*Encelia californica*), California sagebrush (*Artemisia californica*), prickly-pear cactus (*Opuntia littoralis*), and lemonade berry (*Rhus integrifolia*).

2.3 Plants

Most plant species that were observed within the study area are considered common or expected within the study area vicinity and include a mix of native and non-native species. However, three special-status species were determined to be present within the study area: wooly seablite, southwestern spiny rush, and red sand verbena, each of which is CNPS CRPR List 4.2 species. In addition, suitable habitat for other special-status plant species is present within the study area.

Common native plant species observed during the habitat assessment included the following species: lemonade berry, California sagebrush, California encelia, telegraphweed, alkali heath, alkali heliotrope, prickly-pear cactus, deerweed, salt grass, western ragweed (*Ambrosia psilostachya*), coastal goldenbush (*Isocoma menziesii*), batis, Parish's pickleweed (*Arthrocnemum subterminale*), big saltbush (*Atriplex lentiformis*), Pacific pickleweed, salt dodder (*Cuscuta salina*), California sun cup (*Camissoniopsis* bisorta), bluff buckwheat, nightshade (*Solanum* sp.), and brittlegrass (*Setaria* sp.).

Common non-native species observed during the habitat assessment included: Mexican fan palm, acacia, eucalyptus, Australian saltbush, Bermuda grass, flax-leaved horseweed (*Erigeron bonariensis*), five---hooked bassia, cheeseweed, baby sun-rose (*Aptenia cordifolia*), fat-hen (*Atriplex prostrata*), hottentot fig (*Carpobrotus* sp.), Lamb's quarters (*Chenopodium album*), white-stem filaree (*Erodium moschatum*), garland chrysanthemum, grass poly (*Lythrum hyssopifolia*), myoporum, Peruvian pepper tree (Schinus mole), Brazilian pepper tree (*Schinus terebinthifolius*), sow thistle (*Sonchus* sp.), and puncturevine (*Tribulus terrestris*).

2.4 Wildlife

Wildlife species observed within the study area are considered common to the general vicinity. The majority of species recorded were birds such as mallard (*Anas platyrhynchos*), mourning dove (*Zenaida macroura*), Anna's hummingbird (*Calypte anna*), white-throated swift (*Aeronautes saxatalis*), barn swallow (*Hirundo rustica*), cliff swallow (*Petrochelidon pyrrhonota*), northern rough-winged swallow (*Stelgidopteryx serripennis*), black phoebe (*Sayornis nigricans*), American crow (*Corvus brachyrhynchos*), common raven (*Corvus corax*), European starling (*Sturnus vulgaris*), house finch (*Carpodacus mexicanus*), double-crested cormorant (*Phalacrocorax auritus*), great blue heron (*Ardea herodias*), great egret (*Ardea alba*), osprey (*Pandion haliaetus*), American coot (*Fulica americana*), black-bellied plover (*Pluvialis squatarola*), willet (*Tringa semipalmata*), whimbrel (*Numenius phaeopus*), marbled godwit (*Limosa fedoa*), and belted kingfisher (*Ceryle alcyon*).

Marine invertebrates observed included buckshot barnacles (*Chthalamus* sp.), blue mussel (*Mytilus edulis*), California horn snail (*Cerithidea californica*), California mussel (*Mytilus*

californianus), checkered limpet (*Lottia strigatella*), Gould's bubble snail (*Bulla gouldiana*), and Pacific oyster (*Ostrea lurida*).

Marine vertebrates observed included California corbina (*Menticirrhus undulates*) and topsmelt (*Atherinops affinis*).

2.5 Jurisdictional Waters and Wetlands

A jurisdictional delineation was conducted within the project footprint plus a 100-foot buffer. Two named features that could be subject to the jurisdiction of the USACE, RWQCB, and CCC were delineated: Ballona Lagoon and Grand Canal. These two features are treated as one for the purpose of this document. Both the Grand Canal and the Ballona Lagoon were determined to be subject to tidal influence. USACE and RWQCB potential jurisdictional areas within the 100-foot buffer study area total approximately 0.929-acre of Section 404 non-wetland waters of the U.S. and 0.075-acre of Section 404 wetland waters of the U.S. (Table 2). Additionally, 0.793-acre of potential USACE Section 10 navigable waters of the U.S. was mapped in the 100-foot buffer study area. Potential CCC jurisdiction within the 100-foot buffer study area totaled approximately 0.929-acre of one-parameter wetlands. Figures 6a and 6b depict the limits of each jurisdiction. Based on the lack of freshwater input and the historic context of this feature receiving any freshwater flows it was determined that the Grand Canal and the Ballona Lagoon is not subject to CDFW jurisdiction.

Table 2. Jurisdictional Delineation Summary (acres)

Study Area Feature	USACE Section 404 Non-Wetland Waters of the U.S./RWQCB Section 401 Non-Wetland Waters of the U.S.	USACE Section 404 Wetland Waters of the U.S./RWQCB Section 401 Wetland Waters of the U.S.	USACE Section 10 Navigable Waters of the U.S.	CCC 1-Parameter Wetlands
Ballona Lagoon and Grand Canal	0.929	0.075	0.793	0.929
Total	0.929	0.075	0.793	0.929

2.6 Vegetation/Land Use Impacts

Temporary impacts to vegetation communities/land uses will result in a total of 0.004 acre of short-term temporary impacts to native vegetation communities (excluding developed areas). These impacts would occur during the construction phase only and no permanent direct impacts to native vegetation communities will occur. Table 3 below presents the existing vegetation within the study area (500-foot buffer) and the impacts associated with the project.

Approximately 0.004 acre of temporary direct impacts will occur to the sensitive vegetation community Southern Coastal Salt Marsh, which is generally synonymous with *Sarcocornia pacifica* Herbaceous Alliance (Pickleweed Mats) and *Distichilis spicata* Herbaceous Alliance – Disturbed (Salt Grass Flats – Disturbed) as described by Sawyer et al (2009).

Table 3. Temporary and Permanent Impacts to Vegetation Communities/Land Uses

Vegetation Community/Land Use/Land Condition	Acres Within 500 feet of Project	Temporary Impacts (acres)
Developed (Vegetation Community)	24.60	0.001
Disturbed/Ruderal	0.18	---
Open water	3.13	0.027
Southern Coastal Salt Marsh)	0.90	0.004
Coastal Brackish Marsh	0.16	---
Southern Foredunes	0.43	---
Southern Coastal Bluff Scrub	0.35	---
Total	29.74	0.032

2.7 Jurisdictional Waters and Wetlands Impacts

The project occurs within the jurisdiction of several agencies including USACE, RWQCB, and CCC and will result in temporary direct impacts to aquatic resources, including existing wetland habitat. No permanent direct impacts will occur. Table 4 below and Figure 6a and 6b identify temporary impacts to jurisdiction regulated by each of the agencies.

Table 4. Temporary Impacts to Aquatic Resources (acres)

Study Area Feature	USACE Section 404 Non-Wetland Waters of the U.S./RWQCB Section 401 Non-Wetland Waters of the State	USACE Section 404 Wetland Waters of the U.S./RWQCB Section 401 Wetland Waters of the State	USACE Section 10 Navigable Waters of the U.S.[1]	CCC 1-Parameter Wetlands
Ballona Lagoon and Grand Canal	0.028	0.003	0.025	0.004
Total	0.028	0.003	0.025	0.004

1.USACE Section 404 Wetlands overlaps with CCC 1-Parameter Wetlands

2.USACE Section 10 overlaps with USCE Section 404 Non-wetland.

Chapter 3
Mitigation Requirements and Work Plan

3.1 Determination of Required Mitigation

Pursuant to the Section 404 Final Compensatory Mitigation Rule, the overall acreage, functions, values and services of wetlands should not be reduced within the watershed. As such, areas of temporary impact associated with the project will be restored to pre-project conditions or better to offset temporary losses to wetland WoUS, non-wetland WoUS, and CCC 1-parameter wetlands. The restoration of wetland and waters will restore the functions and values of the existing onsite resources. All mitigation will occur onsite and within the project watershed.

3.2 Mitigation Requirements

This mitigation plan outlines the implementation, maintenance, monitoring and management of waters and habitats provided as mitigation to offset temporary impacts associated with the project. The proposed mitigation plan would:

- Restore temporary impacts to waters and habitats to pre-project conditions or better;
- Retain existing onsite hydrology to create self-sustaining habitat;
- Restore impacts to woolly sea-blite (*Suaeda taxifolia*, CNPS CRPR 4.2 species);
- Address maintenance and monitoring methods during the habitat establishment period.

Habitat types to be restored include southern coastal salt marsh. No existing native habitats will be converted to other habitat types as part of this HMMP. Table 5 shows the proposed mitigation by mitigation type and vegetation community.

Table 5. Vegetation Communities and Aquatic Resources to be Restored

Vegetation Community/Land Use	Temporary Impacts (acres)	Onsite Restoration (acres)
Southern Coastal Salt Marsh	0.004	0.004
Total	0.004	0.004

3.3 Responsible Parties

The following sections define the role of each party responsible for implementation and success of the mitigation plan.

- Owner/Operator
- Restoration Ecologist
- Restoration Contractor

3.3.1 Owner/Operator

The owner/operator of the mitigation project is LABOE and will ultimately be responsible for permit compliance and implementation of this HMMP. The owner/operator will be responsible for obtaining the services of a qualified restoration ecologist and restoration contractor, as well as long term maintenance and preservation.

3.3.2 Restoration Ecologist

The owner/operator shall obtain the services of a qualified restoration ecologist with experience in the planning, design, and implementation of aquatic and estuary restoration projects in Southern California. The restoration ecologist will be responsible for oversight of all site preparation, installation, maintenance, monitoring and reporting for the mitigation project. The restoration ecologist will be responsible for coordination between the owner/operator and restoration maintenance contractor, as well as the resource agencies. The restoration ecologist will be responsible for directing the restoration maintenance contractor activities regarding the implementation of this HMMP and to assure the success of the mitigation project and compliance with the project permits and this HMMP.

3.3.3 Restoration Maintenance Contractor

The owner/operator shall obtain the services of a qualified restoration maintenance contractor with experience in native habitat maintenance and restoration in Southern California. The restoration maintenance contractor will be responsible for all site preparation activities including grading, initial non-native removal, plant and hydroseed installation, and irrigation, Following the installation of the mitigation site the restoration maintenance contractor will be responsible for maintaining the mitigation site including necessary protective fencing, regular non-native plant removal, replanting (if needed), regular watering (if needed), trash removal, and maintaining signage. The restoration maintenance ecologist will be responsible for performing maintenance tasks and facilitating compliance with site performance standards under the direction of the restoration ecologist. The restoration maintenance contractor will be responsible for coordinating with the restoration ecologist and the owner/operator regarding mitigation installation procedures, site maintenance, and any implementation of any adaptive management measures identified by the restoration ecologist.

3.4 Pre-Construction Project Activities

3.4.1 Pre-Construction Plant Survey, Nesting Bird Survey, and Biological Monitoring of Vegetation Removal

Pre-Construction Plant Survey

Prior to any initial ground disturbance activities, a plant survey of the impact area and adjacent area will be conducted to identify and map wooly seablite, spiny-leaved rush, red-sand verbena, and sea cliff buckwheat. The survey will satisfy Mitigation Measure Bio-1 as outlined in the project EIR and provided below.

MM-BIO 1: Special-Status Plant Surveys

To confirm the presence or absence of special-status plant species or sea cliff buckwheat (the host plant for El Segundo butterfly) within the disturbance footprint, a special-status plant survey shall be completed prior to construction. The focused survey shall be conducted by a qualified biologist during the appropriate blooming period, or when the plant is readily identifiable, prior to the start of construction activities. If any sensitive, non-listed plant species is found, then the individuals shall be clearly identified and avoidance measures shall be utilized to the extent practical.

If avoidance is not practical a count of impacted individuals will be conducted and the same number of individuals will be replanted during site installation.

Pre-Construction Nesting Bird Survey

A nesting bird survey will be conducted prior to any ground disturbance or vegetation removal between February 15 and August 31. The survey will satisfy Mitigation Measure Bio-6 as outlined in the project EIR and provided below.

MM-BIO 6: Nesting Bird Survey

If construction commences during the bird breeding season (February 15 through August 31), a preconstruction survey for nesting birds shall occur within three days prior to construction activities by an experienced avian biologist. The survey shall occur within all suitable nesting habitat within the project impact area and a 500-foot buffer. If nesting birds are found, an avoidance area shall be established in consultation with the resource agencies as appropriate by a qualified biologist around the nest until a qualified avian biologist has determined that young have fledged or nesting activities have ceased. The project site shall be re-surveyed if there is a lapse in construction activities for more than seven days during the bird breeding season.

Biological Monitor during Vegetation Removal Activities

A biological monitor will be present during any vegetation removal activities associated with the project to ensure no impacts to special-status wildlife occur. Monitoring of vegetation removal will satisfy Mitigation Measure Bio-2 as outlined in the project EIR and provided below.

MM-BIO-2: Monitor during Vegetation Removal

A qualified biologist shall monitor all vegetation removal and ground-disturbing activities, such as staging, grubbing and grading, for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat outside the project footprint and to survey for sensitive wildlife species. When vegetation removal and ground-disturbing activities are not occurring, as-needed monitoring at the project site shall occur. Monitoring logs, as appropriate depending on project activities, shall be maintained for the duration of construction activities.

3.4.2 Construction Fencing

Prior to ground disturbance all areas of temporary impact to biological resources shall be delineated using silt fencing and visible (orange) construction fencing. The fencing shall be

maintained throughout the project construction duration and mitigation and monitoring period until determined to not be required by the restoration ecologist. Fencing of the construction limits will satisfy Mitigation Measure Bio-7 as outlined in the project EIR and provided below.

MM BIO-7: Silt Fencing at Construction Limits

Construction limits shall be identified using silt fencing, which shall be installed under the supervision of a qualified biologist prior to the commencement of work. Construction personnel shall strictly limit their activities, vehicles, equipment, and construction materials to the project footprint, including designated staging areas, and routes of travel. Construction areas shall consist of the minimal area necessary to complete the proposed project. The fencing shall remain in place until the completion of all construction activities and for at least one year to protect the restored habitat areas until plants are established.

3.5 Project Mitigation Area Site Preparation and Installation

3.5.1 Excavation, Stockpiling and Grading

During excavation all soils removed from the site will stockpiled and stored for the duration of the project. Following the completion of the work in Grand Canal and on the west bank of Grand Canal all stockpiled soils will be replaced within the temporary impact areas until original elevations and grades are achieved. The west bank of Grand Canal will be regraded to pre-project conditions.

3.5.2 Trash Removal and Non-Native Plant Removal

The restoration maintenance contractor shall be responsible for removing all trash and debris from the mitigation area prior to planting. Removal of trash and debris from the mitigation area shall be performed during each maintenance visit.

All non-native vegetation will be removed from the mitigation sites prior to planting and during each maintenance visit. Any non-native removal required will be conducted either by hand. Herbicide may only be used early in the growing season before non-natives have gone to flower and hand pulling may be done prior to seed set. Herbicide application shall be conducted by a licensed herbicide applicator. Only herbicides approved for use in or near aquatic environments shall be utilized.

3.5.3 Irrigation/Watering

Due to the small size of the mitigation area no temporary irrigation system will be installed. Watering of plant material will be done following installation and hydroseeding activities and following any supplemental planting to replace any dead material. After initial installation and watering it is expected that no watering will be needed due to the tidal fluctuations within the mitigation area. However, supplemental watering may occur following initial plant installation if recommended by the restoration ecologist.

3.5.4 Planting Plan

Planting of the mitigation area will consist of both container stock and hydroseeding. The seed mix may be applied with a broadcast seeder and raked into the soil throughout the restoration areas if determined to be appropriate by the restoration ecologist. If planting must occur during the months of April through October, the plantings will be watered once a week for the first three months, and once every other week through October, or until the restoration ecologist determines that watering is no longer needed. Each plant will receive at least two gallons of water during each watering event.

Planting and seeding will be accomplished with native species consistent with the pre-impact species composition. All non-native vegetation, trash and debris will be removed from the mitigation site prior to planting and seeding.

Tables 6 and 7 present the planting palette and seed mixes to be utilized within the mitigation area. Indicated quantities for the various species are based on 4-foot square plant spacing across the proposed planting areas. Placement of individual plants in clusters will reflect natural conditions.

Table 6. Southern Coastal Salt Marsh Mitigation Area Planting Palette

Restoration Area: Southern Coastal Salt Marsh (0.004 acre)			
Scientific Name	Common Name	Propagule	Quantity
Sarcocornia pacıfica	Pacific pickleweed	1 gallon	19
Ambrosia chamissonis	Beach bur	1 gallon	2
Jaumea carnosa	Fleshy jaumea	1 gallon	12
Distichilis spicata	Salt grass	1 gallon	6
Atriplex prostrata	Spearscale	1 gallon	5
Frankenia salina	Alkali heath	1 gallon	10
Acmispon glaber	deerweed	1 gallon	2
Heliotropium curassavicum	Alkali heliotrope	1 gallon	8
Suaeda taxıfolia[1]	Woolly sea-blite	1 gallon	6
Juncus acutus ssp. *leopoldii*[1]	Southwestern spiny rush	1 gallon	6
Total Container Stock			78
[1]CNPS CRPR 4.2 Species			

Table 7. Southern Coastal Salt Marsh Mitigation Area Seed Mix

Restoration Area: Southern Coastal Salt Marsh (0.004 acre)		
Botanical Name	Common Name	Lbs. Pure Live Seed/Acre
Atriplex patula	Beach saltbush	2
Cammisoniopsis bistorta	Sun cup	2
Cammisoniopsis cheiranthifolia	Beach evening primrose	2
Cressa truxillensis	Alkali weed	3
Distichilis spicata	Salt grass	3
Eriogonum parvifolium	Sea cliff buckwheat	2
Eriophyllum confertifolia	Golden yarrow	2
Frankenia salina	Alkali heath	3
Heliotropium curassavicum	Alkali heliotrope	2
Isocoma menziesii	Coast goldenbush	1
Juncus acutus ssp. *leopoldii*	Southwestern spiny rush	2
Malvella leprosa	Alkali mallow	3
Sarcocornia pacifica	Pacific pickleweed	3
Total (lbs/acre)		30

3.5.6 Signage

Signs will be placed along the sidewalk adjacent to the mitigation area once restoration installation activities are complete. The proposed placement at the top of the slope adjacent to the pedestrian walkways along the Grand Canal shall alert residents and pedestrians not to enter the mitigation site.

3.5.7 Protective Caging

Protective caging will be installed around the plantings as directed by the restoration ecologist. Material for caging, if needed, will consist of plastic screen mesh or an equivalent material. Caging for each plant will extend at least 3 inches into the soil and 1 foot above the plant tip to allow sufficient height for at least 2 years' growth. The upper edges of the cage will be folded over each other, creating an "envelope" around the plant.

Chapter 4
Maintenance Plan and Activities

The operator shall contract with a qualified restoration maintenance contractor to maintain the sites throughout the maintenance and monitoring period which is defined as five years from installation of the mitigation, or until project success criteria have been achieved.

Activities conducted during the maintenance period may involve replanting container plants, reseeding, repairing areas that have eroded, inspecting and repairing signs, removing trash and debris, and weeding to control non-native or invasive plant species. For the purpose of this mitigation effort, an invasive plant is one with a rating of High, Moderate, or Limited by the California Invasive Plant Council or a plant determined to be invasive by the restoration ecologist.

This mitigation plan is based upon a 5-year maintenance and monitoring schedule with more intensive effort in the initial periods. Particular attention will be made to controlling the establishment of invasive plants in and adjacent to the restoration sites. Monthly site maintenance visits will take place during the first year of the maintenance period, every other month for Year two, and quarterly for years three through five as presented in Table 8 below. Removal and/or treatment of non-native or invasive plants will be directed under the direction the restoration ecologist as indicated following scheduled inspections.

Table 8. Mitigation Site Maintenance Schedule

Year of Project Following Installation	Maintenance Schedule
Year 1	Monthly
Year 2	Every Other Month
Year 3	Quarterly
Year 4	Quarterly
Year 5	Quarterly

Replacement planting and seeding, erosion repair, protective caging and other adaptive management activities will be implemented as directed by the restoration ecologist and as indicated based upon the results of the scheduled inspections throughout the 5-year maintenance period.

Chapter 5
Monitoring Plan

The monitoring period will start following installation of the mitigation site and will include qualitative biological monitoring, permanent photo station documentation, and annual quantitative performance monitoring.

5.1 Qualitative Monitoring

The project restoration ecologist will conduct monthly qualitative monitoring through year 1 of the monitoring period, every other month for year two, and quarterly for years three through five as presented in Table 9 below.

Table 9. Mitigation Site Monitoring Schedule

Year of Project Following Installation	Monitoring Schedule
Year 1	Monthly
Year 2	Every Other Month
Year 3	Quarterly
Year 4	Quarterly
Year 5	Quarterly

Qualitative monitoring will focus on assessing the health, survivorship, and overall cover of native target vegetation. Plant and wildlife species observed will be noted. Any non-native and invasive plants observed will be noted. Any issue(s) that have the potential to affect the performance of the mitigation site will be documented and mapped. Photographs will be taken to document the performance of the mitigation site. Following each qualitative monitoring visit the restoration ecologist will prepare a memorandum documenting the results of the visit and any maintenance recommendations to be sent to the owner/operator and restoration maintenance contractor. The memorandum will contain an assessment of the health and cover of native target plantings and will note any the presence of any non-native/invasive species. Any other issues that may affect the performance of the mitigation site will be documented, and maintenance recommendations will be made.

5.2 Annual Quantitative Performance Monitoring

Vegetation monitoring will be conducted along transects or within quadrats, as appropriate to the particular habitat type/size of mitigation site and as determined by the restoration ecologist. The number and location of monitoring transects and quadrats will be determined as part of the first year monitoring effort, with the design directed at providing statistically relevant results. Transect locations will be clearly marked both in the field and recorded with a GPS. The position of quadrats along the transect will be randomly selected each year, or if point-intercept methods are used all species occurring every half meter of the transect will be recorded.

In addition to the quantitative data required for evaluation of mitigation success, general field notes will also be compiled as to hydrological conditions (based on surface observations and limited soil sampling), animal species observed or detected, integrity of fencing/signage, and other general conditions relevant to the characterization of the success of the mitigation effort as well as identification of adaptive/corrective measures that may be appropriate to ensure relevant success criteria. Permanent photo documentation points will be established for the mitigation site from which color photographs will be taken each year to document the progression of vegetation conditions. The number and location of points will be established as part of the first-year monitoring effort. Photographs will be taken on the same compass bearing to provide accurate year-to-year visual comparisons.

5.3 Performance Standards and Final Success Criteria

This plan assumes that performance monitoring will be conducted over a 5-year period. Monitoring may occur over an extended period if the success criteria are not met and held within the initial 5 years. Table 10 presents the performance standards and final success criteria for the mitigation site.

Table 10. Performance Standards and Final Success Criteria for Southern Coastal Salt Marsh Mitigation Area

Parameter	Performance Standard	Final Success Criterion
Plant Survival—minimum percentage survival of original plantings. Replacement planting to occur each year to compensate for any dead or under- performing plantings. The same number of planted special-status plants (based on pre-construction plant survey) shall be replaced each year as needed and the total number of special-status plantings shall be verified in Year 5.	Year 1: 85% Year 2: 90% Year 3: 100% Year 4: 100%	Year 5: 100%
Native Species Cover—minimum relative percent vegetation cover comprised of native and target southern coastal salt marsh species.	Year 1: 45% Year 2: 55% Year 3: 65% Year 4: 75%	Year 5: 85%
Non-native Species—maximum relative percent cover of species listed as High, Moderate and Low Priority by Cal IPC.	Year 1: 5% Year 2: 5% Year 3: 5% Year 4: 5%	Year 5: 5%

5.4 Adaptive Management

Adaptive management will be utilized to address any unforeseen issues that affect the performance of the mitigation site that are not discussed in the HMMP. Adaptive management may be initiated at any time during the 5-year maintenance and monitoring period. Each annual

report will discuss the site performance and the need for any adaptive management actions (replanting, increased maintenance or monitoring, irrigation.

Any significant issue or contingency that arises at the site (e.g., plant survival issues, fire, flooding, etc.) will be reported in writing to the resource agencies within 2 weeks from the date of the incident. Accompanying the report will be a plan for remediation with an implementation schedule, monitoring schedule, and financial assurances.

5.5 Annual Monitoring Reports

A report documenting the performance of the mitigation site will be prepared annually for each year of the 5-year monitoring period. The Annual Monitoring Reports will document the results of the qualitative monitoring, maintenance conducted, and any unexpected issues and adaptive management actions taken throughout the previous year. A list of plants and wildlife observed in or adjacent to the mitigation site(s) will be included. The Annual Monitoring Reports will also document the results of the annual quantitative monitoring including raw and summarized data and will also contain photographs taken from the permanent photo monitoring stations. The Annual Monitoring Reports will contain figures that depict the mitigation site(s) and will show the placement of transects/quadrats and the location of permanent photo monitoring stations. The Annual Monitoring Reports will be submitted annually to each respective resource agencies by January 31 of each year or according to dates specified in the final permits.

5.6 Project Completion and Agency Confirmation

Project completion will be achieved when the final success criteria have been achieved, and verified by resources agency staff, or when agency staff determine that the project is complete. Project completion may be achieved prior to Year 5 if agency staff determines that final success criteria are achieved. Once the final success standards are met the owner/operator may request that a site visit be conducted with resource agency staff to review the site and success criteria. A written statement of Project completion shall be provided by the resource agencies for the Project to be considered successful and complete.

Chapter 6

Site Protection, Long-Term Management and Financial Assurances

6.1 Site Protection

The mitigation site will be preserved for perpetuity through a site protection instrument such as a restrictive covenant, deed restriction, or equivalent instrument. Following project completion LABOE will assume responsibility for and will fund long-term maintenance and management of the mitigation site.

6.2 Long-term Management

Long-term management of the mitigation site will be the responsibility of LABOE. A Long-term Management Plan will be prepared by LABOE and submitted to resource agency staff for approval. The Long-term Management Plan will describe the activities to be conducted on the site to assure long-term viability of the preserved habitats such as: regular/annual monitoring and reporting, maintenance of signage, erosion repair, non-native/invasive species maintenance, trash and debris removal, and will provide contingency measures such as supplemental planting and watering.

Funding for the long-term management will be the responsibility of LABOE and LABOE will be required to provide a bond covering the fees associated with implementing the Long-term Management Plan.

6.3 Financial Assurances

The owner/operator shall assume all costs and financial responsibility for the mitigation site through the 5-year maintenance and monitoring period including all components of the mitigation project: site installation, maintenance, monitoring, reporting, site protection and long-term management including any contingency actions.

Request for Agency Oversight Application

The purpose of this application is to provide the Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board (Water Board) sufficient information to determine which agency will be the appropriate lead agency to provide oversight for the assessment and/or remediation of this Brownfield site. The detailed site information requested in this application will also help the appropriate lead agency to expedite the development of a cost recovery agreement, so that the applicant can begin work in a timely and efficient manner.

For a California Land Reuse and Revitalization Act (CLRRA) Agreement or a Prospective Purchaser Agreement, please complete the appropriate Supplemental Attachment since additional information is required for these programs.

SECTION 1
APPLICANT/PRIMARY CONTACT INFORMATION

The Applicant (i.e., individual, business entity, or organization) requesting oversight must possess all necessary rights and access to the site so that it can carry out any and all activities that the oversight agency may require in making its regulatory decisions.

Applicant Name: City of Los Angeles - Bureau of Engineering

Applicant Point of Contact Name: Mr. Sylvester Kueh

E-mail Address: sylvester.kueh@lacity.org

Phone: (213)485-1693

Address, City, County & Zip Code: 1149 S. Broadway Street, Los Angeles, Los Angeles County 90015

Applicant's relationship to site: Current Owner ☒ Operator ☐
Local Agency ☐ Prospective Purchaser ☐ Developer ☐
Other (please describe):

Current Owner (if different from Applicant):

Owner Point of Contact Name:

E-mail Address:

Phone: ( ) -

Address, City, County & Zip Code:

Consulting Firm Name: AECOM (for technical questions only)

Consultant Point of Contact Name: Shapoor Hamid, PhD, Principal Scientist

E-mail Address: shapoor.hamid@aecom.com

Phone: (213)996-2630

Request for Agency Oversight Application

Address, City, County & Zip Code: 300 S. Grand Avenue, Los Angeles, Los Angeles County 90071

Primary Point of Contact for this Site: Applicant Contact ☒ or Consultant Contact ☒ or Owner Contact ☒

Billable Party Information:

Billing Point of Contact Name:

E-mail Address:

Phone: ( ) -

Address, City, County & Zip Code:

Tax ID Number (applicable only to business entities and organizations; please do not provide individual social security numbers):

SECTION 2
SITE INFORMATION

If applicable, the applicant may reference information from an attached Phase 1 Environmental Assessment or other site investigation reports available for the Site.

1. Is this Site listed on Envirostor? Yes ☐ No ☒ and/or Geotracker? Yes ☐ No ☒

2. Name of Site: 128 Hurricane Street - VAPP

3. Address City County ZIP: 128 Hurricane Street, Venice also known as Marina Del Rey, CA 90292

4. APN(s): 422-5010-016 Acres: 0.097 Zoning: Mixed

5. Provide a Site Location Map and a Site Diagram showing significant features

6. Describe the current use of the Site and include description of features:
   Vacant Lot

7. Describe the surrounding land use (including proximity to residential housing, schools, churches, etc.):
   Surrounded by Residential housing, and water treatment plant. School within 0.3 miles.

8. Background: Current & Previous Business Operations
   Name: Currently, no business operations. Past business operations was oil production from 1928 to 1932.

Request for Agency Oversight Application

Type: Public Facilities

Years of Operation:4

9. If known, list all previous businesses operating on this Site:
   1. McDonald Petroleum, Ltd.
   2.
   3.
   4.
   5.

10. What hazardous substances, pollutants, or contaminants have been or are being used/stored at the Site?
    Petroleum hydrocarbons

11. What environmental media is/was/may be contaminated (check all that apply)?
    Soil ☒ Air ☐ Groundwater ☐ Surface Water ☐ Unknown ☐

12. Has sampling been conducted? Yes ☒ No ☐ If yes, then identify the contaminants detected, including the maximum concentrations, and contaminants that exceeded screening levels (e.g., Preliminary Remediation Goals or California Human Health Screening Levels).Reports are attached

13. Is there currently a potential of exposure of the community or workers to hazardous substances, pollutants, or contaminants at the Site?
    Yes ☒ No ☐ If yes, then explain. Direct exposure to petroleum hydrocarbons if excavation occurs.

14. Provide a brief summary of removal or remedial activities that have been undertaken or completed at the Site, if any. see attached RAP

15. Provide a description of known or possible water quality impacts at the Site. Also, provide information about the type(s) of water supply for the Site and, if known, any information on municipal, domestic, agricultural or industrial water supply wells that are either on the Site or within a 1-mile radius of the project area.

    Not known

16. Are any Federal, State or Local regulatory agencies currently involved with the Site? Yes ☒ No☐ If yes, describe the regulatory agencies' involvement with the Site, and provide the regulatory agencies' contact names and telephone numbers below.

Agency Involvement Contact Name Phone

Agency	Involvement	Contact Name	Phone Number

Request for Agency Oversight Application

Army Corps of Engineering	**Section 404 Water Permit**	**Deana J. Cummings**	**(213)452-3002**
Los Regional Water Quality	**Section 401 Water Permit**	**Dana Cole**	**(213)576-5733**
Califoria Coastal Commission	**State Coastal Development Permit**	**Shannon Vaughn**	**(562)590-5071**

17. What is the proposed future use of the Site? Develop as parking lot, open space, and landscaping

18. If the Site is not cleaned-up to unrestricted standards, will the owner accept land use restrictions? Yes

19. What oversight service is being requested of the Lead Agency (check all that apply)?

Initial Investigation/Preliminary Endangerment Assessment ☐
Supplemental Investigation ☐
Remedial Investigation/Feasibility Study ☐
Removal Action/Remedial Action ☒
Case Closure ☐
Document Review ☒
Other:

20. Provide a general description of the nature of the proposed redevelopment, including a general timeline for construction: The City plans to develop the vacant lot into a parking lot, open space, and landscaping. Timeline is not known at this time.

21. Provide information about the potential benefits of the proposed redevelopment, if available:

Anticipated number of jobs created/retained: Unknown
Anticipated number of proposed residential units: 0
Anticipated square footage of planned commercial space: 3,031
Anticipated square footage of planned open space: 1,199
Anticipated acres made ready for re-use by proposed Site cleanup: 0.097

22. Provide information on the environmental documents produced for the Site to date. Note that copies may be requested by the designated Lead Agency.

☐ Preliminary Endangerment Assessment, dated
☒ Phase 1 Environmental Assessment, dated June 21,2016

Request for Agency Oversight Application

- ☒ Phase 2 Environmental Assessment, dated August 31, 2018, amended May 2020
- ☐ Health Risk Assessment, dated
- ☒ Other, describe and provide date: Geotechnical Investigation Summary Report dated July 24, 2006
- ☒ Other, describe and provide date: Phase III ESA - Remediation Plan, May 2020
- ☐ Other, describe and provide date

SECTION 3
COMMUNITY PROFILE INFORMATION

1. What are the demographics of the community (e.g., socioeconomic level, ethnic composition, specific language considerations, etc.)?
   As of 2017, Median household income: 106,612; 69.7% white, 9.52% hispanic

2. **Local Interest**: Has there been any media coverage?
   no

3. **Past Public Involvement**: Has there been any past public interest in the Site as reflected by community meetings, ad hoc committees, workshops, fact sheets, newsletters, etc.?
   Yes, the VAPP EIR process and public hearings with the Department of City Planning

4. **Key Issues and Concerns**: Have any specific concerns/issues been raised by the community regarding past operations or present activities at the Site?
   Noise, vibration, traffic

5. Are there any concerns/issues anticipated regarding Site activities?
   No

6. Are there any general environmental concerns/issues in the community relative to neighboring sites?
   Noise, vibration, traffic

7. Describe the visibility of activities and any known interest the Site:
   Activities would be visible from nearby residential buildings and along the walking trail known as the Espanade, but is a low traffic area.

Request for Agency Oversight Application

SECTION 4
CERTIFICATION

The signatory below is an authorized representative of the Applicant and certifies to the best of his/her knowledge and belief that the information contained in this application, including any attachments, is true and complete and accurately describes the Applicant, the Site, and related conditions. The Applicant agrees to promptly inform the agency of any changes that occur in the information contained in this application.

The Applicant agrees to reimburse the lead agency (the Department of Toxic Substances Control or the Regional Water Quality Control Board) for the lead agency's costs in preparing and negotiating the appropriate cost recovery agreement, regardless of whether the agreement is subsequently executed by the Applicant and the lead agency, and, in the event the cost recovery agreement is executed by the parties, for oversight of the activities identified in the Scope of Work of the selected Agreement.

_____	_____	_____
Applicant Representative	Date	Title

Request for Agency Oversight of a Brownfield Site
Supplemental Attachment: California Land Reuse and Revitalization Act (CLRRA) Application

Please complete this form ONLY if you are an eligible entity applying for a California Land Reuse and Revitalization Act (CLRRA) Agreement

Definitions of terms used in the CLRRA Application can be found in Article 2 "Definitions," and Article 6, "Streamlined Site Investigation and Response Plan Agreements," Chapter 6.82, Division 20 of the Health and Safety Code (commencing with section 25395.60).

1. Are you applying as a/an:
   - ☐ Bona fide purchaser (BFP)
   - ☐ Contiguous property owner (CPO)
   - ☐ Innocent landowner (ILO)
   - ☐ Prospective purchaser (PP)
   - ☐ Bona ground tenant (BGT)

2. Is the Site located outside an infill area in an urban area?
   Yes☐ No☐

3. Is the Site solely impacted by petroleum from an underground storage tank and eligible for reimbursement from the Underground Storage Tank Cleanup Fund?
   Yes☐ No☐

   If you answered YES to either question 2 or 3, contact a DTSC Brownfield Coordinator to discuss Site-specific details.

4. Current zoning and planned use of the Site:

5. Do you own the Site? Yes☐ No☐

6. Did (will, in the case of a PP) the owner conduct due diligence or All Appropriate Inquiry (AAI) prior to acquiring Site? Yes☐ No☐

   Date AAI was conducted (will be conducted, in the case of a PP) _____.

7. Did the owner take reasonable steps with regard to contamination at the Site including, as appropriate; stopping continuing releases, preventing threatened releases, and preventing or limiting human, environmental or natural resource exposure to earlier hazardous substance releases? Yes☐ No☐

8. Date the Site was/will be purchased and title was/will be transferred

See attached Addendum for definitions of CLRRA terms used in this Supplemental Attachment.

Request for Agency Oversight of a Brownfield Site
Supplemental Attachment: California Land Reuse and Revitalization Act (CLRRA) Application

Applicant's Disclosure Statement:

In submitting this application, I verify that, to the best of my knowledge, I can meet the requirements for a Bona Fide Purchaser, Contiguous Property Owner Innocent Landowner, Prospective Purchase or Bona Fide Ground Tenant set forth in Division 20, Chapter 6.82 (commencing with section 25395.60) of the Health and Safety Code and, upon request by the oversight agency, will submit documentation that I meet each of the following conditions in accordance with Health and Safety Code section 25395.80:

> *On or before the date of property acquisition, I made "All Appropriate Inquiries" into the previous ownership and uses of the site; and*
>
> *I am not potentially liable or affiliated with any other person who is potentially liable through any direct or indirect familial relationship, or through any contractual, corporate, or financial relationship unless that relationship was created by the instrument by which title or possession to the site was conveyed or financed or was a contract for the sale of goods or services, or through the result of a reorganization of a business entity that was potentially liable for the release or threatened release of hazardous materials at the site.*

The Applicant agrees to reimburse the lead agency (the Department of Toxic Substances Control or the Regional Water Quality Control Board) for the lead agency's costs in preparing and negotiating the CLRRA Agreement, regardless of whether the agreement is subsequently executed by the Applicant and the lead agency, and, in the event a CLRRA Agreement is executed by the parties, for oversight of the activities identified in the agreement.

The signatory below is an authorized representative of the Applicant and certifies to the best of his/her knowledge and belief that the information contained in this application, including any attachments, is true and complete and accurately describes the Applicant, the Property, and related conditions. The Applicant agrees to promptly inform the lead agency of any changes that occur in the information contained in this application.

Signature of Applicant:

_____

Date:

_____ _____

Name & Title:

_____ _____

Address:

_____ _____

Request for Agency Oversight of a Brownfield Site
Supplemental Attachment: Prospective Purchaser Agreement

Please complete this form ONLY if you are an eligible entity applying for a Prospective Purchaser Agreement with DTSC

1. Is the current owner aware of your plans to seek a Prospective Purchaser Agreement with DTSC?
   Yes ☐ No ☐

   a) If "yes," then when do you expect to take title to the Site?

   b) If "no," then what is your proposed interest in the Site and what vehicle will be used to consummate the transaction?

2. Please describe if known, the timing of the proposed property transaction in sufficient detail to give DTSC a sense of your needs and timetable.

3. Attach a copy of the Site map, legal boundary description and Title Report.

4. Describe the "substantial benefit" to the State of California that will result if your proposal is implemented. For example, describe the changes expected in the local and state tax base or other benefits to the community and surrounding neighborhood which could occur as a result of the Site redevelopment.

5. Describe the financing to be used to complete remediation prior to the development of the Site.

6. Briefly describe, in general terms, the removal or remedial activities to be performed in the future.

7. Attach a list of names and addresses of potentially responsible parties, and describe all efforts to identify the potentially responsible parties.

Note: If remediation is occurring during and after construction, such as for groundwater treatment or soil vapor extraction, a separate Operation and Maintenance Agreement must be executed to ensure that remedial activities occur until remedial goals are met.

Request for Agency Oversight of a Brownfield Site
Supplemental Attachment: Prospective Purchaser Agreement

Applicant's Disclosure Statement:

In submitting this application, I verify under penalty of perjury that, to the best of my knowledge, the Applicant is not a responsible party or affiliated with a responsible party for this site.

The Applicant agrees to reimburse the lead agency for its costs in preparing and negotiating the Prospective Purchaser Agreement, regardless of whether the agreement is subsequently executed by the Applicant and the lead agency, and, in the event a Prospective Purchaser Agreement is executed by the parties, for oversight of the activities identified in the agreement.

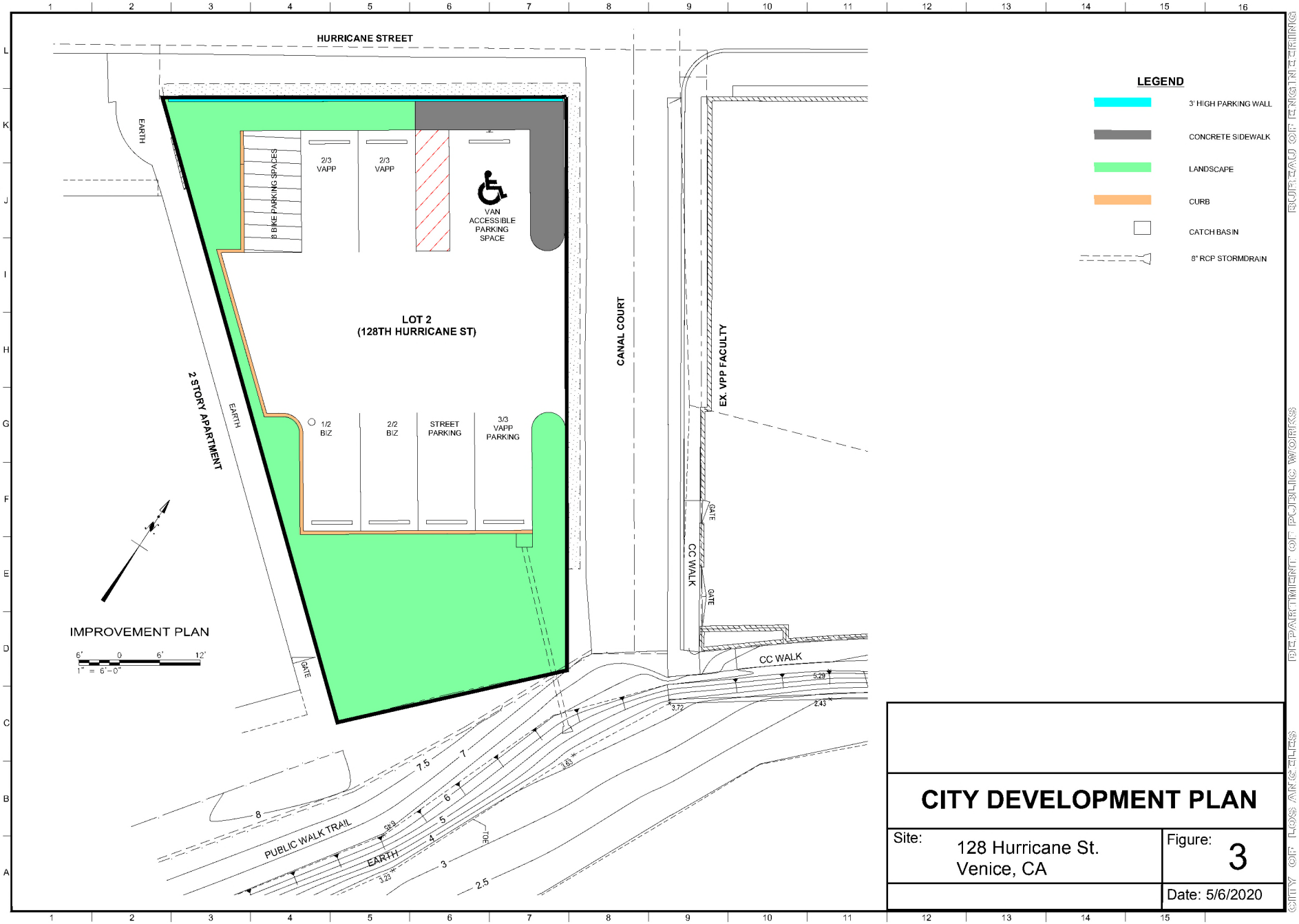
The signatory below is an authorized representative of the Applicant and certifies to the best of his/her knowledge and belief that the information contained in this application, including any attachments, is true and complete and accurately describes the Applicant, the Property, and related conditions. The Applicant agrees to promptly inform DTSC of any changes that occur in the information contained in this application.

Signature of Applicant:

_____

Date:

Name & Title:



CITY DEVELOPMENT PLAN

Site:	Figure:
128 Hurricane St. Venice, CA	3
	Date: 5/6/2020

BUREAU OF ENGINEERING
DEPARTMENT OF PUBLIC WORKS
CITY OF LOS ANGELES

Wetlands JURISDICTIONAL DELINEATION REPORT

VENICE AUXILIARY PUMPING PLANT
COMMUNITY OF VENICE,
LOS ANGELES COUNTY, CALIFORNIA

PREPARED FOR :

City of Los Angeles, Department of Public Works Bureau of Engineering, Environmental Management Group 1149 S. Broadway, Suite 600, Los Angeles CA 90015 Contact: Dr. Jan Green Rebstock, Environmental Supervisor II 213-485-5761

PREPARED BY :

ICF International
1 Ada, Suite 100
Irvine, CA 92618
Contact: Paul Schwartz
949-333-6634

January 2016

ICF International. 2016. Jurisdictional Delineation Report, Venice Auxiliary Pumping Plant, Community of Venice, Los Angeles County, California. January. (ICF 476.15) Irvine, CA. Prepared for Los Angeles Bureau of Engineering, Los Angeles, CA.

Contents

Page

Chapter 1 **Introduction** **1-1**

1.1 Project Location 1-1 1.2

Project Description 1-2

Chapter 2 **Regulatory Background** **2-1** 2.1

U.S. Army Corps of Engineers Regulated Activities 2-1 2.1.1

Waters of the United States 2-1 2.1.2

Special Aquatic Sites and Wetlands 2-2 2.1.3

Solid Waste Agency of Northern Cook County v. U.S. Army Corps of Engineers 2-2 2.1.4

Rapanos v. United States and Carabell v. U.S. Army Corps of Engineers 2-3 2.1.5

Section 10 of the Rivers and Harbors Act 2-5 2.2

State Regulated Activities 2-5 2.2.1

Section 401 of the Clean Water Act 2-5 2.2.2

Porter-Cologne Water Quality Control Act 2-6 2.2.3

State Water Resources Control Board/Regional Water Quality Control Boards 2-6 2.3

California Department of Fish and Wildlife Regulated Activities 2-6 2.3.1

California Department of Fish and Wildlife Jurisdiction 2-7 2.3.2

California Fish and Game Code Section 1602 ..... 2-7 2.4

California Coastal Act – California Coastal Commission 2-7 2.4.1

Definition of Wetlands and Policy 2-8 2.4.2

Environmentally Sensitive Habitat Areas 2-9

Chapter 3 **Methodology** **3-1**

3.1 Project Research 3-1 3.2

Jurisdictional Delineation 3-1 3.2.1

U.S. Army Corps of Engineers Jurisdiction 3-2 3.2.2

Regional Water Quality Control Board Jurisdiction 3-3 3.2.3

California Department of Fish and Wildlife Jurisdiction 3-3 3.2.4

California Coastal Commission 3-4

Chapter 4 **Environmental Setting** **4-1**

4.1 Topography and Land Use 4-1 4.2

Hydrology 4-1

4.2.1 Precipitation.....4-1 4.2.2
Hydrologic Unit.....4-2 4.3
Vegetation/Land Cover Types.....4-2 4.3.1
Developed.....4-2 4.3.2
Disturbed/Ruderal 4-2 4.3.3

Sarcocornia pacifica Herbaceous Alliance (Pickleweed Mats).....4-2 4.3.4

Frankenia salina Herbaceous Alliance (Alkali Heath Marsh).....4-3 4.3.5

Distichilis spicata Herbaceous Alliance—Disturbed (Salt Grass Flats—Disturbed).....4-3 4.4
Soils.....4-3

Chapter 5 **Jurisdictional Delineation Results 5-1**

5.1 Delineated Feature
Descriptions.....5-1 5.1.1

USACE/RWQCB Jurisdiction Description.....5-1 5.1.2
CDFW Jurisdiction Description.....5-2 5.1.3

CCC Jurisdiction Description 5-2 5.2
Delineation Results Summary 5-2

5.3 List of Delineators and Report Preparers/ Reviewer 5-3

Chapter 6 **References 6-1**

Appendices

A Jurisdictional Delineation Maps

B Study Area Photographs

C Wetland Determination Data Forms

D Preliminary Jurisdictional Determination Form

Tables

Table Page

4-1 Average Rainfall Data Summary for Los Angeles International Airport, California (in inches)..... 4-1

5-1 Jurisdictional Delineation Summary (acres) 5-2

Community of Venice, Los Angeles County, California
Contents

Acronyms and Abbreviations

CCC California Coastal Commission
CDFW California Department of Fish and Wildlife
CEQA California Environmental Quality Act
CESA California Endangered Species Act
CFR Code of Federal Regulations
CIS close interval survey
CWA Clean Water Act
CZMA Coastal Zone Management Act
EPA U.S. Environmental Protection Agency
ESHA Environmentally Sensitive Habitat Area
FAC facultative
FACU facultative upland
FACW facultative wetland
GPS global positioning system
HTL High-Tide Level
HUC Hydrologic Unit Code
ICF ICF International
JD Jurisdictional Determination
LCP Local Coastal Program
LIP Land Implementation Plan
LUP Land Use Plan
MHW Mean High-Water
MLLW Mean Lower Low-Water
msl mean sea level
NHD National Hydrography Dataset
NI no indicator
NO no occurrence
NOAA National Oceanic and Atmospheric Administration
OBL status of obligate
OHWM ordinary high-water mark
Porter-Cologne Act Porter-Cologne Water Quality Control Act
project Venice Auxiliary Pumping Plant Project
RGL Regulatory Guidance Letter
RPW relatively permanent water
RWQCB Regional Water Quality Control Board
SWANCC Solid Waste Agency of Northern Cook County
SWRCB State Water Resources Control Board
TNW traditional navigable water
UPL obligate upland
USACE U.S. Army Corps of Engineers
USGS U.S. Geological Survey
VAPP Venice Auxiliary Pumping Plant
VERTCON

North American Vertical Datum Conversion VPP
Venice Pumping Plant
WoS waters of the State
WoUS waters of the United States

Chapter 1
Introduction

On September 21, 2015, ICF International (ICF) conducted a routine-level delineation of jurisdictional waters and wetlands within a portion of the Ballona Lagoon and Grand Canal for the Los Angeles Bureau of Engineering as part of the federal and state regulatory permitting process for activities to be conducted for the Venice Auxiliary Pumping Plant Project (project).

The purpose of this delineation was to identify the extent of federal and state jurisdiction within and adjacent to the project site to support the resource-agency permitting process under Sections 404 and 401 of the Clean Water Act (CWA), Section 10 of the Rivers and Harbors Act, Section 13260 of the Porter-Cologne Water Quality Control Act (Porter-Cologne Act), Section 1602 of the California Fish and Game Code, and Section 30121 of the California Coastal Act.

Section 404 of the CWA covers waters of the United States (WoUS) as well as federal wetlands. Section 10 of the Rivers and Harbors Act covers navigable waters and rivers. Both Section 404 and Section 10 are regulated by the U.S. Army Corps of Engineers (USACE). Under Section 401 of the CWA, the Regional Water Quality Control Board (RWQCB), under guidance from the U.S. Environmental Protection Agency (EPA), regulates at the state level all activities that are regulated at the federal level by USACE. The RWQCB/State Water Resources Control Board (SWRCB) may also regulate activities that affect non-federal waters and wetlands (e.g., isolated features) under the Porter-Cologne Act. Section 1600 et. seq. of the California Fish and Game Code is regulated by the California Department of Fish and Wildlife (CDFW) and covers aquatic features, which may include lakes or streambeds or other aquatic features that support wildlife or potential habitat for wildlife. Section 30121 of the California Coastal Act is regulated by the California Coastal Commission (CCC), which regulates all development activities in the Coastal Zone, including wetlands, as defined by the CCC under Title 14 of the California Code of Regulations, and Environmentally Sensitive Habitat Areas (ESHAs), defined under Section 30107.5 of the California Coastal Act. If a proposed project may affect waters or wetlands, the project site must be evaluated to determine the presence of jurisdictional waters. Permits for the proposed activity must be sought from each applicable resource agency. Details regarding each of these resource agencies and their regulatory authority, jurisdiction, permits, and regulatory processes are provided in Chapter 2, *Regulatory Background*.

The information and results presented herein document the investigation, best professional judgment, and conclusions of the investigators. It is correct and complete to the best of our knowledge. However, all jurisdictional determinations should be considered preliminary until reviewed and approved by the regulatory agencies.

1.1 Project Location

The proposed project is immediately north of the intersection of Canal Court and Hurricane Street in the community of Venice, City of Los Angeles, Los Angeles County, California (Appendix A, Figure 1). The majority of the project site abuts the western bank of the Grand Canal (Appendix A, Figure 2); however, some work would be required within the canal. The jurisdictional delineation study area (study area), defined as the project footprint plus a 100-foot buffer (where appropriate), is mapped within non-sectioned lands, Township 15 West, Range 2 South of the Venice, California, U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle map (USGS 1964) (Appendix A, Figure 2).

1.2 Project Description

The project would include the construction of an auxiliary pumping facility that would provide additional reliability and supplement capacity to the existing Venice Pumping Plant (VPP). The project would be sized to supplement the pumping capacity of the VPP (Pump Station No. 646), for a combined ultimate peak flow capacity of 87 million gallons per day, reflecting wet weather flows of a 10-year storm event. Major project components of the Venice Auxiliary Pumping Plant (VAPP) would include one electrical building approximately 30 feet in height; three pumps constructed below ground level; utility connections; transformers and generators; a 17-foot by 17-foot submerged diversion structure, the top of which would be below the lowest elevation of the Grand Canal; and a 66-inch sewer to connect VAPP to the new diversion structure. A portion of Hurricane Street and Canal Court would be temporarily closed off. Shoring would be installed around the project site, and then excavation would occur to a depth of approximately 25 feet. The proposed project would require the excavation of approximately 10,000 cubic yards of soil, approximately 2,300 cubic yards of which would be exported off site and disposed of in an approved area landfill. Water pumped from the site would be disposed of in a manner consistent with RWQCB regulations and other related permit requirements.

Construction of the underground facilities associated with the VAPP, including the three new pumps, the wet well, valve vault, meter vault, and piping, would occur. These facilities would be constructed at a maximum depth of approximately 25 feet below ground. Within the Grand Canal, a diversion structure approximately 23 feet by 95 feet would be excavated to a depth of approximately 18 feet below ground and then sealed. Excavated materials would be hauled from the site and disposed of at an appropriate location. Water flowing in the Grand Canal would be diverted around a cofferdam structure by the presence of the dam itself. The diversion structure would then be constructed around the in-service close interval survey (CIS) pipe. Construction of the cofferdam, placement of the diversion structure, and backfill and soil compaction would occur within the Grand Canal. The CIS pipe would be cut so that the modular insert could be installed. The pipes would then be connected and a seal would be inserted into the shell. Backfill and soil compaction would be completed, and the Grand Canal channel bottom would be restored to its original elevation. Finally, the diversion structure would be sealed, removing all shoring steel, and allowing flows to resume to pre-construction conditions within the Grand Canal. The Esplanade would be reopened to pedestrian access on the west side of the Grand Canal. Surface improvements at the site would occur, consisting of constructing an approximately 30-foot-high electrical building and installing two new 480-volt City of Los Angeles Department of Water and Power transformers.

Chapter 2
Regulatory Background

The following sections summarize the regulations imposed on each type of jurisdictional feature potentially present within the study area.

2.1 U.S. Army Corps of Engineers Regulated Activities

Pursuant to Section 404 of the CWA, USACE regulates the discharge (temporary or permanent) of dredged or fill material into WoUS, including wetlands. A discharge of fill material includes, but is not limited to, grading, placing riprap for erosion control, pouring concrete, and stockpiling excavated material into WoUS. Activities that generally do not involve a regulated discharge (if performed specifically in a manner to avoid discharges) include driving pilings, performing certain drainage channel maintenance activities, constructing temporary mining and farm/forest roads, and excavating without stockpiling.

2.1.1 Waters of the United States

WoUS, as defined in Code of Federal Regulations (CFR) Title 33, Section 328.3, includes the following.

(1) All waters that are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters that are subject to the ebb and flow of the tide;

(2) All interstate waters, including interstate wetlands;

(3) All other waters, such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation, or destruction of which could affect interstate or foreign commerce, including any such waters:

(i) That are or could be used by interstate or foreign travelers for recreational or other purposes; or

(ii) From which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or

(iii) That are used or could be used for industrial purpose by industries in interstate commerce;

(4) All impoundments of waters otherwise defined as waters of the United States under the definition;

(5) Tributaries of waters identified in paragraphs (1) through (4) of this section;

(6) The territorial seas;

(7) Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (1) through (6) of this section.

(8) Waters of the United States do not include prior converted cropland. Notwithstanding the determination of an area's status as prior converted cropland by any other federal agency, for the purposes of the Clean Water Act, the final authority regarding Clean Water Act jurisdiction remains with EPA.

> Waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of CWA (other than cooling ponds as defined in 40 CFR 423.11(m), which also meet the criteria of this definition), are not waters of the United States.

The limit of USACE jurisdiction, excluding wetlands and tidal waters, is delineated using the ordinary high-water mark (OHWM), defined in CFR 328.3(e) as:

> …that line on the shore established by the fluctuations of water and indicated by physical characteristics such as [a] clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas.

The limit of Section 404 jurisdiction within navigable/tidal waters is delineated using the maximum predicted annual tide (or High-Tide Level [HTL]) for the previous year. The HTL elevations for each tidal gauge station are available online from the National Oceanic and Atmospheric Administration (NOAA) (NOAA 2015a).

2.1.2 Special Aquatic Sites and Wetlands

Section 404 of the CWA identifies six categories of Special Aquatic Sites: Sanctuaries and Refuges, Wetlands, Mudflats, Vegetated Shallows, Coral Reefs, and Riffle and Pool Complexes. Wetlands are explained in detail below.

Normally, three criteria must be satisfied to classify an area as a jurisdictional wetland: (1) a predominance of plant life that is adapted to life in wet conditions (hydrophytic vegetation); (2) soils that saturate, flood, or pond long enough during the growing season to develop anaerobic conditions in the upper part (hydric soils); and (3) permanent or periodic inundation or soils saturation, at least seasonally (wetland hydrology) (Environmental Laboratory 1987).

2.1.3 Solid Waste Agency of Northern Cook County v. U.S. Army Corps of Engineers

In 1986, in an attempt to clarify the reach of its jurisdiction, USACE stated that Section 404(a) extends to intrastate waters that:

> …(a) are or would be used as habitat by birds protected by migratory bird treaties or (b) are or would be used as habitat by other migratory birds that cross state lines or (c) are or would be used as habitat for endangered species or (d) used to irrigate crops sold in interstate commerce" (51 Federal Register 41217).

As a result of the 2001 *Solid Waste Agency of Northern Cook County* (*SWANCC*) case, the U.S. Supreme Court held that USACE may not rely on the Migratory Bird Rule to establish a significant nexus to interstate or foreign commerce. Although no formal guidance was issued by USACE that interprets the extent to which the *SWANCC* decision would limit jurisdictional determinations, in practice, USACE considers intrastate waters as WoUS where there is an appropriate connection to a navigable water or other clear interstate commerce connection. Therefore, WoUS, including jurisdictional wetlands, must show connectivity with (i.e., be tributary to) a navigable WoUS to be subject to USACE under Section 404 of the CWA.

2.1.4 Rapanos v. United States and Carabell v. U.S. Army Corps of Engineers

In 2006, the U.S. Supreme Court issued an opinion regarding the extent of USACE jurisdiction over certain waters under Section 404 of the CWA. The *Rapanos-Carabell* consolidated decisions addressed the question of jurisdiction over attenuated tributaries to WoUS as well as wetlands adjacent to those tributaries.

On June 5, 2007, USACE and EPA issued guidance related to the *Rapanos* decision. The guidance identifies those waters over which the agencies (USACE and EPA) will assert jurisdiction categorically and on a case-by-case basis. To summarize, USACE will continue to assert jurisdiction over the following features.

- Traditional navigable waters (TNWs) and their adjacent wetlands
- Non-navigable tributaries of TNWs that are relatively permanent waters (RPWs) (e.g., tributaries that typically flow year-round or have a continuous flow at least seasonally [i.e., typically 3 months]) and wetlands that directly abut such tributaries (i.e., not separated by uplands, berm, dike, or similar feature)

For non-RPWs, the agencies will determine whether a "significant nexus" exists with a TNW using the data found in an Approved Jurisdictional Determination (JD) form. The purpose of the significant nexus evaluation is to determine whether the existing functions of a tributary affect the chemical, physical, and/or biological integrity of a downstream TNW. Tributary characteristics that are considered when evaluating whether a significant nexus exists include volume, duration, and frequency of flow; proximity to a TNW; and hydrologic and ecologic functions performed by the tributary and all of its adjacent wetlands. Based on that information, the agencies may assert jurisdiction over the following features.

- Non-navigable tributaries that do not typically flow year-round or have continuous flow at least seasonally
- Wetlands adjacent to such tributaries
- Wetlands adjacent to but not directly abutting a relatively permanent non-navigable tributary

The agencies will typically not assert jurisdiction over the following features.

- Swales or erosional features (e.g., gullies and small washes characterized by low volume and infrequent or short-duration flow)
- Ditches (including roadside ditches) excavated wholly in uplands and draining only uplands that do not carry a relatively permanent flow of water

Approved Jurisdictional Determinations

An Approved JD is an official USACE jurisdictional determination, is valid for 5 years, can be used and relied upon in a CWA citizen's lawsuit if its legitimacy is challenged (except under extraordinary circumstances), and can be immediately appealed (33 CFR 331). Approved JDs are documented in accordance with Regulatory Guidance Letter (RGL) No. 07-01 and require the use of the Approved JD form. Approved JDs are evaluated by USACE and EPA.

Under the *Rapanos* guidance, an Approved JD is required for determinations for all "isolated" waters or wetlands and is subject to review by USACE and EPA.

Preliminary Jurisdictional Determinations

USACE issued RGL No. 08-02 on June 26, 2008, allowing USACE to issue Preliminary JDs for a project. A Preliminary JD is a non-binding written indication that there may be WoUS, including wetlands, on a project site. In addition, it identifies the approximate location of these features. Preliminary JDs are used when a landowner, permit applicant, or other affected party elects to voluntarily waive or set aside questions regarding CWA jurisdiction over a particular site, usually in the interest of allowing the landowner to move ahead expeditiously to obtain Section 404 authorization where the party determines that it is in his or her best interest to do so. A Preliminary JD is not an official determination regarding the jurisdictional status of potentially jurisdictional features and has no bearing on Approved JDs. A Preliminary JD cannot be used to confirm the absence of jurisdictional waters or wetlands, is advisory in nature, and cannot be appealed. It is considered "preliminary" because a recipient can later request an Approved JD if one is necessary or appropriate.

A Preliminary JD is documented using the Preliminary JD form. For purposes of impact calculations, compensatory mitigation requirements, and other resource protection measures, a permit decision made on the basis of a Preliminary JD treats all waters and wetlands that would be affected in any way, except by the permitted activity, as if they were jurisdictional. Although a Preliminary JD may be chosen by the applicant, the district engineer reserves the right to use an Approved JD where warranted.

2011 Draft Clean Water Act Guidance

On April 27, 2011, USACE and EPA issued draft guidance for determining jurisdiction under the CWA (USACE 2011). The guidance supersedes the previous guidance from 2003 regarding *SWANCC* (68 *Federal Register* 1991–1995) and 2007 *Rapanos* guidance. This document reiterated the guidance issued under the *Rapanos* decision, asserting that the following waters are protected by the CWA.

- Traditional navigable waters
- Interstate waters
- Wetlands adjacent to either TNWs or interstate waters
- Non-navigable tributaries to TNWs that are relatively permanent (meaning they contain water at least seasonally)
- Wetlands that directly abut relatively permanent waters

The guidance further clarifies the criteria for defining TNWs, primarily consistent with previous guidance. In addition, a significant nexus evaluation is required for the "other waters" category of the regulations (see item 3 in Section 2.1.1, *Waters of the United States*, above). The guidance divides these waters into two categories—those that are physically proximate to other jurisdictional waters and those that are not—and discusses how each category should be evaluated.

Finally, the guidance reiterated that certain aquatic areas are generally not considered WoUS, as follows.

- Wet areas that are not tributaries or open waters and do not meet the agencies' regulatory definition of "wetlands"
- Waters that are excluded from coverage under the CWA by existing regulations
- Waters that lack a "significant nexus" where one is required for a water to be protected by the CWA
- Artificially irrigated areas that would revert to upland should irrigation cease
- Artificial lakes or ponds created by excavating and/or diking dry land and used exclusively for such purposes as stock watering, irrigation, settling basins, or rice growing
- Artificial reflecting pools or swimming pools created by excavating and/or diking dry land
- Small ornamental waters created by excavating and/or diking dry land for primarily aesthetic reasons
- Water-filled depressions created incidental to construction activity
- Groundwater drained through subsurface drainage systems
- Erosional features (gullies and rills) and swales and ditches that are not tributaries or wetlands

2.1.5 Section 10 of the Rivers and Harbors Act

Section 10 of the Rivers and Harbors Act gives USACE regulatory and permitting authority over work in, over, or under "navigable WoUS." Regulated Section 10 activities include the construction of structures in or over navigable WoUS, the excavation/dredging or deposition of material in navigable WoUS, or any obstruction or alteration to a navigable WoUS. Section 10 navigable WoUS and Section 404 WoUS do overlap in some areas that involve wetlands and non-wetland waters associated with navigable WoUS.

The limits of Section 10 navigable WoUS are defined by the Mean High Water (MHW) elevation, using Mean Lower Low Water (MLLW) as a baseline (MHW minus MLLW = Section 10 MHW).

2.2 State Regulated Activities

2.2.1 Section 401 of the Clean Water Act

A federal permit or license cannot be issued that may result in a discharge to WoUS unless certification under Section 401 of the CWA is granted or waived by EPA, state, or tribe where the discharge would originate (EPA 2010). Within the proposed project area, the ability to grant, grant with conditions, deny, or waive certification falls to three separate parties: RWQCB or SWRCB and EPA.

Pursuant to Section 401 of the CWA:

> . . . any applicant for a federal permit for activities that involve a discharge to waters of the United

States shall provide the federal permitting agency a certification from the state in which the discharge is proposed that states that the discharge will comply with the applicable provisions under the federal Clean Water Act.

Before USACE will issue a Section 404 permit, applicants must apply for and receive a Section 401 water quality certification or waiver, as applicable. Under Section 401 of the CWA, all activities that are regulated at the federal level by USACE are also regulated at the state level. Therefore, state jurisdiction usually includes all waters or tributaries to waters that are determined to be WoUS and, similar to WoUS, typically delineated at the OHWM. However, if it is determined that the waters are not WoUS, they may still be subject to state jurisdiction based on the Porter-Cologne Act.

2.2.2 Porter-Cologne Water Quality Control Act

The state also regulates activities that would involve "discharging waste, or proposing to discharge waste, within any region that could affect waters of the State" (California Water Code 13260(a)), pursuant to provisions of the Porter-Cologne Act. Waters of the State (WoS) are defined as "any surface water or groundwater, including saline waters, within the boundaries of the state" (California Water Code 13050(e)). Such waters may include waters that are not subject to regulation under Section 404 (i.e., isolated features). These waters may include isolated vernal pools, isolated wetlands, or other aquatic habitats that are not normally subject to federal regulation under Section 404 of the CWA.

2.2.3 State Water Resources Control Board/Regional Water Quality Control Boards

In California, SWRCB and nine RWQCBs regulate activities within state and federal waters under Section 401 of the CWA and the Porter-Cologne Act. SWRCB is responsible for setting statewide policy, coordinating and supporting RWQCB efforts, and reviewing petitions that contest RWQCB actions. Each semi-autonomous RWQCB sets water quality standards, issues Section 401 certifications and waste discharge requirements, and takes enforcement action for projects that occur within its boundary. However, when a project crosses multiple RWQCB jurisdictional boundaries, SWRCB becomes the regulating agency and issues project permits.

2.3 California Department of Fish and Wildlife Regulated Activities

Pursuant to Sections 1600–1616 of the California Fish and Game Code, CDFW regulates any activity that will substantially divert or obstruct the natural flow—or substantially change or use any material from the bed, channel, or bank—of any river, stream, or lake. CDFW also regulates any activity that will deposit or dispose of debris, wastewater, or other material containing crumbled, flaked, or ground pavement that may pass into any river, stream, or lake. The applicant must notify CDFW prior to such activities and obtain a Lake or Streambed Alteration Agreement.

2.3.1 California Department of Fish and Wildlife Jurisdiction

CDFW jurisdiction includes ephemeral, intermittent, and perennial watercourses (including dry washes) and lakes that are characterized by the presence of (1) definable bed and banks and (2) existing fish or wildlife resources. Furthermore, CDFW jurisdiction often extends to habitats adjacent to watercourses, such as oak woodlands in canyon bottoms or willow woodlands that support hydrologic functions within the riparian system. CDFW jurisdiction typically does not

include features without a discernible bed and bank, such as swales, vernal pools, or wet meadows.

2.3.2 California Fish and Game Code Section 1602

The California Fish and Game Code mandates that:

> ...it is unlawful for any person to substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake designated by the department, or use any material from the streambeds, without first notifying the department of such activity.

Historical court cases have further extended CDFW jurisdiction to include watercourses that seemingly disappear but re-emerge elsewhere. Under the CDFW definition, a watercourse need not exhibit evidence of an OHWM to be claimed as jurisdictional.

Water features such as vernal pools and other seasonal swales—where the defined bed and bank are absent and the feature is not contiguous or closely adjacent to other jurisdictional features—are generally not asserted to fall within state jurisdiction under Section 1602. CDFW generally does not assert jurisdiction over human-made water bodies unless they are located where such natural features were previously located or (importantly) where they are contiguous with existing or prior natural jurisdictional areas.

CDFW jurisdiction in altered or artificial waterways is based on the functions and values of those waterways to fish and wildlife. CDFW precedent is that CDFW will assert jurisdiction over altered or artificial waterways in the following cases.

- Modified natural waterways that support, or have the potential to support, fish, aquatic invertebrates, and/or riparian vegetation. Such waterways will normally be viewed as within the jurisdiction of CDFW under Section 1600 et seq. of the California Code of Regulations.
- Artificial waterways that have acquired the physical attributes of natural systems (bed and bank, riparian vegetation, or other habitat parameters). Such waterways will normally be viewed as within the jurisdiction of CDFW under Section 1600 et seq. of the California Code of Regulations.

2.4 California Coastal Act – California Coastal Commission

In 1972, the United States Congress passed the Coastal Zone Management Act (CZMA) (Title 16 United States Code 1451–1464). The CZMA declared a national policy "to preserve, protect, develop, and, where possible, restore or enhance the resources of the nation's Coastal Zone for this and succeeding generations." The CZMA sought to encourage and help states develop and implement

management programs for the use of coastal land and water resources, "giving full consideration to ecological, cultural, historic, and esthetic values as well as the need for compatible economic development." The Coastal Zone Conservation Act (Proposition 20), approved in 1972, prohibited development 1,000 yards inland from California's mean high tide without a permit from a regional or state coastal commission. Proposition 20 created a temporary California Coastal Zone Conservation Commission and six regional commissions to develop a statewide plan for coastal protection, which eventually led to the passage of the California Coastal Act in 1976. The California Coastal Act led to the permanent establishment of the CCC, the mandate of which is to protect and enhance the resources of the Coastal Zone.

To achieve maximum responsiveness to local conditions, accountability, and public accessibility, the California Coastal Act relies heavily on local government and local land use planning procedures and

enforcement. Therefore, implementation of California Coastal Act policies is accomplished primarily through the preparation of Local Coastal Programs (LCPs), which are reviewed and approved by the CCC. An LCP typically consists of a Land Use Plan (LUP) and an Land Implementation Plan (LIP). The LUP indicates the kinds, locations, and intensities of land uses; the applicable resource protection and development policies; and, where necessary, a listing of implementing actions. The LIP consists of the zoning ordinances, zoning district maps, and other legal instruments that are necessary to implement the LUP. Any amendments to the certified LCP will require review and approval by the CCC prior to becoming effective. After certification of an LCP, coastal development permit authority is delegated to the appropriate local government. The CCC retains original permit jurisdiction over certain specified lands, such as submerged lands, tidelands, and public trust lands, and has appellate authority over development approved by local government in specified geographic areas and for major public works projects and major energy facilities.

In authorizing coastal development permits, the local government must find that the development conforms to the certified LCP. Furthermore, after certification of the LCP, city actions on applications for California Coastal Act authority to conduct certain types of development, as well as development within certain geographic areas, are appealable to the CCC.

2.4.1 Definition of Wetlands and Policy

Section 30121 of The California Coastal Act defines wetlands as such:

> Wetland "means lands within the Coastal Zone may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, and fens."

The CCC applies a one-parameter approach to defining wetlands. As such, any area with a preponderance of hydrophytic vegetation, the presence of hydric soils, or wetland hydrology meets the definition of a wetland in the Coastal Zone.

Section 13577(b) of Title 14, Division 5.5, Article 18, of The California Code of Regulations defines wetlands as such:

(1) Measured 100 feet landward from the upland limit of the wetland. Wetland shall be defined as land where the water table is at, near, or above the land surface long enough to promote the formation of hydric soils or to support the growth of hydrophytes and shall also include those types of wetlands where vegetation is lacking and soil is poorly developed or absent as a result of frequent and drastic fluctuations of surface water levels, wave action, water flow, turbidity, or high concentrations of salts or other substances in the substrate. Such wetlands can be

recognized by the presence of surface water or saturated substrate at some time during each year and their location within, or adjacent to, vegetated wetlands or deep-water habitats. For purposes of this section, the upland limit of a wetland shall be defined as:

(A) The boundary between land with predominantly hydrophytic cover and land with predominantly mesophytic or xerophytic cover;

(B) The boundary between soil that is predominantly hydric and soil that is predominantly non hydric; or

(C) In the case of wetlands without vegetation or soils, the boundary between land that is flooded or saturated at some time during years of normal precipitation and land that is not.

(2) For the purposes of this section, the term "wetland" shall not include wetland habitat created by the presence of and associated with agricultural ponds and reservoirs where:

(A) The pond or reservoir was in fact constructed by a farmer or rancher for agricultural purposes; and

(B) There is no evidence (e.g., aerial photographs, historical survey, etc.) showing that wetland habitat pre-dated the existence of the pond or reservoir. Areas with drained hydric soils that are no longer capable of supporting hydrophytes shall not be considered wetlands.

2.4.2 Environmentally Sensitive Habitat Areas

The California Coastal Act (California Public Resources Code Division 20, Section 30240a) restricts land uses within or adjacent to ESHAs. The California Coastal Act, Section 30107.5, defines an ESHA as:

> …any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and could be easily disturbed or degraded by human activities and developments.

Included within this definition are wetlands, estuaries, streams, riparian habitats, lakes, and portions of open coastal waters that meet the rare or valuable habitat criteria. Not all wetlands necessarily meet the "rare or valuable habitat criteria," and as set forth in Section 30233, "where there is no feasible less environmentally damaging alternative and where feasible mitigation measures have been provided to minimize adverse environmental effects," degraded or low-value wetlands that do not meet the rare or valuable habitat criteria may be subject to restoration in accordance with Section 30233.7.

Chapter 3
Methodology

3.1 Project Research

Prior to the field visit, a 200-foot-scale (1 inch = 200 feet) aerial photograph of the study area was obtained and compared with USGS 7.5-minute topographic quadrangles to identify potential jurisdictional features within the study area as indicated by vegetation types, topographic changes, or visible drainage patterns. The National Hydrography Dataset (NHD) data for the study area (USGS 2015) and the National Wetlands Inventory (USFWS 2015) were referenced to identify any mapped features such as streams and wetlands. The study area was carefully reviewed in Google Earth (Google Earth 2015) at various scales, and potential jurisdictional features were noted and identified on field maps. A review of the U.S. Department of Agriculture, Natural Resources Conservation Service, Soil Survey Geographic database (USDA/NRCS 2015) was attempted but no soil data is available for the study area.

3.2 Jurisdictional Delineation

ICF biologists Paul Schwartz and Lily Sam conducted the jurisdictional waters and wetland delineation for the study area on September 21, 2015. The jurisdictional delineation was conducted between 9:00 a.m. and 1 p.m. The tide during the September 21 field visit was rising from a low tide of +3.02 feet mean sea level (msl) at 9:10 a.m. to a high tide of 4.65 feet msl at 3:51 p.m. (NOAA 2015a). Weather conditions during the delineation consisted of clear skies (5–15% cloud cover), temperatures ranging from 81–88 degrees Fahrenheit, with winds ranging from 0–2 miles per hour. The study area was surveyed on foot and jurisdictional limits, wetland sample points, culverts, and other notable locations were recorded using a Trimble Yuma global positioning system (GPS) unit with a Geneq SX Blue II receiver, providing sub-meter accuracy, and recorded on field maps. Common plant species observed were identified by visual characteristics and morphology in the field. Taxonomic nomenclature for plants follows the National Wetlands Plant List (USACE 2014). If plants were unknown, the *Jepson Manual: Vascular Plants of California,* second edition (Baldwin et al. 2012), was used to identify plants to species level.

On September 29, 2015, Arcadis U.S. Inc. conducted a topographic mapping of a subset of the study area (Appendix A, Figures 6a and 6b). The topographic mapping was prepared at 0.5-foot intervals using National Geodetic Vertical Datum of 1929 (NGVD 29). The NGVD 29 elevations were then converted to North American Vertical Datum of 1988 (NAVD 88) elevations using an Orthometric Height Conversion calculator available via North American Vertical Datum Conversion (VERTCON) (NOAA 2015b). The NOAA MHW and HTL elevations (MLLW datum) were then adjusted to match the NAVD 88 topographic elevations depicted on Figure 6a and 6b by subtracting 0.19 foot from each elevation.

3.2.1 U.S. Army Corps of Engineers Jurisdiction

In order to accurately map the limits of USACE jurisdictional waters and wetlands within the study area, the jurisdictional delineation consisted of two components: a field visit and a desktop analysis. The methodology for both of these components is discussed below.

USACE Field Investigation

Potential Section 404 WoUS and wetlands were initially delineated using methods established in the *Wetland Delineation Manual* (Environmental Laboratory 1987), the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region* (USACE 2008a), *A Field Guide to the Identification of the Ordinary High-Water Mark (OHWM) in the Arid West Region of the Western United States* (USACE 2008b), and 2007 and 2008 *Rapanos* guidance (USACE and EPA 2008).[1]

During the September 21, 2015 field visit, the delineation of non-wetland waters was based on the presence of observable OHWM indicators, consisting of break in bank slope, debris wracking, staining, change in sediment texture, and change in vegetation cover. Paired wetland sample points were spaced throughout the study area to determine the limits of the USACE wetland boundary.

At each wetland sample point, several parameters were considered to determine whether the sample point was within a wetland. Three criteria normally must be fulfilled to classify an area as a jurisdictional USACE wetland: (1) a predominance of hydrophytic vegetation, (2) the presence of hydric soils, and (3) the presence of wetland hydrology. Details regarding the application of these techniques are described below.

- **Hydrophytic Vegetation:** The hydrophytic vegetation criterion is satisfied at a location if greater than 50 percent of all the dominant species present within the vegetation unit have a wetland indicator status of obligate (OBL), facultative wetland (FACW), or facultative (FAC) (Environmental Laboratory 1987). An OBL indicator status refers to plants that have a 99 percent probability of occurring in wetlands under natural conditions. An FACW indicator status refers to plants that usually occur in wetlands (67–99 percent probability) but are occasionally found elsewhere. An FAC indicator status refers to plants that are equally likely to occur in wetlands or elsewhere (estimated probability 34–66 percent for each). An NI (no indicator) status designates that insufficient information was available to determine an indicator status. An NO (no occurrence) status indicates that the species does not occur in the region. When a plant with an NO status is found within a region, it usually indicates that the plant is ornamental. The wetland indicator status used for this report follows the *Arid West 2014 Regional Wetland Plant List* (USACE 2014).
- **Hydric Soils:** The definition of a hydric soil is a soil that formed under conditions of saturation, flooding, or ponding long enough during the growing season to develop anaerobic conditions in the upper part (USDA/NRCS 1994). This determination is based on the various field indicators detailed in the *Arid West Supplement* and the *Field Indicators of Hydric Soils in the United States* (Version 7.0) (USDA/NRCS 2010).

[1] On June 5, 2007, USACE and EPA issued guidance related to the *Rapanos-Carabell* consolidated decisions to address the question of jurisdiction over attenuated tributaries to WoUS as well as wetlands adjacent to those tributaries. On December 2, 2008, USACE and EPA issued guidance that incorporated revisions to the June 5, 2007, memorandum. The *Rapanos-Carabell* decision is discussed in further detail in Section 2.1.4, above.

- **Wetland Hydrology:** Wetland hydrology is determined using indicators of inundation or saturation (flooding, ponding, or tidally influenced) detailed in the *Wetland Delineation Manual* and the *Arid West Supplement*.

USACE Desktop Analysis

The waters within the study area are tidally influenced. On November 3, 2015, USACE Regulatory Section Chief Dan Swenson was contacted to confirm the appropriate delineation approach for the study area. It was determined that the upper elevational limits of Section 404 and Section 10 waters

should be determined based on the elevations of the HTL (Maximum Predicted Annual Tide) and the MHW line, respectively.[2] The tidal data from the Santa Monica Tidal Station (Station 9410840) were used to determine the elevational limits of Section 404 and Section 10 waters (NOAA 2015a).

The elevational limit of Section 404 waters was established based on the HTL, which is based on the maximum predicted annual tide for the study area. The maximum predicted annual tide for the Santa Monica Tidal Gauge Station for the study area is +6.9 feet msl (MLLW datum). The elevational limit of Section 10 waters was established based on the MHW elevation (+7.13 feet msl) and then adjusted, as the MLLW elevation (+2.44 feet msl) is used as the baseline elevation for NOAA tidal data. As such, the upper elevational limit of Section 10 jurisdiction in the study area is +4.69 feet msl (MLLW datum). The NOAA MHW and HTL elevations (MLLW datum) were then adjusted to match the NAVD 88 topographic elevations depicted on Figure 6a and 6b by subtracting 0.19 foot from each elevation. Therefore, the Section 404 elevation mapped in the study area is 6.71 feet (NAVD 88) and the Section 10 elevation mapped in the study area is 4.5 feet (NAVD 88).

3.2.2 Regional Water Quality Control Board Jurisdiction

The evaluation of state jurisdiction followed guidance from Section 401 of the CWA and typically follows the same jurisdictional areas that are used to define the limits of Section 404 WoUS and wetlands.

3.2.3 California Department of Fish and Wildlife Jurisdiction

CDFW jurisdiction typically includes features with a defined bed and bank. The evaluation of potential jurisdictional areas follows the guidance of relevant CDFW materials and standard practices by CDFW personnel. CDFW jurisdiction is generally delineated by measuring the outer width and length boundaries of potential jurisdictional areas, consisting of the greater of either the top-of-bank measurement or the extent of associated riparian or wetland vegetation.

For this project, in addition to delineating the physical limits of what could be considered limits of CDFW jurisdiction, the feature was also evaluated using historical aerial photos (Google Earth 2015) to assess the inputs into the feature and its historical function as a marine non-aquatic resource. Based on the review of that data, it was determined that the feature is a canal/lagoon and primarily marine with minimal freshwater input, mostly from local runoff, and does not meet the CFGC definition of a lake or stream.

[2] Dan Swenson, USACE Regulatory Section Chief (Los Angeles District), personal communication, November 3, 2015

3.2.4 California Coastal Commission

CCC jurisdictional wetlands were mapped as the limits of one-parameter wetlands, consisting of the presence of a preponderance of hydrophytic vegetation, and/or the presence of hydric soils, and/or the presence of wetland hydrology. USACE standard definitions provided above were used to define each of the three potential wetland indicators used to delineate CCC wetlands. The upper limits of CCC one-parameter wetlands consisted of the greater of either the limits of the OHWM, Section 404 elevations, limits of hydric soils, or the upper limits of areas supporting a preponderance of hydrophytic vegetation.

Chapter 4
Environmental Setting

This chapter describes the topography, land use, hydrology, vegetation characteristics, and soils associated with the study area.

4.1 Topography and Land Use

The study area is within the coastal low lands of the community of Venice, City of Los Angeles, California, at the confluence of the Grand Canal and Ballona Lagoon. Ballona Lagoon is connected to the Marina Del Rey Harbor channel approximately 0.80 mile to the southeast, and the study area is subject to muted daily tidal fluctuations. The Grand Canal is the main channel of the Venice Canals. The elevations within the study area range from sea level to approximately 12 feet above mean sea level (msl) (USGS 1964). The study area consists primarily of either open water, the vegetated banks associated with Ballona Lagoon and the Grand Canal, or developed lands associated with the adjacent upland residential areas. A portion of the existing VPP is in the study area. Sidewalks run along both sides of the Grand Canal; however, the sidewalk on the eastern bank is in need of repair and has areas of pickleweed vegetation growing through cracks. The study area is surrounded by residential housing to the north, west and east, the existing VPP to the west, and open water associated with the Ballona Lagoon to the south.

The NHD depicts the Grand Canal and Ballona Lagoon within the study area as an NHD Streamline (Appendix A, Figure 3). The National Wetlands Inventory has mapped the following wetland types as occurring in the study area: Estuarine and Marine Deepwater and Estuarine and Marine Wetland occurring in Ballona Lagoon, and Riverine occurring in the Grand Canal (Appendix A, Figure 4).

4.2 Hydrology

4.2.1 Precipitation

The regional climate is characterized by hot, dry summer months and mild winters. Seasonal rainfall averages 12.01 inches per year and occurs predominantly from only a few storm events between October and April. The following precipitation data (Table 4-1) for Los Angeles International Airport, California, were used for this analysis (Western Regional Climate Center 2015).

Table 4-1. Average Rainfall Data Summary for Los Angeles International Airport, California (in inches)

Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec Total Average 2.65 2.67 1.85 0.77 0.17 0.05 0.02 0.07 0.16 0.39 1.40 1.82 **12.02** Source: Western Regional Climate Center 2015

4.2.2 Hydrologic Unit

The study area is within the Garapito Creek-Frontal Santa Monica Bay Hydrologic Unit Code (HUC) 10 watershed, which is included in the larger Santa Monica Bay HUC 8 watershed. The Garapito Creek Frontal Santa Monica Bay HUC 10 and Santa Monica Bay HUC 8 watersheds terminate in the

Pacific Ocean (Appendix A, Figure 5).

The Santa Monica Bay HUC 8 watershed drains an area of approximately 385 square miles and contains 27 sub-watersheds. The northern extent of the watershed extends along the Ventura-Los Angeles County line on the west to the Ballona Creek Watershed to the south. Much of the northern portion of the watershed is open space associated with the Santa Monica Mountains. The middle and southern portions of the watershed are more urban and contains portions of Los Angeles, Santa Monica, El Segundo, Manhattan Beach, Redondo Beach and Palos Verdes. (City of Los Angeles Stormwater Program 2015.)

4.3 Vegetation/Land Cover Types

Community descriptions from the *Manual of California Vegetation* (Sawyer et al. 2009) were used to classify the vegetation within the study area where possible. The study area is composed of the following vegetation/land cover types: Developed Lands, Ornamental Vegetation, Estuarine/Open Water, Lower Coastal Salt Marsh, and Upper Coastal Salt Marsh. Each of these vegetation types/land uses is discussed below.

4.3.1 Developed

Developed lands were mapped in association with the residential structures and surface roads within the study area and includes ornamental vegetation typically associated with the developed areas such as Mexican fan palm (*Washingtonis robusta;* FACW), acacia (*Acacia* sp., UPL), eucalyptus (*Eucalyptus* sp.; UPL), Peruvian pepper tree (*Schinus molle;* FACU), iceplant (*Carpobrotus* sp.; FACU), and myoporum (*Myoporum* sp.; FACU).

4.3.2 Disturbed/Ruderal

This area vegetation type was mapped on the eastern side of the study area associated with a vacant lot surrounded by developed lands to the north, east, and south. The area contains a small facility (unknown purpose) and a small footpath leading from the sidewalk adjacent to the Grand Canal to the Via Dolce surface street. This area is dominated by non-native and native annual and perennial species such as iceplant (*Carpobrotus* sp.; FACU), garland chrysanthemum (*Glebionis coronaria;* UPL), telegraphweed (*Heterotheca grandiflora;* UPL), cheeseweed (*Malva parviflora*; UPL), Bermuda grass (*Cynodon dactylon*; FACU), and Australian saltbush (*Atriplex semibaccata*; FAC).

4.3.3 Sarcocornia pacifica Herbaceous Alliance (Pickleweed Mats)

This vegetation type was mapped within the tidal zone of the Grand Canal and Ballona Lagoon. This area is dominated by native wetland species such as pickleweed (*Sarcocornia pacifica*; OBL), batis (*Batis maritima*; OBL), wooly seablight (*Suaeda taxifolia*, FACW), spearscale (*Atriplex prostrata*;

FACW), and fleshy jaumea (*Jaumea carnosa*; OBL). The upper portions of this area support species such as salt grass (*Distichilis spicata*; FAC), five-hooked bassia (*Bassia hyssopifolia*; FAC), beach bur (*Ambrosia chamissonis*; UPL), and alkali heath (*Frankenia salina*; FACW) indicating the start of the wetland-upland interface.

4.3.4 *Frankenia salina* Herbaceous Alliance (Alkali Heath Marsh)

This vegetation type was mapped immediately above the tidal zone of the Grand Canal and Ballona Lagoon. This area is dominated by species such as alkali heath (*Frankenia salina*; FACW), salt grass

(*Distichilis spicata*; FAC), five-hooked bassia (*Bassia hyssopifolia*; FAC), wooly seablight (*Suaeda taxifolia*, FACW), beach bur (*Ambrosia chamissonis*; UPL), alkali heliotrope (*Heliotropium curassavicum;* FACU), and deerweed (*Acmispon glaber;* UPL). The lower portion of this area transitions to wetland species such as pickleweed (*Sarcocornia pacifica*; OBL), batis (*Batis maritima*; OBL), and fleshy jaumea (*Jaumea carnosa*; OBL).

4.3.5 *Distichilis spicata* Herbaceous Alliance—Disturbed (Salt Grass Flats—Disturbed)

This vegetation type was mapped along the upper banks of the Grand Canal. The cover of vegetation is relatively low as this area is adjacent to sidewalks and has been impacted by regular foot traffic. This area is dominated by salt grass and flax-leaved horseweed (*Erigeron bonariensis*; UPL). It also contains some cover of five-hooked bassia (*Bassia hyssopifolia*; FAC), alkali heath (*Frankenia salina*; FACW), and Bermuda grass (*Distichilis spicata*; FAC).

4.4 Soils

No mapping is available from the Natural Resources Conservation Service for the study area. Based on soils observed in the wetland sample points, the soils on site consisted of sandy clay and loams.

Chapter 5
Jurisdictional Delineation Results

This chapter describes the delineated features and expected jurisdictional status within the study area. This report documents the potential jurisdictional waters, wetlands, and other aquatic features within the study area. An impacts analysis is not included as a part of this report.

The information and results included herein document the investigation, best professional judgment, and conclusions of the investigators. It is correct and complete to the best of our knowledge. However, all jurisdictional determinations should be considered preliminary until reviewed and approved by the regulatory agencies. The study area was delineated with the understanding that a request for a Preliminary JD would be submitted for the project.

Appendix A, Figures 6a and 6b, depict the results of the jurisdictional delineation. Photographs documenting the conditions present during the delineation are provided in Appendix B. Wetland Determination Data forms are provided in Appendix C, and a Preliminary JD form is included in Appendix D.

5.1 Delineated Feature Descriptions

Two named features were documented as occurring within the study area: Ballona Lagoon and Grand Canal. For the purposes of this delineation, the two features are treated as one feature of open water and associated wetlands referred to as Ballona Lagoon and Grand Canal. The feature was determined to contain waters and wetlands subject to the jurisdiction of USACE under Section 404 and Section 10 of the CWA, waters and wetlands subject to the jurisdiction of the RWQCB under Section 401 of the CWA, estuarine habitat subject to the jurisdiction of CDFW under Section 1600 et seq. of the California Fish and Game Code, and coastal wetlands subject to the jurisdiction of CCC under Title 14 of the California Code of Regulations and Section 30107.5 of the California Coastal Act. Each of the various jurisdictions is discussed below. Table 5-1 presents a summary of all jurisdictions within the study area.

5.1.1 USACE/RWQCB Jurisdiction Description

Within the study area, the Ballona Lagoon and the Grand Canal is a perennial water feature and is a direct tributary to the Marina Del Rey Harbor Channel and the Pacific Ocean. Based on physical evidence (i.e., break in bank slope, debris wracking, staining, change in sediment texture, and change in vegetation cover) within the study area, the OHWM was observed to be at the toe of the slope along the 2.5-foot elevational contour. Based on the tidal gauge data from the Santa Monica Tidal Gauge Station (adjusted to plot on NAVD 88 topographic elevations), the limits of potential Section 404 and Section 10 waters were determined to be +6.71 feet (NAVD 88)and +4.5 feet (NAVD 88), respectively (Appendix A, Figure 6a). Several sets of paired wetland sample points were assessed to determine the extent of three-parameter USACE wetlands. Based on the results of the wetland sample points, the lower areas of the channel banks were determined to meet the criteria for three-parameter USACE wetlands (Appendix A, Figure 6a).

Within the study area, approximately 0.929 acre of USACE Section 404 WoUS and 0.075 acre of Section 404 wetlands were mapped, and approximately 0.793 acre of Section 10 navigable waters was mapped.

Within the study area, approximately 0.929 acre of RWQCB Section 401 WoS and 0.075 acre of

Section 401 wetlands were mapped. Appendix A, Figure 6a, depicts potential USACE and RWQCB jurisdiction mapped within the study area.

5.1.2 CDFW Jurisdiction Description

As discussed in Section 3.2.3 above, it was determined that this feature was not subject to CDFW jurisdiction, based on the lack of freshwater input and the historic context of this feature receiving any freshwater flows. It should be noted that the feature does provide habitat and so is expected to be subject to CDFW jurisdiction under the California Endangered Species Act (CESA) and the California Environmental Quality Act (CEQA). Those assessments and conclusions are discussed separately in the *Biological Resources and Habitat Assessment, Venice Auxiliary Pumping Plant, Los Angeles County, California*, dated January 2016 (ICF 2016).

5.1.3 CCC Jurisdiction Description

The limits of potential CCC jurisdictional one-parameter wetlands in the study area were determined by the presence of the hydrology parameter, which was based on the limits of Section 404 WoUS (6.71 feet, NAVD 88). The 6.71 foot msl elevation exceeded the limits of the hydric soil and hydrophytic vegetation parameters. Within the study area, approximately 0.929 acre of CCC jurisdiction was mapped. Appendix A, Figure 6b, depicts potential CCC jurisdiction mapped within the study area.

5.2 Delineation Results Summary

Within the entire study area, one feature that could be subject to the jurisdiction of USACE, RWQCB/EPA, CDFW, and CCC was delineated: Ballona Lagoon and Grand Canal. USACE and RWQCB/EPA potential jurisdictional areas within the study area total approximately 0.929 acre of Section 404 non-wetland WoUS/Section 401 non-wetland WoS and 0.075 acre of Section 404 wetland WoUS and Section 401 wetland WoS. Additionally, 0.793 acre of potential USACE Section 10 WoUS was mapped in the study area. Appendix A, Figure 6a, depicts the limits of potential USACE/RWQCB jurisdiction in the study area. Potential CCC jurisdiction within the study area totaled approximately 0.929 acre of one-parameter wetlands. Appendix A, Figure 6b, depicts the limits of potential CCC jurisdiction in the study area.

Table 5-1. Jurisdictional Delineation Summary (acres)

Jurisdiction	**Ballona Lagoon and Grand Canal**
USACE Section 404 Non-Wetland WoUS/RWQCB Section 401 Non-Wetland WoS	0.929
USACE Section 404 Wetland WoUS/RWQCB Section 401 Wetland WoS	0.075
USACE Section 10 Navigable WoUS	0.793
CCC One-Parameter Wetlands	0.929
Acres Total	0.929

5.3 List of Delineators and Report Preparers/ Reviewer

Paul Schwartz, Senior Biologist—Lead Delineator/Report Preparer

Lily Sam, Biologist—Delineator

Megan Jameson, Senior Regulatory Specialist—Report Reviewer

Brittany Buscombe—GIS Specialist

Chapter 6
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Personal Communication

Dan Swenson. USACE Regulatory Section Chief, Los Angeles District. November 3, 2015 and December 28, 2015—personal conversation regarding Section 404 elevational limits and Section 10 limits in the tidal waters of Ballona Lagoon and Grand Canal. City of Los Angeles, Los Angeles County, California.

Appendix A
Jurisdictional Delineation Maps

1 Regional Vicinity Map

2 USGS Topographic Map

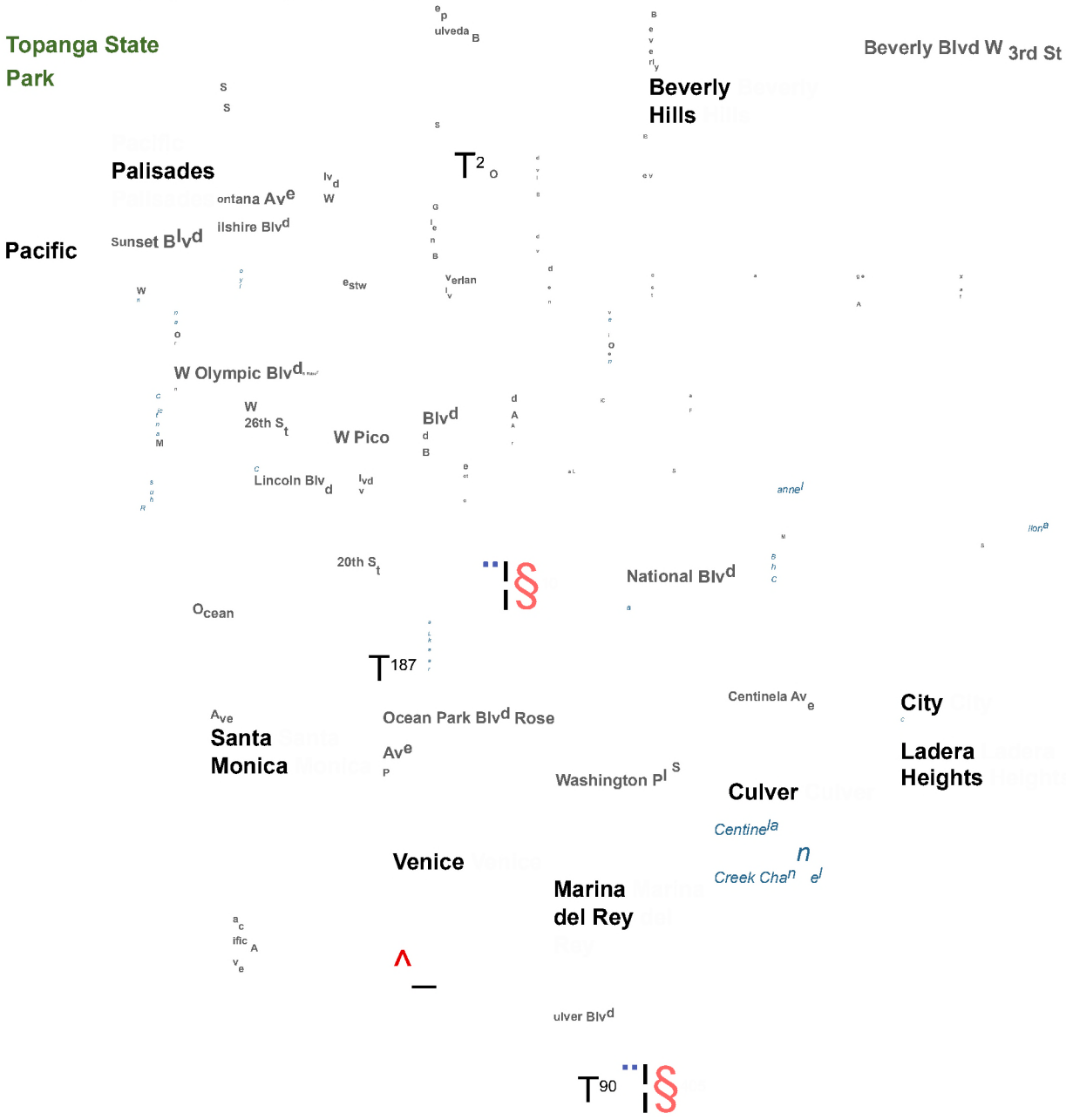
3 National Hydrography Dataset Map

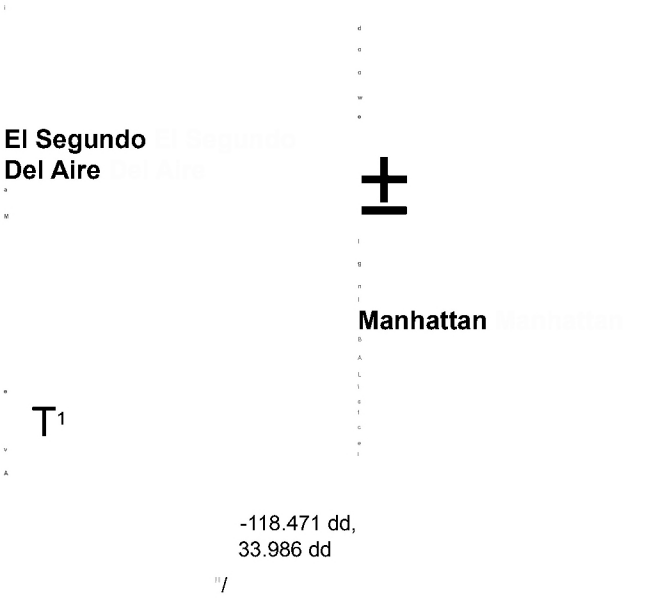
4 National Wetlands Inventory Map

5 Watershed Map

6a USACE/RWQCB Jurisdictional Delineation Results

6b CDFW/CCC Jurisdictional Delineation Results





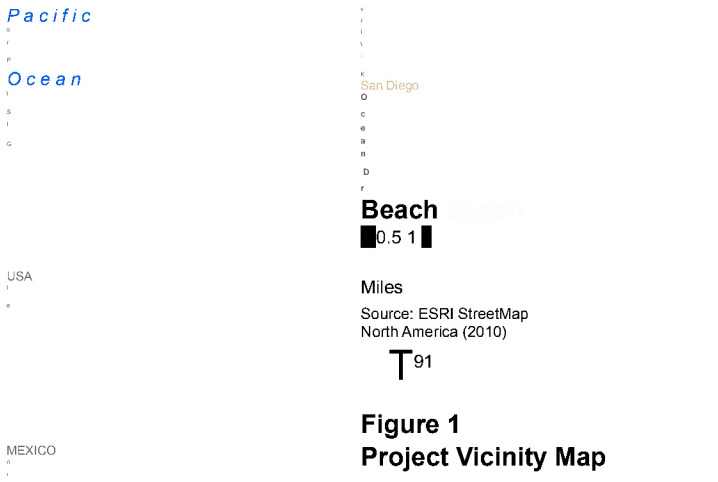


Figure 1
Project Vicinity Map
Venice Auxiliary Pumping Plant Project



Figure 2

USGS Topographic Map
Venice Auxiliary Pumping Plant Project

-118.471 dd, 33.986 dd

Legend

1 inch = 1,000 feet

1,000

Feet

Source: NHD;
ESRI World Imagery (2010) Map
Prepared: 1/13/2016

Jurisdictional Delineation

Study Area NHD Streamline

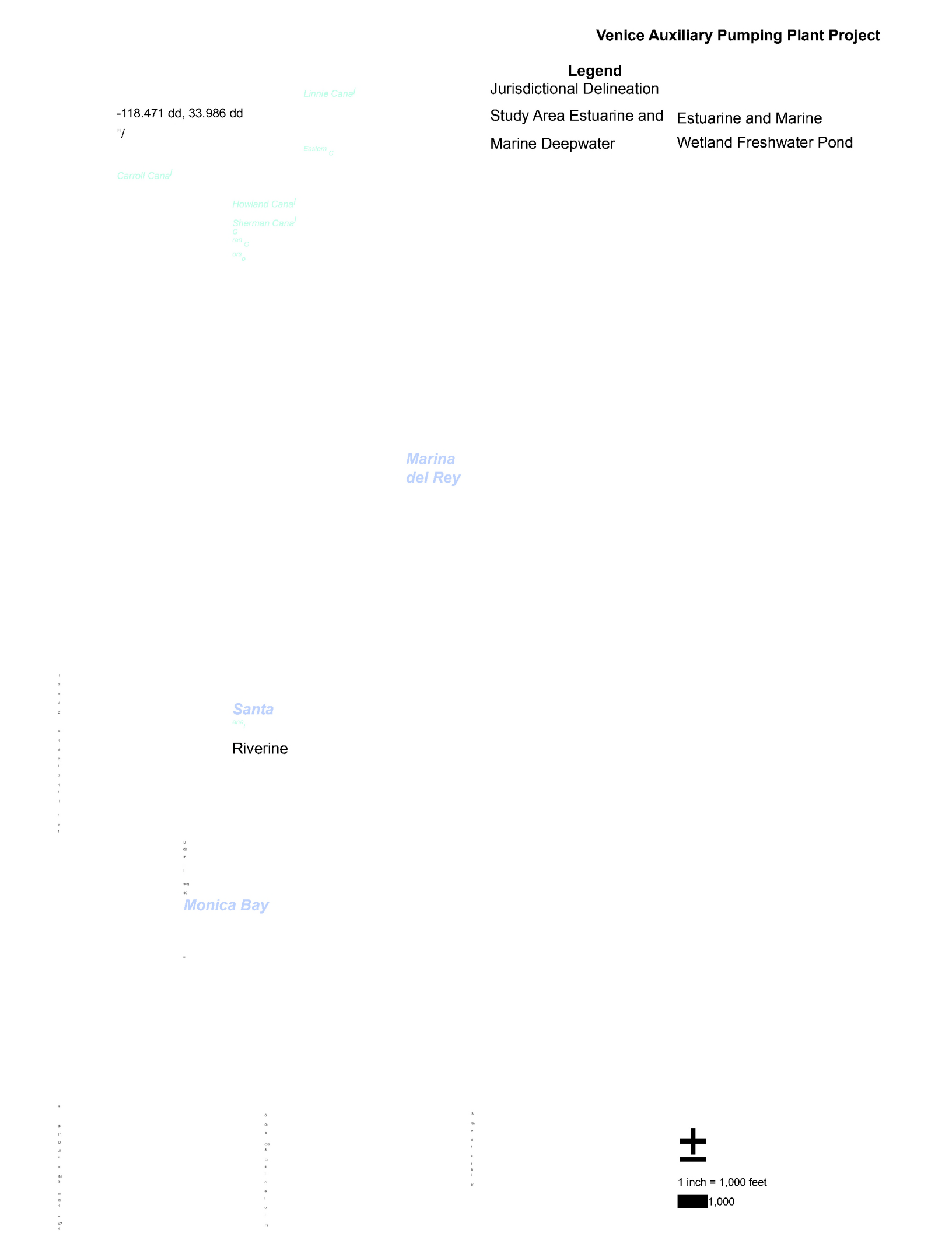
-118.453 dd,
33.965 dd

Ballona Creek

Figure 3

National Hydrography Dataset Map

Venice Auxiliary Pumping Plant Project



Feet

Source: NHD;
ESRI World Imagery (2010) Map
Prepared: 1/13/2016

Figure 4

"/
-118.453 dd,
33.965 dd

National Wetlands Inventory Map
Venice Auxiliary Pumping Plant Project

Watershed (HUC 8)

Legend







Jurisdictional
Delineation Study Area
Watersheds (HUC 10)

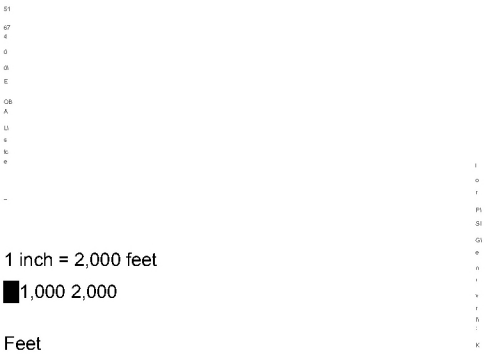
Santa Monica Bay

Dominguez
Channel

V_{90}

V_1

Ballona
Creek



1 inch = 2,000 feet

1,000 2,000

Feet

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-118.462 dd,
33.976 dd

Source: NHD;
ESRI World Imagery (2010) Map Prepared: 1/13/2016

Figure 5
Watershed Map
Venice Auxiliary Pumping Plant
Project

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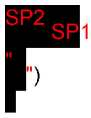
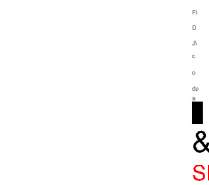


Pumping Plant

Legend

Study Area (SA) = 3.013 Acres
-118.459 dd,
33.975 dd



Ballona Lagoon

Limits of Section 404 Non-Wetland WoUS/Section 401 Non-Wetland WoS; Elev. 6.71'; Acres in SA = 0.929

Section 404 Wetland WoUS/Section 401 Wetland WoS; Acres in SA = 0.075



1 inch = 60 feet

0 30

&

Limits of Section 10 Navigable WoUS; Elev. 4.5', Acres in SA = 0.793 ") Wetland Sample Point

Topographic Line (NAVD 88)

& Photo Point

Source: Google Earth

Map Prepared: 1/7/2016

#* Culvert

Figure 6a
USACE/RWQCB Jurisdictional Delineation Results Map Venice Auxiliary Pumping Plant Project

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33.976 dd

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Pumping Plant

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-118.459 dd, 33.975 dd

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Ballona Lagoon
Legend

Study Area (SA) = 3.013 Acres

SP3

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1 inch = 60 feet
0 30 ■

&
CCC 1-Parameter Wetland; Acres in SA = 0.929 ") Wetland Sample Point

Topographic Line (NAVD 88)

& Photo Point

■

Source: Google Earth Map Prepared: 1/7/2016

■

#* Culvert

Figure 6b
CCC Jurisdictional Delineation Results Map Venice Auxiliary Pumping Plant Project

Appendix B
Study Area Photographs
Venice Auxiliary Pumping Plant Appendix B: Photo Log

	**Photograph #** 1 **Photo Date** 9/21/2015 **Location** West side of study area, adjacent to trail. **Direction** Northeast **Comment** Photo depicts conditions along the banks of Ballona Lagoon.
	**Photograph #** 2 **Photo Date** 9/21/2015 **Location** West side of study area, south of existing pumping plant. **Direction** Southwest **Comment** Photo depicts conditions along the concrete bank south of the existing pumping plant.



Photograph # 3

Photo Date 9/21/2015

Location West side of study area, along sidewalk on east side of existing pumping plant.

Direction Northwest

Comment Photo depicts conditions present along the west side of Grand Canal.

Venice Auxiliary Pumping Plant Appendix B: Photo Log



Photograph # 4

Photo Date 9/21/2015

Location West side of study area, at Intersection of Canal Ct. and Hurricane St.

Direction Northeast

Comment Photo depicts conditions present where the proposed auxiliary pumping plant will be located.



Photograph # 5

Photo Date 9/21/2015

Location West side of study area, along sidewalk adjacent to residential housing and location of proposed auxiliary pumping plant.

Direction Southeast.

Comment Photo depicts conditions present along the west side of Grand Canal.



Photograph # 6

Photo Date 9/21/2015

Location West side of study area, along sidewalk on east side of existing pumping plant.

Direction Northwest

Comment Photo depicts location of SP 1.

Venice Auxiliary Pumping Plant Appendix B: Photo Log



Photograph # 7

Photo Date 9/21/2015

Location West side of study area, along sidewalk on east side of existing pumping plant.

Direction Northwest

Comment Photo depicts location of SP 2.



Photograph # 8

Photo Date 9/21/2015

Location West side of study area, adjacent to side walk along Ballona Lagoon.

Direction Northeast

Comment Photo depicts location of SP 3.



Photograph # 9

Photo Date 9/21/2015

Location West side of study area, adjacent to side walk along Ballona Lagoon.

Direction Northeast

Comment Photo depicts location of SP 4.

Venice Auxiliary Pumping Plant Appendix B: Photo Log



Photograph # 10

Photo Date 9/21/2015

Location East side of the study area, in empty lot.

Direction Southeast

Comment Photo depicts conditions present within the empty lot on east side of the study area.



Photograph # 11

Photo Date 9/21/2015

Location Sidewalk on east side of Grand Canal.

Direction Northwest

Comment Photo depicts conditions present along the sidewalk on the east side of Grand Canal.



Photograph # 12

Photo Date 9/21/2015

Location Sidewalk on east side of Grand Canal.

Direction Southeast

Comment Photo depicts conditions present along the sidewalk on the east side of Grand Canal.



Photograph # 13

Photo Date 9/21/2015

Location East side of the study area, confluence of Grand Canal and Ballona Lagoon.

Direction Northwest

Comment Photo depicts conditions present along the sidewalk on the east side of Grand Canal.



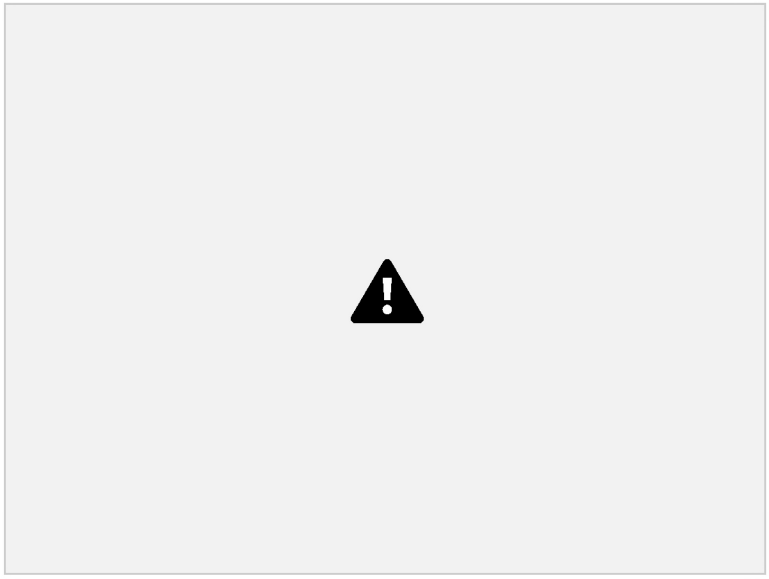
Photograph # 14

Photo Date 9/21/2015

Location East side of study area, in empty lot.

Direction Northwest

Comment Photo depicts location of SP 5.



Photograph # 15

Photo Date 9/21/2015

Location East side of study area, in empty lot.

Direction Northwest

Comment Photo depicts location of SP 6.

Appendix C
Wetland Determination Data Forms
Appendix D
Preliminary Jurisdictional Determination Form

PRELIMINARY JURISDICTIONAL DETERMINATION FORM

This preliminary JD finds that there *"may be"* waters of the United States on the subject project site, and identifies all aquatic features on the site that could be affected by the proposed activity, based on the following information:

Los Angeles District

District Office File/ORM # PJD Date:

CA

ty of Los Angeles, Department of
ıblic Works

State City/County

Los Angeles/I

Nearest Waterbody:

Location: TRS, LatLong or UTM:

Grand C

(WGS 8

Name/
Address of Person
Requesting PJD

Tidal:

Non-Wetland Waters:

Stream Flow:

Identify (Estimate) Amount of Waters in the Review Area:

See atta

on the Site Identified as

Name of Any Water Bodies

Non-Tidal:

0.92 linear ft | width | acres

N/A Section 10 Waters:

Class:

Estuarine

Determination:

Wetlands:

0.075 acre(s) Cowardin

Date of Field Trip:

Office (Desk) Determination Field

SUPPORTING DATA: Data reviewed for preliminary JD (check all that apply - checked items should be included in case file and, where checked and requested, appropriately reference sources below):

Maps, plans, plots or plat submitted by or on behalf of the applicant/consultant:

Office does not concur with data sheets/delineation report.

Data sheets prepared/submitted by or on behalf of the applicant/consultant.

Data sheets prepared by the Corps

Office concurs with data sheets/delineation report.

See JD report

Corps navigable waters' study:

U.S. Geological Survey Hydrologic Atlas:

U.S. Geological Survey map(s). Cite quad name:

USGS NHD data.

Venice, California

USGS 8 and 12 digit HUC maps.

USDA Natural Resources Conservation Service Soil Survey. Citation:

No NRCS/USDA soil data available

See Figure 5 from JD report.

National wetlands inventory map(s). Cite name:

State/Local wetland inventory map(s): FEMA/FIRM maps:

100-year Floodplain Elevation is:

Photographs: Aerial (Name & Date):

✔

✔

Google Earth, Various dates.

Site Photographs from 9/21/2015

Other (Name & Date):

✔

Previous determination(s). File no. and date of response letter:

Other information (please specify):

IMPORTANT NOTE: The information recorded on this form has not necessarily been verified by the Corps and should not be relied upon for later jurisdictional determinations.

(REQUIRED)

Signature and Date of Regulatory Project Manager

Signature and Date of Person Requesting Preliminary JD
(REQUIRED, unless obtaining the signature is impracticable)

EXPLANATION OF PRELIMINARY AND APPROVED JURISDICTIONAL DETERMINATIONS:

1. The Corps of Engineers believes that there may be jurisdictional waters of the United States on the subject site, and the permit applicant or other affected party who requested this preliminary JD is hereby advised of his or her option to request and obtain an approved jurisdictional determination (JD) for that site. Nevertheless, the permit applicant or other person who requested this preliminary JD has declined to exercise the option to obtain an approved JD in this instance and at this time.

2. In any circumstance where a permit applicant obtains an individual permit, or a Nationwide General Permit (NWP) or other general permit verification requiring "preconstruction notification" (PCN),

or requests verification for a non-reporting NWP or other general permit, and the permit applicant has not requested an approved JD for the activity, the permit applicant is hereby made aware of the following: (1) the permit applicant has elected to seek a permit authorization based on a preliminary JD, which does not make an official determination of jurisdictional waters; (2) that the applicant has the option to request an approved JD before accepting the terms and conditions of the permit authorization, and that basing a permit authorization on an approved JD could possibly result in less compensatory mitigation being required or different special conditions; (3) that the applicant has the right to request an individual permit rather than accepting the terms and conditions of the NWP or other general permit authorization; (4) that the applicant can accept a permit authorization and thereby agree to comply with all the terms and conditions of that permit, including whatever mitigation requirements the Corps has determined to be necessary; (5) that undertaking any activity in reliance upon the subject permit authorization without requesting an approved JD constitutes the applicant's acceptance of the use of the preliminary JD, but that either form of JD will be processed as soon as is practicable; (6) accepting a permit authorization (e.g., signing a proffered individual permit) or undertaking any activity in reliance on any form of Corps permit authorization based on a preliminary JD constitutes agreement that all wetlands and other water bodies on the site affected in any way by that activity are jurisdictional waters of the United States, and precludes any challenge to such jurisdiction in any administrative or judicial compliance or enforcement action, or in any administrative appeal or in any Federal court; and (7) whether the applicant elects to use either an approved JD or a preliminary JD, that JD will be processed as soon as is practicable. Further, an approved JD, a proffered individual permit (and all terms and conditions contained therein), or individual permit denial can be administratively appealed pursuant to 33 C.F.R. Part 331, and that in any administrative appeal, jurisdictional issues can be raised (see 33 C.F.R. 331.5(a)(2)). If, during that administrative appeal, it becomes necessary to make an official determination whether CWA jurisdiction exists over a site, or to provide an official delineation of jurisdictional waters on the site, the Corps will provide an approved JD to accomplish that result, as soon as is practicable.

PRELIMINARY JURISDICTIONAL DETERMINATION FORM

This preliminary JD finds that there *"may be"* waters of the United States on the subject project site, and identifies all aquatic features on the site that could be affected by the proposed activity, based on the following information:

Appendix A - Sites

Los Angeles District

District Office File/ORM # PJD Date:

CA

Los Angeles/Los

State City/County Person Requestinq PJD

Site	Aquatic Resource	Class of Resource	Number in Review Area	Latitude	Longitude	Cowardin Class	Est. Amount of Aquatic Resource	Class
1			1	33.97		Estuarine	0.929	non-wetland
1			1	33.97	-118.461	Estuarine	0.075	Non-Section 10 wetland
1			1	33.97	-118.461	Estuarine	0.793	Section 10 tidal
				-118.46			Non	

Notes:

See attached jurisdictional delineation report for additional information.

Venice Auxiliary Pumping Plant
Sea Level Rise Hazard Analysis

Prepared For:

Los Angeles Department of City Planning
200 N Spring St
Los Angeles, CA 90012

Prepared By:

moffatt & nichol
4225 East Conant Street
Long Beach, CA 90808

December 2019

M&N File 10203

Table of Contents

DOCUMENT VERIFICATION III

ACRONYMS AND ABBREVIATIONS IV

EXECUTIVE SUMMARY 1

1. INTRODUCTION 3
   - 1.1 Background 3
   - 1.2 Site Location 4
   - 1.3 Site Topography 4
   - 1.4 Venice Canals Tide Gate System 5

2. SEA-LEVEL RISE SCENARIOS 9
   - 2.1 Best Available Science for Sea Level Rise Projections 9
   - 2.2 Project Specific Sea Level Rise Scenarios 10

3. COASTAL HAZARDS 11
   - 3.1 Non-Storm Tidal Flooding 11
   - 3.2 Coastal Storms 15
   - 3.3 Fluvial Storms 18
   - 3.4 Tsunamis 18

4. SEA LEVEL RISE IMPACTS ON COASTAL RESOURCES 21
   - 4.1 Public Access and Recreation 21
   - 4.2 Coastal Habitats 21
   - 4.3 Natural Landforms 22
   - 4.4 Agricultural Resources 22
   - 4.5 Water Quality and Groundwater 22
   - 4.6 Scenic Resources 22
   - 4.7 Cultural Sites and Archaeological or Paleontological Resources 22

5. ADAPTATION PLANNING 23
   - 5.1 Marina del Rey Tide Gate Operations & Maintenance Plan 23
   - 5.2 Flood Hazard Mitigation through Structural Floodproofing 23
   - 5.3 Update Sea Level Rise Analysis in 2050 23

6. REFERENCES 25

Table of Figures

Figure 1: Location Map 4
Figure 2: Site Topography 5
Figure 3: Venice Canals Tidal Gate System 6
Figure 4: Diagram of wet and dry modes of the Venice Canal Tide Gate System 6
Figure 5: Diagram of Marina del Rey Tide Gate (Based off 2007 as-built drawings) 7
Figure 6: Preliminary FIRM in the Venice Pumping Plant vicinity 8
Figure 7: Sea Level Rise Projections for Three Risk Aversion levels, Santa Monica, CA (OPC, 2018) 10
Figure 8: Venice Sea Level Rise Hazards Diagram 11
Figure 9: Santa Monica gage tide ranges and extreme water levels. 12
Figure 10: Potential non-storm flooding hazards assuming Marina del Rey tide gates are not functioning. 14
Figure 11: Sea level rise hazard associated with a 1.6 feet of sea level rise with 100-year return period storm. 16
Figure 12: Sea level rise hazard associated with a 3.3 feet of sea level rise with 100-year return period storm. 16
Figure 13: Sea level rise hazard associated with a 4.9 feet of sea level rise with 100-year return period storm. 17
Figure 14: Sea level rise hazard associated with a 6.6 feet sea level rise with 100-year return period storm. 17
Figure 15: Tsunami Flood Hazard Map (Source: Cal-OES Venice Quadrangle) 19

Document Verification

Client	City of Los Angeles
Project name	Venice Auxiliary Pumping Plant
Document title	Sea Level Rise Hazard Analysis
Document sub-title	–
Status	Draft
Date	December 19, 2019
Project number	10203
File reference	Q:\LB\10203 - Venice Auxiliary Pumping Plant SLR Study\8 Deliverables

Revision	Description	Issued by	Date	Checked
00	Draft report	JC	June 26, 2018	AH
01	Draft report	JC	July 16, 2018	AH
02	Revised draft report	AH	December 19, 2019	JT

Produced by:
Moffatt & Nichol
4225 East Conant Street
Long Beach, CA 90808
www.moffattnichol.com

Disclaimer: *It is understood that estimating and projecting future weather, tidal, ocean and on-shore conditions and their impacts upon existing or contemplated developments or resources is difficult, complex and based on variable assumptions, and further, is impacted by factors potentially beyond the Consultant's ability to predict or control. Accordingly, any estimates, forecasts reviews or assessments provided as part of the Services are presented solely on the basis of the assumptions accompanying the estimates, forecasts, reviews and assessments, and subject to the information or data utilized at the time of this Project. As such, Consultant makes no warranty that the hazard maps will represent actual climate events or that adaptation measures will be adequate to protect against actual climate events. In addition, to the extent Consultant utilizes materials provided by the Client or third parties, or material that is generally available, Consultant is entitled to rely upon any such information concerning the Project, except to the extent it is explicitly provided that Consultant will independently verify the accuracy or completeness of such materials or information.*

Acronyms and Abbreviations

BFE	Base Flood Elevation
Cal EMA	California Emergency Management Agency
Cal OES	State of California Office of Emergency Services
CCC	State of California Coastal Commission
CDP	Coastal Development Permit
CEQA	California Environmental Quality Act
City	City of Los Angeles
cm	centimeter
CoSMoS	Coastal Storm and Modeling System
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
gpm	gallons per minute
H++	Extreme SLR scenario due to rapid Antarctic ice sheet mass loss (Sweet et al, 2017)
LA	Los Angeles
M&N	Moffatt & Nichol
MHHW	mean higher high water
MHW	Mean high water level
mgd	million gallons per day
MLLW	mean lower low water
MSL	mean sea level
NAVD 88	North American Vertical Datum of 1988
NFIP	National Flood Insurance Program
NOAA	National Oceanic and Atmospheric Association
OPC	Ocean Protection Council
PFIRM	Preliminary Flood Insurance Rate Map
EIR	Environmental Impact Report
SLR	Sea Level Rise
USGS	U.S. Geological Survey
VAPP	Venice Auxiliary Pumping Plant
VSPP	Venice Stormwater Pumping Plant
VPP	Venice Pumping Plant

Executive Summary

The City of Los Angeles is in the process of obtaining a Coastal Development Permit (CDP) for the Venice Auxiliary Pumping Plant (VAPP). To assist the City in this effort, Moffatt & Nichol has been commissioned to prepare a sea level rise hazard analysis specific to the Project site and design life that is consistent with the *California Coastal Commission (CCC) Sea Level Rise Policy Guidance* originally adopted in August 2015 and updated in November 2018 to incorporate sea level rise projections released by the California Ocean Protection Council (OPC) in 2018.

The Venice Pumping Plant (VPP), owned and operated by the City of Los Angeles, is the largest pumping plant in the City with an average flow of 20 million gallons per day (mgd). The facility has no diversions for bypassing and has had near misses which have nearly resulted in the discharge of untreated sewage into the Grand Canal and Ballona Lagoon. An upgrade to the VPP, the VAPP is proposed to increase the pumping capacity and includes a diversion and bypass pipeline to allow for necessary maintenance on the existing VPP. The project is critical to the ongoing operation and maintenance of the City's Coastal Interceptor Sewer.

A sea level rise study was performed recently by Moffatt and Nichol (2018) for the community of Venice. This study uses the sea level rise scenarios developed during the previous study, based on data available from the USGS Coastal Storm Modeling System (CoSMoS) and the Ocean Protection Council's *Sea Level Rise Guidance (OPC 2018)*, and applies them for a site-specific evaluation of non-storm tidal flooding and coastal flooding scenarios. A range of sea level rise projections are used for this study, including 1.6, 3.3, 4.9, and 6.6 feet. Hazards such as extreme monthly tides and a 100-year coastal storm event were combined with sea level rise scenarios to understand future coastal hazards that could impact the Project site and coastal resources.

The project site is located adjacent to the Grand Canal and the Ballona Lagoon in the community of Venice. The water levels in the Ballona Lagoon are subject to limited tidal influence by the Marina del Rey tide gate in order to provide circulation in the lagoon, but the tide gates prevent water levels from exceeding an elevation of 5 feet above mean lower low water. With the Marina del Rey tide gate in place and functioning, the site is well protected from non-storm tidal events and 100-year coastal storm events for SLR scenarios up to and including 4.9 feet based on the CoSMoS hazard data. There is a 98% chance SLR will not exceed 5 feet this century, indicating the Project is unlikely to be exposed to coastal hazards over the facility's design life of 50 years.

The project is also within the "credible upper bound" tsunami inundation zone depicted on the State of California Tsunami Inundation Map for Emergency Planning (State of California, 2009). However, we do not recommend using this map for the design of hazard mitigation measures. Using this hazard map for design purposes is beyond scope of the map's stated purpose, particularly within a regulatory context:

This tsunami inundation map was prepared to assist cities and counties in identifying their tsunami hazard. It is intended for local jurisdictional, coastal evacuation planning uses only. This map, and the information presented herein, is not a legal document and does not meet disclosure requirements for real estate transactions nor for any other regulatory purpose (State of California, 2009).

City of Los Angeles recognizes the long-term risks of sea level rise, but believes the near-term risks of not implementing the project are more significant as it may result in the discharge of untreated sewage from the VPP. Adaptation strategies involve continued maintenance of the tide gates, and the development of a flood gate operation and maintenance plan that accounts for sea level rise. Other future mitigation recommendations include flood proofing the facility to protect against flooding due to the potential malfunction of the tide gate or extreme coastal hazard event.

1. Introduction

The City of Los Angeles owns and operates the Venice Pumping Plant (VPP) (Pump Station No. 646), located at 140 Hurricane Street in the Los Angeles community of Venice, adjacent to the Ballona Lagoon and the Grand Canal. The VPP was built in 1957 and upgraded in 1987. It is currently the largest pumping plant in the City with a capacity of 45,000 gallons per minute (gpm) and an average of 20 million gallons per day (mgd). During recent years, flow conditions have reached 50 mgd, which nearly resulted in untreated discharges directly into the Grand Canal and Ballona Lagoon. The VPP is a critical facility that services the communities of Topanga, Pacific Palisades, Brentwood, and Mar Vista along with the City of Santa Monica and parts of Los Angeles County.

The VPP has no diversions for bypassing the facility for required maintenance in the event of an emergency. Consequently, the facility is at risk of discharging untreated sewage in the event of a maintenance or operational emergency. To improve the redundancy and resiliency of the VPP, the City has designed a project to upgrade and enhance the VPP. This upgrade will provide the ability to perform critical maintenance on the VPP. The project, known as the Venice Auxiliary Pumping Plant (VAPP) consists of adding a new two-story building with an operation and control center for the pumping plant, three 18 mgd submersible pumps, associated electrical equipment, a diversion structure, a bypass pipeline, and parking spaces. The project will increase the combined capacity of the VPP and VAPP to 87 mgd and provide redundancy and resiliency in the case of emergency. This project is critical to the ongoing operation and maintenance of the City's Coastal Interceptor Sewer (CIS).

The City is in the process of obtaining a Coastal Development Permit (CDP) for the VAPP. To assist the City in this effort, Moffatt & Nichol has been commissioned to prepare a sea-level rise analysis (Study) specific to the project site and design life that is consistent with the *California Coastal Commission Sea Level Rise Policy Guidance* originally adopted in August 2015 and updated in November 2018 to incorporate sea level rise projections released by the California Ocean Protection Council (OPC). The Study evaluates the projected coastal hazards associated with three sea level rise scenarios, the degree to which the Project and coastal resources are impacted by these hazards, and adaptation strategies to avoid or minimize impacts related to sea level rise during the Project design.

1.1 Background

Moffatt & Nichol recently completed a *Sea Level Rise Vulnerability Assessment* for the community of Venice (Moffatt & Nichol, 2018) that evaluated coastal hazards for a range of sea level rise scenarios projected over the remainder of this century. The sea level rise scenarios described in Moffatt & Nichol, 2018 are used as a basis in this report to be consistent with the community scale vulnerability assessment and any forthcoming planning documents. Additional information and references used in this project specific analysis are listed below:

- Marina Del Rey tide gate operations and emergency response measures
- Marina Del Rey tide gates rehabilitation as-built plans dated 2007
- Venice Auxiliary Pumping Plant Design Drawings, Draft 100% submittal

1.2 Site Location

The VAPP is located in the City of Los Angeles in the community of Venice on South Esplanade, and adjacent to the Grand Canal as shown in Figure 1. The site is located adjacent to the existing Venice Pumping Plant (VPP).

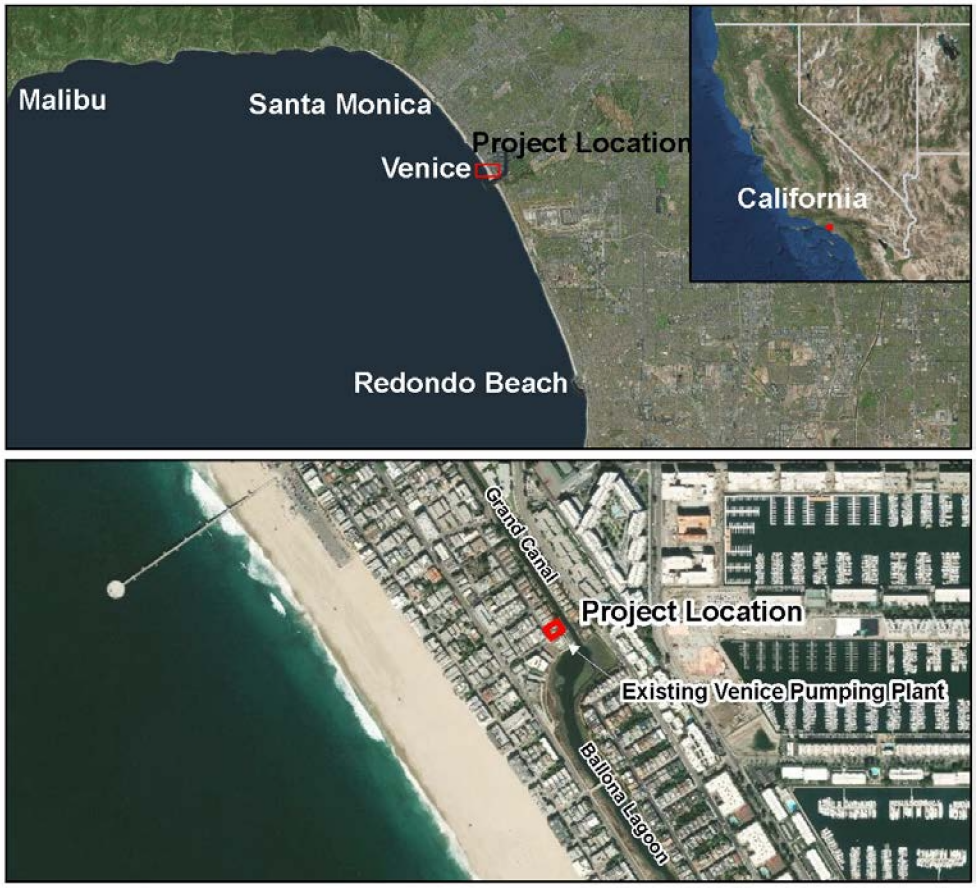


Figure 1: Location Map

1.3 Site Topography

Site topography and elevation are key factors in assessing coastal hazards at the project site. Existing topography of the site and adjacent areas are shown in Figure 2. According to the 100% Design Drawings, the proposed finish floor elevation of the electrical building is 7.67 feet and the pump station elevation is 6.92 feet. The proposed elevations onsite range from 6.92 to 8.0 relative to the North American Vertical Datum of 1988 (NAVD).

The project site is located roughly 1,200 feet from the present-day shoreline behind a ~500 foot wide sandy beach and 700 feet of dense residential development. As illustrated in Figure 2, the back beach and residential development are higher in elevation than the low-lying topography along the Venice Canals. This horizontal setback provides a substantial buffer from current and future coastal hazards such as shoreline erosion and storm-related flooding at the proposed project site.

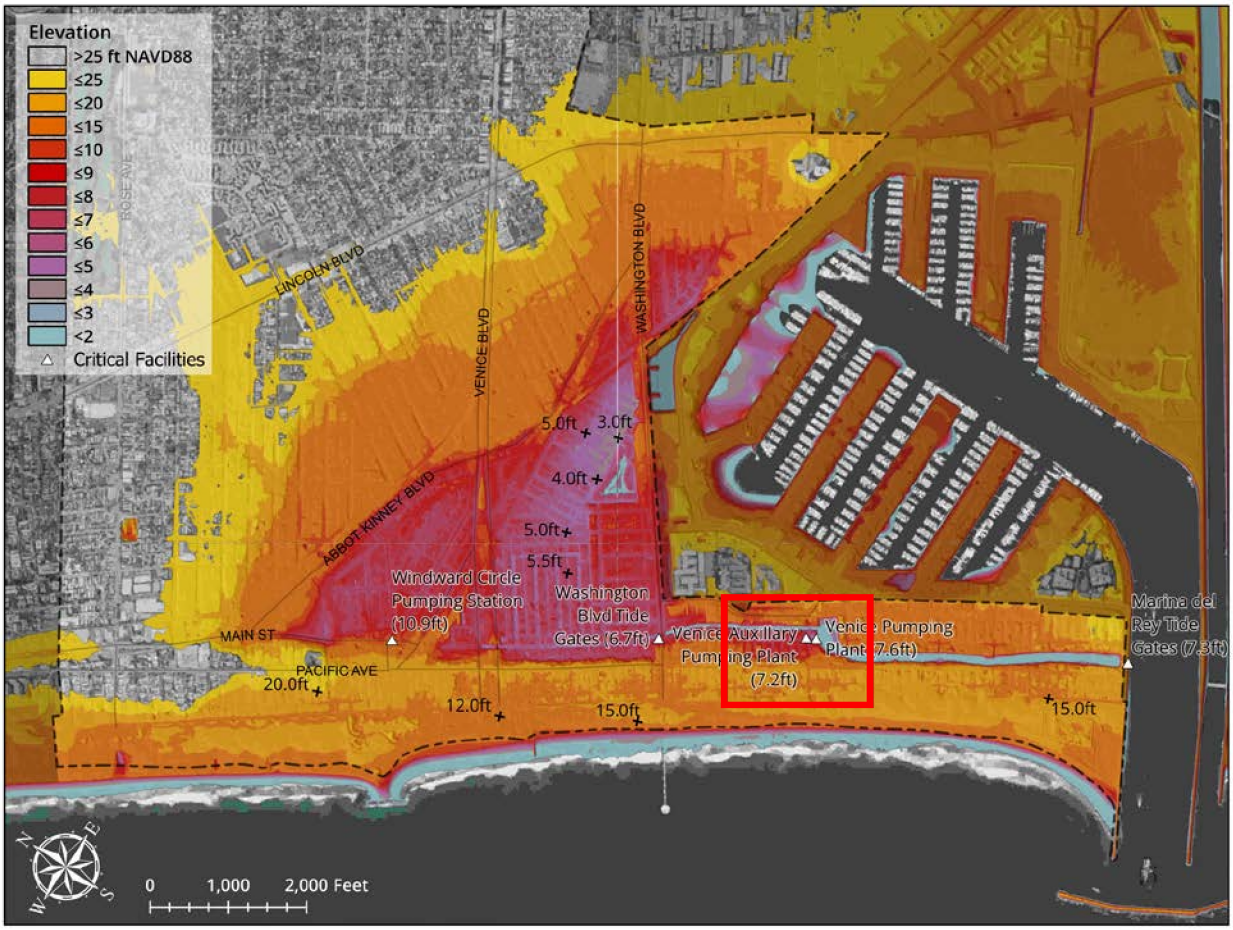


Figure 2: Site Topography

1.4 Venice Canals Tide Gate System

The Venice Canals District and nearby low-lying areas are protected from tidal flooding through a dual tide gate system. The first line of defense is the Marina del Rey tide gate (Figure 3), which is located on the northern Marina del Rey jetty and directly connects the Ballona Lagoon to the Pacific Ocean. For purposes of evaluating the proposed VAPP project the Marina del Rey tide gates are the most important system since they control water levels in the Grand Canal and Ballona Lagoon adjacent to the project site and VPP. The second tide gate is located at Washington Boulevard and directly connects the Venice Canals to the Grand Canal, which opens to Ballona Lagoon.

Both tide gates are owned by the City of Los Angeles and serve to mute the lower and upper limits of the ocean tidal range. This reduction in tide range allows for increased stormwater drainage capacity during the wet season (October - April) and prevents flooding that would otherwise occur during astronomical high tides. An illustration of the wet season and dry season operating modes is provided in Figure 4.

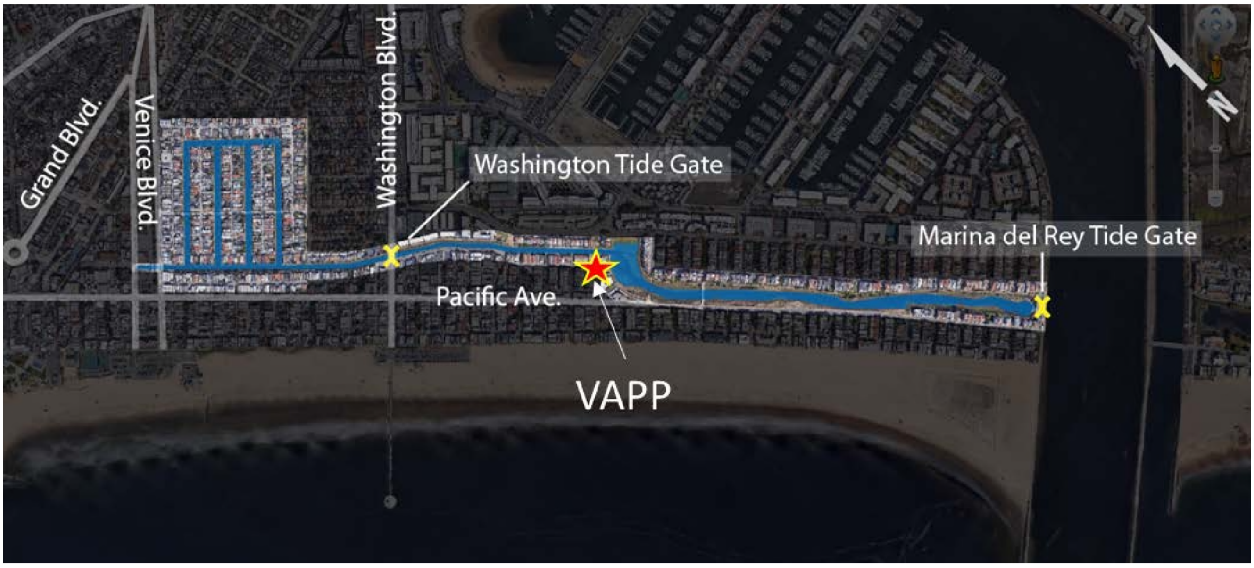


Figure 3: Venice Canals Tidal Gate System

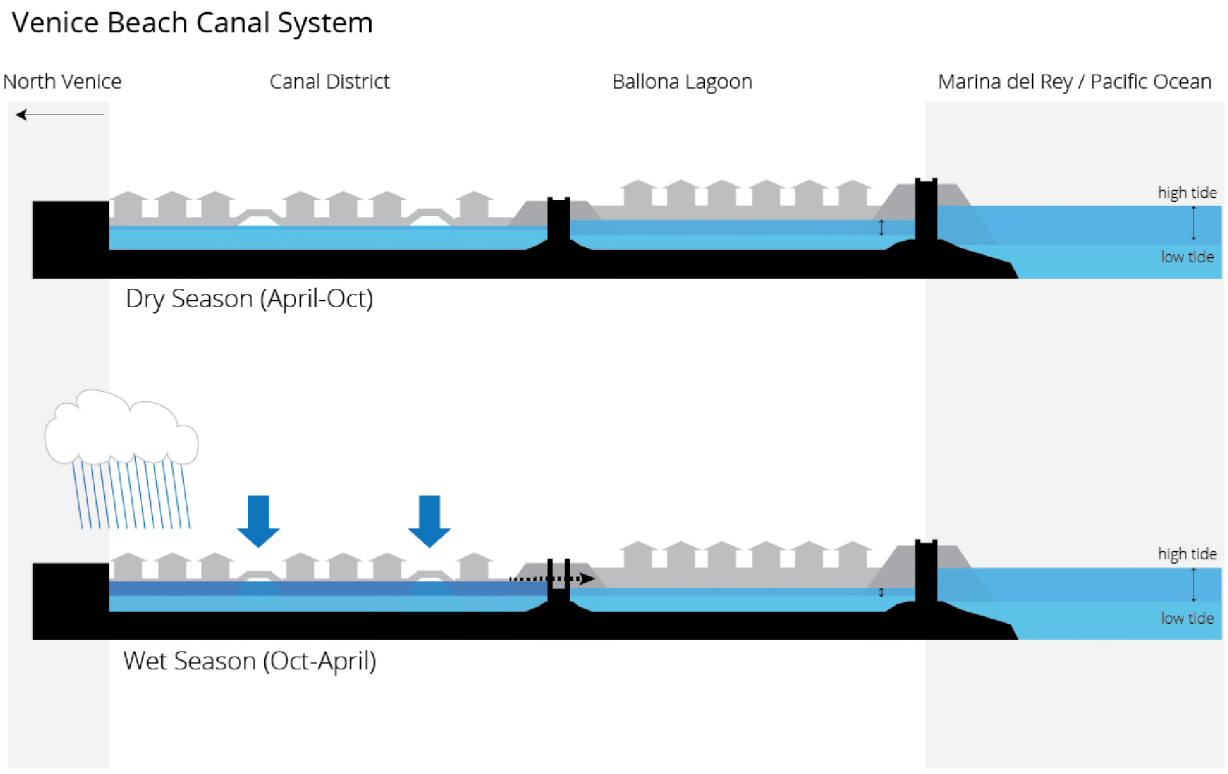


Figure 4: Diagram of wet and dry modes of the Venice Canal Tide Gate System

The Marina del Rey tide gate system is operated by City of LA Sanitation and Environment personnel at the Venice Pumping Plant (VPP). Their philosophy is to keep the gates open as much as possible to allow for tidal influence in the lagoon and canals to improve circulation. During the dry weather season the gates are open until water levels in the Grand Canal reach an elevation of 5 feet above mean lower low

water (MLLW) level which is close to the North American Vertical Datum of 1988 (NAVD 88) as shown in Figure 9. During the wet weather season, the gates are typically closed at a lower elevation, in preparation for a wet weather event. By maintaining a lower water surface elevation in the canals, there is additional storage volume available for attenuating runoff from the tributary watershed. After a wet weather event, the tide gates are opened during the subsequent low tide to convey stormwater to the ocean.

In the 50-year history of the tide gates, no failure has ever occurred that resulted in flooding of the VPP facility. As important flood prevention infrastructure for the coastal zone area, any failure in the operation of the Marina del Rey tide gates could potentially result in flooding of the VAPP and community of Venice. Due to the importance of these tide gates, responsibility for operations and emergency response lie with VPP operators who are on duty 24 hours a day. Typically the gates are operated remotely from the VPP facility but in an emergency, such as a power outage, crews can operate the gates manually onsite.

The tide gates and Via Marina roadway essentially form an earthen levee system that provide flood protection against high ocean water levels. The existing grade above the Marina del Rey tide gate has a relatively high crest elevation of approximately 16 feet (NAVD88) as shown in Figure 5 and is sheltered from direct ocean waves due to the Marina del Rey breakwater. Note, this crest elevation provides roughly 8 feet of freeboard above the preliminary 100-year base flood elevation (BFE) in Marina del Rey.

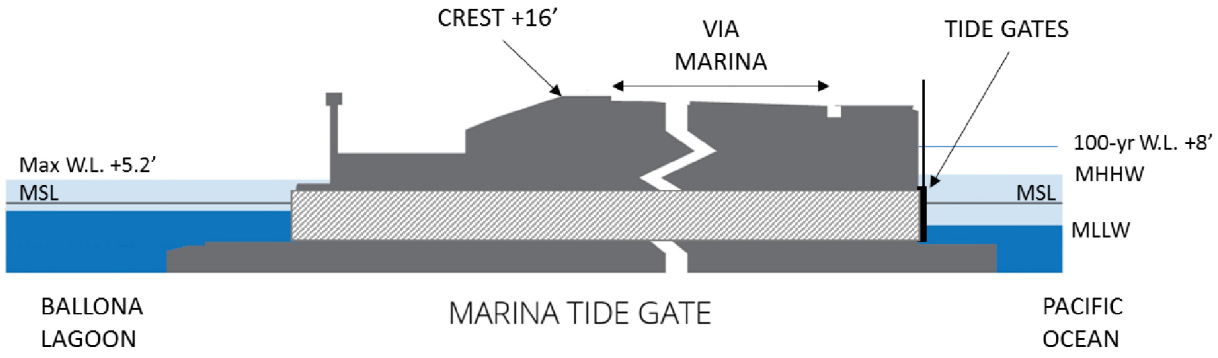


Figure 5: Diagram of Marina del Rey Tide Gate (Based off 2007 as-built drawings)

The Marina del Rey tide gate and surrounding levee are not certified by the Federal Emergency Management Agency (FEMA) as a flood control infrastructure, which means the flood protection provided by this system is not reflected in their hazard analysis. Since the tide gates and levee are neglected in the FEMA analysis, a BFE of 8 feet NAVD88 is mapped along the Ballona Lagoon and Grand Canal as shown in the Preliminary Flood Insurance Rate Map (PFIRM) dated October 28, 2016. Since the project site elevation is slightly lower than the preliminary BFE the VPP and proposed VAPP parcels are mapped within Zone AE.

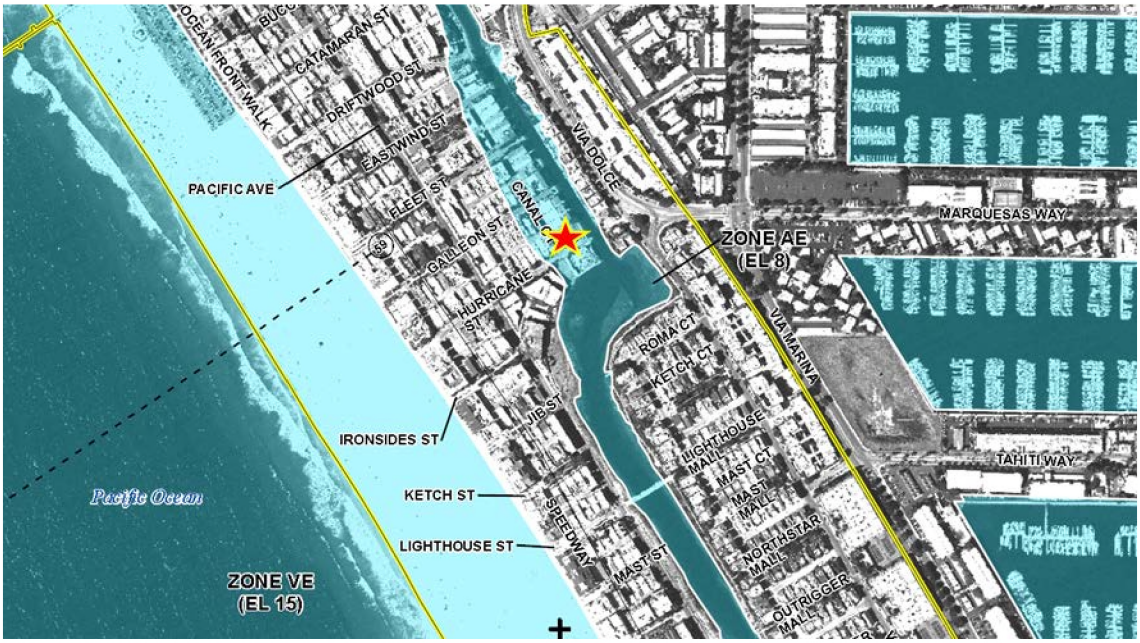


Figure 6: Preliminary FIRM in the Venice Pumping Plant vicinity

2. Sea-Level Rise Scenarios

There is broad agreement in the scientific community that the earth is predicted to warm and that sea levels will rise as a result of the thermal expansion of water and increased contributions from melting glaciers (Coastal and Ocean Working Group of the California Climate Action Team [CO-CAT], 2013; (CCC, 2015). Although there is consensus among the scientific community on these concepts, the timing and severity of sea level rise is relatively uncertain and is dependent on region-specific conditions. The uncertainty in the sea level rise projections is a result of potential variation in future global emissions of carbon dioxide (a function of future social behavior) and the non-linear response of the ocean to warmer temperatures and contributions from land-based ice sources.

2.1 Best Available Science for Sea Level Rise Projections

As a supporting study to a CDP application, the most relevant guidance to this analysis is the *California Coastal Commission Sea Level Rise Policy Guidance* (CCC, 2018). The original guidance document was adopted in 2015 and a science-focused update was adopted in November 2018. The purpose of the update was to incorporate more recent publications by the Ocean Protection Council (OPC) titled *Rising Seas in California: An Update on Sea-Level Rise Science* (2017) and the *State of California Sea-Level Rise Guidance: 2018 Update* (2018). The 2018 OPC SLR Guidance is now referenced as the best available science throughout the CCC SLR Policy Guidance document.

The OPC (2018) Guidance projects SLR for multiple emissions scenarios and uses a probabilistic approach based on Kopp et al. 2014 to generate a range of projections at a given time horizon. For the 2050-time horizon the "likely range" of SLR is between 0.6 to 1.1 feet. Kopp et al. 2014 estimated there is a 66% probability that SLR will fall within this "likely range". The likely range of SLR at the 2070-time horizon is 1.0 - 1.8 feet for a high emissions scenario. The likely range of SLR at the 2100-time horizon is 1.5 – 3.3 feet for a high emissions scenario. The upper end of the "likely range" is recommended for low risk aversion situations where impacts from SLR greater than this amount would be insignificant, or easily mitigated. This "low risk aversion" curve is shown in orange in Figure 7. At any given time horizon there is a 17% chance that SLR will exceed this curve.

For medium-high risk aversion situations more conservative (lower probability) projections for SLR are recommended by the OPC Guidance. These projections have a 1-in-200 chance (0.5% probability) of occurring at a given time horizon and would be appropriate for use on projects where damage from coastal hazards would carry a higher consequence and/or a lower ability to adapt such as residential and commercial structures. The medium-high risk aversion curve is shown in red in Figure 7.

The OPC guidance also includes a specific singular scenario (called H++), based on projections by Sweet et al 2017, which incorporates findings of DeConto and Pollard (2016) that predict Antarctic ice sheet instability could make extreme sea-level outcomes more likely than indicated by Kopp et al. 2014 (OPC, 2017). Because the H++ scenario is not a result of probabilistic modeling the likelihood of this scenario cannot be determined. Due to the extreme and improbable nature of the H++ scenario, it is most appropriate to consider when planning for development that poses a high risk to public health and safety, natural resources and critical infrastructure (OPC 2018). The H++ extreme risk aversion curve is shown in purple in Figure 7.

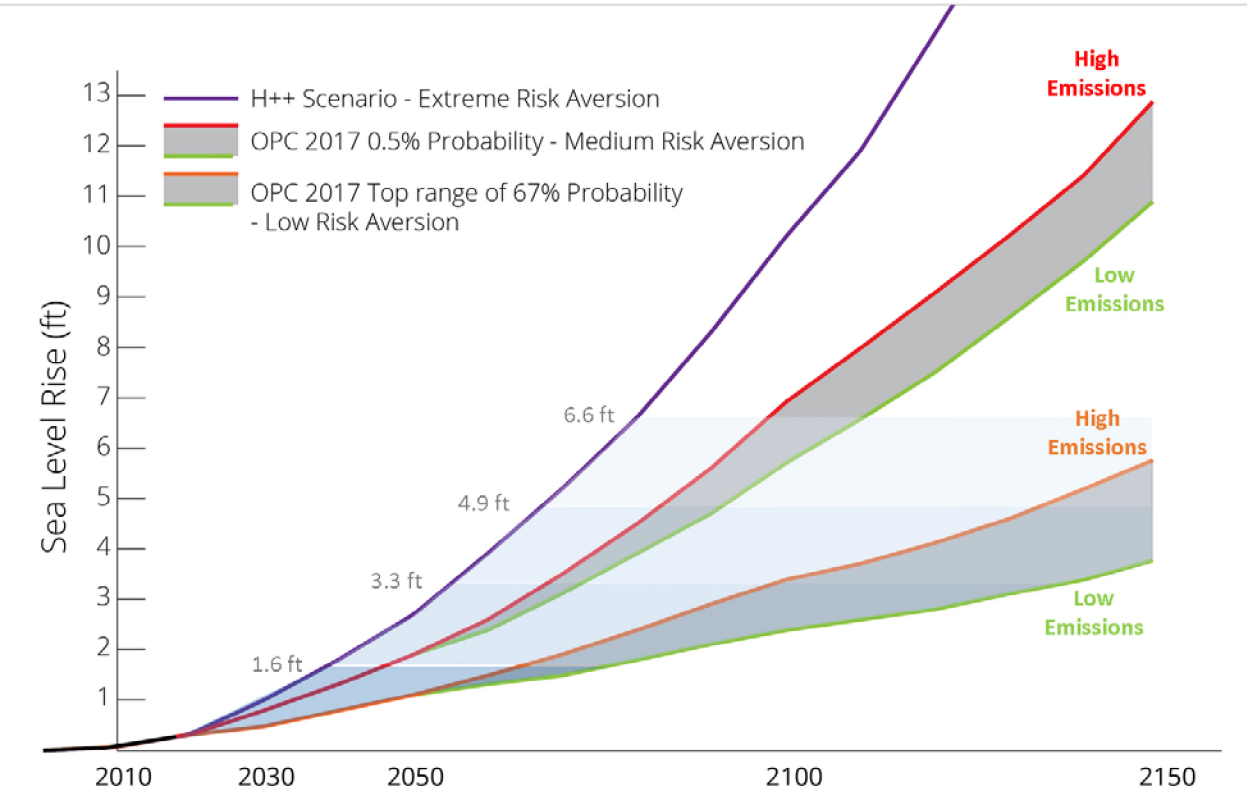


Figure 7: Sea Level Rise Projections for Three Risk Aversion levels, Santa Monica, CA (OPC, 2018)

2.2 Project Specific Sea Level Rise Scenarios

The sea level rise projections used for analysis of coastal hazards were based on a Project design life of 50 years, corresponding to a time horizon of 2070. Rather than focus on sea level rise projected for this single time horizon, multiple scenarios were selected to account for the range in projections at year 2070 and a value reflecting an upper range of sea level rise in 2100.

This iterative approach will provide a basis for understanding how coastal hazards and impacts change during and beyond the Project's design life. Given the uncertainty in sea level rise projections, the precise value selected for the project design life is not as important as selecting a range of values that can help identify impact thresholds to the Project and coastal resources. The sea level rise scenarios are listed below and shown in Figure 7.

1. Sea level rise of 1.6 feet (~50 cm) represents the upper end of the likely range of SLR projections in 2070, and the lower end of the likely range of projections in 2100.
2. Sea level rise of 3.3 feet (~100 cm) represents the medium-high risk aversion projection in 2070 and the low-risk aversion projection for 2100.
3. Sea level rise of 4.9 feet (~150 cm) represents a worst-case, H++ SLR scenario for 2070.
4. Sea level rise of 6.6 feet (~200 cm) represents the medium high risk-aversion projection for 2100.

3. Coastal Hazards

Coastal hazards influenced by sea level rise such as extreme wave events, extreme tides, fluvial storm events, and tsunamis are discussed in this section. The hazard information is compiled from several reference documents, and no additional numerical modeling was performed as part of this study. The resources used and assumptions made for each hazard type are described in each section along with maps illustrating the proximity of each hazard to the Project site. The hazard maps are presented solely on the assumptions accompanying the referenced information utilized at the time of the Study. A diagram of the sea level rise hazards for the project location are shown in Figure 8.

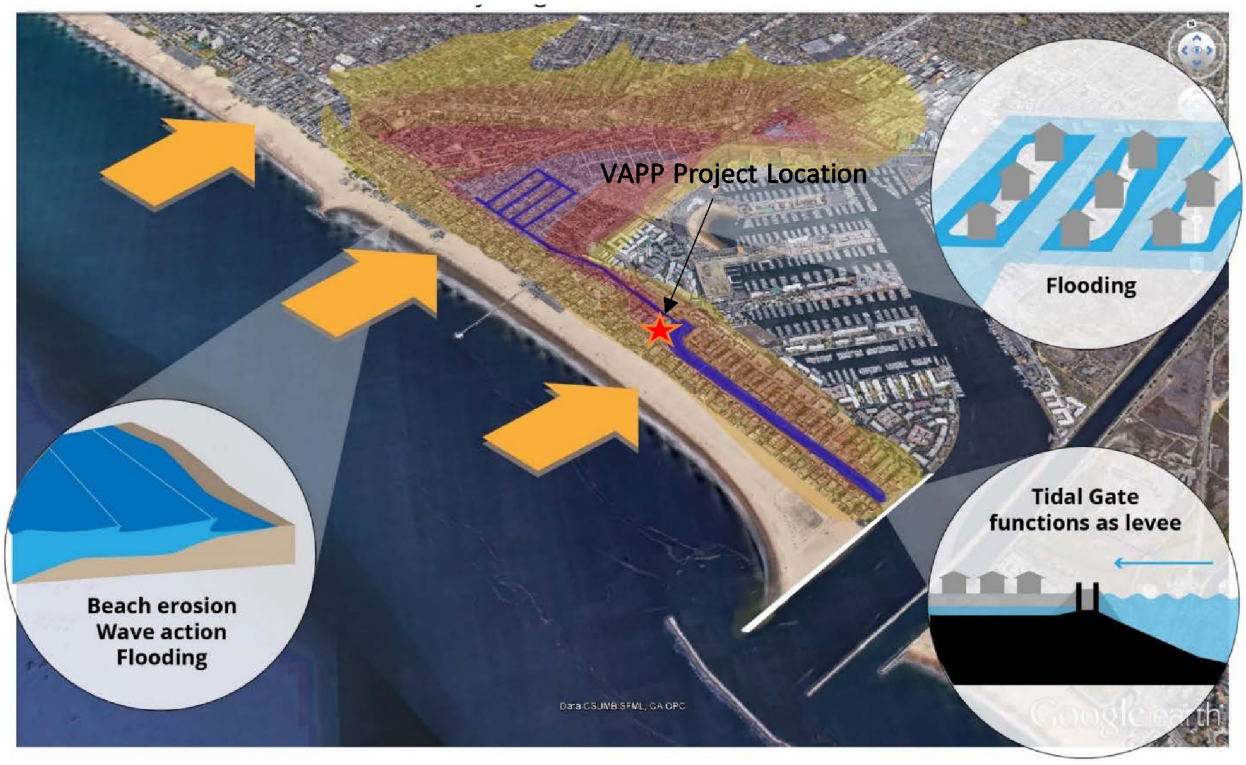


Figure 8:Venice Sea Level Rise Hazards Diagram

3.1 Non-Storm Tidal Flooding

The nearest, long-term sea level record in the study area is the Santa Monica tidal station operated by the National Oceanic and Atmospheric Administration (NOAA). The buoy has been operational for over 85 years. Elevations listed in this report are referenced to the North American Vertical Datum of 1988 (NAVD) unless otherwise noted. The tides in Los Angeles are mixed semidiurnal, with two high tides and two low tides of differing magnitude occurring each day. Typical daily tides range from mean lower low water (MLLW) to mean higher high water (MHHW), a tidal range of about 5.5 feet.

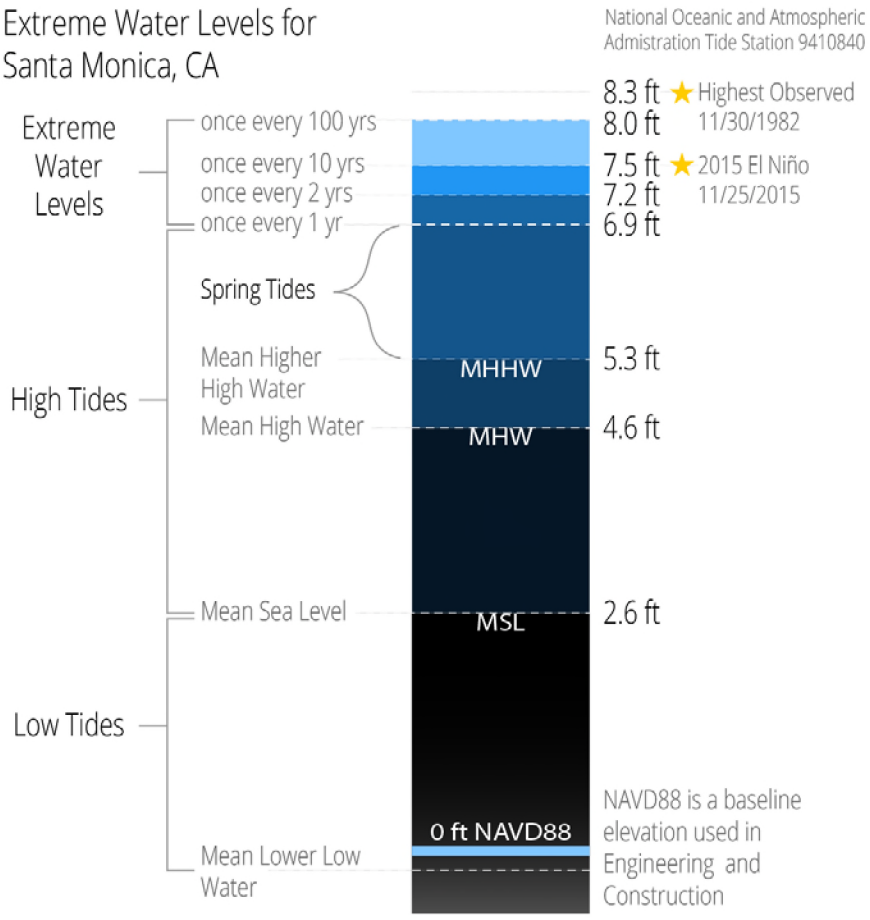


Figure 9: Santa Monica gage tide ranges and extreme water levels.

Astronomical tides make up the most significant amount of the total water level. During spring tides, which occur twice per lunar month, the tide range increases due to the additive gravitational forces of the sun and moon on the same side of the planet. The largest spring tides of the year, often referred to as "king tides", result in peak high tides that can reach almost 7 feet above NAVD 88 as shown in Figure 9. During neap tides, which also occur twice per lunar month, the gravitational forces of the sun and moon partially offset one another, resulting in a smaller tide range.

To evaluate the potential for tidal flooding hazards in the community wide *Sea Level Rise Vulnerability Assessment* (Moffatt & Nichol, 2018), an extreme monthly high tide water level of 6.5 feet NAVD88 was combined with each sea level rise scenario and mapped using the existing site topography. Tidal flood hazards were also evaluated under the key assumption that the tide gate was not functioning and allowed water levels in the canals and Ballona Lagoon to rise along with ocean water levels. A map illustrating the potential widespread flooding under these assumptions is provided in Figure 10. Given the simplistic "bathtub" method applied, the hazards are solely a function of existing topography. Low-lying areas in the vicinity of the Venice Canals would experience flooding at greater depths and duration than higher elevations such as the proposed project site.

The non-storm flooding potential demonstrates that the Marina del Rey tide gates are critical flood prevention infrastructure for the project site and the community of Venice. The tide gates were rehabilitated in 2007 by the County of Los Angeles before ownership was transferred to the City of Los Angeles. The LA Sanitation and Environment personnel, which operate the VPP, have been responsible for operating and maintaining the tide gates such that they continue to provide reliable flood protection today and into the future. The Via Marina road elevations above the gates are high enough (approx. 16 feet NAVD88) that even 6.6 feet of SLR in combination with a 100-year water level would not overtop this barrier (Figure 5). The Marina del Rey tide gates and earthen levee provide a significant amount of adaptive capacity to mitigate tidal flooding in combination with SLR.

The primary vulnerability to the marina gates is the effect of higher water levels on its functionality for increasing SLR scenarios. As sea levels rise, the duration the tide gates will need to remain closed will increase. For example, after +1.6 feet SLR, water levels in the marina will rarely be lower than the present minimum water level kept in the Ballona Lagoon. This type of SLR scenario may require adaptive management of the gate operations, especially during wet weather operations, to manage the increasing ocean water levels while still providing sufficient storage in advance of a significant rainfall event.



Figure 10: Potential non-storm flooding hazards assuming Marina del Rey tide gates are not functioning.

3.2 Coastal Storms

The Project site is located about 1,200 feet inland of the active shoreline, behind Venice Beach and several blocks of developed properties and streets. The wide beach provides an effective buffer against erosion and flooding during coastal storm events. However, a widely acknowledged impact of sea level rise is a landward and upward shift in the beach profile and shoreline position. This long-term shoreline change combined with sea level rise and an extreme wave event will result in the coastal storm hazard area moving further landward.

Coastal storm hazard projections from published by the USGS as part of the Coastal Storm Modeling System (CoSMoS 3.0) were used to evaluate how these hazards may affect the Project site. CoSMoS is a multi-agency effort led by the USGS to make detailed predictions of coastal flooding and erosion based on existing and future climate scenarios for Southern California. The modeling system incorporates state-of-the-art physical process models to enable detailed prediction of currents, wave height, wave runup, and total water levels (Barnard, P.L. et al, 2009). The storm-related water levels are then projected onto a digital elevation model to estimate the extent of flooding. The coastal flooding extents represent a 100-year wave event in combination with various rates of sea level rise.

At the time of this study CoSMoS 3.0 results were available for sea level rise scenarios of 0 - 200 cm (6.6 feet) at increments of 50 cm (0.8 feet). To be consistent with sea level rise scenarios assumed for the project, described in Section 2, the coastal flooding results for 50 cm (~1.6 feet), 100 cm (~3.3 feet) and 150 cm (~4.9 feet), and 200 cm (~6.6 feet) were used. Maps showing how the coastal flood hazard changes with each sea level rise scenario are provided in Figures 15 through 19.

The maps show a limit of the 100-year storm coastal flooding for each of the sea level rise scenarios and indicate the Project site is not exposed to coastal storm flooding during a 100-year coastal storm event until the 6.6 foot sea level rise scenario. During the 6.6 foot sea level rise scenario, large areas of Venice, including the project site, would be subject to flood inundation. However, this sea level rise scenario is not expected to occur over the 50-year design life of the VAPP. Based on the OPC projections, there is a 99% chance this amount of SLR doesn't occur this century. Under a worst case SLR scenario, represented by the H++ projections, this amount of SLR would not occur until 2080.

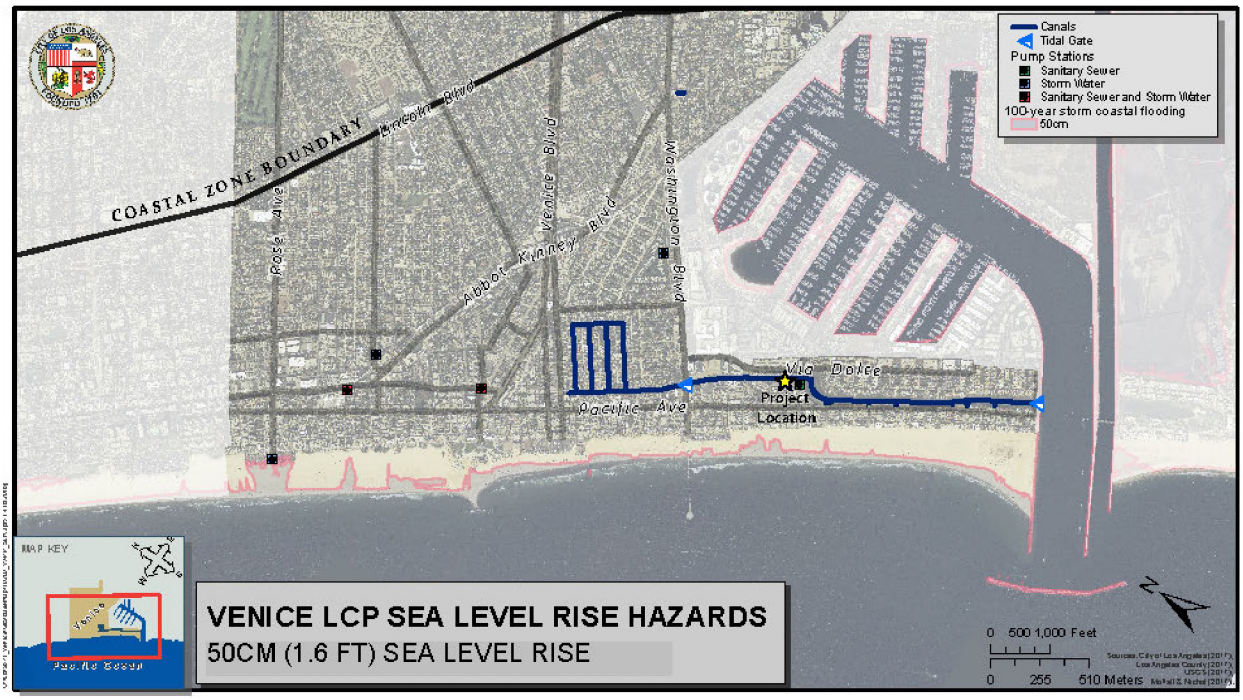


Figure 11: Sea level rise hazard associated with a 1.6 feet of sea level rise with 100-year return period storm.

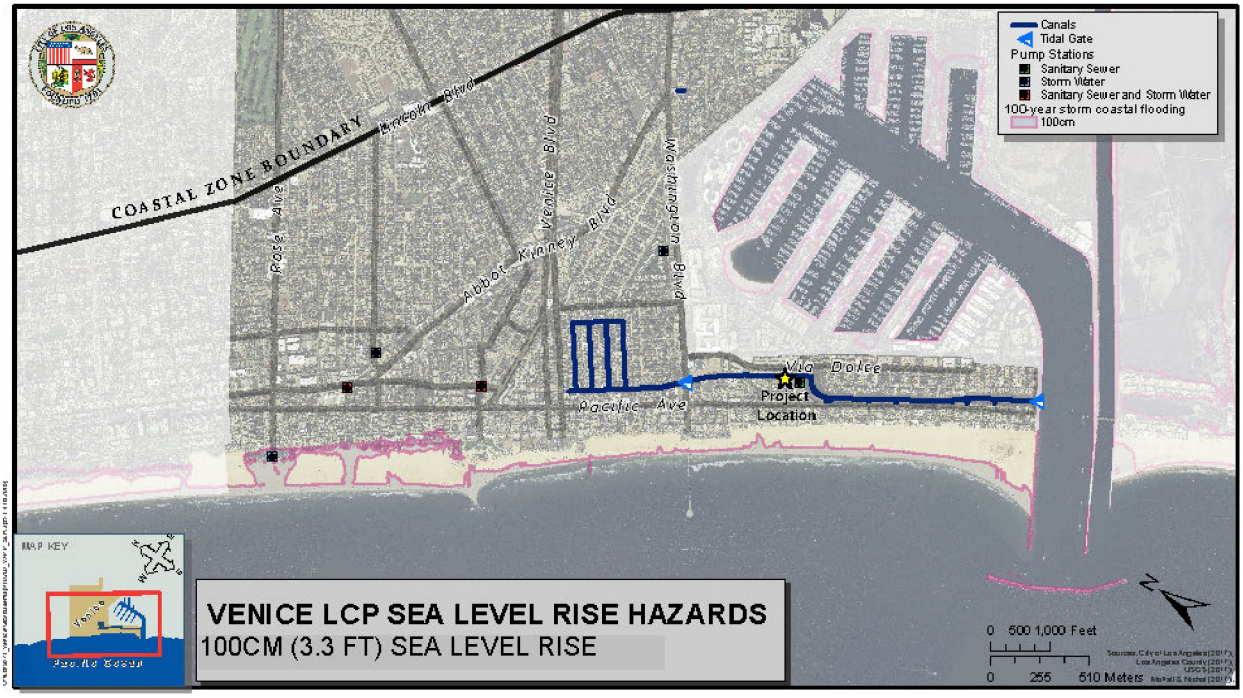


Figure 12: Sea level rise hazard associated with a 3.3 feet of sea level rise with 100-year return period storm.



Figure 13: Sea level rise hazard associated with a 4.9 feet of sea level rise with 100-year return period storm.

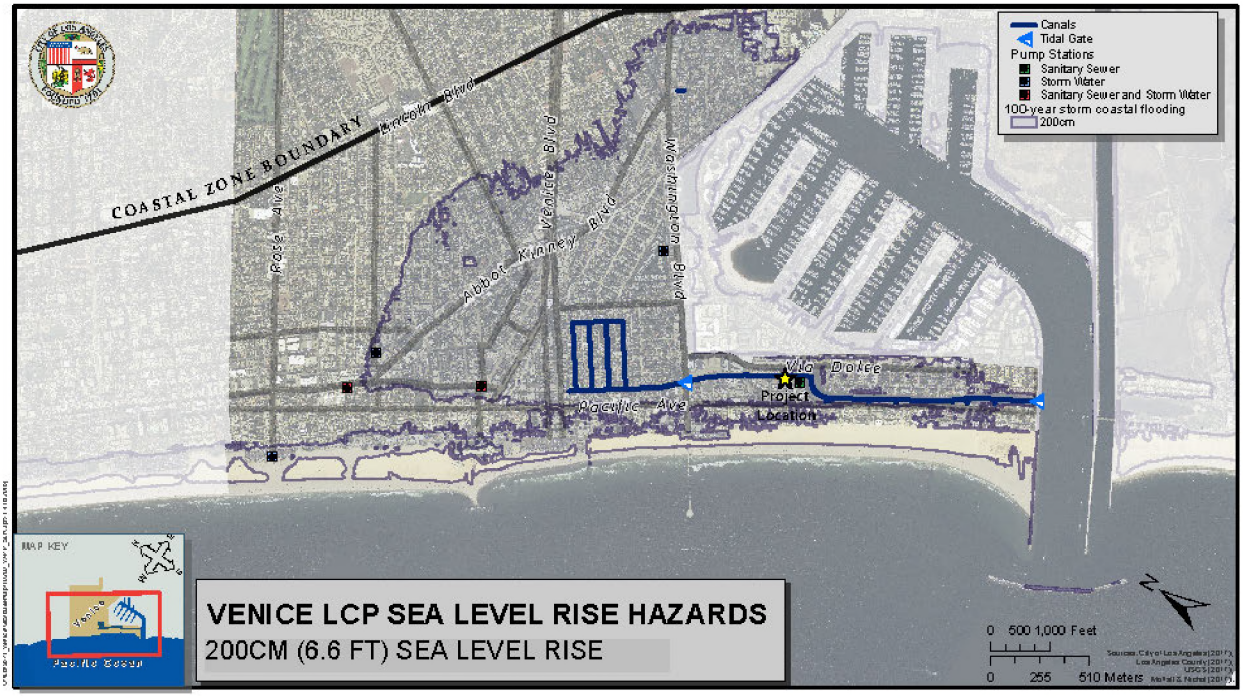


Figure 14: Sea level rise hazard associated with a 6.6 feet sea level rise with 100-year return period storm.

3.3 Fluvial Storms

The VAPP is located on the Venice Grand Canal and Ballona Lagoon, which receive surface runoff from the surrounding neighborhoods. Ballona Lagoon water level is regulated to allow daily release and flushing at pre-selected combinations of tide and lagoon water surface levels. The effective FIRM (6037C1752F) dated September 26, 2008 shows the project site as a "shaded Zone X", which is generally associated with areas which meet one or more of the following criteria:

- Areas of 0.2% annual chance flood (i.e. 500-year event)
- Areas of 1% annual chance flood (i.e. 100-year event) with average depths of less than 1 foot or drainage areas less than 1 square mile
- Areas protected by levees from the 1% annual chance flood

However, it's not clear which of the criteria were used to map the hazards shown on the effective maps, and the updated PFIRMs do not indicate any potential flooding from fluvial hazards. As shown in Figure 6, the PFIRM indicates that the site is in a Zone AE with a BFE of 8 feet since the Marina del Rey tide gate and levee system was neglected in the FEMA analysis, as these facilities are not FEMA-accredited flood control structures.

The Project site's exposure to fluvial storm hazards is considered low for present-day and sea level rise scenarios of less than 1.6 feet. The operations of the tide gate systems have been effective in providing flood protection from both coastal and fluvial storm events over the 50-year history of the VPP. This is attributed to the large available storage volume of the Grand Canal and Ballona Lagoon relative to their respective drainage areas.

The Hydrology Technical Memorandum prepared for the project in 2016 (Watearth, 2016) evaluated peak flow rates in the Grand Canal and concluded the 100-year water surface elevation remain below the canal bank elevations for pre and post project conditions. This memorandum did not evaluate how SLR will affect storage volume and water surface elevations, but it is assumed there is some capacity to accommodate SLR with the freeboard available above the extreme storm water surface elevations. As sea level rises, the probability increases that the water surface elevation in the lagoon will exceed flood stage because higher ocean water levels will require the gates to be closed more often. Additional hydrologic and hydraulic analyses are recommended as an adaptation strategy to evaluate fluvial exposure thresholds for sea level rise scenarios above 1.6 feet that account for rising groundwater levels, reduced storage volume and gate operations that account for these factors.

3.4 Tsunamis

The State of California "Venice Quadrangle - Tsunami Inundation Map for Emergency Planning" was published on March 15, 2009 through a joint effort by the State of California Office of Emergency Services (Cal OES)[1], the California Geologic Survey, the University of Southern California Tsunami Research Center,

[1] At the time these maps were released Cal OES was known as California Emergency Management Agency (Cal EMA)

and NOAA. Tsunami inundation areas were depicted in these maps relative to a mean high water (MHW) sea-level condition and represent the maximum tsunami run-up from a number of credible, extreme tsunami sources. Therefore, the maps do not represent inundation from a single event; rather, they display the maximum tsunami generated from a combination of sources to create a "credible upper bound" for each region of the coastline for use in emergency planning. The purpose of the maps is clearly stated as follows:

This tsunami inundation map was prepared to assist cities and counties in identifying their tsunami hazard. It is intended for local jurisdictional, coastal evacuation planning uses only. This map, and the information presented herein, is not a legal document and does not meet disclosure requirements for real estate transactions nor for any other regulatory purpose.

The inundation map has been compiled with best currently available scientific information. The inundation line represents the maximum considered tsunami runup from a number of extreme, yet realistic, tsunami sources. Tsunamis are rare events; due to a lack of known occurrences in the historical record, this map includes no information about the probability of any tsunami affecting any area within a specific period of time. (State of California, 2009).

Based on the Tsunami Inundation Map prepared by Cal OES, the project is located within a tsunami hazard zone (see Figure *15*).

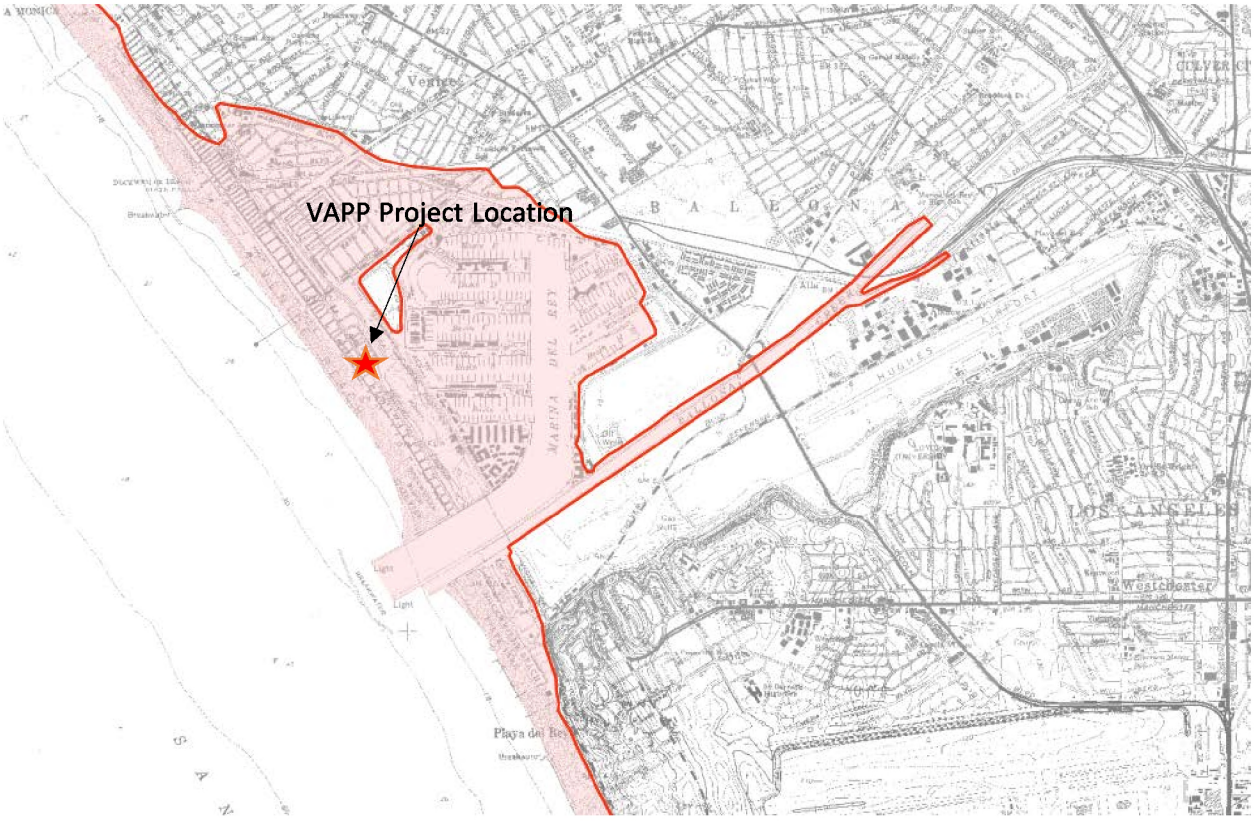


Figure 15: Tsunami Flood Hazard Map (Source: Cal-OES Venice Quadrangle)

Tsunamis are rare events. Therefore, probability of occurrence is a key factor in understanding the Project's exposure to tsunami hazards. The State of California tsunami inundation maps do not have a probability associated with them, but the lack of known occurrences in the historical record is an indication that the probability is very low, probably less likely than non-storm tidal flooding or coastal flooding events.

The project is within the "credible upper bound" tsunami inundation area depicted on the state tsunami inundation map. A tsunami event of this magnitude would result in widespread flooding of Venice, including portions of the Project site, for the present day (no sea level rise) scenario. Each increment of sea level rise would result in a corresponding increase in the tsunami flood hazard.

4. Sea Level Rise Impacts on Coastal Resources

Sea level rise impacts on coastal resources must be evaluated for development projects that require a CDP. These projects are typically in coastal zones subject to inundation, flooding, wave impacts, erosion, or saltwater intrusion, and, therefore, exposed to coastal conditions associated with sea level rise. In addition, locations close to or hydraulically connected to these at-risk locations must be considered in an analysis of how the Project may impact coastal resources within the context of sea level rise over time. The goal of the evaluation is to minimize risks to development and avoid impacts to coastal resources that may arise over the life of the Project (CCC 2015).

Coastal resources, as identified in the California Coastal Commission Sea Level Rise Policy Guidance adopted in 2015, include the following:

- **Public Access and Recreation:** Public access and recreation resources include public access ways and easements, beaches, recreation areas, public trust lands, and trails that may be impacted by sea level rise and/or due to the proposed project.
- **Coastal Habitats:** Habitats in the project area that are connected to water, including beaches, intertidal areas, and wetlands, which can be highly sensitive to changes in sea level.
- **Natural Landforms:** Existing natural landforms in the project area that may be impacted by sea level rise relative to the project.
- **Coastal Agricultural Resources**: Agricultural resources may be affected by sea level rise through changes to surface drainage and the groundwater table.
- **Water Quality and Groundwater**: Sea level rise may impact the groundwater table, substantially changing water quality, altering on-site drainage, and limiting future drainage options.
- **Scenic Resources:** Visual and scenic resources include ocean and scenic coastal views that may be impacted by the project or adaptive strategies to address sea level rise.
- **Cultural Sites and Archaeological or Paleontological Resources:** These include areas of traditional cultural significance to California Native American tribes and historical or paleontological finds as identified by California's State Historic Preservation Officer.

4.1 Public Access and Recreation

Esplanade, a public sidewalk between the existing Project site and the Grand Canal, provides public access. The proposed project would be built largely on a site that is currently vacant, but adjacent to an existing industrial site (VPP). The project is not expected to affect the influence of sea level rise on public access or recreation over the facility's design life.

4.2 Coastal Habitats

The proposed Project is located on a tidally influenced lagoon that is controlled by the Marina del Rey tide gates. Increasing sea levels may impact the health and succession of the immediate wetland habitats of

the lagoon and canals. The project itself is protected by the Marina del Rey tidegates and will not contribute to sea level rise related impacts on these resources.

4.3 Natural Landforms

The proposed VAPP will be constructed in an existing developed area in the community of Venice that is currently vacant. The Project is not expected to affect the influence of sea level rise on natural landforms over the facility's design life.

4.4 Agricultural Resources

The proposed VAPP site is not used for agriculture. The proposed Project would not significantly affect agricultural resources. The Project is not expected to affect the influence of sea level rise on agricultural resources over the facility's design life.

4.5 Water Quality and Groundwater

The proposed VAPP facility site is approximately 0.1 miles from the Pacific Ocean. Due to its proximity to the Ballona Lagoon, the groundwater is anticipated to be reached at only a few feet down at the project site. The Project is not expected to affect the influence of sea level rise on water quality and groundwater over the facility's design life. However, groundwater levels are expected to increase as sea levels rise. Higher groundwater levels may create additional buoyancy forces on underground structures, such as pipelines or pump stations. The liquefaction potential below proposed structures may also be affected by an increase in groundwater levels over the Project's design life.

4.6 Scenic Resources

The proposed Project would be built largely within the existing developed area of Venice Beach and is bordered by the VPP on the east, the Grand Canal on the north, Canal Court on the south, and residential buildings on the west. The Project site is currently vacant and unoccupied.

To minimize adverse visual effects, the proposed facility would be composed of relatively low-profile buildings similar to a commercial office building, with vegetative and architectural screening to ensure that exposed pipelines, pump station, and other industrial-type equipment are screened from public view. The Project is not expected to affect the influence of sea level rise on scenic resources over the facility's design life.

4.7 Cultural Sites and Archaeological or Paleontological Resources

The Project is not expected to affect the influence of sea level rise on cultural sites, archaeological, or paleontological resources over the facility's design life.

5. Adaptation Planning

The coastal hazards evaluated in Section 3 indicate the site has a low exposure to extreme tides, coastal storms and fluvial storms over the Project's 50-year design life (2020 to 2070). The Marina del Rey tide gates and earthen levee below Via Marina road provide effective flood protection infrastructure for the VPP and proposed VAPP. The exposure of the Project site to tsunamis is more difficult to assess, given the limited information available that links tsunami hazard zones with a probability of occurrence. Adaptation strategies have been developed to mitigate known hazards in the design of the facility and establish triggers for when future strategies should be initiated.

5.1 Marina del Rey Tide Gate Operations & Maintenance Plan

The Marina del Rey tide gates are essential in protecting the proposed project from flood inundation hazards including non-storm tidal flooding, coastal flooding, sea level rise, and tsunami. It is critical that the tide gates be maintained and operated in a manner that will decrease the risk of malfunction or failure. A recommended adaptation strategy is for the City to prepare an operations and maintenance (O&M) plan that identifies the roles and responsibilities for operations personnel and emergency response protocols to ensure the gates remain functional in storm and non-storm conditions. The O&M plan should be revaluated at intervals of about 5 years in order to reflect the most updated sea level rise projections and other potential hazards that may affect the tide gate operations.

5.2 Flood Hazard Mitigation through Structural Floodproofing

Structural floodproofing of the VAPP infrastructure could provide additional protection against extreme events such as tsunamis and would also increase adaptive capacity to tolerate future hazards driven by SLR. These strategies may include stop logs for structure openings such as doors and windows, waterproof vaults for electrical equipment, or elevating sensitive equipment above projected flood levels.

5.3 Update Sea Level Rise Analysis in 2050

The topography of the Project site and its distance from the active shoreline offer both vertical and horizontal setbacks from hazards such as extreme tides, coastal storms, and fluvial storms, assuming the Marina del Rey tide gates are closed. For sea level rise greater than 1.6 feet the sites exposure to fluvial storms becomes more uncertain. At some point we expect the combination of rising tides and groundwater levels will impact the capacity of the Grand Canal and Ballona Lagoon to store and convey storm runoff. The following adaptation strategy is recommended to reduce this uncertainty in a future update of the Sea Level Rise Analysis:

- Update the Project specific sea level rise analysis in 2050 or when local MSL has risen 1.6 feet above MSL of the 1983-2001 tidal epoch. The updated analysis should account for updated sea level rise science and regional adaptation efforts or land use changes that could affect the Project's exposure to coastal hazards.
- Evaluate the impacts of sea level rise on the Ballona Lagoon and the operation of the Marina del Rey tide gates, including the increased risk of interior flooding from the Ballona Lagoon and the

Grand Canal during storm events that coincide with high tides and increased groundwater levels. If this study indicates a risk of flooding during these extreme events, then an active pumping system may be required to prevent flooding of the project site as well as other structures and facilities near Ballona Lagoon and the Grand Canal.

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CPC-2024-2010-GPA-ZC-CU3-SPPC

Exhibit C: Environmental Clearance

C.3 – Addendum dated June, 2024

Venice Auxiliary Pumping Plant (VAAP) Project

Addendum to the Environmental Impact Report

State Clearinghouse Number: 2015111038

City of Los Angeles
Department of Public Works
Bureau of Engineering
Environmental Management Group
1149 South Broadway, Suite 600
Los Angeles, California 90015

Contact: Norman Mundy
Norman.Mundy@lacity.org

June 2024

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Table of Contents

Sections

1.0 Project Overview
2.0 Purpose of this Addendum to the Certified Final EIR
3.0 Previous Environmental Review
4.0 Project Description and Proposed Modifications
5.0 Impact Discussion
6.0 Conclusion

List of Figures

1 Project Vicinity Map
2 Project Location Map
3 Project Site Map

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Section 1.0 Project Overview

This document is an Addendum to the Environmental Impact Report (EIR) for the Venice Auxiliary Pumping Plant Project (Project). In accordance with the State CEQA Guidelines, an Draft EIR that analyzed six build alternatives plus the No Project Alternative was prepared and distributed to public agencies and the general public by the City on October 27, 2013 for a 45-day public review period. Following public review of the Draft EIR and subsequent preparation of an administrative draft of the Final EIR and associated Findings of Fact and Mitigation Monitoring and Reporting Program. The Final EIR was completed in June 2017 and the EIR was certified and the Project was approved by the City Council in August 2017. Subsequent to the August 2017 Project approval, the City identified additional changes to the previously approved Project, which are described and evaluated in the following sections of this Addendum.

The City owns and operates the Venice Pumping Plant (VPP) (Pump Station No. 646), located at 140 Hurricane Street in the Los Angeles community of Venice, adjacent to the Ballona Lagoon and the Grand Canal. The VPP is the City's largest pumping plant and it is considered a critical facility for conveying sewage from its tributary area. The facility was designed and built in 1957 and was last upsized and upgraded in 1987. Five pumps currently serve the facility. The VPP collects sewage from the City's Coastal Interceptor Sewer (CIS), which serves the communities of Topanga, Pacific Palisades, Brentwood, Venice, and Mar Vista. It also serves the City of Santa Monica and parts of Los Angeles County. Sewage is pumped south to the City's Hyperion Treatment Plant (HTP), located in Playa del Rey. Unlike other portions of the City's sewage collection and conveyance system, there are no diversions for bypassing the facility or associated CIS for required maintenance or in the event of an emergency. Moreover, the existing VPP is essentially built out and has no additional space for required back up pumps and associated equipment to ensure system reliability.

During dry-weather flows (no rain), two pumps generally pump an average of 20 million gallons per day (mgd) of sewage. However, all five pumps have been used simultaneously to convey sewage influent from the collection area to the HTP during wet-weather flows (rain), depending on conditions. During certain years, flows during wet-weather conditions have reached 50 mgd and on several occasions, during extreme weather events (e.g., 1990s and 2000s), the flows exceeded the combined and simultaneous pumping capacity of the facility, resulting in near-miss events, which would have required emergency discharges directly to the Grand Canal and Ballona Lagoon or overflows into the surrounding street network. To address these issues, LABOE began planning and designing projects that would upgrade and enhance the CIS and VPP (see Chapter 2, Project Description of the Draft EIR), including the Proposed Project.

Construction is anticipated to begin in 2020 and last approximately 2 years.

The Proposed Project would be built on three vacant lots with a total combined area of

approximately 12,076 square feet. As shown in Figures 2-4, the Proposed Project would include a number of improvements:

- One building, two stories and approximately 32 feet in height, with a total of 2,500 square feet that will house the operational control center for the plant, related electrical equipment, and employee workstations;
- Three 18 mgd wet-pit submersible pumps, constructed underground;
- Electrical equipment, utility connections, instrumentation and controls, transformers, and generators;
- A 17- by 17-foot submerged diversion structure on the existing CIS, the top of which would be below the lowest elevation of the Grand Canal and buried underneath it;
- Concrete wet well, influent piping and a sluice gate;
- A new 66-inch sewer to connect VAPP to the new diversion structure;
- Fencing with blinds and vegetation for screening the VAPP building;
- Parking – a total of eight parking spaces will be provided at 128 Hurricane Street to allow for Project required employee, delivery/visitor, and Beach Impact Zone parking, and public parking, including the relocation of coastal parking; and
- Landscaping and Open Space at 128 Hurricane Street.

The Proposed Project includes a two-story electrical and control building along the west side of Project Site, adjacent to Canal Court (see Figure 2-4, Site Plan of the Draft EIR) and associated employee and visitor/delivery parking for the new building located at 128 Hurricane Street. The building would be two stories, about 32 feet in height, 50 feet in length, and 2,500 square feet (both levels combined) in area. The building would include spaces for an electrical equipment room and a generator room on the first floor. In addition to a state-of-the-art control station, the second floor would include workstations for computer operators, a restroom, mechanical room, and server rooms. Heating, ventilation, and air-conditioning equipment for the electrical building would be located north of the building.

The preliminary building design includes perimeter walls constructed of reinforced concrete, with a cool roofing system (PVC membrane or similar) above the second level. Proposed finishes include architectural stamped concrete, reveals, and impressions; metal awnings over each of the exterior doors and sustainable roofing (Sika Décor or similar); and painted surfaces with colors that blend in with the surrounding neighborhood. Windows would be required for occupied spaces on the second level; all windows would be energy-efficient dual-glazed units. The exterior conceptual design would be enhanced to include architectural features that are in keeping with the architecture, massing, and materials that are currently present on the adjacent residential structures.

The VAPP electrical system would include a small diesel-fueled standby generator to provide power for critical loads in the event of a loss of power from the Los Angeles Department of Water and Power (LADWP) and the inability of existing VPP standby generators to provide power to the VAPP. The standby generator would be located in an enclosed room on the first floor with 1-hour flood rated

doors; an intake and exhaust louver would provide the proper cooling for the generator. Because of the location of the electrical building within a residential neighborhood, acoustic louvers would also be installed. The VAPP generator would provide up to 24 kilowatts (kW) of power at 120/240 volts (V) for lighting, the Supervisory Control and Data Acquisition system, the security/access control system, and air conditioning for the VAPP control room. The VAPP generator would have an integral storage tank that would hold enough fuel for up to 8 hours of run time at full load.

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Section 2.0 Purpose of this Addendum to the Certified Final EIR

The purpose of this Addendum to the Certified Final EIR is to update the previously certified Venice Auxiliary Plant (VAPP) EIR regarding requests for a General Plan Amendment and a Zone Change.

CEQA Guidelines Section 15164(a) states: "The lead agency or responsible agency shall prepare an Addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred."

Section 15162 calls for the preparation of a subsequent EIR when any of the following have occurred:

- Substantial changes are proposed in the project which will require major revisions of the previous EIR;
- Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR; or
- 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, such as:
    - One or more significant effects was not discussed in the previous EIR;
    - Significant effects previously examined will be substantially more severe;
    - 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; or
    - Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects.

This Addendum is being prepared because the Applicants have applied to the City of Los Angeles Department of City Planning (Planning Department) for two entitlements that were not addressed in the VAPP EIR. The two entitlements sought are:

- A **General Plan Amendment** to change the land uses at 128 E. Hurricane Street, 3813 South Esplanade and 3817 South Esplanade from *Multiple Family Residential – Low Medium II* to *Public Facility*, and
- A **Zone Change** for 128 E. Hurricane Street, 3813 South Esplanade and 3817 South Esplanade from *RW2-1* to *PF*.

The Addendum is the appropriate document for the following reasons:

- No substantial changes are proposed to the project which will require major revisions of the previously prepared and certified EIR;
- No substantial changes have occurred with respect to the circumstances under which the project is being undertaken; and
- No 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, has been identified.

The analysis that follows identifies the new entitlements, the existing conditions in terms of land use impacts as described in the EIR, any potential impacts associated with the new entitlements, and a discussion as to why this does not constitute substantially new or different information warranting the preparation of a subsequent EIR.

Section 3.0 Previous Environmental Review

The City of Los Angeles (City) prepared a Draft Environmental Impact Report (EIR) for the Venice Auxiliary Pumping Plant (VAPP) Project and circulated that document for a 45-day public review period, beginning on October 27, 2016 and ending on December 15, 2016.

The document was made available to the public on the LABOE webpage (http://eng.lacity.org/venice_aux_pumping_plant) and at the City of Los Angeles Bureau of Engineering, Environmental Management Group and at the Lloyd Taber-Marina del Rey Library, Venice-Abbot Kinney Memorial Library, Westchester Library, and Playa Vista Public Library. Following the close of the public comment period, a Final EIR was prepared which included the complete Draft EIR, an Executive Summary, and responses to all written and oral comments received during the public review period for the Draft EIR. The City certified the Final EIR and adopted the Findings of Fact and Statement of Overriding Considerations and Mitigation Monitoring Program (MMP) on August 8, 2017 (Council file No. 17-0775). The Notice of Determination (NOD) was filed on August 9, 2017.

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Section 4.0 Project Description and Proposed Modifications

4.1 Project Purpose

The City owns and operates the VPP (Pump Station No. 646), located at 140 Hurricane Street in the Los Angeles community of Venice, adjacent to Ballona Lagoon and the Grand Canal. The plant is the City's largest pumping plant and considered a critical facility for conveying sewage from its tributary area (described above). It also serves as the control facility for all pumping stations that operate in the City. The facility, designed and built in 1957, includes a control facility and three pumps. The VPP has two levels, one above ground and one below, for equipment, emergency generators, and a control center. The facility is manned and operated 24 hours per day, 7 days per week by system operators by six employees (two per shift). Two off-street parking spaces are available for deliveries and the operator(s). The entire facility is gated and closed to the public. The VPP is also equipped with an exhaust fan that discharges vapors through an existing stack. In addition, wet wells (holding sumps for sewage) and associated pumps are located underground, within a sealed and enclosed facility, to minimize odor discharges. The facility was last upsized and upgraded in 1987. At that time, two new pumps were installed. The existing VPP is essentially built out and has no additional space for required backup pumps and associated equipment necessary to convey sewage flowing during peak wet-weather events, including the emergency generators that would be needed to run the pumps in the event of a power failure.

As noted above, the VPP pumps sewage from the City's CIS collection area to the HTP. There are currently no sewage diversions for bypassing the pumping plant. Therefore, unlike other portions of the City's sewage conveyance system where diversions are in place to minimize demand and reliance upon pumping plants, the CIS currently has no redundant or parallel facilities that can be used to redirect flows from these communities.

Flows enter the VPP from a single 66-inch reinforced concrete sewer pipe depressed approximately 18 feet below ground within the Grand Canal that discharges into two existing wet wells. Wet well No. 1 serves Pumps 1 through 4, and wet well No. 2 serves Pump 5. Each of the five 400-horsepower dry-pit centrifugal pumps has a design capacity of 18 million gallons per day (mgd) at 100 feet total dynamic head (TDH) (total amount of pressure when sewage is flowing in the system). The pumps are served by a new 60-inch manifold that connects to a 48-inch force main. From the VPP, flows are pumped south, under the Marina del Rey channel, and then to the HTP, which is located just south of LAX in Playa del Rey. Because of the 60-foot elevational difference between Venice (low point) and Playa del Rey (high point), the VPP must continuously pump the flows in order to avoid sewage backups.

During dry-weather flows (no rain), two pumps generally pump an average of 20 mgd of sewage. During wet-weather flows (rain), depending on conditions, all five pumps may be needed simultaneously to convey sewage influent from the collection area to the HTP. This is because the system is not closed and can be affected by infiltration (i.e., from storm drains and groundwater). During certain years, flows during wet-weather conditions have reached 50 mgd. When operating simultaneously, the five pumps

each are capable of pumping 12,500 gallons per minute.

Due to their continuous use, the pumps require regular maintenance and therefore need to be taken off-line to be serviced and repaired. The pumps have had several maintenance issues in the past. At times, two pumps have been out of service for extended periods during wet-weather flows. To provide the required capacity at the pumping plant during such events, the City rents portable pumps to supplement the existing pumps. However, pumps that are capable of handling solids are uncommon in the required sizes and difficult to rent. Therefore, the City incurs significant costs when additional pumps are needed. Furthermore, the portable aboveground pumps result in noise and odor impacts on the surrounding neighborhood when temporarily in operation. To provide for redundancy and ensure adequate pumping capacity when the pumps are temporarily out of service, the City needs a total of eight (i.e., three additional) pumps.

There have been several occasions, beginning in the 1990s and extending through the early 2000s, when influent flows to the VPP during periods of wet weather nearly exceeded the combined pumping capacity (90 mgd) of all five pumps while working simultaneously. This resulted in a near miss of sewage spill into the Grand Canal and Ballona Lagoon because the wet wells and pumps were almost entirely inundated by sewage. Exceeded sewer capacity would have required emergency discharges directly to the Grand Canal and Ballona Lagoon or overflows into the surrounding street network. Because of these conditions, the City of LABOE, began planning and designing projects that would upgrade and enhance the CIS and VPP. These projects include the VPP Manifold Replacement Project, which was completed in August 2015, the Venice Dual Force Main (VDFM) Project, construction of which will begin in late 2016, and the proposed VAPP project.

4.2 Existing Project Description

The Proposed Project would be built on three vacant lots with a total combined area of approximately 12,076 square feet. As shown in Figures 2-4, the Proposed Project would include a number of improvements:

- One building, two stories and approximately 32 feet in height, with a total of 2,500 square feet that will house the operational control center for the plant, related electrical equipment, and employee workstations;
- Three 18 mgd wet-pit submersible pumps, constructed underground;
- Electrical equipment, utility connections, instrumentation and controls, transformers, and generators;
- A 17- by 17-foot submerged diversion structure on the existing CIS, the top of which would be below the lowest elevation of the Grand Canal and buried underneath it;
- Concrete wet well, influent piping and a sluice gate;

- A new 66-inch sewer to connect VAPP to the new diversion structure;
- Fencing with blinds and vegetation for screening the VAPP building;
- Parking – a total of eight parking spaces will be provided at 128 Hurricane Street to allow for Project required employee, delivery/visitor, and Beach Impact Zone parking, and public parking, including the relocation of coastal parking;
- Landscaping and Open Space at 128 Hurricane Street;
- Construction laydown areas at:
    - Laydown Area 1: 128 Hurricane Street (primary site for construction staging and storage),
    - Laydown Area 2: vacant lot owned by LA County across the Grand Canal at Via Dolce (for material and equipment storage); and
    - Laydown Area 3: vacant lot at 9940 Jefferson Boulevard, in Culver City, for soil stockpiling.

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Figure 1
Project Vicinity Map
Venice Auxiliary Pumping Plant Project

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Figure 2
Project Location Map (with Existing and Temporary Pedestrian/Vehicular Access)
Venice Auxiliary Pumping Plant Project

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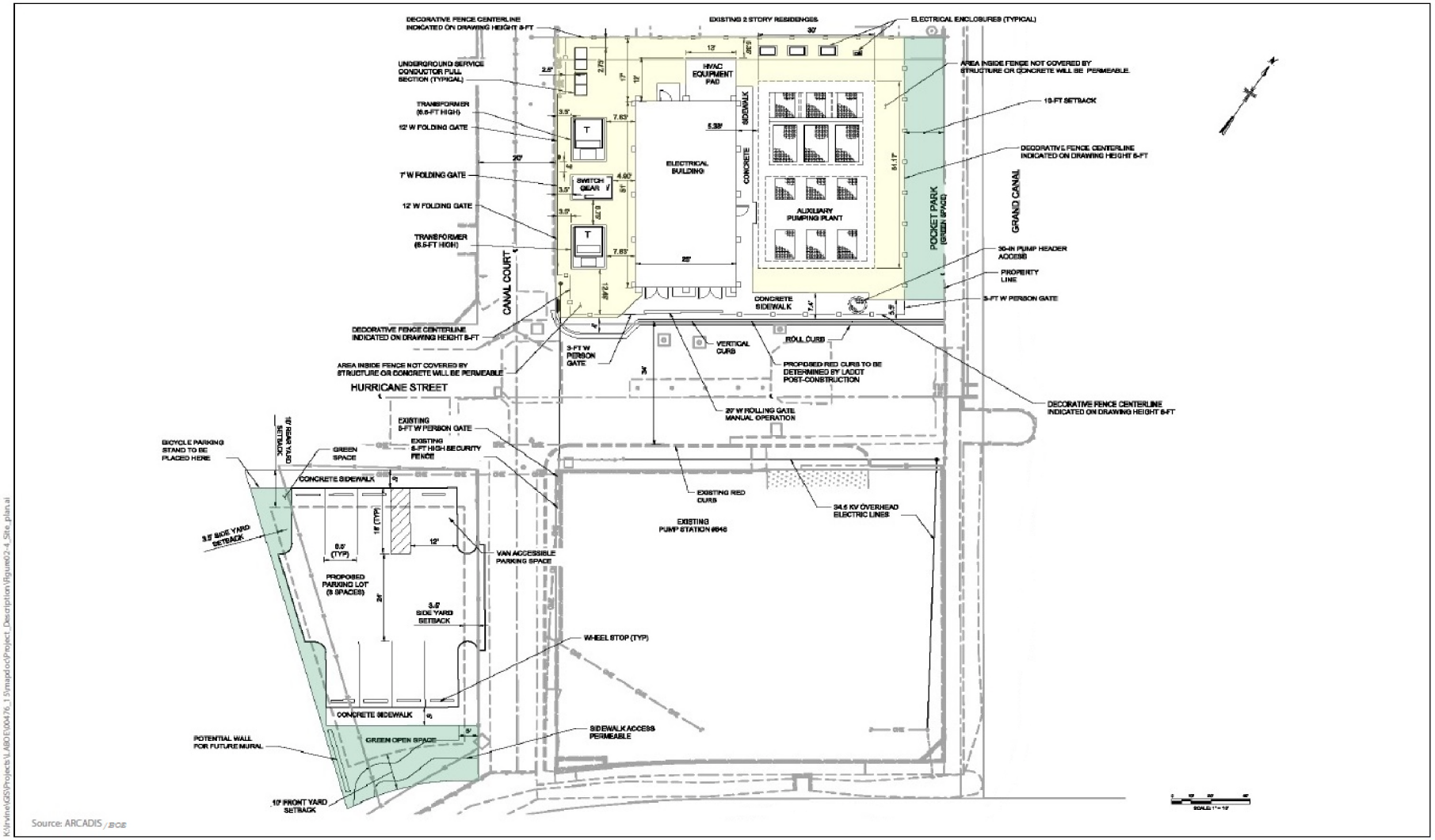

Figure 3
Site Plan
Venice Auxiliary Pumping Plant Project

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4.3 Proposed Additions and Modifications to the Project

As discussed in Section 3.8 of the VAPP EIR, it was anticipated that the VAPP project would seek a Public Benefits Project Permit pursuant to Section 14.6 of the Los Angeles Municipal Code. Instead, the Applicants have applied to the Planning Department for the following two entitlements:

- A **General Plan Amendment** to change the land uses at 128 E. Hurricane Street, 3813 South Esplanade and 3817 South Esplanade from *Multiple Family Residential – Low Medium II* to *Public Facility*, and
- A **Zone Change** for 128 E. Hurricane Street, 3813 South Esplanade and 3817 South Esplanade from *RW2-1* to *PF*.

The potential environmental impacts of these actions are analyzed in this Addendum.

Section 5.0 Impact Discussion

5.1 Introduction

The analyses provided below address each of the environmental issues analyzed in the certified EIR and focus on the potential changes in environmental impacts due to the proposed project additions and modifications outlined in Section 4.3.

5.2 Visual and Aesthetic Resources

5.2.1 Project Modifications

The proposed project additions and modifications outlined in Section 4.3 will not create any new significant environmental impacts. No new impacts related to aesthetics would occur as a result of the Project Modifications. All construction and operational impacts were found to be less than significant when the mitigation measures outlined below are implemented. As such, implementation of the proposed modifications to the project would not result in any new or substantially different visual and aesthetic resources impacts.

The following mitigation measures were adopted as part of the Final EIR to address perceived effects to visual and aesthetic resources as much as practicable:

> **MM-AES-1: Construction Staging/Stockpiled Materials and Equipment.** LABOE or its construction contractor shall be the responsible party for providing temporary construction fencing along the periphery of active construction areas to screen as much of the construction activity as possible from view at the street level.
>
> To minimize views of stockpiled materials and idle construction equipment in staging areas and reduce visual clutter and disorder, project construction staging areas shall be enclosed or screened from view at the street level with appropriate screening materials. The contractor shall provide daily visual inspections to ensure that areas immediately surrounding the construction staging areas are free from construction-related clutter and graffiti and maintained in a clean and orderly manner throughout the construction period. Graffiti shall be painted over, masked out, or cleaned off within 24 hours after notification by the project inspector.
>
> **MM-AES-2: Nighttime Construction Activities.** Should emergency construction activities occur at night, LABOE or its construction contractor shall ensure that lighting will be directed away from surrounding sensitive land uses, particularly residences, and toward the specific location intended for illumination. Lighting associated with construction activities or for security purposes shall be shielded to minimize glare and spill light around sensitive land uses in the surrounding area.
>
> **MM-AES-3: Final Design**. LABOE shall ensure that all Proposed Project structures will be designed to minimize their visual presence. Where site and design allow, the project elements shall incorporate design and location features that minimize the size of the structures and provide setbacks from adjoining street frontages, screening, and/or architectural treatments that are appropriate to the design setting where visible from the public right-of-way at street level. Where necessary, structures shall be designed and built to the satisfaction of the City Engineer/City

Architect and in compliance with all applicable design guidelines, policies, and development standards, as discussed Section 3.1.1, *Regulatory Setting*.

MM BIO-3: Restoration of Vegetation within the Grand Canal also has aesthetic benefits. See biological section for full description.

In addition, the following Best Management Practice will be implemented during construction activities:

BMP-AES-1: Resident Vouchers for Window Washing and Car Washes during Construction. LABOE or its construction contractor will implement best available control measures, as required by SCAQMD Rule 403 regarding fugitive dust, and other relevant regulations related to controlling dust from construction activities. However, to minimize any aesthetic impact construction dust may have on nearby neighboring cars and resident windows, the Public Affairs Office of the Department of Public Works shall provide vouchers to immediately adjacent residents for window washing and car washes, as appropriate.

With implementation of these mitigation measures and best practices, visual and aesthetic resources impacts will remain less than significant during construction and operation of the project.

5.3 Air Quality

5.3.1 Project Modifications

The proposed project modifications outlined in Section 4.3will not result in any new environmental impacts or change the method of construction assumed in the air quality impact analysis within the previously certified EIR.

No new significant impacts related to air quality would occur as a result of modifications to the project modificationst. All construction and operational impacts were found to be less than significant if the mitigation measure outlined below was implemented. The project changes will not result in new air quality impacts different than those identified in, and mitigated for, in the certified EIR during construction or operation. Implementation of the proposed modifications to the project would not result in any new or substantially different air quality impacts.

The following mitigation measure was adopted as part of the Final EIR to reduce impacts related to the construction activities and address the particulate matter 10 microns in diameter or less localized significance threshold.

MM AQ-1. Tier 3 construction equipment. All off-road diesel-powered construction equipment greater than 50 horsepower will meet Tier 3 emission standards. All construction equipment will be outfitted with ARB best available control technology devices. Any emissions-control device used by the contractor will achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by ARB regulations. A copy of each unit's certified tier specification, best available control technology documentation,

and ARB or SCAQMD operating permit will be provided at the time of mobilization of each applicable unit of equipment.

With implementation of the approved mitigation measure, air quality impacts will remain less than significant during construction and operation of the project.

5.4 Biological Resources

5.4.1 Project Modifications

There are no new significant impacts that would result with implementation of the modifications to the Proposed Project described in Section 4.3 either during construction or operation. All impacts would be less than significant with mitigation incorporated. The acquisition of 128 Hurricane will not result in the generation of new biological impacts different than those identified in, and mitigated for, in the certified EIR during construction or operation. As such, implementation of the proposed modifications to the project would not result in any new or substantially different biological impacts. The following mitigation measures were developed to avoid or minimize the Proposed Project's potential impacts on biological resources and jurisdictional areas and are also contained in Appendix C of the EIR.

MM-BIO-1: Special-Status Plant Surveys

To confirm the presence or absence of special-status plant species within the disturbance footprint, a special-status plant survey shall be completed prior to construction. The focused survey shall be conducted by a qualified biologist during the appropriate blooming period, or when the plant is readily identifiable, prior to the start of construction activities. If any sensitive non-listed plant species is found, then the individuals shall be clearly identified and avoidance measures shall be utilized to the extent practical.

MM-BIO-2: Monitoring During Vegetation Removal

A qualified biologist shall monitor all vegetation removal and ground-disturbing activities, such as staging and grading, for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat outside the project footprint and to survey for sensitive wildlife species. When vegetation removal and ground-disturbing activities are not occurring, as-needed monitoring at the project site shall occur. Monitoring logs, as appropriate depending on project activities, shall be maintained for the duration of construction activities.

MM-BIO-3: Restoration of Vegetation within Grand Canal

Regarding the disturbance footprint within the Grand Canal, habitat along the bank shall be restored to its original condition by seeding, cuttings and/or container plant installation following construction. Habitat restoration shall be performed in coordination with regulating agencies (CCC, USACE, and RWQCB) and as required by agency permits. A habitat restoration plan shall be prepared and submitted to EMG for review and approval, prior to submittal to the agencies. The plan will include a native plant palette, and establishment period, as well as success criteria and monitoring requirements. In addition, a monetary contribution may be provided to the Grand Canal Restoration Project fund for wider restoration of the canal banks.

MM-BIO-4: Covered Disposal Containers

Work crews shall properly dispose of all garbage in covered containers to avoid attracting predators (such as crows and ravens) that could contribute indirectly to depredation of California least tern eggs and chicks in the nearby nesting colony.

MM-BIO-5: Water Quality Monitoring During Construction

Water quality shall be monitored by the qualified biologist or a water quality specialist to ensure that no substantial increases in turbidity occur during construction, and that no erosion occurs on the west bank during in-water construction activities. The contractor shall ensure compliance with RWQCB Section 401 Water Quality Certification, USACE Section 404 authorization, applicable water-quality related Best Management Practices, and the project Storm Water Pollution Prevention Plan.

MM-BIO-6: Nesting Bird Survey

If construction commences during the bird breeding season (February 15 through August 31), a preconstruction survey for nesting birds shall occur within three days prior to construction activities by an experienced avian biologist. The survey shall occur within all suitable nesting habitat within the project impact area and a 500-foot buffer. If nesting birds are found, an avoidance area shall be established in consultation with the resource agencies as appropriate by a qualified biologist around the nest until a qualified avian biologist has determined that young have fledged or nesting activities have ceased. The project site shall be re-surveyed if there is a lapse in construction activities for more than seven days during the bird breeding season.

MM-BIO-7: Silt Fencing at Construction Limits

Construction limits shall be identified using silt fencing, which shall be installed under the supervision of a qualified biologist prior to the commencement of work. Construction personnel shall strictly limit their activities, vehicles, equipment, and construction materials to the project footprint, including designated staging areas, and routes of travel. The construction areas shall consist of the minimal area necessary to complete the proposed project. The fencing shall remain in place until the completion of all construction activities.

MM-BIO-8: ESHA Protection

Existing functions and values in ESHA shall be protected, enhanced, and restored as necessary to previous undisturbed conditions in accordance with applicable USACE, RWQCB, CCC, or City of Los Angeles permits and requirements.

MM-BIO-9: Restoration of Mudflats within Grand Canal

The temporary work area in the Grand Canal within mudflat/open water shall be returned to pre-construction grade and contours following construction.

With implementation of the approved mitigation measures, biological impacts will remain less than significant during construction and operation of the project.

5.5 Circulation, Traffic and Transportation

5.5.1 Project Modifications

The proposed project additions and modifications outlined in Section 4.3 will not result in any new significant environmental impacts. As such, implementation of the proposed modifications to the project would not result in any new or substantially different traffic impacts.

Mitigation consists of the following measures to reduce the temporary adverse impacts associated with construction-period activity in the vicinity of the construction site. The implementation of the following mitigation measures would ensure that traffic/transportation impacts would be less than significant.

MM- TRANS-1: Construction Worker Shuttles

Construction workers would park at an off-site location and be shuttled to and from the Project Site each workday on 10 to 15-passenger shuttles or vans. While no specific off-site location has been identified at this time, it would likely lie within five miles of the Project Site. The selected contractor would be required to identify and secure a suitable location

MM-TRANS-2. Coordination with Emergency Service Providers

To minimize impacts on emergency access to the site during construction, the contractor, on behalf of the LABOE, shall coordinate with emergency service providers (police, fire, ambulance and paramedic services), prior to initiating construction, to provide advance notice of any lane closures, construction hours, and changes to local access and to identify alternative routes where appropriate.

With implementation of the existing mitigation and additional construction-related traffic permit conditions, traffic impacts will remain less than significant during construction and operation of the project.

5.6 Cultural/Paleontological Resources

5.6.1 Project Modifications

The proposed project modifications outlined in Section 4.3 will not result in any new significant environmental impacts related to cultural resources or paleontological resources. The Project would result in no operational impacts on archaeological resources. Based on the setting and the level of previous disturbance, the potential for construction activities to disturb, damage, or degrade an archaeological resource or its setting is low. Additionally, if archaeological resources are encountered, Mitigation Measure MM-CUL-1 would reduce potential project-related construction impacts to less than significant. The incremental effects of the Project, after mitigation, would not contribute to a significant adverse cumulative impact on archaeological resources.

The Proposed Project would have no impacts on Tribal Cultural Resources, because no such resources are present within the project footprint, based on information received to date. Therefore, the project would

not contribute to a significant adverse impact on Tribal Cultural Resources.

The following mitigation measure was developed to avoid or minimize the Proposed Project's potential impacts on cultural resources.

MM-CUL-1: Unanticipated Archaeological and/or Tribal Cultural Resource Discoveries

In the unlikely event that any prehistoric artifact of historic period materials or bone, shell, or nonnative stone is encountered during construction, work shall be immediately stopped, the area secured, and work relocated to another area until the found materials can be assessed by a qualified archaeologist. Examples of such cultural materials might include historical trash pits containing bottles and/or ceramics; or structural remains or concentrations of grinding stone tools such as mortars, bowls, pestles, and manos; chipped stone tools such as projectile points or choppers; and flakes of stone not consistent with the immediate geology such as obsidian or fused shale. If the Archeologist determines that an artifact may qualify as a tribal cultural resource, a Native American monitor shall be consulted. The contractor shall stop construction within 30 feet of the exposure of these finds until a qualified archaeologist can be retained to evaluate the find (see 36 CFR 800.11.1, 14 CCR 15064.5(f) and PRC § 21084.3(b)). If the resources are found to be significant, they shall be avoided or impacts shall be mitigated consistent with Section 106, State Historic Preservation Officer Guidelines, and/or Assembly Bill 52.

5.7 Geology, Soils and Seismicity

5.7.1 Project Modifications

The proposed project additions and modifications outlined in Section 4.3 will not result in any new significant environmental impacts.. As such, implementation of the proposed modifications to the project would not result in any new or substantially different geology, soils and seismicity impacts. With implementation of the mitigation measure identified below, no new significant impacts related to geology and soils would occur as a result of the proposed modifications to the Project. The following mitigation measure was approved as part of the Final EIR to avoid or minimize potential impacts from the Project related to geology and soils. It should be noted that there are also specific recommendations contained in the *Geotechnical Engineering Report – Venice Auxiliary Pumping Plant*, December 14, 2015 (see Appendix G of this EIR) and *Phase I Environmental Site Assessment (128 Hurricane Street)*, May 2016 (see Appendix K of this EIR). Mitigation Measure MM-GEO-1 noted below has been abbreviated. The complete text is provided in Appendix G of the EIR.

MM-GEO-1: Liquefaction Considerations

Given the data presented in Section 3 of the *Geotechnical Engineering Report – Venice Auxiliary Pumping Plant*, December 14, 2015, and the results of the liquefaction calculations, potential liquefaction induced settlements on the order of 1.75 inches are estimated for the site. A potential liquefaction induced differential settlement of 1 inch is estimated between the proposed structures

and the pipe header. These potential liquefaction induced settlements shall be considered and accounted for in the design of the Proposed Project.

Mat foundations are recommended for support of the project structures, with the understanding that the foundation would be susceptible to liquefaction-induced settlements. Mat foundations for the wetwell/valve structure and diversion structures shall be founded on jet-grouted columns constructed within the natural soils. The mat foundation for the electrical building shall be founded on compacted fill soil. Mat foundations shall be designed and constructed to bear at a depth of at least 24 inches below the lowest adjacent grade. Mat foundations can be designed for an allowable bearing capacity of 1,500 pounds per square foot (psf). A coefficient of vertical subgrade reaction, for a 1-foot-square loaded area, of 100 kips per cubic foot (kcf) may be used for design of the mats.

Total static settlement of the proposed foundations, designed and constructed in accordance with the recommendations presented herein, shall not exceed 1 inch. Differential static settlement shall not exceed one-half of the total settlement.

Resistance to lateral loads can be provided by friction at the base of the foundation and passive earth pressure. A coefficient of friction of 0.35 may be assumed with dead-load forces. An allowable passive lateral earth pressure of 250 psf per foot of depth up to a maximum of 2,500 psf may be used for sides of the foundation poured against undisturbed natural soil or properly compacted fill. The allowable passive pressure may be increased by 33% of lateral loading due to wind or seismic forces.

With implementation of the approved mitigation, geology, soils and seismicity impacts will remain less than significant during construction and operation of the project. Additionally, as the certified EIR did not contain a chapter of analysis on hazardous waste and materials, the were two mitigation measures included in the Geology/Soils section that pertain to Hazardous Waste and Materials. These mitigation measures are discussed below in Section 5.9

5.8 Greenhouse Gas Emissions

5.8.1 Project Modifications

The proposed project additions and modifications outlined in Section 4.3 will not create any new significant environmental impacts related to greenhouse gas emissions. GHG emissions for the project were found to be less than significant, well below the threshold. No significant air quality impacts would result from project implementation related to GHGs and implementation of the proposed modifications to the project would not result in any new or substantially different greenhouse gas impacts. Impacts remain less than significant and no mitigation is required.

5.9 Hazardous Waste and Materials

5.9.1 Project Modifications

The certified EIR did not contain a chapter with analysis of hazardous waste and materials, as it was initially screened out during the scoping process. However, two mitigation measures related to hazardous waste and materials were included in the Geology and Soils chapter:

MM-HAZ-1a: Soil and Soil Vapor Subsurface Investigation.

Prior to construction, a soil and soil vapor subsurface investigation shall be conducted by a qualified environmental consultant specializing in the identification and handling of hazardous materials. The subsurface investigation may include, but would not be limited to:

- A scope of work consisting of Pre-Field Activities, such as preparation of a Health and Safety Plan (HASP), determining and marking sampling/boring locations and obtaining utility clearance, and Field Activities, such as identifying appropriate sampling procedures, health and safety measures, chemical testing methods, and quality assurance/quality control (QA/QC) procedures in accordance with the ASTM Standard.
- Necessary permits for boring advancement.
- A Sampling and Analysis Plan (SAP) in accordance with the scope of work.
- Laboratory analyses conducted by a State-certified laboratory.
- Disposal process including transport by a State-certified hazardous material hauler to a State-certified disposal or recycling facility licensed to accept and treat hazardous waste.

MM-HAZ-1b: Confirmation of Oil Well Abandonment.

Prior to construction, the applicant shall obtain confirmation via DOGGR of the proper abandonment of oil well 'McDonald 2'. If re-abandonment of McDonald 2 was not performed to current DOGGR requirements, the applicant shall seek the assistance of a qualified environmental consultant to abandon the oil well to current standards.

MM-HAZ-2: Methane Encroachment.

If the analytical results of the subsurface investigation under Mitigation Measure HAZ-1a determine that methane encroachment has the potential to affect VAPP operational activities, the environmental consultant shall provide recommendations during construction of the proposed project to mitigate long term potential impacts.

To comply with MM-HAZ-1a, the City of Los Angeles retained AECOM to perform a Phase II Environmental Site Assessment at 128 Hurricane Street

With implementation of the approved mitigation during implementation of the proposed project modifications outlined in Section 4.3, hazardous waste and materials impacts will remain less than significant during construction and operation of the project.

5.10 Hydrology, Water Quality/Stormwater Runoff

As discussed in Section 4.7 of the Draft EIR prepared for the project, the project will be completed in compliance with the NPDES Municipal Separate Storm Sewer System (MS4) Permit and meet the necessary sanitary sewer service standards. The installment of the VAPP will allow the City to alternate waste water flow between the existing force main and the new dual force main which is currently under construction. Without the installment of the new pumping plant, the current sewer service standards

will continue to deteriorate and run a high risk of overflowing the system, cause a potential break in the system, and cause a potential health risk to the local waterways.

5.10.1 Project Modifications

The proposed project modifications outlined in Section 4.3 will not result in any the new significant impacts related to hydrology and water quality. As such, implementation of the proposed modifications to the project would not result in any new or substantially different hydrology and water quality/stormwater runoff impacts. There were no impacts to hydrology and water quality requiring mitigation for implementation of the project. Project construction activities would not generate unavoidable adverse impacts to hydrology or water quality. As such, no mitigation measures regarding Project construction impacts to hydrology or water quality were required in the EIR. Operation of the Proposed Project would contribute to inundation by tsunami or sea level rise, if a power failure resulted, and impacts to water quality would be significant. No feasible mitigation has been identified.

5.11 Land Use Plans

5.11.1 Project Modifications

The proposed project additions and modifications outlined in Section 4.3 will not result in any the new significant impacts related to land use. The parcels currently zoned as RW2-1 would be rezoned as PF-1 and the land uses for the parcels would be changed from Multiple Family Residential – Low Medium II to Public Facility. These changes would facilitate the construction of the project as described in the VAPP EIR.

There are no mitigation measures required for the Project directly related to land use and planning. Secondary impacts to surrounding land uses that could result from construction of the Proposed Project are addressed with mitigation measures MM AES-1, MM AES-2, MM BIO-1 through MM BIO-9, MM CUL-1, MM NOI-1, MM NOI-2, and MM TRAF-1. Secondary impacts to land uses that could result from Proposed Project operations are addressed with mitigation measures MM AES-3, MM GEO-1, and MM NOI-3. As such, implementation of the proposed modifications to the will not result in any new or substantially different land use impacts.

5.12 Noise and Vibration

5.12.1 Acquisition of a private parcel at 128 Hurricane Street

Noise and vibration impacts for the project were found to be significant and unavoidable. The proposed project modifications outlined in Section 4.3 will not result in any new significant impacts related to noise and vibration in addition to the impact analysis within the previously certified EIR. As such, implementation of the proposed modifications to the project will not result in any new or substantially different noise and vibration impacts.

While MM NOI-1 would reduce construction noise levels to the extent feasible, it would not eliminate the

predicted noise impacts entirely; therefore, construction noise impacts are considered significant and unavoidable.

While MM NOI-2 would substantially reduce construction vibration levels and mitigate the potential impacts related to building damage, it would not eliminate all the predicted impacts related to annoyance at nearby residences; therefore, construction vibration impacts are considered significant and unavoidable.

It is noted that all significant and unavoidable impacts related to project construction would be temporary and would cease once project construction is complete.

All operational noise impacts would be less than significant after implementation of MM NOI-3.

The following mitigation measures were approved in the previously certified EIR to reduce the Project's potential impacts related to noise and vibration.

> **MM NOI-1: Prepare and Implement a Construction Noise Control Plan.** To reduce the significant construction noise impacts, the Los Angeles Bureau of Engineering (LABOE) and Contractor shall develop a noise control plan that includes the implementation of the following noise reduction measures during construction.
>
> **a) Construction Hours** - The operation of construction equipment shall occur only between 8:00 a.m. to 6:00 p.m. Monday through Saturdays. No construction activity shall occur on national holidays or at any time on Sundays. Access to the construction site may occur prior to construction hours for the purpose of set up, conducting safety meetings, etc. The use of the pile driver, grader and jackhammer construction equipment shall be limited to the hours of 9 a.m. to 3:30 p.m. However, specific work related to the VAPP connection the manifold will be exempt from these hours, along with any emergency conditions or unforeseen work that would require the use of this equipment to complete a specific task in one continuous work event. Haul trucks can only access the site through local neighborhood streets from 9 a.m. to 4 p.m. Construction personnel shall not be permitted on the Project Site (including laydown and storage areas) outside of the hours of 7:30 am to 6:00 pm. Material or equipment deliveries and collections shall not occur outside the hours of 8:00 am to 6:00 pm. In addition, no construction worker parking would be allowed along Hurricane Street or on adjacent local streets. Construction workers shall park offsite and arrive by shuttle to the construction site, as arranged by the construction contractor.
>
> **b) Piles** - All piles, including sheeting, shall be installed and extracted using vibration- and percussive-free methods.
>
> **c) Construction Mitigation Coordinator –** The City and/or its Contractor shall maintain good communication with the surrounding community regarding the schedule, duration, and progress of construction activities. Residents at properties within 500 feet of construction activities shall be

notified 72 hours in advance of the planned activities prior to the start of work. The notification shall advise that there will be loud noise associated with the construction, and shall state the date, time, and expected duration of the planned activities. The notification shall provide a telephone contact number for affected parties to ask questions or share any concerns. A construction mitigation coordinator for the Project will be required to maintain a call log, so that the City can track resolution and nature of any complaints. These complaints may range from noise, vibration, dust, traffic, etc. The call log shall contain the name and address (if available) of the person making the complaint, the date and time of the call, and any details regarding the nature of the complaint related to noise, vibration, dust, parking, traffic, etc. related to construction activities. The call log shall be provided to the Public Works Department (Public Affairs Office, LA Sanitation, LABOE) upon request. Residents shall be informed of the construction mitigation coordinator and on-site construction supervisor contact information by posting of the phone number on the construction site. Signage should be visible from Canal Court, the Esplanade, Via Dolce, and Hurricane Street.

d) Noise barriers - To the extent practicable, temporary noise barriers with a minimum height of 20 feet shall be employed around the Project Site. Openings in the barriers shall be kept to the minimum necessary for access of vehicles, equipment, and construction material. These barriers shall be constructed as follows.

- From commercially available acoustical panels lined with sound-absorbing material (the sound-absorptive faces of the panels shall face the construction equipment); or,
- From acoustical blankets hung over or from a supporting frame. The blankets shall provide a minimum sound transmission class rating of 28 and a minimum noise-reduction coefficient of 0.80 and shall be firmly secured to the framework with the sound-absorptive side of the blankets oriented toward the construction equipment. The blankets shall be overlapped by at least 6 inches at seams and taped so that no gaps exist. The largest blankets available shall be used in order to minimize the number of seams. The blankets shall be draped to the ground to eliminate any gaps at the base of the barrier.

e) For noise-generating equipment that cannot be shielded by site perimeter barriers, localized noise barriers or enclosures shall be employed wherever feasible. The height and location of these barriers/enclosures shall be designed to block the line of sight between the equipment and the surrounding homes.

f) Noise Monitoring Plan - LABOE/Contractor shall retain the services of an acoustical/noise consultant to prepare a Noise Monitoring Plan. The plan shall be site-specific for monitoring and reporting construction noise levels in the community to evaluate the Contractor's performance. Based on details of the Contractor's specific construction schedule, the plan shall develop construction noise goals, in terms of 1-hour Leq, that should be achieved for each phase of construction with the inclusion of feasible and practicable noise abatement measures. If noise monitoring indicates the applicable noise goals have been exceeded, steps shall be taken to promptly implement any additional effective abatement measures that are feasible and/or practicable.

g) Quiet construction equipment - To the fullest extent practicable, the quietest available type of construction equipment shall be used. Newer equipment is generally quieter than older equipment. The use of electric-powered equipment is typically quieter than diesel- or gasoline-powered equipment, and hydraulic-powered equipment is typically quieter than pneumatic-powered equipment.

h) Construction equipment noise compliance - All construction equipment used on the proposed Project that is regulated for noise output by a local, state, or federal agency shall comply with such regulation while in the course of Project activity and use on site.

i) Proper maintenance - All construction equipment shall be properly maintained, as poor maintenance of equipment may cause excessive noise levels.

j) Equipment mufflers, shrouds and shields - All construction equipment shall be equipped with properly operating and maintained mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features that meet or exceed original factory specifications.

k) No idling - All construction equipment shall be operated only when necessary, and shall be switched off when not in use. Idling inactive construction equipment for prolonged periods (i.e., more than 2 minutes) shall not be permitted.

l) Minimum use of audible safety warnings - The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only.

m) No Project-related public address or music system shall be audible at any adjacent residential receptor.

n) Construction work training - Construction employees shall be trained in the proper operation and use of the equipment. Careless or improper operation or inappropriate use of equipment can increase noise levels. Poor loading, unloading, excavation, and hauling techniques are examples of how a lack of adequate guidance and training may lead to increased noise levels.

o) Generator and compressor placement - Stationary noise sources such as generators and compressors shall be positioned as far as possible from noise sensitive areas.

p) Construction equipment storage – Construction equipment shall be stored on the Project Site or designated laydown areas while in use, to the extent feasible. This will eliminate noise associated with repeated transportation of the equipment to and from the site.

MM-NOI-2: Implement ground-borne vibration control measures to reduce construction-generated vibration. To reduce the significant construction vibration impacts, LABOE/Contractor shall implement the following vibration reduction measures during project construction:

- All piles, including sheeting, shall be installed and extracted using vibration- and percussive-free methods.
- LABOE and/or Contractor shall retain a qualified structural or geotechnical engineer to conduct pre-construction surveys of adjacent neighboring structures (including photographing and/or videotaping) to document existing building conditions for future comparison if any vibration-related damage is suspected or results from construction-related activities.
- If considered appropriate by the structural/geotechnical engineer, monitoring shall be conducted during construction to check for vibration-related damage from equipment during its use. Such monitoring may include vibration measurements obtained inside or outside of the buildings, or other tests and observations deemed necessary.

MM-NOI-3: Design project facilities to reduce noise from all mechanical and electrical equipment to levels that comply with applicable regulations. To reduce the significant operational noise impacts to less than significant, noise control features shall be included during the final architectural and engineering design phase of the project, to reduce overall operational noise levels from all project-related sources to within 5 dB CNEL of existing ambient noise levels in the surrounding community (53 to 57 dB CNEL, as described in Table 3.9-6), and to comply with Chapter XI of the City of Los Angeles Municipal Code (i.e., restrict noise level increases, relative to the existing 1-hour L_{eq}, to 5 dBA or less). The City shall retain an acoustical/noise consultant to evaluate the design and provide recommendations for specific noise-control features, as necessary, feasible, and practicable, based on the final equipment selections and specifications for the project. Such noise control features may include, but are not limited to, the following.

- Selecting equipment with lower sound power levels.
- Adjusting the location of equipment items within the Project Site to increase the distance from the closest sensitive receptors and/or increase acoustical shielding provided by intervening structures, where practicable and feasible.
- Shielding noise-generating equipment with screens, acoustical panels, enclosures, or block walls.
- Using sound-rated doors, windows, and access hatches at the electrical building and subterranean vault.
- Adding sound-absorptive materials to interior spaces to reduce buildup of reverberant noise levels.
- Designing ventilation systems with acoustical louvers, intake and exhaust silencers, and other features to control exterior noise propagation from interior sources.

In addition, the following Best Management Practices will be implemented:

BMP-NOI-1: Offsite work space: The City shall work with the construction contractor to identify potential offsite shared office space that could be made available to residents in the immediate vicinity that work at home during weekday construction hours. The space would

ideally have internet service and meeting room space.

5.13 Energy

5.13.1 Acquisition of a private parcel at 128 Hurricane Street

It is anticipated that total annual electricity consumption for the project during operations is approximately 630,000 kWh. The proposed project modifications outlined in Section 4.3will not create any new significant impacts related to energy resources, consistent with the impact analysis within the previously certified EIR. During the construction period, equipment and vehicles would be primarily powered by diesel fuel and would likely require minimal electricity. Table 3.11-1 shows the construction-period fuel use and equivalents in MMBTU, which would be 9,500 MMBTU over the entire period, or approximately 300 MMBTU when amortized over the anticipated 30-year life of the project.[1] Construction-period energy use includes energy that would be used in worker commute trips as well as haul trips and equipment use, which would result in the consumption of an estimated 66,000 gallons of fuel.

Although fuel would be consumed by construction vehicles and equipment, the fuel consumption would be temporary in nature and would represent a negligible increase in regional demand, and an insignificant amount relative to the more than 18 billion gallons of on-road fuels used in the state in 2013, an increase of approximately 0.000004 percent (California Energy Commission 2014). Given the extensive network of fueling stations throughout the project vicinity and the fact that the 2-year construction period would be short-term, no new or expanded sources of energy or infrastructure would be required to meet the energy demand associated with project construction. As such, construction impacts related to the extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities would be **less than significant**, and no mitigation measures are required.

As such, implementation of the proposed modifications to the project are also considered to be a negligible increase in diesel fuel use and would not result in any new or substantially different energy impacts. There would be no significant impacts related to energy either during construction or operation of the Project. No mitigation measures were required in the certified EIR.

[1] Consistent with the methodology for GHG emissions, construction-period energy consumption is divided over the anticipated 30-year life of the proposed Project. Although construction would occur over a 2-year period, this method is intended to apportion the upfront energy consumption over the life of the proposed Project.

Section 6.0 Conclusion

As required by State CEQA Guidelines Sections 15162 and 15164, an Addendum to a previously certified EIR shall be prepared if some changes or additions to a project are necessary and that none of the conditions warranting the preparation of a subsequent EIR are present. As demonstrated in the analysis included in Section 5.0 above, the Addendum is the appropriate document for the following reasons:

- No substantial changes are proposed to the project which will require major revisions of the previously prepared and certified EIR;
- No substantial changes have occurred with respect to the circumstances under which the project is being undertaken; and
- No 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 shows any of the following:
  - The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
  - Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - 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
  - Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

CPC-2024-2010-GPA-ZC-CU3-SPPC

Exhibit D: Map and Text Amendment

EXHIBIT A:
Venice Land Use Plan Text Amendments

The City Council adopts the following amendments to the Venice Coastal Zone Land Use Plan. Additions shown in **bold underline**. No deletions are provided.

Modify Policy I. D. 1 on pages II-25 and II-26 of the LUP as follows:

> **Policy I. D. 1.** Canals and Ballona Lagoon Waterways. The Venice estuaries and wetlands including the Ballona Lagoon, Venice Canals, and Grand Canal south of Washington Boulevard, are designated in the Land Use Plan as natural and coastal recreational resources, and are rezoned to the "Open Space" designation.
>
> Adjacent Use/Development: The only permitted development adjacent to the canals and lagoon shall be habitat restoration, single-family dwellings, **public facilities**, public parks and walkways, subterranean or surface public parking lots, maintenance activities and emergency repairs. Surface public parking lots shall be permitted only where sufficient access and roadway capacity exists to accommodate such parking. New construction along the Canals, and Ballona Lagoon shall comply with standards for setbacks, noise barriers, landscape plan, pervious surfacing with drainage control measures to filter storm run-off and direct it away from environmentally sensitive habitat areas, buffer areas in permanent open space, land dedication for erosion control, and wetland restoration including off-site drainage improvements. For more details refer to the provisions contained in Policy Group I.A., Residential Land Use and Development Standards, and Policies IV.C.1 and IV.C.2, Stormwater Runoff and Circulation.

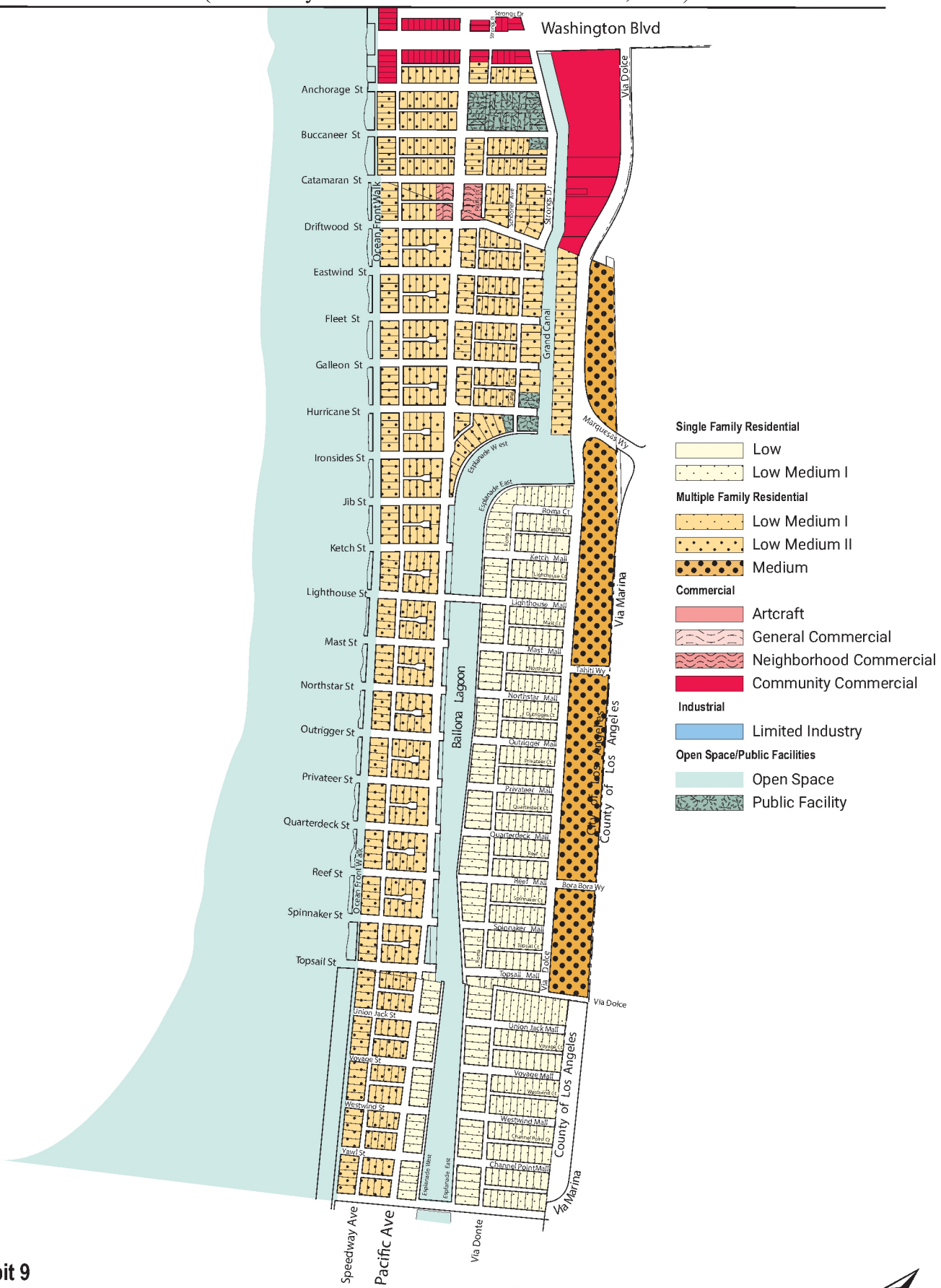


Exhibit 9

Land Use Plan (Map): Marina Peninsula • Silver Strand • Ballona Lagoon West • Ballona Lagoon (Grand Canal) East

N
Not to Scale



0 50 100

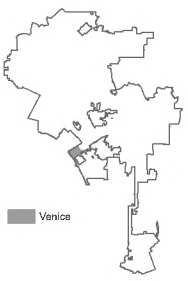
Feet

CPC-2024-2010-GPA-ZC-CU2-SPPC

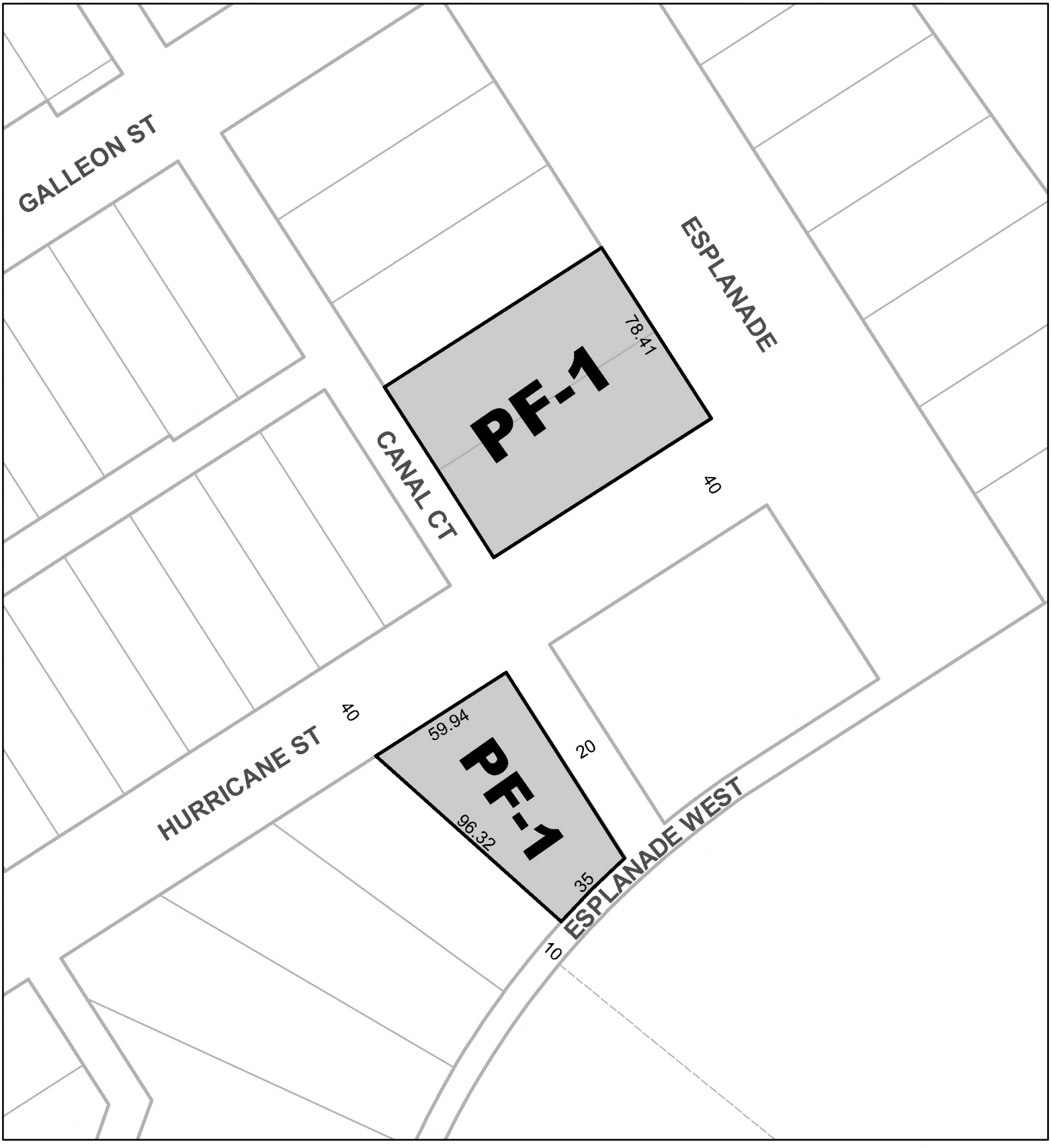
AA/Cf 013125

VENICE

City of Los Angeles



Data Sources: Department of City Planning & Bureau of Engineering



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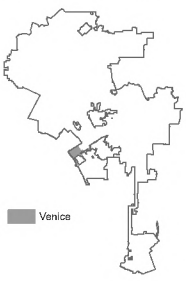
Feet

CPC-2024-2010-GPA-ZC-CU2-SPPC

AA/Cf 013125

City of Los Angeles



Data Sources: Department of City Planning & Bureau of Engineering

CPC-2024-2010-GPA-ZC-CU3-SPPC

Exhibit E: Coastal Development Permit No. 5-24-0123

CALIFORNIA COASTAL COMMISSION
South Coast District Office
301 E Ocean Blvd., Suite 300
Long Beach, CA 90802-4302
(562) 590-5071

Th12a
Th12b
Th13a

Appeal Filed:	12/19/22
49th Day:	Waived
Dual Permit Filed:	1/2/25
270th Day:	9/29/25
Staff:	JD-LB
Staff Report:	08/29/25
Hearing Date:	09/11/25

STAFF REPORT: APPEAL – SUBSTANTIAL ISSUE & DE NOVO/DUAL PERMIT

Appeal/Application Nos.:	**A-5-VEN-22-0068, A-5-VEN-22-0069, and 5-24-0123**
Applicant:	**City of Los Angeles Department of Public Works**
Agent:	Environmental Management Group
Local Government:	City of Los Angeles
Local Decision:	Approval with Conditions
Appellant:	Genevieve Morrill
Project Locations:	3813 & 3817 South Esplanade, 128 East Hurricane Street, and a portion of Grand Canal, Venice, City of Los Angeles, Los Angeles County (APNs: 4225-008-904, 4225-010-901)
Project Description (On Appeal):*	Construction of a new two-story, 32-foot tall, 2,500 square foot wastewater pumping plant (Venice Auxiliary Pumping Plant - VAPP), a diversion structure with a 66-inch inlet pipe in the Grand Canal, subsurface improvements below Hurricane St. and public right-of-way improvements, 22,159 cubic yards of cut, 9,455

	cubic yards of native fill with a net cut of 12,704 cubic yards, habitat restoration to pre-project conditions; and construction of a nearby parking lot to provide seven vehicle parking spaces, including two for public use only, and four bicycle parking spaces for VAPP employees, oil well re-abandonment, a new public art installation, and landscaping.
Project Description (De Novo / Dual):*	Construction of a new two-story, 32.-5-foot-tall, 2,283 square foot wastewater pumping plant (Venice Auxiliary Pumping Plant – VAPP), a diversion structure with a 66-inch inlet pipe in the Grand Canal, habitat restoration and mitigation, subsurface improvements below Hurricane St., public right-of-way improvements, two on-street public parking spaces, and 7,324 cubic yards of cut, 5,864 cubic yards of fill with a net cut of 1,460 cubic yards; and construction of a nearby 2,509 square foot parking lot to provide seven public parking spaces, and four bicycle parking spaces, a new public art installation, bioswale, and landscaping, after an oil well re-abandonment and soil remediation on the site.
Staff Recommendation:	Substantial Issue on Appeal and Approval with Conditions on De Novo/Dual.

*The project descriptions above are intended as brief summaries of the primary project components. Please see subsections III.A (Locally-Approved Project) and VII.A (De Novo/Dual Permit Project) below for complete locally-approved and de novo project descriptions.

IMPORTANT NOTE: The Commission will not take testimony on the "substantial issue" recommendation unless at least three commissioners request it. The Commission may ask questions of the applicant, any aggrieved person, the Attorney General or the Executive Director prior to determining whether or not to take testimony regarding whether the appeal raises a substantial issue. (14 CCR § 13115(c).) If the Commission takes testimony regarding whether the appeal raises a substantial issue, testimony is generally at the discretion of the Chair and limited to three minutes total per side. Only the applicant, the appellant, persons who opposed the application before the local government, and the local government shall be qualified to testify during this phase of the hearing. Others may submit comments in writing. (14 CCR § 13117.) If the Commission finds that the appeal raises a substantial issue, the de novo phase of the hearing will occur directly following that finding, during which it will take public testimony.

SUMMARY OF STAFF RECOMMENDATION

The project site consists of three non-contiguous, City-owned vacant lots totaling approximately 12,076 square feet and a portion of Grand Canal, located between the first road and the sea in the Ballona Lagoon West Subarea of Venice, within the City of Los Angeles, Los Angeles County.

The City approved two local Coastal Development Permits[1] (CDPs) for:

1. Construction of a new two-story, approximately 32-foot-high, 2,500 square foot electrical building across two vacant, side-by-side canal-fronting lots at 3813 and 3817 South Esplanade, installation of a temporary cofferdam, construction of a new diversion structure and inlet pipe, construction of an underground pumping station, an encroachment of electrical equipment within the northerly side yard setback, and habitat restoration to pre-project conditions.

2. Development of a new surface parking lot providing seven vehicle parking spaces (including one ADA space and two for public use) and four bicycle parking spaces for the VAPP, a new public art installation, and new landscaping. The City also approved the re-abandonment of a non-active oil well originally abandoned in 1932 and associated soil remediation.

Both City-approved projects were appealed by Geneveive Morrill on December 19, 2022. The appeals generally raise issues related to inconsistencies with allowable land uses, community character, visual resource impacts, hazards, and public access.

Staff recommends that the Commission, after public hearing, determine that a **substantial issue exists** with respect to the grounds on which appeal numbers A-5-VEN-22-0068 and A-5-VEN-22-0069 have been filed because the City's findings that the development is consistent with the provisions of the Venice Land Use Plan (LUP) and the Coastal Act regarding siting a public facility and public parking lot in a residentially zoned area was not adequately supported by documents in the record file or the local CDP's findings or the effective certification of an LUP amendment. In addition, as approved by the City, the height of the electrical building and electrical equipment encroachments into the side yard setback inconsistent with the development standards of the Venice LUP. Furthermore, the City did not adequately address sea level rise hazards and water quality impacts associated with the project.

The proposed development has been revised since its initial approval by the City. Since local approval, the City has revised the following:

1. VAPP Building Size: Revised from 2,500 sq. ft. to 2,283 sq. ft. (administrative change only; no structural modifications).
2. Parking Configuration:

[1] DIR-2017-4173-CDP-SPP-1A and DIR-2017-4167-PUB-CDP-SPP-1A

   a. Three VAPP employee/visitor spaces relocated on-site at the VAPP facility.
   b. Seven instead of two parking spaces at 128 Hurricane Street now dedicated entirely to public use.
3. Parapet Wall Height: Reduced from 30.39 feet to 30 feet.
4. Power Equipment: One new switchgear unit in the rear yard.
5. Perimeter Walls/Fences: Lowered from 8 feet to 6 feet.
6. Public Right-of-Way Improvements:
   a. Two new on-street parking spaces.
   b. New sidewalk along the north side of Hurricane Street (between Canal Court and the Esplanade).
7. Stormwater Management:
   a. Bioswale added to the lagoon-fronting yard at 128 Hurricane Street.
   b. Storm drain system reconfigured to direct runoff into the bioswale, with overflow to the lagoon.
8. Additional CMU Walls: 3.5-foot-high CMU wall added along the front property line and western edge of the parking lot at 128 Hurricane Street.
9. Grading Revisions:
   a. Cut reduced from 22,159 to 7,324 cubic yards.
   b. Fill reduced from 9,455 to 5,864 cubic yards.
   c. Net cut reduced from 12,704 to 1,460 cubic yards.

Some of the project revisions—such as the reduced parapet wall height—help address appeal issues related to community character and visual compatibility. Additionally, changes to the stormwater management system respond to concerns raised on appeal regarding water quality impacts to adjacent coastal waters. In addition, staff recommend several special conditions to address other issues raised on appeal that are not resolved by the above-mentioned revisions, including inconsistencies with the Venice Land Use Plan (LUP) and the need to address risks associated with sea level rise through future planning for coastal hazards. As such, Staff recommends the Commission find the proposed project, as conditioned, consistent with Chapter 3 of the Coastal Act and **approve** Application Nos. A-5-VEN-22-0068, A-5-VEN-22-0069, and 5-24-0123 with 19 special conditions, as detailed in the staff report. Staff recommends 21 special conditions including: 1) Submittal of Final Plans, 2) Consistency with the Land Use Plan, 3) Local Government Approval, 4) Assumption of Risk, Waiver of Liability and Indemnity, 5) Resource Agencies, 6) Construction and Pollution Prevention Plan, 7) Final Dewatering Plan, 8) Water Quality and Hydrology Plan, 9) Oil Spill Prevention and Response Plan, 10) Future Coastal Hazards Analysis and Adaptation Plan, 11) Tsunami Evacuation and Safety Plan, 12) Final Lighting Plan, 13) Landscaping-Drought Tolerant, Non-Invasive Plants, 14) Archaeological and Tribal Cultural Resources Monitoring and Treatment Plan, 15) Final Revised Habitat Restoration Plan (HRP), 16) Final Remediation Plan, 17) Removal of Site Materials, 18) Public Parking Sign Program, and 19) Traffic Control Plan.

The motions and resolutions can be found on Pages 7 and 34-35 of the staff report.

Table of Contents

I. MOTIONS AND RESOLUTIONS – SUBSTANTIAL ISSUE 7
II. APPEAL PROCEDURES 7
III. FINDINGS AND DECLARATIONS 9
A. Project Location, Project Description, and Background 9
B. Local Government Action 14
C. Appellant's Contentions 16
D. Factors to be Considered in Substantial Issue Analysis 17
E. Substantial Issue Analysis 18
F. Substantial Issue Factors 31
IV. MOTIONS AND RESOLUTIONS – DE NOVO & DUAL PERMITS 34
V. STANDARD CONDITIONS 35
VI. SPECIAL CONDITIONS 36
VII. FINDINGS AND DECLARATIONS 49
A. Project Location, Description, and Background 49
B. Development and Visual Resources 50
C. Public Access 56
D. Coastal Hazards 59
E. Biological Resources 66
F. Water Quality 71
G. Oil Spill Prevention 76
H. Archaeological, Paleontological, and Tribal Cultural Resources 78
I. Local Coastal Program 79
J. California Environmental Quality Act (CEQA) 80
Appendix A – Relevant Coastal Act and Venice LUP Policies 81
A. Public Access 81
B. Development and Visual Resources 82
C. Coastal Hazards 85
D. Water Quality & Biological Resources 86
E. Archaeological and Tribal Cultural Resources 88
F. Oil Spill 88
G. Land Use 88
Appendix B – Cultural Resources Significance Testing Plan Procedures 89
Appendix C – Substantive Files 91

EXHIBITS

Exhibit 1 – Vicinity Map
Exhibit 2 – Locally-Approved Plans
Exhibit 3 – Appeals
Exhibit 4 – Project Plans (De Novo/Dual)

I. MOTIONS AND RESOLUTIONS – SUBSTANTIAL ISSUE

Appeal No. A-5-VEN-22-0068

Motion: I move that the Commission determine that Appeal No. A-5-VEN-22-0068 raises **NO SUBSTANTIAL ISSUE** with respect to the grounds on which the appeal has been filed under Section 30602 of the Coastal Act.

Staff recommends a **NO** vote. Following the staff recommendation on this motion will result in the Commission proceeding to conduct a de novo review of the application, and adoption of the following resolution and findings. Conversely, passage of this motion will result in a finding of No Substantial Issue, and the local action will become final and effective. The motion passes only by an affirmative vote of the majority of the appointed Commissioners present.

Resolution: The Commission hereby finds that Appeal No. A-5-VEN-22-0068 presents a **SUBSTANTIAL ISSUE** with respect to the grounds on which the appeal has been filed under Section 30602 of the Coastal Act regarding consistency with Chapter 3 policies of the Coastal Act.

Appeal No. A-5-VEN-22-0069

Motion: I move that the Commission determine that Appeal No. A-5-VEN-22-0069 raises **NO SUBSTANTIAL ISSUE** with respect to the grounds on which the appeal has been filed under Section 30602 of the Coastal Act.

Staff recommends a **NO** vote. Following the staff recommendation on this motion will result in the Commission proceeding to conduct a de novo review of the application, and adoption of the following resolution and findings. Conversely, passage of this motion will result in a finding of No Substantial Issue, and the local action will become final and effective. The motion passes only by an affirmative vote of the majority of the appointed Commissioners present.

Resolution: The Commission hereby finds that Appeal No. A-5-VEN-22-0069 presents a **SUBSTANTIAL ISSUE** with respect to the grounds on which the appeal has been filed under Section 30602 of the Coastal Act regarding consistency with Chapter 3 policies of the Coastal Act.

II. APPEAL PROCEDURES

Section 30600(b) of the Coastal Act provides that prior to certification of its Local Coastal Program (LCP), a local jurisdiction may, with respect to development within its area of jurisdiction in the coastal zone and consistent with the provisions of Sections 30604, 30620 and 30620.5, establish procedures for the filing, processing, review, modification, approval or denial of a coastal development permit. Pursuant to this provision, the City of Los Angeles developed a permit program in 1978 to exercise its option to issue local CDPs. Sections 13301-13325 of Title 14 of the California Code of Regulations provide procedures for issuance and appeals of locally issued CDPs.

Section 30602 of the Coastal Act allows any action by a local government on a CDP application evaluated under Section 30600(b) to be appealed to the Commission. The standard of review for such an appeal is the Chapter 3 policies of the Coastal Act. [Cal. Pub. Res. Code §§ 30200 and 30604.]

After a final local action on a City CDP application, the Coastal Commission must be noticed within five days of the decision. After receipt of such a notice which contains all the required information, a twenty working-day appeal period begins during which any person, including the applicants, the Executive Director, or any two members of the Commission, may appeal the City decision to the Coastal Commission. [Cal. Pub. Res. Code § 30602.] As provided under section 13318 of Title 14 of the California Code of Regulations, the appellant must comply with the procedures for filing an appeal as required under section 13111 of Title 14 of the California Code of Regulations, including the specific grounds for appeal and a summary of the significant question raised by the appeal.

The action currently before the Commission is to find whether there is a "substantial issue" or "no substantial issue" raised by the appeal of the local approval of the City-approved project.[2] Sections 30621 and 30625(b)(1) of the Coastal Act, and Section 13321 of the Commission's regulations, require a de novo hearing of the appealed project unless the Commission determines that no substantial issue exists as to the project's conformity with Chapter 3 of the Coastal Act.

Commission staff recommends a finding of **substantial issue**. If the Commission decides that the appellant's contentions raise no substantial issue as to conformity with Chapter 3 of the Coastal Act, the action of the local government becomes final. Alternatively, if the Commission finds that a substantial issue exists with respect to the conformity of the action of the local government with the Chapter 3 policies of the Coastal Act, the local CDP is voided and the Commission will hear the de novo matter and dual permit application immediately following the substantial issue finding, unless the Commission schedules the de novo portion of the hearing for a future date. [Cal. Pub. Res. Code §§ 30621 and 30625.] Section 13321 of the Coastal Commission regulations specifies that de novo actions will be heard according to the procedures outlined in Sections 13114 and 13057-13096 of the Commission's regulations.

If there is no motion from the Commission to find no substantial issue, it will be presumed that the appeal raises a substantial issue, and the Commission will hold the de novo phase of the public hearing on the merits of the application, using the Chapter 3 policies of the Coastal Act. The Venice LUP, certified on June 14, 2001, is used as guidance. Sections 13110-13120 of Title 14 of the California Code of Regulations further explain the appeal hearing process.

If the Commission decides to hear arguments and vote on the substantial issue question, those who are qualified to testify at the hearing as provided by Section 13117

[2] All references to the City-approved project include the project approved under the two local CDPs and appealed under the two appeals A-5-VEN-22-0068 and A-5-VEN-22-0069 before the Coastal Commission.

of Title 14 of the California Code of Regulation, will typically have three minutes per side to address whether the appeal raises a substantial issue. The only persons qualified to testify before the Commission at the substantial issue portion of the appeal process are the applicants, appellants, persons who opposed the application before the local government, and the local government. Testimony from other persons must be submitted in writing. The Commission will then vote on the substantial issue matter. It takes a majority of Commissioners present to find that the grounds for the appeal raise no substantial issue.

III. FINDINGS AND DECLARATIONS

A. Project Location, Project Description, and Background

Project Location

The project site consists of three non-contiguous, vacant City-owned lots totaling approximately 12,076 square feet, and a portion of Grand Canal, located between the first road and the sea in the Ballona Lagoon West Subarea of Venice, within the City of Los Angeles, Los Angeles County (**Exhibit 1**). All three lots are zoned Residential Waterways (RW2-1) in the City's uncertified zoning code and have a land use designation of Medium Residential in the City's certified Land Use Plan. Two canal-fronting parcels—3813 and 3817 Esplanade—are side-by-side and bounded by Grand Canal to the east, the existing Venice Pumping Plant directly across the street (Hurricane Street) to the south, Canal Court to the west, and multi-family residences to the north. The third lot, located at 128 Hurricane Street, is caddie corner from the canal-fronting lots on a lagoon-fronting parcel bounded by Ballona Lagoon to the south, Hurricane Street to the north, multi-family residential uses to the west, and Canal Court and the existing Venice Pumping Plant to the east.

Permit Jurisdiction Area

Within the areas specified in Coastal Act Section 30601, which is known in the City of Los Angeles permit program as the Dual Permit Jurisdiction area, the Coastal Act requires that any development which receives a local CDP permit also obtain a second (or "dual") CDP from the Coastal Commission. For projects located inland of the areas identified in Section 30601 (i.e., projects in the Single Permit Jurisdiction), the City of Los Angeles local CDP is the only CDP required. A portion of the proposed project is located within the Dual Permit Jurisdiction Area, where both a local CDP from the City of Los Angeles and a second or "dual" CDP from the Commission are required. Another portion lies within the Commission's original or "retained" jurisdiction, where only a CDP from the Commission is required. Accordingly, the applicant must obtain a CDP from the Commission for the proposed development within both jurisdictions. On July 14, 2023, Commission staff received CDP application No. 5-23-0582. A hearing was scheduled for both appeals (A-5-VEN-22-0068 and A-5-VEN-22-0069) and the CDP application (5-23-0582) for the December 2023 Commission meeting. However, those items were postponed and on February 6, 2024, the applicant withdrew CDP application 5-23-0582.

A new application (5-24-0123) for the subject CDP was submitted on February 24, 2024. The Commission's standard of review for the proposed development in the Dual Permit Jurisdiction area and the Commission's retained jurisdiction is the Chapter 3 policies of the Coastal Act.

VAPP Project Description

The two side-by-side canal-fronting parcels would be developed with the proposed Venice Auxiliary Pumping Plant (VAPP). The proposed wastewater pumping facility includes several above-grade and below-grade structures, as described below and as approved by the City (**Exhibit 2**).

VAPP Above Grade Development:

a) Los Angeles Department of Water and Power (LADWP) Equipment

Along the west property line, the City approved 3.5-feet-high perimeter bollards to allow LADWP staff access to the site for maintenance and repair of the proposed power equipment that would be located in the rear yard, including a switchgear unit approximately ten feet high and two transformers approximately six feet high. This equipment would be set back 5.88 feet from the west property line. Along the north property line, between Canal Court and the Grand Canal, the City approved a six-foot-high compound wall and three electrical termination boxes, each 8.5 feet high and placed on six-inch-high concrete pads, located approximately 3.09 feet from the property line. The City approved an encroachment of electrical equipment within the northerly side yard setback

b) Electrical Building

East of the electrical equipment, the City approved a two-story electrical building with a height of twenty-five feet and parapet walls ranging from approximately 5.5 to 7.25 feet above the flat roofline. The building includes 2,500 square feet of floor area, with setbacks of 53.38 feet at the front (along the canal), 20.65 feet at the rear (along Canal Court), 17.35 feet on the north side (adjacent to an existing single-family residence), and ten feet on the south side (along Hurricane Street). The ground floor includes a generator room, storage room, and switchgear equipment, while the second floor contains a server room, operations and maintenance room, and an electrical and mechanical equipment room. The 1,152 square-foot roof area includes a hatch for access, solatubes,[3] mechanical equipment, and approximately 167 square feet of designated space for future photovoltaic panels.

c) Front Yard and South Side Yard

[3] A Solatube is a type of tubular skylight that captures sunlight through a rooftop dome and channels it down a reflective tube to naturally light interior spaces.

The canal-facing side of the property will include a 1,821-square-foot permeable front yard area, consisting of a minimum ten-foot-wide setback that extends the full length of the west property line. Non-invasive low and moderate water use plants will be planted within the front yard setback area. A six-foot-high decorative fence will be located along the front yard setback and continue along the south property line. There will be an opening in the south side fence for a thirty-foot rolling gate and new driveway.

d) Right-of-way Improvements

The City approved a new thirty-foot driveway and a sidewalk with an ADA-compliant ramp and vertical curb along the width of the south side of the property. The City would also demolish and rebuild a portion of the Esplanade public walkway between the proposed VAPP site and the waterway to construct the temporary cofferdam and the permanent improvements, including the inlet pipe and diversion structure.

e) Construction Materials and Equipment Storage

Laydown Area 1, located at vacant lot 128 Hurricane Street, would be used as a construction laydown area and site for soil stockpiling. Laydown Area 2, located on a vacant lot east of the Grand Canal at 3821 S. Via Dolce (APN: 4225-013-904)[4], would be used for materials and equipment storage. Laydown Area 3 (APN: 4296-001-270), located on a vacant lot outside the coastal zone at 9940 Jefferson Boulevard in Culver City, would be used for soil stockpiling.

VAPP Below Grade Development:

f) Excavation and Grading

The cut and fill estimates, including surface grading, for the City-approved VAPP includes 22,159 cubic yards of cut, reuse of 9,455 cubic yards of the material for onsite fill resulting in a net export of 12,704 cubic yards of sediment. Excavation depths vary across the site with maximum depths of 30 feet for the wet well and valve vault and 24 feet for the diversion structure. Soil stockpiles would be placed at Laydown Areas 1 and 3.

g) Temporary Cofferdam

The project also includes the temporary installation of a cofferdam (95 feet long and 23 feet wide) within the Esplanade and Grand Canal secured by removeable soldier piles and sheeting for a period of approximately six months. The area within the cofferdam would be dewatered, with the discharge directed to the existing pumping plant. Following dewatering, the soil would be excavated and stockpiled in preparation for the

[4] The property is owned by Los Angeles County, and Special Condition 3 requires that the applicant obtain any and all authorizations needed from local governments, including those needed from the County to use the property.

installation of the below-grade structures. Once the below grade structures are completed, the cofferdam would be removed and the site restored.

h) Auxiliary Pumping Plant, Diversion Structure, and 66-inch pipe

From north to south, the VAPP would include three wet wells and a valve vault. The wet well would be located 25 feet below grade, positioned between the electrical building and the canal-facing property-line. Extending west to east from the wet wells beneath the Esplanade would be a new 66-inch inlet pipe, which connects to a new 17-foot by 17-foot diversion structure 18 feet below grade within the Grand Canal. This structure would serve as a control junction, allowing wastewater to be directed between the Coastal Interceptor Sewer and either the existing or new pump facilities using remote-controlled pipe gates. Without this feature, the City would have no ability to manage or redirect flows between the two systems. Supporting infrastructure would include a new influent pipe and a sluice gate installed 11 feet below the west canal bank and canal walkway.

Adjacent to the two lots, at the intersection of Canal Court and Hurricane Street, the VAPP would connect to an existing underground manifold, which conveys flows from the plant to the force main that transports wastewater to the Hyperion Treatment Plant. The street above will be repaved following the completion of below-grade improvements.

i) Grand Canal Restoration

In a portion of the Grand Canal, the impacted vegetated slope and canal benthos would be restored to previous grade and compaction with the previously excavated material. The western bank of the Grand Canal would be revegetated by seeding, cuttings and/or container plant installation. As approved by the City, restoration of canal bottom and vegetated bank would be completed within the temporary impact area only.

<u>VAPP Parking Lot Project Description</u>

The City approved the construction of a surface parking lot providing seven parking spaces, a three-dimensional public art installation no greater than six feet high in the southwestern corner of the lot, non-invasive low to moderate water use landscaping, and one bike rack accommodating up to four bicycles for VAPP employees on the southeast corner of the vacant lot, located approximately 80 feet from the proposed VAPP facility. Of the seven parking spaces, three of the parking spaces would be reserved for VAPP employees, two for Beach Impact Zone (BIZ) parking, and the two remaining spaces would be reserved for the public, including one van-accessible ADA-compliant space. Development of the site requires re-abandonment of an oil well (McDonald 2; API 03713842) and soil removal and remediation.

j) Oil Well Abandonment and Site Remediation

The project includes the re-abandonment of an oil well originally abandoned in 1932. This process involves exposing the well casing, testing it for leaks, and drilling out the old cement. A wellhead, cellar ring, and blow-out prevention equipment would be installed, and the well would then be backfilled with compacted fill. Approximately 260 cubic yards of soil would be excavated—160 cubic yards confirmed as contaminated and an additional 100 cubic yards excavated as a precaution for testing. All contaminated soil would be disposed of at an off-site landfill. The new parking lot would be paved over the re-abandoned well.

Background

To better understand the proposed scope of work, it is necessary to provide context for how the sewer system in Venice connects to the broader wastewater infrastructure. In this context, the terms 'wastewater' and 'sewage' are used interchangeably—sewage is not limited to restroom waste but includes water discharged from a variety of everyday urban activities. Common residential sources include laundry facilities, kitchens, and restrooms. Although the City maintains separate systems for sewage and stormwater, stormwater can still enter the sewer system (e.g., through manhole covers and pipes infiltrated by tree roots[5]). As a result, rainfall must be factored into the design and capacity planning of the City's wastewater network.

Wastewater from individual buildings is carried through underground pipes into a central network of larger pipes. One such system is the Coastal Interceptor Sewer ("Coastal Sewer"), which collects wastewater along approximately 11.8 miles of the Los Angeles County coastline. The Coastal Sewer runs along Pacific Coast Highway (PCH), beginning at the Los Angeles city boundary near PCH and Coastline Drive, and continues through Santa Monica, Venice, Marina del Rey, and Playa del Rey before terminating at the Hyperion Treatment Plant, located just south of Los Angeles International Airport. Transporting wastewater over such long distances, and often uphill, requires considerable energy to overcome gravity. To address this obstacle, the Coastal Sewer relies on a system of force mains (pressurized pipes) and pumping plants (mechanical systems that generate hydraulic pressure). Together these components generate the necessary transport power needed to move wastewater through the system and deliver it to its ultimate destination: the Hyperion Treatment Plant in Playa Del Rey.

The existing Venice Pumping Plant is the largest wastewater pumping facility in the City of Los Angeles and serves as one of the final force-generating points before wastewater reaches the Hyperion Treatment Plant. Wastewater enters and exits the facility through a multi-step process. First, an existing 5.5-foot-wide sewer pipe, buried 18 feet below grade within the Grand Canal, conveys wastewater to the facility. From there, the flow is directed into two existing wet wells—large, sealed, underground concrete chambers— where the wastewater is temporarily held before being

[5] https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp-tp?_adf.ctrl-state=udfc3lykw_5&_afrLoop=2485684086404507#!

pressurized and pumped onward. Although it may seem counterintuitive to keep the pipes immersed in sewage, it actually minimizes oxidation damage to the pumps. The wet wells are located 25 feet below grade and thus prevents any risk of wastewater surfacing or threatening the surrounding area.

Next, centrifugal pumps generate the energy needed to move wastewater from the wet wells and toward the Hyperion Treatment Plant. The existing facility houses five pumps. Under normal dry-weather conditions, two pumps are typically sufficient to handle incoming flows. However, during storm events, all five pumps may be required to be activated to handle increased volume. Collectively, the five pumps have a total capacity of up to 90 million gallons per day, roughly equivalent to the volume of 200 Olympic-sized swimming pools.[6]

Pumping such a large volume of wastewater requires significant pressure, particularly because the Hyperion Treatment Plant sits approximately 60 feet higher in elevation than the Venice Pumping Plant. The failure of a single pump during high-flow periods could result in sewage backups. In the past, the City has rented portable pumps when one or more of the pumps were offline for repairs. However, portable pumps must operate above ground, which introduces additional impacts such as noise and odor that are otherwise avoided with permanent, below-grade pumps. Sourcing temporary solid-waste pumps of the correct capacity can also be challenging, particularly in an emergency, when time is critical.

According to the City, wet-weather flows have nearly exceeded the capacity of the existing pumps on multiple occasions. In a worst-case scenario, if the wet wells and pump system become fully inundated, the City could be forced to discharge millions of gallons of untreated wastewater into the Grand Canal or nearby residential streets. To prevent such a failure and ensure system reliability, the City proposes this project to supplement the existing pumping capacity with new pumps.

B. Local Government Action

On December 4, 2017, the City held a joint public hearing for local CDP DIR-2017-4167-PUB-CDP-SPP and associated case no. ZA-2017-3950-ZAA and local CDP DIR-2017-4173-CDP-SPP and associated case no. ZA-2017-3953-CU. Several Venice residents provided comments at the hearing including Steve and Ann Mason, Daniel Whalen, Steve Bradbury and Robin Rudisill. Commenters expressed a range of concerns related to the proposed project. These included the visual appearance of the existing pumping station; potential odors or gases emitted from both the existing and proposed facilities; an objection to the statement of ownership of the 128 Hurricane Street site; and that the public hearing notice had been posted on private property. Additional concerns involved limiting construction hours; implementing dust and dirt mitigation measures during construction; addressing the presence of unhoused individuals on the vacant lots; ensuring adequate security on site; and restricting the new parking lot from being used for

[6] https://www.livestrong.com/article/350103-measurements-for-an-olympic-size-swimming-pool/

public parking to discourage increased traffic from those seeking free spaces. Commenters also raised issues regarding the timing and adequacy of public noticing for the Environmental Impact Report (EIR), the scope of the project's additional capacity, and whether the facility would comply with regulatory requirements for wastewater treatment plants, particularly given its proximity to the Canals and the beach.

Prior to the hearing, the Department of City Planning received a letter from Daniel Whalen and Sharon McQueen, the property owners of 128 Hurricane Street, objecting to the inclusion of their property in the project site and approval process prior to its acquisition by the City. They also asserted that public notices were posted exclusively on their private property and not on the City-owned parcels included in the proposed development. Additionally, they claimed that the project exceeds the maximum allowable height permitted under the Venice Coastal Zone Specific Plan by two feet.

On November 18, 2021, the Director of Planning and Zoning Administrator issued a Joint Letter of Determination for Case Nos. DIR-2017-4167-PUB-CDP-SPP and ZA-2017-3950-ZAA approving the construction, use, and maintenance of a new two-story, approximately 32-foot-high, 2,500 square foot electrical building across two vacant, side-by-side canal-fronting lots at 3813 and 3817 South Esplanade, installation of a temporary cofferdam, construction of a new diversion structure and inlet pipe, construction of an underground pumping station, and habitat restoration to pre-project conditions.

On the same date, the Director of Planning and Zoning Administrator issued a Joint Letter of Determination for Case Nos. DIR-2017-4173-CDP-SPP and ZA-2017-3953-CU approving the construction of a new surface parking lot providing seven vehicle parking spaces (including one ADA space and two for public use) and four bicycle parking spaces for the VAPP, a new public art installation, and new landscaping. The City also approved the re-abandonment of a non-active oil well originally abandoned in 1932 and associated soil remediation.

The local appeal period for the Joint Determinations ended on December 6, 2021. On December 3, 2021, the Planning Director and Zoning Administrator's approval of the above-described cases were subsequently appealed to the Los Angeles City Planning Commission (CPC) by Michael and Genevieve Morrill-Borassi.

On August 11, 2022, the CPC held a hearing for the local appeal. In Case Nos. DIR-2017-4167-PUB-CDP-SPP-1A and ZA-2017-3950-ZAA-1A, the CPC denied the appeal in part and granted the appeal in part to correct the grant clause to allow the encroachment of electrical equipment within the northerly side yard setback. The CPC sustained the Planning Director and Zoning Administrator's Joint Letters of Determination dated November 18, 2021 and issued a Letter of Determination dated September 13, 2022, the City's final action.

On November 18, 2022, the Commission received the City's Notice of Permit Issuance for the project and opened the Commission's 20 working-day appeal period. On December 19, 2022, the above-mentioned appeals were received from Genevieve Morrill. No other

appeals were received prior to the end of the Commission's appeal period on December 20, 2022. A 49-day Waiver for the appeal hearings was submitted to the Coastal Commission by the applicant on January 9, 2023.

C. Appellant's Contentions

Both City-approved projects were appealed by Geneveive Morrill on December 19, 2022 (**Exhibit 3**). The appellant raises the following contentions:

Contentions about the proposed VAPP (A-5-VEN-22-0068) and the parking lot (A-5-VEN-22-0069):

1. The VAPP and VAPP Parking Lot project has not been designed to respect the residential community or the sensitive coastal location in which it is located.

2. The project violates the Coastal Act as it does not respect the character of the community and may have adverse impacts on water quality, sensitive habitat and coastal resources.

3. The project conflicts with Venice Land Use Plan[7] Policy 1.A.5 that seeks to preserve and protect stable multifamily neighborhoods.

4. The project conflicts with Policy 1.D.1 that states that the only permitted development adjacent to the canal and lagoon shall be habitat restoration, single family homes and parks.

5. The project conflicts with Policy IV.B.7 that requires a plan to rehabilitate the grand canal between Hurricane and Washington and maintain the habitat.

6. The project conflicts with Policy 1.E.2 that requires new development to respect the scale and character of the community. Visuals prepared by the City and enclosed with this appeal show that the site will be dominated by three ten-foot-tall transformers (without any screening), power poles and other industrial features.

7. The project conflicts with Policy I.C.1 that states that the scale and design of such facilities much be compatible with adjacent and neighboring uses. Although the single building has been designed to meet the height and setback requirements of the LUP, the project involves numerous areas of equipment including transformers, HVAC equipment, wells and power poles that have not been sited in a way that is compatible. The site is too small for the project and does not allow a buffer of landscaping along all sides that face residential uses. An open parking lot with no security or landscape buffer is not compatible with the neighboring homes.

[7] All further references to a Policy in the appeal contentions are to the certified Venice LUP.

8. The project conflicts with Policy 1.C.6 that states that hazardous industrial uses, including the VAPP served by this parking lot, shall not be located adjacent to residential areas shall not be located adjacent to residential areas. In addition, the existing pump plant is not maintained in a manner which is compatible with the area, is allowed to be covered with graffiti, litter and exterior equipment. Coastal access is impeded by the existing plant because the City does not maintain the landscaping and walkway around the plant to allow visitors to enjoy and access the lagoon.

9. The use is an industrial facility on a site identified as Low Medium residential in the Ballona Lagoon West subarea of the certified Venice Land Use Plan (LUP). Greater protection and buffering should be afforded to the residential neighbors as this is a residentially zoned and designated property.

Contentions about the proposed VAPP (A-5-VEN-22-0068):

1. The heavy equipment associated with the facility, including gigantic transformers, should be moved away from residences and closer to the existing pump plant.

2. The design is not visually compatible with the neighborhood.

3. The outdoor equipment is located too close to an adjoining residential use without any landscape buffer.

4. This public facility does not need to be in this sensitive location adjacent to an Environmentally Sensitive Habitat Area (ESHA) and unique lagoon.

5. The City application does not adequately consider sea level rise, potential impacts to sensitive species and other environmental concerns.

Contentions about the proposed VAPP parking lot (A-5-VEN-22-0069):

1. The project includes unnecessary parking and would add an unsecured empty fenced area immediately adjacent to residences.

2. The parking lot would provide more spaces than the VAPP requires for employees and visitors.

3. The public portion of the lot will be a haven for RVs and encampments, and should at least be secured each day.

4. Instead of unneeded parking, a portion of this property closest to the existing pump plant could be used for equipment, so that the industrial facility can be adequately screen and buffered from residents.

D. Factors to be Considered in Substantial Issue Analysis

When determining whether an appeal raises a "substantial issue," Section 13115(c) of the Commission's regulations provide that the Commission may consider factors, including but not limited to:

1. The degree of factual and legal support for the local government's decision [that the development is consistent or inconsistent with the relevant provisions of the Coastal Act];

2. The extent and scope of the development as approved or denied by the local government;

3. The significance of the coastal resources affected by the decision;

4. The precedential value of the local government's decision for future interpretations of its LCP; and

5. Whether the appeal raises local issues, or those of regional or statewide significance.

The Commission may, but need not, assign a particular weight to a factor. Staff recommends that the Commission find that **a substantial issue exists** with respect to whether the local government actions conform to the provisions of Chapter 3 of the Coastal Act for the reasons set forth below.

E. Substantial Issue Analysis

As stated in Section II of this report, the grounds for an appeal of a CDP issued by the local government prior to certification of its LCP are the Chapter 3 policies of the Coastal Act. Any local government CDP issued prior to certification of its LCP may be appealed to the Commission. The Commission shall hear an appeal unless it determines that no substantial issue exists as to conformity with Chapter 3 policies of the Coastal Act.

Chapter 3 of the Coastal Act is the standard of review for the substantial issue determination. Here, the Venice LUP policies provide guidance and may be used by the Commission to evaluate a project's consistency with Chapter 3. The primary issues raised by this appeal relate to allowable land uses, visual resources, biological resources, impacts to water quality, and coastal hazards.

Coastal Hazards Contentions

Relevant coastal hazards policies of Chapter 3 of the Coastal Act and the Venice LUP are listed in **Appendix A** of this report.

1. **The City does not adequately consider sea level rise.**

   The appellant contends that the local CDP approval failed to adequately assess the potential impacts of sea level rise on the proposed project. Section 30253 of the Coastal Act requires that new development minimize risks to life and property in

areas subject to hazards, including flooding, and without affecting the safety of neighboring properties or requiring shoreline protective devices. Section 30270 requires sea level rise be taken into account in decision making. These provisions require the City to evaluate the site's vulnerability to hazards and consider both how to minimize associated risks and whether the proposed increase in the site's intensity of use is appropriate given those risks.

The project site is located in a low-lying, flood-prone area adjacent to a tidally influenced canal. It is part of a broader region in Venice—generally bounded by Pacific Avenue and Abbot Kinney Boulevard—that is vulnerable to a "bathtub effect," in which floodwaters can accumulate and become difficult to drain due to the higher surrounding elevations. This includes the project site itself. Additionally, the site is located within the Federal Emergency Management Agency's (FEMA) AE Zone, which indicates a one percent annual chance of flooding, with potential flood levels reaching up to +8 feet NAVD88 in low-lying areas.

The local CDP findings provide some analysis regarding the long-term safety of the proposed development over its anticipated lifespan, but the analysis does not adequately account for the function of the development as critical infrastructure or for the full life of the development. The City references an initial sea level rise vulnerability assessment for the Venice Coastal Zone, conducted by Moffat & Nichol in 2018 ("City 2018 Assessment"). That assessment concluded that, under medium- to high-risk aversion sea level rise scenarios, "coastal assets could flood annually… and high water levels could greatly increase potential for flooding of inland low-lying areas" by the year 2100. The City's 2018 Assessment ultimately recommended that strategies to address these flooding risks be incorporated into the City's future certified Local Coastal Program (LCP).

In addition, the local CDP findings cite a project-specific sea level rise hazard report prepared by Moffat & Nichols and dated December 19, 2019. That report acknowledges the site could experience flooding in scenarios involving more than six feet of sea level rise. However, it concludes that such conditions are unlikely to occur within the proposed 60-year design life of the VAPP, citing a 99 percent probability that six feet of sea level rise will not be reached this century under OPC projections. The report notes that under a worst-case H++ scenario, this level may not be reached until 2080.

Based on these findings, the local CDP concludes that adaptation strategies—such as ongoing tide gate maintenance, a flood gate operation plan, and possible future floodproofing—would be sufficient to protect the facility. The City also notes that any repair, demolition, or new construction following a flooding event would be subject to additional review.

While the hazard assessments provide relevant information about projected sea level rise scenarios, the local CDP findings do not demonstrate how the proposed development minimizes risk over the long term, including specifically what would happen beyond the shorter 60-year design life, after which sea level rise impacts are expected to worsen while at the same time the City will need to continue to provide

wastewater services. Simply referencing the low probability of a worst-case scenario does not satisfy the obligation to ensure long-term safety, particularly given the project's location in a known floodplain and immediately adjacent to a tidally influenced waterway. The Commission's 2021 Sea Level Rise Coastal Adaptation Planning Guidance for Critical Infrastructure[8] recommends evaluating higher-end SLR scenarios (e.g., the High Scenario based on the updated 2024 OPC State SLR Guidance[9]) and longer anticipated lifetimes for critical infrastructure such as water infrastructure (e.g., major sewage pumping plants) because of the large investments and long timelines involved in studying, planning, financing, and implementing infrastructure projects along with any necessary adaptation projects. The Critical Infrastructure Guidance and the recent CCC 2024 Sea Level Rise Policy Guidance update[10] also note that while it may not always be appropriate or feasible to *design* for the highest SLR scenarios, it is important to consider and develop phased adaptation approaches that may be necessary over the long-term if such high end scenarios come to pass. Moreover, the proposed project entails a substantial increase in the intensity of use of the site, yet the CDP findings do not evaluate whether such intensification is appropriate given the identified flood risks; and given the potential environmental impacts should the VAPP flood, the project should consider and include elements to minimize adverse impacts should flooding occur.

In light of the above, the local CDP findings fail to adequately address risks from sea level rise. Without a thorough analysis, the findings do not demonstrate consistency with Coastal Act Section 30253, which requires minimizing hazards to life and property.

Biological Resource Contentions

Relevant biological resource and water quality policies of Chapter 3 of the Coastal Act and the Venice LUP are listed in **Appendix A** of this report.

1. **The proposed VAPP and associated parking lot violate the Coastal Act as it may have adverse impacts on water quality, sensitive habitat and species, and coastal resources.**

The appellant contends that the project violates the Coastal Act as it may have adverse impacts on water quality, sensitive habitat and coastal resources. Sections 30230 and 30231 of the Coastal Act require that marine resources and the biological productivity of coastal waters be maintained and enhanced. Venice LUP Policy IV.B.1 requires uses adjacent to the lagoon be carried out in a manner to protect the biological productivity of marine resources.

Water Quality Impacts

The City's findings regarding consistency with these Coastal Act policies reference the project's required compliance with the nine mitigation measures outlined in the

[8] SLR Critical Infrastructure Guidance, adopted November 17, 2021
[9] OPC State Sea Level Rise Guidance, adopted June 2024
[10] CCC SLR Policy Guidance, adopted November 2024

Environmental Impact Report (EIR)'s Mitigation Monitoring and Reporting Program (MMRP), dated May 2017. Mitigation Measure MM BIO-5 mandates water quality monitoring during construction by a qualified biologist or water quality specialist. This measure is intended to ensure compliance with the Regional Water Quality Control Board (RWQCB) Section 401 Water Quality Certification, the U.S. Army Corps of Engineers (USACE) Section 404 authorization, applicable water quality-related Best Management Practices (BMPs), and the project's Storm Water Pollution Prevention Plan (SWPPP). Mitigation Measure MM BIO-7 requires installation of silt fencing at the construction site, limited to the minimum area necessary to complete the proposed project.

Additionally, while the EIR identifies both construction and post-construction impacts that could adversely affect water quality, it concludes that implementation of specific BMPs would reduce these impacts to a less-than-significant level without requiring formal mitigation measures.

Notably, the City-approved plans for the VAPP include on-site drainage features such as permeable and landscaped yard areas, as well as several drains designed to direct runoff into the VAPP's wet well system, thereby preventing untreated discharges into coastal waters. Similarly, the approved VAPP parking lot plans incorporate permeable landscaping and direct runoff to a biofiltered catch basin for treatment before entering the adjacent lagoon.

Despite the EIR's analysis and the proposed on-site drainage in the approved plans, the City's findings do not address whether the locally-approved project includes sufficient water quality protection measures. Specifically, the findings do not evaluate whether the project may inadvertently or intentionally discharge pollutants into the Grand Canal or the lagoon, nor do they assess the adequacy of the permeable yard areas and drainage systems in avoiding water quality impacts to surrounding coastal waters.

Furthermore, while the City's findings acknowledge the need for soil removal and remediation due to soil contamination, they state only that appropriate handling and disposal would be governed by standard Bureau of Engineering (BOE) conditions and applicable laws. However, the local CDP findings do not specify what those requirements entail, nor do they address whether such measures would be sufficient to prevent water quality impacts, particularly given the site's proximity to the lagoon.

Overall, the City's Coastal Development Permit (CDP) findings fail to adequately consider the project's consistency with water quality protection policies of the Coastal Act and the Venice LUP.

Sensitive Habitat Impacts

The appellant contends that the project violates the Coastal Act due to potential adverse impacts on sensitive habitat areas. The Ballona Lagoon and Grand Canal are designated as ESHA in the Venice LUP; however, the Commission classifies both as wetlands pursuant to Coastal Act Section 30121. Wetlands are protected

under both the LUP and the Coastal Act, specifically Section 30233. As such, any development within or adjacent to these areas must be evaluated for consistency with the Coastal Act's wetland protection policies.

Section 30233 of the Coastal Act permits dredging or filling of coastal waters (or wetlands) only for limited purposes—such as incidental public service projects—and only where feasible mitigation measures are implemented to minimize adverse environmental effects. The proposed project qualifies as an incidental public service use, and mitigation has been incorporated.

The City's findings acknowledge that construction activities will have temporary impacts[11] on the Grand Canal. However, these impacts were determined not to be significant, in part due to the project's required compliance with the mitigation measures outlined in the Mitigation Monitoring and Reporting Program (MMRP). Relevant measures include biological monitoring during vegetation removal (MM BIO-2), restoration of vegetation within the Grand Canal (MM BIO-3), and restoration of the canal's mudflats (MM BIO-9), among others.

The appellant has not identified any specific sensitive habitat concerns or demonstrated how the project would result in unmitigated impacts inconsistent with Coastal Act policies. In the absence of such evidence, this contention does not raise a substantial issue.

Coastal Resources Impacts

The appellant contends that the project violates the Coastal Act on the grounds that it may have adverse impacts on coastal resources. However, the appellant does not provide any specific information identifying which coastal resources would be affected or how those impacts would occur. In the absence of supporting evidence or analysis, this contention does not raise a substantial issue with respect to the project's consistency with the Coastal Act.

2. This public facility does not need to be in this sensitive location adjacent to an ESHA and unique lagoon.

The appellant contends that the proposed public facility "does not need to be in this sensitive location adjacent to an ESHA and unique lagoon," in part due to its proximity to Ballona Lagoon and the Grand Canal, which are both designated as ESHA in the Venice LUP, as shown in Exhibit 22b. However, the proposed public facility is intended to provide critical redundancy for the existing Venice Pumping Plant, which is located adjacent to the proposed site. This redundancy is essential to preventing potential sewer overflows into the Grand Canal and Ballona Lagoon, an outcome that would pose significant risks to both water quality and biological resources. The proposed VAPP will be connected to the Coastal Interceptor Sewer

[11] The Commission's definition of temporary impacts are those involving no significant ground disturbance (i.e. grading) or killing of native vegetation and those where the vegetation and habitat function recover within 12 months to the similar on-the-ground status prior to initial disturbance.

drain located adjacent to both the project site and existing pumping plant. This connection is necessary to manage and redirect wastewater flows to the VAPP relieving capacity constraints at the existing Venice pumping plant. There are no other nearby sites available to support the public facility.

Furthermore, construction of the surface parking lot includes the removal and remediation of soils containing elevated levels of lead and total petroleum hydrocarbons (TPH-d). If left unremediated, these contaminants present an ongoing risk to water quality, particularly during storm events when runoff may transport pollutants into Ballona Lagoon.

Given the public service purpose of the project, its role in preventing water quality degradation, and the remediation benefits associated with construction, this contention does not raise a substantial issue with respect to the project's consistency with the Coastal Act or the Venice LUP.

3. **The City application does not adequately consider potential impacts to sensitive species and other environmental concerns.**

The appellant asserts that the City's application fails to adequately consider the VAPP project's potential impacts on sensitive species and other environmental concerns. While the appellant has not provided any specific information identifying which sensitive species or environmental issues were allegedly overlooked during the City's review, the project is subject to a habitat restoration plan that includes returning canal contours to their pre-construction conditions. In addition, the project as approved must comply with all mitigation measures set forth in the Mitigation Monitoring and Reporting Program (MMRP), including requirements for biological monitoring during construction to identify and protect sensitive species. Therefore, this contention does not raise a substantial issue.

4. **Conflicts with Policy IV.B.7 that requires a plan to rehabilitate the grand canal between Hurricane and Washington and maintain the habitat.**

Venice LUP Policy IV.B.7 requires that the portion of the Grand Canal between Hurricane Street and Washington Boulevard be restored and maintained. While the City-approved project will result in some impacts, it also includes returning the portion of the Grand Canal and the Esplanade public walkway adjacent to the project site to pre-project conditions. Although the project does not encompass the entire segment identified in the policy, it is consistent with the policy's intent and does not conflict with its objectives. The proposed project is not inconsistent with the Policy IV.B.7 goals.

While there would be temporary impacts to the habitat areas within the project footprint, as approved by the City, the site would be returned to its previous condition with no permanent, unmitigated impacts anticipated. Thus, the approved project is not inconsistent with this LUP policy.

Summary
The local CDP findings fail to adequately address potential water quality impacts to the adjacent coastal waters, inconsistent with water quality and biological resource protection policies of the Coastal Act and Venice LUP.

Development and Visual Resources Contentions

Relevant land use, development, and visual resource policies of Chapter 3 of the Coastal Act and the Venice LUP are listed in **Appendix A** of this report.

1. **The use is an industrial facility on a site identified as Low Medium residential in the Ballona Lagoon West subarea of the certified Venice Land Use Plan (LUP). Greater protection and buffering should be afforded the residential neighbors as this is a residentially zoned and designated property.**

The proposed VAPP and associated parking lot would be located on three lots with the certified land use designation of Multi-Family Residential - Low Medium II Density.

In its approval, the City acknowledges the proposed land use is not consistent with the City's designated uses but asserts that the LUP recognizes the importance of improving and expanding public infrastructure. In support of this assertion, the local CDP findings cite LUP Policy V.A.1, which directs public service providers to balance the competing needs of residents and visitors—such as those for roadways, parking, service systems, and public restrooms—and encourages the expansion or development of facilities where necessary, so long as such improvements do not adversely affect residents. The City further notes that the VAPP meets development standards for height, setbacks, yards, and parking, and concludes that the project is consistent with both the Coastal Act and the Venice LUP.

While the City's interpretation of Policy V.A.1 may be accurate in its intent, approving a Public Works facility on lots that are designated for residential use conflicts with LUP Policy I.A.7.b as this designation only allows for residential uses—specifically, up to two units per lot, including duplexes. As such, the development of a sewer pumping facility and associated parking lot on these lots is not consistent with the land use designation in the Venice LUP. As a result, the City's approval does not adequately resolve the fundamental land use conflict and, therefore, prejudices the ability of the City to achieve a fully certified Local Coastal Program (LCP) that is consistent with Chapter 3 of the Coastal Act.

The appellant also contends that greater protection and buffering should be provided to neighboring residential properties for both the VAPP and the proposed surface parking lot. In the absence of a clearly articulated policy conflict or evidence of coastal resource impacts, this general concern about buffering does not rise to the level of a substantial issue.

2. **The proposed VAPP and associated parking lot conflict with Policy 1.D.1 that states that the only permitted development adjacent to the canal and lagoon shall be habitat restoration, single family homes and parks.**

The Venice LUP Policy I.D.1 designates "the Venice estuaries and wetlands including the Ballona Lagoon, Venice Canals, and Grand Canal south of Washington Boulevard" as natural and coastal recreational resources and open space. Policy I.D.1 limits allowable development in these areas to habitat restoration, single-family dwellings, public parks and walkways, subterranean or surface public parking lots, maintenance activities, and emergency repairs.

The proposed project is a public works facility that would be located on lots designated for residential use and directly adjacent to the Grand Canal and Ballona Lagoon, both of which are bodies of water within the coastal zone. A public works facility is not among the uses permitted by LUP Policy I.D.1 for these sensitive areas. The City's local CDP findings do not reference or analyze consistency with Policy I.D.1, and, based on the nature and location of the project, it is evident that the VAPP is not a permitted use under this policy.

The City-approved surface parking lot at 128 Hurricane Street includes both publicly available spaces and spaces reserved for exclusive use by employees of the Venice Pumping Plant and proposed VAPP facility. Thus, because public parking spaces would be available in the new lot, an argument could be made that the City-approved use could qualify as an allowable use under this LUP Policy I.D.1. However, the City failed to analyze the project for consistency with this policy.

3. **Conflicts with Policy I.C.1 that states that the scale and design of such facilities much be compatible with adjacent and neighboring uses. Although the single building has been designed to meet the height and setback requirements of the LUP, the project involves numerous areas of equipment including transformers, HVAC equipment, wells and power poles that have not been sited in a way that is compatible. The site is too small for the project and does not allow a buffer of landscaping along all sides that face residential uses. An open parking lot with no security or landscape buffer is not compatible with the neighboring homes.**

The appellant contends that the VAPP and associated parking lot conflict with LUP Policy I.C.1 that states that the design, scale and height of structures in areas designated for industrial land uses shall be compatible with adjacent uses and the neighboring community. However, wastewater pump plants have been considered public facilities, not industrial facilities, in past Commission actions[12], the Coastal Act,[13]

[12] CDP No. 3-19-0463 - "The County's LCP defines "Public Utility Facilities" to include wastewater treatment plants"
CDP No. 3-82-199-A8 - "...public works facilities, such as wastewater treatment plants..."

and the Venice LUP.[14] Industrial development typically pertains to a development generating some form of material, like a power plant, oil-drilling facility or aquaculture facilities, per the Commission's guidance.[15] To note, the City's General Plan has designated the lot of the existing Venice Pumping Plant as a public facility land use. As such, LUP Policy I.C.1 does not apply to the proposed project.

4. The VAPP and associated parking lot conflict with LUP Policy I.C.6 that hazardous industrial uses shall not be located adjacent to residential areas.

Venice LUP Policy I.C.6 states that "hazardous industrial uses shall not be located adjacent to residential uses." As mentioned above, the Commission classifies wastewater pumping plants as public facilities including their associated parking lots. While the proposed VAPP and parking lot are inconsistent with the underlying residential land use designation in the Venice LUP, Policy I.C.6 applies specifically to hazardous industrial uses—and the Commission has not interpreted wastewater infrastructure or associated parking lots as such—thus, the policy does not apply in this case.

5. Conflicts with Policy 1.A.5 that seeks to preserve and protect stable multifamily neighborhoods.

Policy I.A.5 is intended to preserve and protect stable multi-family neighborhoods and allow for residential growth in areas with sufficient infrastructure and where residents' quality of life can be maintained or improved. The appellant contends that the proposed VAPP and associated parking lot are inconsistent with this policy because they do not constitute residential development and may undermine neighborhood stability.

While the project is not a residential use, the purpose of the facility is to provide essential public infrastructure that supports the safety and functionality of the surrounding residential neighborhood. The pumping plant is designed to prevent sewer overflows, thereby preserving the area's livability and mitigating risks to public health and property. As such, the project neither facilitates new residential growth nor precludes it on other sites; instead, it helps ensure the continued viability of existing residential uses. As such, these factors support the conclusion that the project does not conflict with the intent of Policy I.A.5.

6. Conflicts with Policy 1.E.2 that requires new development to respect the scale and character of the community. Visuals prepared by the City and enclosed with this appeal show that the site will be dominated by three ten-foot-tall

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[13] Coastal Act Section 30114(a) defines "public works" as including: "All production, storage, transmission, and recovery facilities for water, sewerage, telephone, and other similar utilities owned or operated by any public agency or by any utility subject to the jurisdiction of the Public Utilities Commission, except for energy facilities."

[14] The Venice LUP defines public works as "all production, treatment, storage, transmission, conveyance, and recovery facilities for water, sewerage, stormwater, telephone, and other similar utilities owned or operated by a public agency"

[15] LUP Update Guide Section 10 Energy and Industrial Development - July 31, 2013

transformers (without any screening), power poles and other industrial features.

The appellant also contends that the VAPP and associated parking lot conflict with Venice LUP Policy I.E.2 that requires new development to respect the scale and character of community development. The Venice LUP was designed to protect the unique character of Venice primarily through the use of objective building standards.[16]

Height

Venice LUP Policy I.A.7.b. establishes that building heights shall not exceed 30 feet within 60 horizontal feet of the mean high tide line of Ballona Lagoon, the Grand Canal, or the inland side of the Esplanade (City right-of-way), whichever is furthest from the water. Beyond this 60-foot setback, one additional foot of building height is permitted for every two horizontal feet, up to a maximum of 38 feet.

The City-approved proposed two-story electrical building for the VAPP is designed with a flat roof and a parapet wall, reaching a total height of 30.39 feet within 60 horizontal feet of the inland side of the Esplanade. Although this height slightly exceeds the 30-foot limit established by LUP Policy I.A.7.b., the City's local Coastal Development Permit (CDP) findings state that "the proposed height and massing is consistent with the existing two- and three-story structures adjacent to the Grand Canal." However, the City's findings do not analyze whether this height deviation is consistent with the intent of the LUP policy, which is to preserve the scale and character of development in proximity to sensitive coastal resources. As such, the findings lack a clear justification for the inconsistency.

The appellant also raises concerns about the visual impacts of ten-foot-tall electrical transformers, power poles, and other "industrial" features that may be incompatible with the residential scale of the area. While the proposed transformers are not screened with fencing, the applicant is required, as a condition of approval, to conduct ongoing public outreach to explore feasible aesthetic improvements to the transformers and utility boxes and to submit a report on the outcome of that outreach to the Department of City Planning. The City's findings do not reference power poles, and it remains unclear which "other industrial features" the appellant believes are inconsistent with the community's scale and character.

The appellant contends that the proposed surface parking lot is also inconsistent with Policy I.E.2 of the Venice LUP. LUP Policy I.E.2 requires all new development and renovations respect the scale, massing, and landscape of existing residential

[16] There are some subjective components to LUP policies related to community character. For example, LUP Policy I.E.2 provides that new development "shall respect the scale and character of the community development." Although the LUP does not explicitly outline all of the factors that may be considered when evaluating "character" of the community, the policy goes on to state that "[b]uildings which are of a scale compatible with the community (with respect to bulk, height, buffer and setback) shall be encouraged." The policy, therefore, implies a focus on objective measurements, such as bulk, height, buffer and setback, while also allowing for a subjective assessment based on the surrounding "community development."

neighborhoods. The applicant does not propose any buildings that would risk being incompatible with the height, bulk, buffer and setback of other buildings. While the project includes a space reserved for a three-dimensional public art installation within the lot, the installation would be limited to a maximum height of six feet. The applicant also proposes side yard setbacks consistent with LUP Policy I.A.7.b as well as non-invasive landscaping in the front yard adjacent to Ballona Lagoon. The appellant has not demonstrated how this element, or the parking lot more generally, would adversely affect the scale or character of the surrounding area.

Permeable Yard Areas and Setbacks

Policy I.A.7.b. also requires that an average setback of 15 feet, but no less than 10 feet, shall be maintained in the front yard adjacent to the property line nearest the water, minimum side yards of 3.5 feet, and an open, permeable yard of at least 450 square feet for a 30-foot wide lot or at least 600 square feet for a 40-foot wide lot.

The VAPP was approved by the City with an average setback of 15 feet from the Esplanade, including a 10-foot-wide permeable open space area immediately adjacent to the Esplanade walkway. However, 6-inch-high concrete pads supporting electrical termination boxes encroach into the northern side yard setback, rendering the project inconsistent with the LUP. The City's findings do not address whether these encroachments would result in significant visual or community character impacts.

The proposed surface parking lot includes a 15-foot front yard (lagoon-facing) setback, 1,199 square feet of permeable yard area, and a minimum side yard setback of 4.7 feet, consistent with the yard area and setback requirements of the LUP. The proposed bike rack area is within a portion of the required front yard setback and permeable yard area. Although the bike rack would provide means of public access consistent with the LUP, it does not provide permeable paving within the required permeable yard area. The proposed three-dimensional art installation also encroaches into the 15-foot front yard setback inconsistent with LUP Policy I.A.7.b.

7. The VAPP and VAPP Parking Lot project has not been designed to respect the residential community or the sensitive coastal location in which it is located.

The appellant contends that the VAPP and associated parking lot have not been designed to respect the surrounding residential community or the sensitive coastal location. However, the appellant does not identify specific elements of the project design that allegedly conflict with applicable Coastal Act policies or result in adverse impacts to coastal resources apart from the other contentions. Absent any specific evidence or policy-based analysis demonstrating inconsistency with the Coastal Act or the Venice LUP, this generalized contention does not raise a substantial issue.

8. **The heavy equipment associated with the facility including gigantic transformers should be moved away from residences and closer to the existing pump plant.**

The appellant's statement is framed as a recommendation and does not raise a specific issue of inconsistency with applicable Coastal Act policies. As such, it does not raise a substantial issue.

9. **The outdoor equipment is located too close to an adjoining residential use, without any landscape buffer.**

This contention is addressed in the development and visual resource contention response No. 6 with regard to the six-inch concrete pad encroachments into the side yard setbacks.

10. **The project violates the Coastal Act as it does not respect the character of the community.**

This contention is addressed in the development and visual resource contention response No. 6 with regard to the VAPP's height and side yard setback inconsistencies.

11. **The design is not visually compatible with the neighborhood.**

This contention is addressed in the development and visual resource contention response No. 6.

In summary, the proposed VAPP is inconsistent with the LUP's height and side yard setback standards, and the City's findings lack the necessary visual and community character analysis to justify such inconsistencies.

Public Access Contentions

Relevant public access policies of Chapter 3 of the Coastal Act and the certified Venice LUP are listed in **Appendix A** of this report.

1. **The public parking portion would be a haven for RVs and encampments and should at least be secured each day.**

As approved by the City, the applicant would post signage indicating that public parking is available in the parking lot at 128 Hurricane Street, and that these parking spaces are closed to the public from dusk to dawn. Therefore, the City's approval does not authorize overnight public use of the lot. Additionally, this appellant does not state how this parking is inconsistent with the Coastal Act or LUP.

2. **The project includes unnecessary parking and would add an unsecured empty fenced area immediately adjacent to residences.**

The appellant asserts that the parking provided as part of the project is unnecessary. However, the City's findings detail the parking requirements for the VAPP, including both the parking needed to serve the facility and the replacement of free on-street public parking that will be removed due to the project's construction. Additionally, the City's Environmental Impact Report (EIR) includes a parking study demonstrating that the area surrounding the project site—within blocks of the beach and coastal trails—is significantly parking-impacted, particularly during peak periods when parking supply is low. The provision of additional public parking spaces as part of the project would help alleviate this shortage and improve public access to the coastal area.

The appellant also contends that the proposed parking lot would create an unsecured and fenced area adjacent to residential properties. However, no specific coastal resource issue has been identified in relation to this claim. The presence of a fenced area next to residential development does not, in itself, constitute a conflict with Coastal Act policies.

3. **The parking lot would provide more spaces than the VAPP requires for employees and visitors.**

The appellant contends that the parking lot provides more spaces than required for VAPP employees and visitors; however, the project includes an off-site parking lot to meet applicable parking requirements. As documented in the City's findings and the EIR, the parking lot is intended to serve both as replacement for on-street parking displaced by the project and to fulfill facility-related parking needs. Providing this parking protects public access, consistent with Chapter 3 of the Coastal Act and the LUP.

4. **Coastal access is impeded by the existing plant because the City does not maintain the landscaping and walkway around the plant to allow visitors to enjoy and access the lagoon.**

The appellant contends that the existing Venice Pumping Plant impedes coastal access due to inadequate maintenance of the surrounding landscaping and walkway. However, this claim pertains to the existing facility, which is not part of the subject project under review. The current application concerns the proposed VAPP, and issues related to the maintenance of the existing plant fall outside the scope of this project. Therefore, this contention is not a valid ground for appeal and does not raise a substantial issue with respect to the project's consistency with the Coastal Act.

Additional Contentions

1. **Instead of unneeded parking, a portion of this property closest to the existing pump plant could be used for equipment, so that the industrial facility can be adequately screened and buffered from residents.**

The appellant contends that, rather than constructing an off-site parking lot, a portion of that property, particularly the area closest to the existing pumping plant, should be used to house electrical equipment in order to better buffer the facility from adjacent multi-

family residences. However, this contention does not identify a specific inconsistency with any Coastal Act policy or Venice LUP provision. The approved project includes measures to screen and buffer utility infrastructure from nearby residences, and no evidence has been provided to show that the current equipment siting would result in adverse impacts to coastal resources.

In addition, the City's findings and the EIR, state that the off-site parking lot serves multiple important functions: (1) it replaces on-street parking displaced by the project, (2) it provides public parking in an area identified as parking-deficient, and (3) it supports improved public access to the coast, consistent with Coastal Act Section 30212. Providing the parking at this site protects public access, consistent with Chapter 3 of the Coastal Act and the LUP.

2. **The existing pump plant is not maintained in a manner which is compatible with the area, is allowed to be covered with graffiti, litter and exterior equipment.**

The appellant contends that the existing Venice Pumping Plant is not maintained in a manner compatible with the surrounding area and is allowed to accumulate graffiti, litter, and visible exterior equipment. However, the existing facility is not a component of the subject project under review.

Nonetheless, the City has imposed conditions on the new VAPP that address such concerns. Specifically, all graffiti on the VAPP site is required to be removed or painted over to match the underlying surface within 24 hours of its occurrence. This maintenance requirement demonstrates a commitment to ensuring the facility remains compatible with the character of the surrounding area.

As this contention does not relate to the proposed project, it is not a valid ground for appeal and does not raise a substantial issue with respect to the project's consistency with the Coastal Act or the certified Venice Land Use Plan.

F. Substantial Issue Factors

The Commission's standard of review for determining whether to hear the appeal is whether the appeal raises a substantial issue as to conformity with Chapter 3 of the Coastal Act. Cal. Pub. Res. Code §30625(b)(1); 14 C.C.R. § 13321. The Commission's decision will be guided by the factors listed in the previous section of this report and discussed below.

The first factor is the **degree of factual and legal support for the local government's decision** that the development is consistent or inconsistent with the relevant provisions of the Coastal Act. While the City found the project to be consistent with the Coastal Act, its analysis did not provide adequate support for siting a public works facility on lots designated for residential use, did not fully address potential water quality impacts to adjacent coastal waters, and did not demonstrate that risks to life and property have been adequately minimized with regards to sea level rise. Therefore, the Commission finds that the City did not provide an adequate degree of factual and legal support for its decision, and this factor supports a finding of substantial issue.

The second factor is the **extent and scope of the development** as approved or denied by the local government. The City-approved project includes the construction of a two-story, 32foot-tall, 2,500 square-foot structure built across two vacant lots, as well as a parking lot on a third vacant lot. The City-approved project does not observe the setback and height requirements of the Venice LUP. This raises questions as to the consistency of the project with the character of the neighborhood. Thus, this factor supports a finding of substantial issue.

The third factor is the **significance of the coastal resources affected** by the decision. Venice is one of the most popular coastal visitor destinations in California. It also includes wetland habitat directly connected to the ocean. The City's findings fail to adequately address the project's consistency with the water quality and biological resource protection policies of the Coastal Act. Specifically, the findings do not evaluate whether the locally-approved project includes sufficient water quality protection measures, whether the proposed drainage and filtration systems are adequate to avoid water quality impacts to adjacent coastal waters, or whether the proposed soil removal and remediation efforts would be sufficient to prevent contamination from reaching coastal waters.

The existing Venice Pumping Plant is the City's largest wastewater pumping facility and serves as critical infrastructure for conveying sewage from the surrounding Venice area, as well as portions of the City of Los Angeles, the City of Santa Monica, and Los Angeles County. The facility currently lacks capacity for additional pumps to ensure system reliability during wet weather conditions. The proposed VAPP is intended to provide needed redundancy to prevent system failure during such events. Both the existing pumping plant and the proposed VAPP site are located in a low-lying, flood-prone area adjacent to a tidally influenced canal and within FEMA's AE flood zone, which indicates a one-percent annual chance of flooding. Despite these conditions, the City's findings provide limited analysis of the long-term safety and viability of the proposed development over its anticipated lifespan. Specifically, the findings do not adequately address how the project, as designed, will minimize risks to life, property, and surrounding coastal resources in the face of hazards such as flooding, sea level rise, and increased storm intensity. Moreover, because the proposed facility is adjacent to wetland habitat, the failure to fully assess and address these hazards could result in adverse impacts to those habitats, including contamination from inundation or infrastructure failure. The City's determination relies on an analysis of sea level rise scenarios that is appropriate for residential and commercial structures, but not for critical infrastructure like this, which would cause more impacts to coastal resources should it be damaged or fail. The findings also do not explain how risks will be managed beyond the project's estimated 60-year design life, as recommended in the Commission's 2021 SLR Guidance for Critical Infrastructure and particularly given that critical public infrastructure is unlikely to be decommissioned and must maintain uninterrupted service. As such, the City's findings do not adequately demonstrate consistency with the Coastal Act's hazard avoidance and resource protection policies, and the coastal resources affected are significant. As such, this factor supports a finding of substantial issue.

The fourth factor is the **precedential value of the local government's decision** for future interpretations of its LCP. The City does not currently have a certified LCP, but it does have a certified LUP. The Commission determined the LUP to be consistent with Chapter 3 of the Coastal Act, with resource protection policies that outline a clear goal for development in Venice. The project was erroneously determined to be consistent with the Venice LUP in the absence of a Commission-approved and certified LUP amendment to change the land use from residential to the proposed use. The City-approved project is not consistent with the residential land use designation for this area (LUP Exhibit 9 and LUP Policy I.A.7) as well as the associated land use development standards for the side yard and height for this location. Thus, the project, as approved, raises a substantial issue as to its conformance with the Venice LUP, and by extension, the Chapter 3 policies of the Coastal Act. The decision may set an adverse precedent for future interpretations of the Venice LUP and prejudice the City's ability to prepare an LCP in the future. This factor supports a finding of substantial issue.

The final factor is **whether the appeal raises local issues, or those of regional or statewide significance**. Impacts to coastal resources are important statewide issues. The VAPP is critical infrastructure that would provide essential wastewater services to the region by addressing capacity constraints at the existing Venice Pumping Plant. hazards. The appellant raised concerns about community character, and Venice has been identified as a 'Special Coastal Community' drawing visitors from the greater state, country, and world; the issues raised by the appeal therefore exceed the local scope. The local CDP findings do not adequately address the potential resource impacts raised in the appeal. Therefore, the Commission finds that the appeal does raise issues of greater significance, and this factor supports a finding of substantial issue.

Conclusion

Applying the five factors listed above clarifies that the appeal raises a "substantial issue" with respect to the project's consistency with Chapter 3 of the Coastal Act and the Venice LUP as to the contentions outlined in the analysis of the five factors. Therefore, the Commission finds that the appeal raises a substantial issue as to the project's conformity with the Chapter 3 policies of the Coastal Act.

IV. MOTIONS AND RESOLUTIONS – DE NOVO & DUAL PERMITS

De Novo CDP No. A-5-VEN-22-0068

Motion: I move that the Commission approve Coastal Development Permit No. A-5-VEN-22-0068 pursuant to the staff recommendation.

Staff recommends a YES vote on the foregoing motion. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of Commissioners present.

Resolution: The Commission hereby approves a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

De Novo CDP No. A-5-VEN-22-0069

Motion: I move that the Commission approve Coastal Development Permit No. A-5-VEN-22-0069 pursuant to the staff recommendation.

Staff recommends a YES vote on the foregoing motion. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of Commissioners present.

Resolution: The Commission hereby approves a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

Dual CDP No. 5-24-0123

Motion: I move that the Commission approve Coastal Development Permit No. 5-24-0123 pursuant to the staff recommendation.

Staff recommends a YES vote on the foregoing motion. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of Commissioners present.

Resolution: The Commission hereby approves a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

V. STANDARD CONDITIONS

These permits are granted subject to the following standard conditions:

1. **Notice of Receipt and Acknowledgment.** The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.

2. **Expiration.** If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

3. **Interpretation.** Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.

4. **Assignment.** The permit may be assigned to any qualified person, provided that the assignee files with the Commission an affidavit accepting all terms and conditions of the permit.

5. **Terms and Conditions Run with the Land.** These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

VI. SPECIAL CONDITIONS

1. **Submittal of Final Plans.** PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit, in a form and content acceptable to the Executive Director, two (2) full-sized sets of final plans for the proposed development. The final plans shall be in substantial conformance with the plans submitted by the Bureau of Engineering Department of Public Works City of Los Angeles to the Commission, titled "Venice Auxiliary Pumping Plant" with W. O. - SZC12923 and dated June 2025, and shall be subject to the review and written approval of the Executive Director, and shall be revised to comply with the following:

   A. Relocate (to the south end of the parking spaces) or remove the three-dimensional public art installation

   B. Remove the CMU wall currently proposed along the southern property line of 128 Hurricane Street outside of the fifteen-foot required buffer setback area from the property line adjacent to the nearest water.

   C. Replace the concrete foundation in the bike rack area with a permeable surface material, such as decomposed granite or a comparable permeable alternative.

   D. Relocate the three concrete pads underneath the termination boxes outside of the minimum side yard setback of 3.5 feet.

   E. Confirmation, with substantiating information, including calculations for the volume of water produced by the 85th Percentile 24-hour Storm Event for the drainage area, that the final project design (catch basin and bioswale) includes treatment of 100 percent of the 85th Percentile 24-hour Storm Event for the stormwater that will discharge into Ballona Lagoon as part of the project for all pollutants of concern identified in the **Hydrology Technical Memorandum** dated **August 15, 2016**.

   Any proposed changes to the approved revised final plans shall be reported to the Executive Director. No changes to the approved revised final plans shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

2. **Consistency with the Land Use Plan.** PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the City must submit and receive certification of a Venice Land Use Plan Amendment by the Coastal Commission, which must be final and effective in accordance with the procedures identified in the California Code of Regulations, Title 14, Division 5.5, Section 13544. The Venice Land Use Plan Amendment must change the land use designation of the subject properties from Low Medium II—Multi Family to a Public Facilities land use designation. The Land Use Plan Amendment must also update Venice LUP Policy I.D.1 to allow for Public Facilities.

3. **Local Government Approval.** This action has no effect on conditions imposed by the City pursuant to an authority other than the Coastal Act. In the event of conflict between the terms and conditions imposed by the City and those of this coastal development permit, the terms and conditions of Coastal Development Permit A-5-VEN-22-0068/A-5-VEN-22-0069/5-24-0123 shall prevail.

4. **Assumption of Risk, Waiver of Liability and Indemnity.** By acceptance of this permit, the applicant acknowledges and agrees (i) that the site may be subject to hazards, including but not limited to storms, flooding, tsunamis, erosion, and earth movement, many of which will worsen with future sea level rise; (ii) to assume the risks to the permittee and the property that is the subject of this permit of injury and damage from such hazards in connection with this permitted development; (iii) to unconditionally waive any claim of damage or liability against the Commission, its officers, agents, and employees for injury or damage from such hazards; and (iv) to indemnify and hold harmless the Commission, its officers, agents, and employees with respect to the Commission's approval of the project against any and all liability, claims, demands, damages, costs (including costs and fees incurred in defense of such claims), expenses, and amounts paid in settlement arising from any injury or damage due to such hazards.

5. **Resource Agencies.** The permittee shall comply with all requirements, requests and mitigation measures from the California Department of Fish and Wildlife, Regional Water Quality Control Board, U.S. Army Corps of Engineers, and the U.S. Fish and Wildlife Service with respect to preservation and protection of water quality and marine environment. Any change in the approved project that may be required by the above-stated agencies shall be submitted to the Executive Director in order to determine if the proposed change shall require a permit amendment pursuant to the requirements of the Coastal Act and the California Code of Regulations.

6. **Construction and Pollution Prevention Plan (CPPP).** NOT LESS THAN 30 DAYS PRIOR TO COMMENCEMENT OF DEVELOPMENT, the Permittee shall submit, for the review and written approval of the Executive Director, a Construction and Pollution Prevention Plan prepared and certified by a qualified licensed professional. The final Construction and Pollution Prevention Plan shall demonstrate that all construction, including, but not limited to, clearing, grading, staging, storage of equipment and materials, or other activities that involve ground disturbance; building, reconstructing, or demolishing a structure; and creation or replacement of impervious surfaces, complies with the following requirements:

   A. **Minimize Erosion and Sediment Discharge.** During construction, erosion and the discharge of sediment off-site or to coastal waters shall be minimized using appropriate Best Management Practices (BMPs), including, at a minimum:

      (1) Land disturbance during construction (e.g., clearing, grading, and cut and fill) shall be minimized, and grading activities shall be phased, to avoid increased erosion and sedimentation.

      (2) Erosion control BMPs (such as mulch, soil binders, geotextile blankets or mats, or temporary seeding) shall be installed as needed to prevent soil from being transported by water or wind. Temporary BMPs shall be implemented

to stabilize soil on graded or disturbed areas as soon as feasible during construction, where there is a potential for soil erosion to lead to discharge of sediment off-site or to coastal waters.

(3) Sediment control BMPs (such as fiber rolls, sediment basins, inlet protection, sandbag barriers, or straw bale barriers) shall be installed as needed to trap and remove eroded sediment from runoff, to prevent sedimentation of coastal waters.

(4) Tracking control BMPs (such as a stabilized construction entrance/exit, and street sweeping) shall be installed or implemented as needed to prevent tracking sediment off-site by vehicles leaving the construction area.

(5) Runoff control BMPs (such as a concrete washout facility, dewatering tank, or dedicated vehicle wash area) shall be implemented during construction to retain, infiltrate, or treat stormwater and non-stormwater runoff.

B. **Minimize Discharge of Construction Pollutants.** The discharge of other pollutants resulting from construction activities (such as chemicals, paints, vehicle fluids, petroleum products, asphalt and cement compounds, debris, and trash) into runoff or coastal waters shall be minimized through the use of appropriate BMPs, including:

(1) Materials management and waste management BMPs (such as stockpile management, spill prevention, and good housekeeping practices) shall be installed or implemented as needed to minimize pollutant discharge and polluted runoff resulting from staging, storage, and disposal of construction chemicals and materials. BMPs shall include, at a minimum:

(a) Covering stockpiled construction materials, soil (except topsoil), and other excavated materials to prevent contact with rain, and protecting all stockpiles from stormwater runoff using temporary perimeter barriers. Permanent stockpiling of materials is prohibited.

(b) Cleaning up all leaks, drips, and spills immediately; having a written plan for the clean-up of spills and leaks; and maintaining an inventory of products and chemicals used on site.

(c) Proper disposal of all wastes; providing trash receptacles on site; and covering open trash receptacles during wet weather.

(d) Prompt removal of all construction debris from the canal and lagoon.

(e) Detaining, infiltrating, or treating runoff, if needed, prior to conveyance off-site during construction.

(2) Fueling and maintenance of construction equipment and vehicles shall be conducted off site if feasible. Any fueling and maintenance of mobile equipment conducted on site shall take place at a designated area located at least 50 feet from coastal waters, drainage courses, and storm drain inlets, if feasible (unless those inlets are blocked to protect against fuel spills). The fueling and maintenance area shall be designed to fully contain any spills of fuel, oil, or other contaminants. Equipment that cannot be feasibly relocated to a designated fueling and maintenance area may be fueled and maintained

in other areas of the site, provided that procedures are implemented to fully contain any potential spills.

(3) Minimize Other Impacts of Construction Activities. Other impacts of construction activities shall be minimized using appropriate BMPs, including:

(a) Soil compaction due to construction activities shall be minimized, to retain the natural stormwater infiltration capacity of the soil.

(b) The use of temporary erosion and sediment control products (such as fiber rolls, erosion control blankets, mulch control netting, and silt fences) that incorporate plastic netting (such as polypropylene, nylon, polyethylene, polyester, or other synthetic fibers) shall be avoided, to minimize wildlife entanglement and plastic debris pollution.

C. **Construction In, Over, or Adjacent to Coastal Waters and Habitat.** Construction taking place in, over, or adjacent to coastal waters and habitat shall protect the coastal waters and habitat by implementing additional BMPs, including:

(1) Tarps or other devices shall be used to capture debris, dust, oil, grease, rust, dirt, fine particles, and spills to protect the quality of coastal waters.

(2) Implement appropriate BMPs for treatment, storage, construction, curing, slurry management and other appropriate practices for concrete work.

(3) Methods to control fugitive dust on the access road shall be applied as necessary.

(4) All erosion and sediment controls shall be in place prior to the commencement of construction, as well as at the end of each workday.

D. **Manage Construction-Phase BMPs.** Appropriate protocols shall be implemented to manage all construction-phase BMPs (including installation and removal, ongoing operation, inspection, maintenance, and training) to protect coastal water quality.

E. **Construction Site Map and Narrative Description.** The Construction and Pollution Prevention Plan shall include a construction site map and a narrative description addressing, at a minimum, the following required components:

(1) A map, or site plan, delineating the construction site, staging areas, construction corridor(s), temporary job trailers, and the location of all temporary construction-phase BMPs (construction fencing, such as inlet protection, and sediment basins). No equipment and materials shall be placed in locations where they could impact wetland resources.

(2) A description of the BMPs that shall be implemented to minimize land disturbance activities, minimize the project footprint, minimize soil compaction, and minimize damage or removal of non-invasive vegetation. Include a construction phasing schedule, with a description and timeline of significant land disturbance activities.

(3) A description of the BMPs that shall be implemented to minimize erosion and sedimentation, control runoff and minimize the discharge of other pollutants

resulting from construction activities. Include calculations that demonstrate proper sizing of BMPs.

(4) A description and schedule for the management of all construction-phase BMPs (including installation and removal, ongoing operation, inspection, maintenance, and training), including any temporary BMPs that shall be converted to permanent post-development BMPs.

F. **Construction Site Documents.** The Construction Plan shall provide that copies of the signed CDP and the approved Construction Plan be maintained in a conspicuous location at the construction job site at all times, and that such copies are available for public review on request. All persons involved with the construction shall be briefed on the content and meaning of the CDP and the approved Construction Plan, and the public review requirements applicable to them, prior to commencement of construction.

G. **Construction Coordinator.** The Construction Plan shall provide that a construction coordinator be designated to be contacted during construction should questions arise regarding the construction (in case of both regular inquiries and emergencies), and that his/her contact information (i.e., address, phone numbers, email address, etc.) including, at a minimum, a telephone number and an email that will be made available 24 hours a day for the duration of construction, is conspicuously posted at the job site where such contact information is readily visible from public viewing areas while still protecting public views as much as possible, along with indication that the construction coordinator should be contacted in the case of questions regarding the construction (in case of both regular inquiries and emergencies). The construction coordinator shall record the contact information (address, email, phone number, etc.) and nature of all complaints received regarding the construction, and shall investigate complaints and take remedial action, if necessary, within 24 hours of receipt of the complaint or inquiry.

H. **Notification.** The Permittee shall notify planning staff of the Coastal Commission's South Coast District Office at least three working days in advance of commencement of construction, and immediately upon completion of construction.

The permittee shall undertake development in accordance with the Construction and Pollution Prevention Plan, unless the Commission amends this permit or the Executive Director issues a written determination that no amendment is legally required for any proposed minor deviations.

7. **Final Dewatering Plan.** PRIOR TO COMMENCEMENT OF CONSTRUCTION, the permittee shall provide a Final Dewatering Plan that includes:

A. A description of the dewatering operations, including rates and volumes of water expected to be generated, and the BMPs that will be used to prevent impacts to water quality. No dewatering shall be directed from the site into any canal or street that drains into a canal, unless specifically authorized by the California Regional Water Quality Control Board.

B. A copy of a dewatering permit issued by the Los Angeles County Sanitation District or the Regional Water Quality Control Board, or letter of permission, or evidence that no permit or permission is required.

The applicant shall inform the Executive Director of any changes to the project required by the Los Angeles County Sanitation District or the Regional Water Quality Control Board. Such changes shall not be incorporated into the project until the applicant obtains a Commission amendment to this coastal development permit, unless the Executive Director determines that no amendment is legally required.

8. **Water Quality and Hydrology Plan.** PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit, for the review and written approval of the Executive Director, a final Water Quality and Hydrology Plan, prepared by a qualified licensed professional, that conforms with the plan submitted to the Commission titled Hydrology Technical Memorandum dated August 15, 2016. Additionally, the final Water Quality and Hydrology Plan shall demonstrate that the project complies with the following requirements:

   A. **Prepare Plan by a Licensed Professional.** A California-licensed professional (e.g., Registered Professional Civil Engineer, Geotechnical Engineer, Geologist, Engineering Geologist, Hydrogeologist, or Landscape Architect) qualified to complete this work shall be in responsible charge of preparing the Water Quality and Hydrology Plan.

   B. **Implement Treatment Control BMPs.** Treatment Control BMPs (e.g., vegetated swale, detention basin, and storm drain inlet filter) shall be implemented, to remove pollutants of concern from runoff. The project shall comply with the following applicability and performance standards for Treatment Control BMPs:

      (1) A Treatment Control BMP (or suite of BMPs) shall be implemented to remove pollutants of concern from any portion of the runoff produced by the 85th percentile 24-hour design storm that will not be retained on-site.

      (2) Where infiltration BMPs are not adequate to remove a specific pollutant of concern attributed to the development, an effective Treatment Control BMP (or suite of BMPs) shall be implemented prior to infiltration of runoff, or else an alternative BMP that does not involve infiltration shall be substituted for the infiltration BMP.

      (3) Where a Treatment Control BMP is required, a BMP (or suite of BMPs) shall be selected that has been shown to be effective in reducing the pollutants of concern generated by the proposed land use.

   C. **Design and Manage Parking Lot to Minimize Polluted Runoff.** The parking lot shall be designed to minimize impervious surfaces to the maximum extent feasible and to treat and/or infiltrate stormwater on-site for the 85th Percentile 24-Hour Storm Event, preventing runoff—and associated pollutants such as trash, heavy metals, oil and grease, and polycyclic aromatic hydrocarbons—from entering coastal waters or the storm drain system. The project shall comply with the following applicability and performance standards for parking lot design and management:

(1) The design of landscaped areas for parking lots shall include provisions for the on-site infiltration, retention, and/or detention and treatment of stormwater runoff to remove pollutants. Where landscaped areas are designed for infiltration, retention, and/or detention of stormwater runoff from the parking lot, recessed landscaped catchments (i.e., below the elevation of the pavement) shall be installed. All surface parking areas shall direct flow to the catch basin to capture stormwater runoff between the parking area and adjoining streets and properties. Prior to any runoff into Ballona Lagoon, two forms of filtration (catch basin with filter inserts and pouches, and bioswale), consistent with 8B of this special condition, are required to ensure adequate filtering of pollutants. Any modifications to the two proposed filtrations systems each designed to treat runoff from the 85th Percentile 24-Hour Storm Event shall not be implemented unless the applicant obtains an amendment to this coastal development permit, or unless the Executive Director determines that no amendment is legally required.

(2) Filter treatment systems shall be used to remove all pollutants of concern including by not limited to trash, bacteria, heavy metals, oil and grease, and polycyclic aromatic hydrocarbons. All BMPs, shall be adequately maintained to ensure functionality for the life of the project and protect coastal water quality.

(3) The final Water Quality and Hydrology Plan shall describe maintenance requirements of the filtration device (catch basin with filter inserts and pouches) and the applicant's plans for repairing and maintaining the filtration device over their expected lives, including, at a minimum:

(a) The filtration device (e.g., filter inserts, pouches) will be cleaned from sediment, or replaced if cleaning is infeasible, twice per year throughout the life of the device.

(b) Replace the device at the end of its lifespan with the best available technology, providing equal or greater water quality treatment capacity.

D. **Manage BMPs for the Life of the Development.** Appropriate protocols shall be implemented to manage BMPs (including ongoing operation, maintenance, inspection, and training), to protect coastal water quality for the life of the development.

E. **Schedule of BMPs.** A description of the BMPs that will be implemented, including documentation of the expected effectiveness of the BMPs. Include a schedule for installation or implementation of all post-development BMPs.

The permittee shall undertake development in accordance with the Water Quality and Hydrology Plan, unless the Commission amends this permit or the Executive Director issues a written determination that no amendment is legally required for any proposed minor deviations.

9. **Oil Spill Prevention and Response Plan (OSPRP).** PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the Permittee shall submit a Project-specific OSPRP to the Executive Director for review and approval. The Plan shall, at a minimum, include the following:

A. Spill Prevention Practices – Detailed procedures and best management practices to minimize the potential for spills during all stages or re-abandonment.

B. Onsite Spill Response Equipment – Identification, quantity, and location of spill containment and cleanup materials (e.g., absorbents, tools, storage containers, protective gear, etc.) to be maintained at the work site at all times.

C. Training – Training is to be provided to all onsite personnel regarding spill prevention and emergency response, including provisions for conducting pre-construction training or briefings.

D. Notification Protocols – Procedures for immediate notification of spills to all applicable state, federal, and local agencies.

E. Worst-Case Spill Scenario – An analysis of the reasonable worst-case spill scenario associated with re-abandonment activities, potential pathways to adjacent sensitive habitats or waters, the specific equipment, personnel, and procedures that will be available onsite to contain and clean up a spill of that magnitude.

F. Third-Party Spill Response Capability – The OSPR shall identify and maintain a contract or other enforceable agreement with a qualified third-party oil spill response organization (OSRO) capable of responding to and managing spills that exceed the Permittee's onsite containment and cleanup capacity, as needed.

10. **Future Coastal Hazards Analysis and Adaptation Plan.** By acceptance of this CDP, the permittee acknowledges and agrees to continue to evaluate future risk of coastal hazards, including but not limited to flooding as influenced by sea level rise (SLR), groundwater rise, and extreme tsunamis, and to plan, develop, and implement any necessary adaptation responses to coastal hazards, including relocation alternatives, to ensure minimization of risk in the long term, and to address any coastal resource impacts associated with maintaining the subject development at this location.

    Prior to undertaking any future repairs, upgrades, or replacement of the development approved herein that require a CDP amendment, or within twenty (20) years from the date of Commission approval (i.e., September 1, 2045), whichever comes sooner, the permittee or its successors shall submit to the Commission a Coastal Hazards Analysis and Adaptation Plan. The plan shall provide a clear, long-term plan to ensure that the development minimizes flood hazard risks to the facility through at least year 2125. The report shall include, at a minimum:

    A. Information on flood conditions and other coastal hazards in the project area, obtained through periodic monitoring and documentation during extreme tide and storm events. The information shall include an assessment of cumulative changes in coastal hazard risk to the approved development over time.

    B. A geotechnical analysis of current and future coastal hazards in the project area under Intermediate-High and High SLR scenarios (or similar) based on best available science at the time of application. The analysis shall consider flooding from large storm events (the 100-year storm or greater), sea level rise, and

groundwater rise. It shall also account for the broader Venice flood control infrastructure, including the Venice tide gates.

C. An assessment of the vulnerability VAPP and adjacent sewer infrastructure critical to the VAPP's critical function to extreme tsunami hazards (0.04% annual exceedance probability tsunami) including an analysis of the potential damage and risks of uncontrolled sewage flows following a tsunami event.

D. Identification and analysis of potential adaptation measures to address anticipated coastal hazard threats under Intermediate-High and High SLR scenarios. Measures shall avoid the use of shoreline armoring and shall include, but are not limited to, removal or relocation of development, structural retrofits, soft protection strategies, modified operational practices as well as Venice-specific adaptation planning measures, such as upgrades to the Venice tide gates.

11. **Tsunami Evacuation and Safety Plan.** PRIOR TO THE ISSUANCE OF COASTAL DEVELOPMENT PERMIT, the applicant shall submit, for the review and written approval of the Executive Director, a tsunami evacuation and safety plan for mitigating the hazards to human life associated with tsunamis. The plan shall demonstrate that: (1) the existence of the threat of tsunamis from both distant and local sources will be adequately communicated to all employees on site as soon as possible; (2) information will be made available regarding personal safety measures to be undertaken in the event of a potential tsunami event in the area; (3) efforts will be provided to assist less physically mobile employees in seeking evacuation from the site during a potential tsunami event; and (4) staff will be adequately trained to carry out the safety plan. The plan shall include, at a minimum, the following components:

A. Tsunami Information Component, detailing the provision of informational materials to employees of the development and the posting of placards, flyers, or other materials at conspicuous locations within the development, provided in an appropriate variety of languages and formats explaining tsunami risks, the need for evacuation if strong earthquake motion is felt or alarms are sounded, and the location of evacuation routes and places of refuge;

B. Tsunami Evacuation Assistance Component, detailing the efforts to be undertaken by VAPP employees to assist the evacuation of less physically mobile persons during a tsunami event; and

C. Staff Training Component, detailing the instruction to be provided to all VAPP employees to assure that the Tsunami Safety Plan is effectively implemented.

The permittee shall undertake development in conformance with the approved final plans unless the Commission amends this permit or the Executive Director issues a written determination that no amendment is legally required for any proposed minor deviations.

12. **Final Lighting Plan.** PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit a final lighting plan for the

review and approval of the Executive Director, which shall be consistent with the following requirements:

A. All lighting, including temporary lighting installed during project construction on or near the project site, shall be downward directed, shielded away from the Lagoon and Grand Canal and shall use the best available dark-skies technology to minimize glare and spillover effects to the greatest extent feasible.

B. The average light intensity within the Lagoon and Grand Canal shall be no greater than 0.01 foot candles with a maximum of 2700K at the property line that is adjacent to Esplanade. The applicant shall submit an exhibit or report documenting that the final lighting plan is consistent with this requirement.

C. The permittee shall undertake development in conformance with the approved final plans unless the Commission amends this permit or the Executive Director provides a written determination that no amendment is legally required for any proposed minor deviations.

13. **Landscaping – Drought Tolerant, Non-Invasive Plants.** The permittee shall undertake development in accordance with the landscaping plans, dated June 2025. Vegetated landscaped areas shall consist only of native plants or non-native drought tolerant plants, which are non-invasive. No plant species listed as problematic and/or invasive by the California Native Plant Society, the California Invasive Plant Council, or as may be identified from time to time by the State of California shall be employed or allowed to naturalize or persist on the site. No plant species listed as a 'noxious weed' by the State of California or the U.S. Federal Government shall be utilized within the property. All plants shall be low water use plants as identified by the WUCOLS (Water Use Classification of Landscape Species) database.

14. **Archaeological and Tribal Cultural Resource Monitoring and Treatment Plan.** PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit, for the review and approval of the Executive Director, an Archaeological and Tribal Cultural Resources Monitoring and Treatment Plan (Plan) prepared by a qualified resource specialist in consultation with Gabrieleño-affiliated Native American representatives, which shall incorporate the following measures and procedures:

A. All representatives of Gabrieleño-affiliated Native American Tribes listed on an updated Native American Heritage Commission (NAHC) contact list for the area shall be invited to consult on the preparation of the Plan and all who accept the invitation shall be allowed to consult and shall be meaningfully considered in the Plan's development. Evidence of written notification shall be made available to the Executive Director.

B. The Plan shall ensure that any archaeological or tribal cultural resources that are present on the site and could be impacted by the approved development will be identified so that a plan for their protection can be developed. The methods of protection of Tribal Cultural Resources shall be developed in consultation with the Native American tribal government(s). If there is disagreement regarding the method(s) of protection of resources, the methods that are most protective of coastal resources shall be selected. To this end, the Plan shall require that the Gabrieleño-affiliated representatives of Native American Tribes listed on an

updated Native American Heritage Commission (NAHC) contact list for the area be invited to be present and monitor all ground-disturbing activities and arrange for any invited Tribal representative that requests to monitor be present to observe project activities with the potential to impact tribal cultural resources. If non-Gabrieleño-affiliated tribal representatives request to consult on the preparation of the Plan and/or monitor project activities, they shall be allowed to; however, deference shall be given to Gabrieleño-affiliated Tribes regarding the preparation and implementation of the Plan, including monitoring protocols and treatment of any resources. A qualified archaeological monitor shall also be present to observe project activities with the potential to impact archaeological resources. The archaeological monitor shall have experience monitoring for archaeological resources of the local area during excavation projects, be competent to identify significant resource types, and be aware of recommended procedures for the inadvertent discovery of archaeological resources and human remains.

C. There shall be at least one pre-grading conference with the project manager and grading contractor at the project site to discuss the potential for the discovery of archaeological or tribal cultural resources. Prior to grading operations, a copy of all archaeological documents and reports shall be provided to the Native American monitors.

D. The permittee shall provide sufficient archaeological and Gabrieleño-affiliated Native American monitors to assure that all project grading and subsurface construction activities that have any potential to uncover or otherwise disturb cultural deposits are monitored at all times.

E. If any archaeological or cultural deposits, are discovered, including but not limited to skeletal remains and grave-related artifacts, artifacts of traditional cultural, religious or spiritual sites, or any other artifacts relating to the use or habitation sites, all construction shall cease. Should human remains be discovered on-site during the course of the project, immediately after such discovery, the on-site archaeologist and Native American monitor(s) shall notify the County Coroner within 24 hours of such discovery, and all construction activities shall be temporarily halted until the remains can be identified. The Native American group/person deemed acceptable by the NAHC shall participate in the identification process, pursuant to Public Resources Code Section 5097.98. Should the human remains be determined to be that of a Native American, the permittee shall comply with the requirements of Section 5097.98. Within five (5) calendar days of such notification, the permittee shall notify the Executive Director of the discovery of human remains. Treatment of any archaeological or cultural resource discovery shall be determined by the appropriate monitor(s) or the Most Likely Descendant (MLD) when state law mandates the identification of an MLD. If there is disagreement amongst monitors regarding the treatment of any resource discovery, the treatment that is the most protective of coastal resources shall prevail. Significance testing may be carried out only if acceptable to the affected Native American Tribe(s), in accordance with the attached "Cultural Resources Significance Testing Plan Procedures" (Appendix B). The permittee shall report all discovered resources as soon as possible, by phone and/or by email to the Executive Director. The permittee shall provide the

significance testing results and analysis to the Executive Director, if applicable. A permittee seeking to recommence construction activities shall follow the procedures set forth in Appendix B.

F. If the Executive Director, in consultation with affected tribal governments, determines that the discovery is significant or that the treatment method preferred by the affected Native American tribe(s) is in conflict with the approved development plan, the permittee shall seek an amendment from the Commission to determine how to respond to the discovery and to protect both those and any further cultural deposits that are encountered. Development shall not recommence until an amendment is approved, and then only in compliance with the provisions of such amendment.

G. The Permittee shall implement the approved Archaeological and Tribal Cultural Resources Treatment and Monitoring Plan in accordance with this condition. Any proposed changes to the final approved plan shall be reported to the Executive Director. No changes to the approved plan shall occur without a Coastal Commission approved amendment to the coastal development permit, unless the Executive Director determines that no amendment is legally required.

15. **Final Revised Habitat Restoration Plan (HRP).** PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit, for the review and written approval of the Executive Director, a final revised HRP, that shall be in substantial conformance with the *Venice Auxiliary Pumping Plant Habitat Restoration Plan,* dated November 2024, and shall include but not limited to the following:

A. Submittal of a final "Impact Verification" on-site habitat impact report to the Executive Director, within 60 days of completion of construction, verifying the final extent and nature of actual construction impacts. Permanent impacts to the ruderal grassland (transitional wetland buffer, called "bluff scrub" in the 2024 Arcadis HRP) area shall be mitigated on-site at a 1:1 ratio; permanent impacts to the coastal salt marsh habitat shall be mitigated on-site at a 4:1 ratio for wetlands; and the permanent impacts to the intertidal and subtidal unvegetated mudflat shall be mitigated on-site at a 1:1 ratio (Figure 6, 2024 Arcadis HRP). These ratios assume mitigation as either habitat creation or substantial restoration.

B. Section 6.3.2.1. Replace "Southern Coastal Bluff Scrub" with "Transitional Wetland Buffer Habitat" in recognition that the slope adjacent to the Ballona Lagoon and Grand Canal habitat is transitional wetland (southern coastal salt marsh) habitat rather than southern coastal bluff scrub.

C. Add the appropriate quantity of *Juncus acutus* (spike rush) containers to Table 4, the "Southern Coastal Salt Marsh Restoration Area Plant Palette" Replace "Southern Coastal Bluff Scrub" with "Transitional Wetland Buffer Habitat" in the Table 5 title and remove *Artemisia californica* (California sagebrush), *Eriogonum cinereum* (bluff buckwheat), and *Ambrosia psilostachya* (western ragweed) from the plant palette and add the appropriate quantity of *Eriogonum parvifolium* (seacliff buckwheat), *Lupinus chamissonis* (silver dune lupine), *Camissonia cheiranthifolia var. cheiranthifolia* (beach evening primrose), *Croton californicus*

(California croton), *Ambronia umbellate* (pink sand verbena), and *Ambronia maritima* (red sand verbena) containers to the plant palette.

16. **Final Remediation Plan.** PRIOR TO THE COMMENCEMENT OF THE REMEDIATION ACTIVITIES, the permittee shall submit, for the review and approval of the Executive Director, a Final Remediation Plan. The plans shall be developed in consultation with all appropriate state and federal agencies, and shall include the following components:

    A. Results of all sampling and analysis activities.

    B. A detailed site plan of all excavation areas including any necessary staging and temporary stockpile areas.

    C. An estimate of the required surface area and volume of soil that must be excavated to achieve appropriate clean-up thresholds.

    D. The location and evidence of approval for any disposal site(s) that would receive project-related debris material. See **Special Condition 17 (Removal of Site Materials)** for additional detail regarding disposal requirements.

    E. Avoidance and minimization measures to protect the adjacent wetland and habitat areas surrounding the excavation sites.

    F. A post-contaminated soil removal sampling protocol to verify that appropriate cleanup thresholds were achieved.

    G. Provisions for submittal of a final report documenting actual excavation surface areas and volumes and results of post-removal monitoring. If anticipated excavation activities will result in impacts to sensitive resources that are not otherwise addressed in this CDP, the applicant shall submit an application to amend this CDP to address additional impacts, unless the Executive Director determines an amendment is not legally necessary.

    The applicant shall undertake development in conformance with the approved final plans unless the Commission amends this CDP or the Executive Director provides a written determination that no amendment is legally required.

17. **Removal of Site Materials.** PRIOR TO THE COMMENCEMENT OF THE REMEDIATION ACTIVITIES, the permittee shall provide evidence to the Executive Director of the location of the disposal site(s) for all debris material (e.g. soil, wood, brush, metal, fluids, concrete, etc.) from the project site. If a disposal site is located in the coastal zone, the disposal site must have a valid CDP for the disposal of such material. If a disposal site does not have a CDP, such a CDP will be required prior to the disposal of material.

18. **Public Parking Sign Program.** PRIOR TO THE ISSUANCE OF THIS COASTAL DEVELOPMENT PERMIT, the applicant shall submit for review and written approval of the Executive Director, a public parking sign program for the subject seven-space public parking lot and the two public parking spaces on Hurricane Street. The public parking signs, of Commission-approved design, shall be in multiple languages, including at least Spanish and English, informing the public of the two public on-street parking spaces and the subject seven-space public parking lot and their

operating parameters. The signs shall be installed in easily visible locations, such as at the entrance to the parking lot.

The permittee shall undertake the development in accordance with the approved program. Any proposed changes to the approved program, including reducing the number of parking spaces available to the public, shall be reported to the Executive Director. No changes to the program shall occur without a Coastal Commission-approved amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

19. **Traffic Control Plan.**

A. PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit, for the review and approval of the Executive Director, two (2) full sized sets of Traffic Control Plans that demonstrate the following:

(1) Every effort shall be made to minimize the duration of sidewalk, bike and road lane closures so that impacts upon public access are minimized; and

(2) The sidewalk, bike and road lanes should be opened, even intermittently, whenever possible during construction; and

(3) A detour plan to re-route pedestrian and bicycle traffic shall be identified for those periods when the sidewalk and/or bicycle lane is closed within the project area.

(4) Provisions for the use of a flagman to direct traffic during initial placement or removal of construction equipment and/or dumpsters onsite; and during construction to control vehicle traffic entering or exiting the site if needed.

B. The permittee shall undertake development in accordance with the approved plan. Any proposed changes to the approved final plan shall be reported to the Executive Director. No changes to the approved final plans shall occur without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

VII. FINDINGS AND DECLARATIONS

The findings set forth in Section III.E (Substantial Issue Analysis) are incorporated herein.

A. Project Location, Description, and Background

The project location and background findings of report Subsection III.A. (Project Location, Project Description and Background) above are incorporated herein by reference.

Standard of Review

Following a substantial issue determination on the local CDP, the Commission considers de novo review of the project application. Application No. A-5-VEN-22-0068, A-5-VEN-22-0069, and 5-24-0123 are currently before the Commission. The applicant is not bound to the scope of work approved by the City. In past Commission actions,

applicants have made project revisions under de novo applications to address issues of Coastal Act consistency. In this case, the applicant has made project revisions following the City's action on the local CDP.

De Novo/Dual Permit Project Description

The proposed development has been revised since its initial approval by the City (**Exhibit 4**). Since local approval, the City has clarified its project description to reflect the correct size of the proposed VAPP electrical building, revising it from 2,500 square feet to 2,283 square feet. This change is administrative only, with no structural modifications made. Further, the City's proposal provides the three VAPP employee and visitor parking spaces on the VAPP lot, decreasing the height of the canal-fronting parapet wall from 30.39 feet to 30 feet, a new switchgear unit in the rear yard, and lowering the perimeter walls and fences to six feet instead of eight feet. The City also proposes two on-street parking spaces and public right-of-way improvements including a new sidewalk along the north side of Hurricane Street between Canal Court and the Esplanade.

With the City's revised proposal to provide on-site parking at the VAPP facility, the seven parking spaces at 128 Hurricane Street will now be dedicated for public use. In addition, the City proposes the installation of a bioswale within the front yard (lagoon-fronting) permeable landscape area at 128 Hurricane Street. As part of this revision, the storm drain system will be reconfigured to direct runoff from the catch basin into the bioswale, with an overflow pipe connecting from the bioswale to the lagoon. The City also proposes additional concrete masonry unit (CMU) walls along the perimeter of the 128 Hurricane Street site, including a 3.5-foot-high CMU wall along the front property line and along the western edge of the parking lot.

The proposed grading (cut and fill) for the project was reduced. The City-approved project included 22,159 cubic yards of cut, 9,455 cubic yards of native fill with a net cut of 12,704 cubic yards. The City proposes 7,324 cubic yards of cut, 5,864 cubic yards of fill and a net cut of 1,460 cubic yards.

B. Development and Visual Resources

Relevant development and visual resource policies of Chapter 3 of the Coastal Act and the Venice LUP are listed in **Appendix A** of this report.

Land Use and LUP Conformance (Land Use Designation)

Coastal Act Section 30250(a) requires that new development be located within or near existing developed areas capable of supporting it, and where it will not result in significant cumulative adverse impacts to coastal resources. Section 30253 further requires that new development be compatible with the character of surrounding neighborhoods, minimize risks to life and property in high flood hazard areas, and reduce vehicle miles traveled. Collectively, these policies encourage infill development within already urbanized areas in order to avoid unnecessary expansion into areas

where such development could have significant coastal resource impacts. The Venice LUP incorporates these Coastal Act objectives and establishes policies that direct higher-density development to appropriate areas of Venice, including Policy I.A.5, which calls for the preservation of stable multi-family residential neighborhoods while allowing for growth where adequate infrastructure exists and quality of life can be maintained or improved.

The subject VAPP and parking lot parcels are currently designated for multi-family residential use. However, they are vacant and do not contain any existing residential structures or housing units. Therefore, the proposed development will not result in the demolition of residential buildings or the displacement or loss of housing stock. Accordingly, the project aligns with Policy I.A.5 by supporting the preservation of existing residential neighborhoods and safeguarding residents' quality of life through the prevention of potential wastewater overflows from the existing pumping plant.

While the proposed auxiliary sewer pumping plant and associated public parking lot are public facilities on parcels designated for multi-family residential development, this infrastructure is essential to support existing and planned development in the surrounding urban area, including residential uses. The site is adjacent to other developed urban uses, including residential, commercial, and public facilities. The proposed VAPP is specifically designed to supplement the capacity of the existing Venice Pumping Plant, thereby enhancing the reliability and resiliency of the area's wastewater management system. By providing additional capacity and redundancy, the VAPP ensures continued service during peak wet-weather flows or system disruptions. Its location within an already urbanized setting helps ensure the continued viability of these existing developed areas by providing critical public services—specifically wastewater conveyance and public parking. Although the use departs from the residential land use designation in the Venice LUP, the project is consistent with the objectives of the Coastal Act in the broader context of concentrating development where it can be accommodated.

However, while the project may be consistent with broader Coastal Act objectives and the intent of the LUP to preserve housing stock, it presents another conflict with respect to its location adjacent to Grand Canal and Ballona Lagoon. LUP Policy I.D.1. restricts uses adjacent to the canals and Ballona Lagoon to restoration, single-family dwellings, public parks and walkways, subterranean or surface public parking lots, maintenance activities and emergency repairs. As proposed, the majority of the project—specifically the construction of a sewer pumping plant—does not fall within the uses explicitly permitted by this policy and, therefore, is not consistent with this Policy I. D.1.

To address the land use and LUP policy inconsistencies— and avoid prejudicing a future Local Coastal Program (LCP) for Venice—**Special Condition 2 (Consistency with the Land Use Plan)** requires effective certification of an LUP amendment to change the land use designation of the site to allow the proposed public facility as a legally permitted use and establish appropriate development standards specific for this type of infrastructure at this location.

As proposed and conditioned, the development concentrates and supports the concentration of new development in an already developed area. As conditioned, the

development conforms with Section 30250 and 30253(d) of Chapter 3 of the Coastal Act.

VAPP Building Height

Building height can affect the scenic and visual qualities of coastal areas. Additionally, limiting building height adjacent to waterways, like the canals and lagoon, serve ecological functions by providing flyaway zones for birds. In prior actions, the Commission and the City have both consistently limited the height of structures to preserve the character of the Venice area and protect these ecological functions. For this location, the Venice LUP specifies that the maximum height of any structure within 60 horizontal feet of the inland side of the Esplanade or mean high tide of the lagoon (whichever is furthest from the water) shall not exceed 30 feet. Beyond 60 horizontal feet, one additional foot in height is permitted for each two additional horizontal feet to a maximum height of 38 feet. In this case, the inland side of the Esplanade is furthest from the water and serves as the reference point for measuring the 60 horizontal feet.

Additional LUP standards restrict railings and parapet walls to a maximum of 42 inches above the height limit. In addition, no portion of any structure (including roof access structures, roof deck railings and architectural features) shall exceed the height limit within 60 horizontal feet of the mean high tide line of Ballona Lagoon or the inland side of the Esplanade, whichever is furthest from the water. Chimneys, ducts, and other accessory structures essential for building function may exceed the specified height limit by five feet.

In this case, the east side of the proposed VAPP electrical building, nearest to Grand Canal, has a roof height of 25 feet, with a 4.5-foot parapet wall resulting in a revised total height of 29.5 feet consistent with the height limit described above. The building height, as it increases from the east to the west side of the subject site, is also consistent with the required ratio of one foot for every two horizontal feet. The overall height of the building reaches 32.5 feet which is within the maximum height limit of 38 feet. Therefore, the Commission finds that the proposed building height conforms to the Venice LUP.

VAPP Setbacks and Yards

Venice LUP Policy I.A.7.b. requires that an average setback of 15 feet, but not less than 10 feet, shall be maintained in the front yard adjacent to the property line nearest the water, minimum side yard setbacks of three and a half feet, and an open, permeable yard of at least 450 square feet for a 30-foot wide lot, at least 600 square feet for a 40-foot wide lot. As proposed, the VAPP project site provides an average front yard (canal-facing) setback of 15 feet and a 10-foot-wide, 2,932 square foot, permeable open space area from the property line nearest to the Grand Canal. A six-foot tall decorative fence would enclose the east side along the 10-foot permeable yard setback and along the south side yard setback.

Policy I.A.7.b. of the Venice LUP requires minimum side yard setbacks of 3.5 feet from adjacent property lines. The concrete pads (6" H x 60" L x 36" W) supporting three electrical termination boxes encroach six inches into this required setback along the northern property line (between Canal Court and the Esplanade), which is adjacent to the residential structures located at 3805 and 3809 Esplanade. A terminal box enclosure (78" H x 45" W x 24" D) would be installed on each concrete pad. In contrast, the main VAPP building will be set back just over 17 feet from the northern property line. Additionally, a concrete masonry unit (CMU) wall, not to exceed 6 feet in height, will be constructed along the northern property of the site (between Canal Court and the Esplanade) providing visual screening between the facility and the adjacent residential uses.

The six-inch encroachment of a six-inch-high concrete pad would not impact public views, access or other coastal resources, nor would it render it inconsistent with the character of the surrounding area. Nevertheless, the applicant proposes moving the concrete pads out of the side yard setback area. As such, **Special Condition 1** requires the applicant submit revised final plans demonstrating that the concrete pads are outside of the required side yard setbacks, consistent with the Venice LUP.

Parking Lot Setbacks and Yards

In addition to the three parking spaces for employees and visitors on the VAPP site, the City proposes to construct a seven-space public parking lot with 1,074 square-feet of landscaping with a bioswale, four bike parking spaces, and a three-dimensional public art installation (not to exceed six feet in height) on an irregularly shaped 4,229-square-foot lagoon-fronting lot. The City proposes a 3-foot-high CMU wall along the lagoon-fronting property line and a 4-foot-high CMU wall along the west and north property line. The property is also subject to the same setback and yard requirements as the VAPP, which requires an average 15-foot front yard setback, but not less than 10 feet in the front yard adjacent to the property line nearest the water, and a minimum 3.5-foot side yard setback. This front yard setback also satisfies the requirement for a permeable yard area. Consistent with these requirements, the City has provided a 4.7-foot side yard setback.

According to LUP Policy I.A.7.b, the front yard buffer setback is intended to support public access, visual quality, and to protect biological productivity. The City proposes to construct a 3-foot-high CMU wall, place both the bike rack and the three-dimensional art installation within the front yard buffer setback area. While the proposed bike rack would support public access, the City plans to install it on a concrete foundation, which is inconsistent with the permeable yard area requirement under LUP Policy I.A.7.b. Therefore, **Special Condition 1** requires the City to replace the concrete material with a permeable material, such as decomposed granite, consistent with the LUP and with Coastal Act sections 30230 and 30231.

Since the City has not yet selected an artist or finalized the design, the visual impacts of the proposed art installation remain unknown. As such, placing an art piece within the

buffer setback area would be inconsistent with the LUP policy as it may not support biological resources, ensure public access, or enhance visual quality. Accordingly, **Special Condition 1** requires the City to relocate the art installation outside of the buffer setback area to avoid potential adverse impacts on coastal resources, consistent with Coastal Act section 30251.

In addition, the three-foot-high CMU wall located along the lagoon-fronting property line raises concerns due to its potential to degrade visual quality and may impact biological productivity of the lagoon. As such, relocating the CMU wall further inland to the south edge of the parking lot would help to contain vehicle contaminants from the surface parking lot, preventing runoff into the landscaped area and lagoon during storm events. Therefore, **Special Condition 1** requires the City to either relocate the wall to the south end of the parking lot or remove the CMU wall from the lagoon-fronting property line to avoid adverse impacts on coastal resources, consistent with Coastal Act sections 30230, 30231, and 30251. **Special Condition 3** requires the applicant to comply with local government requirements but clarifies that in the event of conflict between the terms and conditions imposed by the City and those of this coastal development permit, the terms and conditions of this permit (CDP No. A-5-VEN-22-0068, A-5-VEN-22-0069, and 5-24-0123) shall prevail.

In addition, the City is required to provide an open, permeable yard of at least 450 square feet for a 30-foot-wide lot and at least 600 square feet for a 40-foot-wide lot, which must be located adjacent to the lagoon-fronting property line. The front yard (lagoon-fronting) property line has a width of 35 feet, and therefore the City is required to provide a minimum of 525 square feet of permeable yard area. The City proposes to exceed this by providing 1,074 square feet of permeable yard area within the front yard adjacent to the lagoon.

VAPP Mass and Scale

Commission staff reviewed the structures along Hurricane Street and Canal Court and found a mix of two and three-story single-family homes and multi-family dwellings, as well as the two-story existing pumping plant. There are three two-story, multi-family residences on South Esplanade between Hurricane Street, Galleon Street, and Canal Court. There is a three-story multi-family dwelling directly across Canal Court from the project site. Additionally, single-family structures across South Esplanade and the canal range from two to three stories in height.

In terms of the mass and scale, the proposed VAPP building conforms with all applicable development standards (with the exception to the six-inch encroachment of the six-inch-high concrete pad into the side yard setback, which does not significantly impact the mass or scale of the structure) in the Venice LUP and is similar in height and design to the residential structures located within this neighborhood. Thus, the proposed development is compatible with the mass and scale of the structures within the survey area.

Community Character

Coastal Act section 30251 and Venice LUP Policy I. E.2 requires new development to be visually compatible with the surrounding area and respect both the scale and character of community development. LUP Policy I. E.3 encourages varied styles of architecture while maintaining the neighborhood scale and massing. Therefore, new development need not be identical to the homes in the surrounding neighborhood; rather, a variety of styles and appearances are part of Venice's unique character. The Venice LUP primarily addresses compatibility with community character and protection of Venice's special status through objective building standards, such as setbacks, height and density.

Here, as proposed and conditioned, the project is consistent with the density, height, and setback requirements of the LUP and is not anticipated to have an adverse cumulative effect regarding the character of this neighborhood, as further analyzed below.

Visual Resources

The Coastal Act protects the visual quality of scenic coastal areas. Buildings along the Grand Canal and Ballona Lagoon have been required to be setback from waterways in order to enhance visual quality pursuant to Venice LUP Policy I.A.7.b.

Consistent with the LUP, the Commission has routinely required an uncovered permeable yard area totaling no less than fifteen times the width of a canal- or lagoon-fronting site. In this case, the two lots that the VAPP would be built across are 70-feet-wide combined and front Grand Canal. As such, the project site for the VAPP would require a minimum of 1,050 square feet of uncovered permeable yard area on the canal-fronting side of the property. The parking lot site is 35 feet wide and fronts Ballona Lagoon, therefore, a minimum of 525 square feet of uncovered permeable yard area must be provided on the lagoon-fronting side of the project site for the parking lot. This yard area and canal/lagoon-front setback is intended to not only preserve the water qualify and biological productivity of the waterways but to also maintain an open and visible access corridor and to enhance visual quality.

The proposed sites for the VAPP would include an electrical building that is consistent with the height and setback standards of the LUP. More specifically, the overall building height of 32.5 feet is under the height limit maximum of 38 feet and the building is setback from the canal by approximately 52 feet, providing more than the average setback of 15 feet required by the LUP. As conditioned, the building also adheres to the side yard setbacks. The VAPP site also includes 2,932 square feet of permeable yard area, including a 10-foot-wide landscaped area immediately adjacent to the Esplanade walkway. A six-foot tall decorative fence (with images of wetland habitat and wildlife) encloses the subject site.

The applicant proposes a public parking lot setback 15 feet from the property line fronting the lagoon, 1,074 square feet of landscaped permeable yard area (after the applicant replaces the concrete for permeable materials per **Special Condition 1**), and four bicycle parking spaces. The applicant also proposes a three-dimensional public art

installation no taller than six feet that is required to be relocated out of the 15-foot front yard setback per **Special Condition 1**. The proposed development, as conditioned, is consistent with the setback requirements from public walkways and viewing areas of the canal and lagoon. As such, the proposed project, including the VAPP site and the parking lot site would not significantly impact views.

The Commission finds that the proposed development, only as conditioned, does not present a significant visual impact to the scenic resources. Therefore, the Commission finds the project, as conditioned, consistent with the visual resource protection policies of Section 30251 of the Coastal Act.

Cumulative Effects

To evaluate the potential cumulative impacts of the proposed project, the incremental effects of the proposed development on community character, mass, and scale are considered in connection with the effects of the past, current, and probable future projects within the subject area. As previously stated, there are three two-story, multi-family residences on South Esplanade, a three-story multi-family dwelling directly across Canal Court from the project site, and single-family structures across South Esplanade and the canal that range from two to three stories in height. The proposed project site is also located adjacent to the existing Venice Pumping Plant, another two-story structure.

With regard to potential cumulative effects of the current project, Commission staff is not aware of any additional projects to be constructed in this neighborhood, except for minor conversions of existing spaces that would not alter the community character of the surrounding area. Additionally, the height and setbacks (as conditioned) of the electrical building are consistent with the requirements of the Venice LUP and similar to other structures in the area. In any case, the VAPP is meant to act as a redundancy for the existing pumping plant to prevent potential sewage spills into the lagoon and on the streets if its current capacity is breached, and, based on current information, it is highly unlikely that any additional redundancy would be needed in Venice at this time. As discussed above, the proposed development conforms to the mass, scale, height, and design of the surrounding homes and maintains buffers from the lagoon and wetland habitat.

Conclusion

The project as proposed and conditioned, is unlikely to contribute to a significant negative cumulative effect on community character, mass and scale, and visual resources of the surrounding area in combination with past and potential future projects. Thus, the project conforms with the visual resource and community character protection policies of Chapter 3 of the Coastal Act.

C. Public Access

Relevant public access policies of Chapter 3 of the Coastal Act and the Venice LUP are listed in **Appendix A** of this report.

The three subject lots are canal and lagoon-fronting lots, approximately 600 feet from Venice Beach, and within a ten-minute walk from restaurants and shops along Washington Blvd. According to the Venice LUP, and more recently confirmed in the Fehr and Peers parking assessment, the site is within an area that is particularly impacted by traffic and in need of parking due to high volumes of visitors and/or residents. The provision of adequate onsite parking with new development is one means by which to protect public access because sufficient on-site parking can help minimize access conflicts between residents, workers, and visitors to the area who compete for public street parking in popular coastal areas, such as Venice.

Policy II.A.3 of the Venice LUP requires parking "be provided pursuant to a detailed parking study that demonstrates that the project will provide adequate parking to meet the needs of the development without causing negative impacts to coastal access or access to public recreational facilities." In this case, the City's Final EIR contains a parking assessment prepared by Fehr and Peers analyzing on-street public parking and one City-owned off-street public parking lot in a 0.3 mile radius around the VAPP. The parking utilization surveys were conducted at two-hour intervals from 8:00 AM to 10:00 PM on a typical weekend day and a typical weekday (Saturday and Thursday). The parking assessment calculated a total of 399 on-street parking spaces and 364 spaces in the public parking lot. The assessment found that during the peak weekend day, the on-street parking spaces were nearly full with 12 spaces available and 106 spaces available in the public lot. The peak weekday had 94 on-street parking spaces available, and the parking lot had 204 spaces available. Moreover, the parking assessment identified that the peak total parking demand for the VAPP and the Venice Pumping Plant together would require up to four parking spaces during shift changes.

The VAPP site is adjacent to Canal Court, an alley where on-street parking is not permitted, and Hurricane Street, where the City has measured four potential on-street parking spaces on the unimproved north side of Hurricane Street, between Canal Court and Grand Canal. During construction, these four on-street parking spaces would be temporarily unavailable.

The City's revised proposal provides three on-site parking spaces for the VAPP employees (in addition to the two existing parking spaces at the Venice Pumping Plant site), two on-street parking spaces (two less than what's feasible) along the north side of Hurricane Street, and seven public off-site parking spaces at the proposed 2,509 square foot surface parking lot at 128 Hurricane Street, including one ADA space. As such, the City proposes a total of twelve parking spaces, five more than originally approved by the City, and eight more than currently exist. A total of nine public parking spaces would be free to the public, five more than currently exist. In addition, the City continues to propose a bike rack accommodating four bicycles at 128 Hurricane Street. To ensure the public is aware of the public parking located at 128 Hurricane Street,

Special Condition 18 requires the applicant to submit a public parking sign program alerting the public of the available parking.

Regarding the construction staging for the project, construction can adversely impact public access by displacing otherwise available on-street, public parking spaces and by blocking pedestrian and vehicle traffic. As such, **Special Condition 19** requires a traffic control plan to ensure impacts to public access are minimized. During construction of the VAPP, the four adjacent on-street parking spaces will be temporarily unavailable for public use, and the lot at 128 Hurricane Street will be utilized for construction staging prior to its development as a public parking lot. However, these impacts are temporary, and there is sufficient parking in the surrounding area to accommodate five additional vehicles during peak periods. Upon project completion, four new parking spaces would be added to the public parking supply, helping to alleviate demand in an area already impacted by limited parking availability.

Furthermore, adequate on-site parking is necessary and provides relief for the low supply of on-street parking that is otherwise utilized by the public to access the coastal zone in Venice. Venice LUP Policy II.A.3 also requires two spaces plus one space for each 500 square feet of floor area for Public Utility Facilities. As such, the VAPP would be required to provide seven parking spaces. However, as described earlier, the VAPP and Venice Pumping Plant would have a combined peak demand of four parking spaces, and five parking spaces would be available across both facilities. As such, the project would have adequate on-site parking to meet the needs of the development, consistent with Venice LUP Policies II.A.3 and I.C.11 (which requires adequate parking be required consistent with II.A.3). Thus, **Special Condition 18** requires the applicant to carry out development of the public on-street parking spaces and the public parking lot at 128 Hurricane Street as proposed, to replace the on-street parking spaces removed due to the VAPP facility, and to enhance public access to the shoreline in this location and ensure that the project will not affect the public's ability to gain access to, and/or to make use of, the coast and nearby recreational facilities.

Pedestrian access to the Esplanade, Grand Canal, and Ballona Lagoon via Hurricane Street would be temporarily closed during construction (up to two years). Access to the Esplanade would remain available from Galleon Street, north of the proposed VAPP site, and from Pacific Avenue, west of both project sites. Vehicle access between Canal Court and Hurricane Street, adjacent to the proposed VAPP site, will be temporarily closed. In addition, the portion of Canal Court adjacent to the proposed parking lot site will also be closed during construction. However, alternative vehicle access would remain available via existing routes along Canal Court, Galleon Street or Pacific Avenue. After construction, pedestrian access would continue to be available from Hurricane Street, Canal Court, and the 128 Hurricane Street lot. Coastal access is also enhanced through the addition of four new bicycle parking spaces.

No long-term, construction or post-construction impacts are anticipated for existing coastal access and nearby recreational facilities. As proposed, and conditioned, the

development conforms to Sections 30210, 30211, and 30252 of the Coastal Act and the applicable public access policies of the Venice LUP.

D. Coastal Hazards

Relevant coastal hazards policies of Chapter 3 of the Coastal Act and the Venice LUP are listed in **Appendix A** of this report.

Section 30253 of the Coastal Act requires new development to minimize risks to life and property in areas subject to flooding and geologic hazards. In addition, Section 30270 directs the Commission to identify, assess, and—where feasible—avoid, minimize, or mitigate the adverse effects of sea level rise. The project site is located in a low-lying floodplain and subject to multiple potential hazards, including flooding, tsunamis, and liquefaction, all of which may be exacerbated by sea level rise. Therefore, the Commission must evaluate whether the siting and design of the proposed development appropriately minimize risks in light of these site-specific hazards and future sea level rise scenarios.

The proposed project is critical infrastructure needed for the City to handle wastewater flows and avoid environmental damage and impacts to public health from uncontrolled sewage overflows. As such, the consequences of damage or interruptions in operations caused by exposure to coastal hazards are significantly higher than other types of development. The City has determined that the design life of the project is 60 years. The City evaluated coastal hazards including how sea level rise will worsen these hazards in a sea level rise hazard analysis report (SLRHA) prepared by Moffatt & Nichol in 2019.

The 2019 SLRHA report evaluated the potential for coastal flooding at the low-lying site consistent with the methodologies utilized in the City's 2018 Sea Level Rise Vulnerability Assessment (SLRVA). The 2019 SLRHA report concludes that the proposed site is very low-lying and would flood now during extreme ocean water levels but for the Marina Del Rey tide gate separating the Grand Canal from the Pacific Ocean. The Marina Del Rey tide gate is effectively used as a flood barrier to prevent high tides and storm surge from flooding the low-lying areas of Venice along the canal system and is operated by City of LA Sanitation and Environment personnel at the Venice pumping plant. The 2019 SLRHA report also identified potential for flooding from extreme coastal wave storms with higher amounts of sea level rise in addition to a general risk from extreme tsunamis. The City's project-specific SLRHA acknowledges coastal hazards could present risks to the proposed VAPP over its design life but ultimately concludes that the threats have relatively low probabilities in part because of the protection from flooding during extreme ocean water levels by the City-operated tide gate. The SLRHA also asserts that the risks of not constructing the project are greater than the risks posed by coastal hazards and sea level rise.

Further, the 2019 SLRHA recommends three primary adaptation strategies to minimize risk for the proposed project. The first is that the City prepare an operations and

maintenance plan for the Marina Del Rey tide gate to ensure the gates remain functional in storm and non-storm conditions, and, relatedly, to ensure the plan is periodically reevaluated based on updated sea level rise projection and other potential hazards. The second recommendation is that the City investigate structural floodproofing of the VAPP infrastructure to provide additional protection against extreme events. The third is that an updated project-specific hazards analysis be completed in 2050 or when sea levels in the City have risen 1.6 ft from current conditions. This stems from uncertainty around the ability for the canal and tide gate system to provide adequate storage capacity during extreme rainfall events as sea level and groundwater level rise.

The City's 2018 SLRVA as well as other more recent statewide coastal hazard information provide additional information about hazards at the project site summarized below.

The California Coastal Commission's Sea Level Rise Policy Guidance[17] (2024 update) recommends a precautionary approach when evaluating sea level rise including that technical analyses for development with extreme risk aversion consider the High scenario as part of the range of sea level rise amounts evaluated. As stated in the Guidance: "For critical infrastructure, development with a very long project life (e.g., 100 years or greater), or assets that have little to no adaptive capacity, that would be irreversibly destroyed or significantly costly to repair, and/or would have considerable public health, public safety, or environmental impacts if damaged, the analysis should consider the High scenario."

While the City has determined that the project has a 50-year design life, the Commission's 2021 Guidance for Critical Infrastructure recommends analyzing longer timeframes given the high level of public investment and long funding and implementation of critical infrastructure projects which often assume long operating timelines for purposes of financing and can take decades to plan and implement significant upgrades or relocation. For this reason, sea level rise for a 100-year period is appropriate to consider, with a projected end-of-life year of 2125. The High, Intermediate-High, and Intermediate sea level rise scenarios for the nearest tide gauge (Santa Monica) are 9.7 feet, 6.8 feet, and 4.7 feet respectively by year 2130.

Wave Overtopping

Wave runup (or uprush) is generally defined as a wave's maximum vertical distance when it breaks and "runs up" a shore. When discussing wave uprush, one may picture large, fast-moving waves crashing against development and injuring people and structures via direct contact or the resulting pull of water back out to sea. California's unprecedented storms of February 2024 brought several examples of particularly devastating wave uprush.

[17] https://www.coastal.ca.gov/climate/slrguidance.html

However, in this case, the project site's location behind a higher-elevation area lessens the potential damage posed by wave uprush. Waves traveling inland must overtop a roughly 500-foot-wide slope with a crest at around 23-feet above current mean sea level and travel hundreds of feet before reaching the project site. Waves would lose a significant amount of force and speed while traveling up that slope and back down toward the project site. While overtopping waves may ultimately contribute to flooding in the low-lying portions of Venice, the site is not in an area presently subject to high wave hazards. However, waves could increasingly contribute to flood hazards at the site with continued sea level rise, particularly under the High scenario.

The Venice Canal System & Coastal Flooding

Much of inland Venice is low-lying and protected from flooding by a set of tide gates that control the flow of water through the Venice Canal system. The canals receive stormwater runoff and tidal flows from two sets of mechanical tide gates. The first set of tide gates is located adjacent to the Marina Del Rey harbor and allows flows between the Pacific Ocean and the Ballona Lagoon. The second set of tide gates is located under the Washington Boulevard Bridge and connects Ballona Lagoon to the rest of the canals. While the Marina Del Rey tide gate functions as a flood barrier, it has not been certified by the USACE such that it can be considered in the development of FEMA Flood Zone mapping.

The City's floodplain regulations apply primarily to areas with a 1-percent chance of flooding in any given year—in other words, areas likely to flood in a 100-year storm event.[18] FEMA refers to these locations as 'Special Flood Hazard Areas' and are shown on Flood Insurance Rate Maps. These areas were established based on flood risk assessments available at the time the official flood maps were published and do not consider sea level rise. FEMA published the most recent Flood Insurance Rate Map for Los Angeles County in 2021. The 2021 Flood Insurance Rate Maps updated the Special Flood Hazard Areas to encompass a broad swath of land surrounding the Venice Canals, including the project site. The City requires new development located in Special Flood Hazard Areas to build the lowest finished floor elevation at least one foot higher than FEMA's predicted base flood elevation.

The project site is in a Special Flood Hazard Area (AE Zone), where FEMA predicts a +8 feet NAVD88[19] baseline flood elevation. This elevation is based on FEMA's estimates for 1 percent annual chance ocean water levels entering the City through its canal connection to the Pacific Ocean. The VAPP site ranges in elevation from approximately 6 to 8 feet NAVD88. The lowest proposed finished floor elevation of the proposed VAPP building is 7.7 NAVD88, which is slightly below the base flood elevation. This suggests that, absent the tide gates, the site would flood during high tides, and the proposed building would be below current 100-year flood levels.

[18] "The 100-Year Flood", U.S Geologic Survey, 2018. This modelling does not account for sea level rise or other climate change induced impacts.
[19] For reference, 'king tides' (which do not have a formal definition but generally are understood to be the highest predicted tides each year) are around +7 feet NAVD88, one foot below the FEMA base flood elevation.

The City's 2018 SLRVA includes significant analysis regarding the exposure and vulnerability of the Venice coastal zone area to flooding hazards. The assessment includes a discussion of the canal and tide gate system and how it is expected to be impacted by SLR. The assessment concludes that the Marina Del Rey tide gate has about 8 feet of freeboard before it would be overtopped. However, it also finds that sea level rise is expected to impact the City's ability to flush and drain the canals well before overtopping of the tide gate occurs. To maintain adequate drainage capacity under future conditions, operational changes or additional infrastructure, such as pumping systems, would likely be necessary, particularly as sea level rise impacts are anticipated before 2100.

During large rainfall events, the City's 2018 SLRVA states that a significant volume of stormwater gravity-drains from surrounding streets into the canals, where opened tide gates allow it to drain into the Marina Del Rey Harbor and the Pacific Ocean. Low tides are a crucial part of this process. Water in the canal system will not drain out of the tide gates unless there is a lower water elevation on the other side. Higher sea levels will make the stormwater-release process difficult. The City's SLRVA discusses the potential for stormwater and/or ocean tides to ultimately exceed the canal capacity and flood approximately 4,000 parcels, including the subject site, walk streets, and canal bridges.

In discussions with Commission staff, the City has demonstrated increasing efforts to bolster the resilience of the tide gate system since its 2018 SLRVA, including installation of a sensor system with automatic closing and opening of the Marina del Rey tide gate. As a result, it is reasonable to conclude that the City will continue to make progress towards ensuring the resilience of the Venice Canal system going forward, which provides significant flood protection to the Venice community and critical infrastructure such as the existing pumping plant and proposed VAPP. However, as identified in the 2019 SLRHA report for the project, there is significant uncertainty about the Venice Canal system to provide adequate flood protection into the future with sea level rise. Therefore, **Special Condition 10** requires the City to reevaluate the hazards conditions including the ability of the City-operated canal system to protect the VAPP by 2050 or when repairs or maintenance requiring a CDP are needed, whichever comes first.

While the Commission agrees that reliance on the existing tide gate and drainage system (with the future reassessment required by **Special Condition 10**) is a reasonable pathway to minimizing coastal flood risk for the proposed project, the City has still proposed floodproofing the VAPP to an elevation of 9 feet, NAVD88 (one foot above the current 1% annual exceedance probability flood elevation). The floodproofing will include dry floodproofing— meaning all portions of the building below 9 feet, NAVD88 will be designed for hydrostatic loads and waterproofed to prevent the flow of water into the pumping plant building including doors and substructure hatches. The proposed floodproofing elevation is only one foot above the current 100-year flood elevation and does not provide much buffer for more extreme water levels or increases to flood levels from sea level rise; however, it does provide additional redundancy to the primary strategy for flood reduction, which is to improve the existing tide gate and drainage system in the Venice area, but that strategy is not project-specific nor is it

before the Commission at this time. Thus, the imposition of **Special Condition 10** and proposed floodproofing are appropriate to mitigate the risks to this critical infrastructure.

Groundwater Rise

Sea level rise could also lead to groundwater shoaling, a process in which subterranean groundwater tables increase as higher ocean water levels "push" groundwater levels up from below. Around the project site, the low topography of the Grand Canal will likely limit the amount that groundwater levels will rise with sea level rise by effectively draining elevated groundwater in areas adjacent to the canal; however, higher groundwater levels in the Venice area could increase the inputs of groundwater to the canal and stormwater system, reducing capacity for adequate drainage during extreme rainfall events. Similarly, higher groundwater levels can create issues for buried infrastructure, such as pipelines, which would experience higher buoyancy loads and potentially increased degradation and corrosion from more saline conditions. Furthermore, higher groundwater levels can increase hydrostatic loads on subterranean structures such as the proposed VAPP.

Groundwater levels were between eight and nine feet below grade as of 2015. The highest historic groundwater level recorded near the site was 4.5 feet below grade (approximately 1.5 to 3.5 feet NAVD88). The proposed facility has been designed for a groundwater elevation of one (1) foot above mean sea level based on the project's 2015 Geotechnical Report. Further analysis of future groundwater levels based on observed groundwater rise data is required by **Special Condition 10** to ensure that risk of higher groundwater levels will be addressed in the future.

Liquefaction

Liquefaction occurs when earthquakes raise the water pressure below-grade and cause surrounding portions of loose-packed, water-logged sediment to liquefy.[20] The soil transformation can be disastrous for development founded on loose sediment without accompanying safety measures. Los Angeles County has produced a map of Liquefaction Zones, or areas "where the stability of foundation soils must be investigated" for safe building design.[21] A large portion of the Venice coastal zone is designated as a Liquefaction Zone, including the project site.

To evaluate site-specific liquefaction potential, the applicant submitted a geotechnical report by Geotechnical Professionals Inc. dated September 29, 2015, and an Updated Geotechnical Report for the Venice Auxiliary Pumping Plant prepared by the City of Los Angeles Geotechnical Engineering Group (GEO) dated December 14, 2015. These reports summarize the results of four exploratory borings excavated up to 80-feet deep throughout the project site. The excavated materials were also tested for plasticity and saturation to inform liquefaction predictions. The report notes that the State of California Seismic Hazard Zones Map identifies this location to be in an area that has potential for liquefaction. Potential liquefaction induced settlements on the order of 1-¾ inches are

[20] California Seismic Hazard Zones, published by the California Geological Survey.
[21] Liquefaction Zones, updated by the County of Los Angeles on August 24, 2022.

estimated for the site and shall be considered and accounted for in the design and construction of the project. To mitigate potential effects of soil liquefaction, the geotechnical report recommends the use of concrete mat foundations to support the project structures. The proposed project incorporates these geotechnical recommendations. Other geotechnical recommendations focus on surficial soils, site preparation, site earthwork, foundations, and retaining walls. Additionally, a representative from the City's GEO would need to observe and test services during site earthwork and foundation construction, review the preliminary foundation and earthwork plans and specifications, and review shoring and jet grouting proposals for groundwater control and discharge.

Tsunamis

Tsunamis are huge waves created by a sudden displacement of ocean waters, often due to deep-sea tectonic movement or volcanic activity. The California Geological Survey has generated maps depicting each county's tsunami hazard zones for the purpose of emergency planning, while the City of Los Angeles has used this information to designate evacuation routes.[22] The City's evacuation routes follow public roadways and lead from to safer, higher-elevation inland locations.

The City identified that the project site falls within a tsunami Inundation Zone. The proposed project is also within the Tsunami Design Zone identified in the engineering standard ASCE 7-22 Tsunami Design Geodatabase. The ASCE Tsunami Design Zone represents probabilistic tsunami hazard assessment modeling results for an extreme (2,475-year return period) tsunami event used in the structural design of critical facilities. A 2,475-year return period tsunami has a 2% probability of occurring within a 50 year period. The modeling suggests the project site would be exposed to a tsunami wave bore approximately 12 feet high moving at speeds of approximately 12 feet per second, which has a high potential for damage.[23] Probabilistic tsunami hazard assessment modeling for higher probability, though still extreme, tsunami events suggests the site is not exposed to tsunami events with recurrence intervals lower than a 1,000-year tsunami event (assuming the Marina Del Rey Tide gate remains closed). While they have a relatively low probability of occurring, extreme tsunami events such as that represented by the ASCE Tsunami Design Zone, have the potential for catastrophic damage to the Venice area. The ASCE 7 standards update in 2016 (adopted into the International Building Code in 2018), required consideration of tsunami loads from extreme tsunamis in the structural design of critical facilities with the intent to prevent catastrophic collapse of buildings for critical infrastructure. The City is currently in the process of applying for a building permit from the LA City Department of Building and Safety where the 2020 California building code standards would apply. Given this, it is the Commission's understanding that the portions of the proposed project considered critical facilities under ASCE 7 (the primary structures critical to the operation of the pumping plant) will be designed for tsunami loads per ASCE 7-16

[22] "Tsunami Hazard Map, California Geological Survey, 2022.
"Tsunami Hazard Specific Annex", City of Los Angeles, 2018.
[23] Probabilistic tsunami hazard analysis (PTHA) data for California, California Geological Survey, 2023 release

Chapter 6. Commission staff are not certain about the extent of structural design changes that may be necessary to comply with the tsunami load standards of ASCE 7-16; however, the City (to clarify, the applicant: LA Department of Public Works) does not expect major design changes to be necessary. Designing the facility for tsunami loads will significantly decrease the risk of catastrophic collapse and improve the ability of the VAPP to recover from an extreme tsunami event, therefore minimizing the risk of environmental or public health impacts.

Beyond the risk of damage to the facility and the risk of environmental or public health impacts from damage to the operation of the sewer infrastructure, for the project to minimize risks to life and safety for those operating the plant, **Special Condition 11 (Tsunami Hazard Evacuation & Safety Plan)** requires the applicant to submit a tsunami evacuation & safety plan for the VAPP informed by available tsunami information. Pursuant to **Special Condition 11,** the tsunami evacuation plan shall be submitted for the Executive Director's review and written approval prior to issuance of the CDP. In addition, the City's Building and Safety Department (LADBS) will review this issue along with some of the other potential hazards discussed before issuing a final building permit. **Special Condition 3** acknowledges that non-Coastal Act related authorizations, such as LADBS approval, are also required for this project and states that if there are any discrepancies between this CDP and other requirements, that the CDP requirements shall prevail.

Conclusion

In summary, the proposed project site is subject to multiple coastal hazards, including flooding from sea level rise and storm events, rising groundwater levels, tsunami risk, and seismic-related liquefaction. However, these risks have been evaluated and are being addressed through a combination of site-specific engineering solutions or reliance on area-wide solutions such as the Marina del Rey tide gates. Site-specific engineering solutions include floodproofing to one foot above the current 100-year flood elevation and electrical systems that have been designed with flexibility for future elevation and designing the facility for extreme tsunami loads. At the same time, the project is located within that broader low-lying context where large-scale adaptation efforts will need to be pursued by the City to reduce current and future flood risk. These efforts may include improvements to the tide gates and potentially other long-term sea level rise adaptation strategies that align with regional resilience goals. Collectively, these site-level and citywide mitigation measures are intended to reduce the project's exposure to coastal hazards over its anticipated lifespan and help maintain essential infrastructure operations in the face of climate-related impacts. Several special conditions are necessary to further minimize risk, including **Special Condition 10** which requires reevaluation of the project's vulnerability to coastal hazards by 2050 or before a CDP is required for repairs, upgrades, replacement, or similar (whichever comes sooner); **Special Condition 11** which requires the development of a tsunami evacuation and safety plan; and lastly, because while risks have been minimized, the project is still in an area potentially vulnerable to significant coastal hazards, **Special Condition 4 (Assumption of Risk, Waiver of Liability and Indemnity)** requires the applicant and their successors and assigns, be that future lessees or the City or successor property

owner, if there are no lessees, to assume the risks of pursuing development in a hazardous area.

While the project site is likely to be exposed to a range of coastal hazards—including tidal flooding, storm surge, rising groundwater, and long-term sea level rise—over the lifespan of the proposed development, these risks are not unique to the site. The area is part of a broader low-lying region within Venice that has been identified by the City's 2018 Vulnerability Assessment as particularly susceptible to flooding, primarily due to mechanisms such as tide gate failure and the gradual loss of drainage capacity caused by rising sea levels and groundwater tables.

The project incorporates critical floodproofing and elevation strategies, groundwater and liquefaction mitigation measures consistent with geotechnical recommendations, and a tsunami evacuation plan approved by appropriate hazard management agencies. Much of the project site's vulnerability to flooding is linked to the performance of the City's tide gate system, which will likely require upgrades as part of future adaptation strategies to address broader, long-term flood risks. As conditioned, the proposed VAPP and parking lot have been adequately sited and designed to minimize risks to life and property onsite and ensure structural stability, consistent with Coastal Act Section 30253. Furthermore, the proposed project, as conditioned, is consistent with the intent of Section 30270.

Therefore, as proposed and conditioned, the Commission finds that the proposed development conforms to Coastal Act Sections 30253 and 30270 and policies IV.G.1, IV.G.2 and IV.G.3 of the Venice LUP related to the siting and design of development in hazardous locations.

E. Biological Resources

Relevant biological resource protection policies of Chapter 3 of the Coastal Act and the Venice LUP are listed in **Appendix A** of this report.

The project sites are at the junction of the Grand Canal and Ballona Lagoon approximately 0.75 miles from the tide gates at the Marina del Rey channel at an elevation between zero and ten feet above mean sea level. Both the Grand Canal and Lagoon are tidally influenced, containing subtidal open water, intertidal mudflat and coastal salt marsh, and non-native grassland (upland) habitat. These habitats provide nesting, foraging, and spawning habitat for dozens of birds, fish, and other species. The subtidal open water portions of Grand Canal and Ballona Lagoon are protected under Coastal Act sections 30230 and 30231. The intertidal mudflat and coastal salt marsh portions of Grand Canal and Ballona Lagoon are protected under Coastal Act section 30233.

The subtidal mud bottom habitat, intertidal mudflat and salt marsh habitats, and non-native grassland (upland) habitat on the western side of the Grand Canal will be impacted by the proposed project. The proposed project will install a new 17 by 17-foot diversion structure 18 to 25 feet below the bottom surface of the Grand Canal involving

installation of a soldier pile/sheeting cofferdam, dewatering, and excavation of 5,730 cubic yards of sediment that will remove subtidal mud bottom and coastal salt marsh habitat. The temporary cofferdam will extend for 80 linear feet about halfway into the canal, be installed with a vibratory hammer or pushed hydraulically, remain in place for six months, and be dewatered as needed throughout that period. Following installation of the diversion structure, the work area encircled by the cofferdam will be backfilled with the sediment that was removed and restored to pre-project grade. The cofferdam would then be removed via crane. The subtidal mud bottom area will be left alone for subtidal algae and epi- and infaunal invertebrates to naturally recolonize. To compensate for isolation and excavation impacts to intertidal mudflat and coastal salt marsh and the non-native grassland (upland) habitat, the applicant proposes to remove non-native invasive species and restore intertidal mudflat and coastal salt marsh with appropriate native coastal salt marsh plant species and the non-native grassland with appropriate transitional wetland buffer habitat plant species.

Existing Biological Conditions

The habitats in the Grand Canal are linearly arranged according to elevation and slope, and corresponding tidal exposure: upper slope non-native grassland (wetland transitional buffer), intertidal mudflat and coastal salt marsh wetlands, and subtidal unvegetated mud bottom (Figure 3, Arcadis Nov. 2024 HRP). The most recent vegetation survey of the project area (Arcadis, March 2024) measured the impacted non-native grassland (wetland transitional buffer) as 463 square feet (0.01 acres) of non-native wild oats and annual brome grassland (*Avena* spp. - *Bromus* spp. Herbaceous Semi-Natural Alliance), the impacted intertidal mudflat and coastal salt marsh wetlands as 108 square feet (0.003 acres) of saltgrass-alkali heath coastal marsh alliance (*Distichlis spicata* - *Frankenia salina* Coastal Herbaceous Alliance)[24], and the impacted subtidal bottom as 1,342 square feet (0.03 acres).

Saltgrass–alkali heath coastal marsh herbaceous alliance is found at or above the high tide line in alkaline and saline wetlands across the entire California coast. According to the 2024 vegetation survey, the saltgrass – Alkali heath coastal marsh community includes native saltgrass (*Distichlis spicata*), alkali heath (*Frankenia salina*), marsh jaumea (*Jaumea carnosa*), Parish's glasswort (*Arthrocnemum subterminale)*, western ragweed (*Ambrosia psilostachya*), and saltwort (*Batis maritima*). Commission staff also identified wooly seablite (*Suaeda taxifolia*) and pickleweed (*Salicornia* or *Sarcocornia* spp.) during a site visit in June 2025. This coastal salt marsh habitat is wetland habitat protected under Coastal Act section 30233. Additionally, the saltgrass – alkali heath coastal marsh herbaceous alliance has a state rarity ranking of S3.

According to the project's Essential Fish Habitat Assessment (AECOM, 2019), the subtidal open water and intertidal mudflat of Ballona Lagoon and the Grand Canal are considered Essential Fish Habitat for Pacific Groundfish and Coastal Pelagic Species.

[24] The March 2024 Arcadis Habitat Survey and November 2024 draft Habitat Restoration Plan described the salt marsh wetland as Alkali Heath Marsh (Frankenia salina Herbaceous Alliance), which has since been renamed in the Online Manual of California Vegetation by the California Native Plant Society. https://vegetation.cnps.org/alliance/618

The commercially or ecologically important fish species potentially occurring in the Ballona Lagoon and Grand Canal include the northern anchovy (*Engraulis mordax*), Pacific sanddab (*Citharichthys sordidus*), and starry flounder (*Platichthys stellatus*); estuarine prey species include topsmelt (*Atherinops affinis*), shiner perch (*Cymatogaster aggregate*), and bay goby (*Lepidogobius lepidus*). Adults of larger fish are unlikely to enter the Ballona Lagoon due to the tide gates and trash rack arrays at the mouth of the Lagoon and entrance to the Marina del Rey channel, but smaller fish and juveniles likely use the area for foraging and rearing habitat.

Development within a Wetland

Section 30233 governs projects that result in dredging and filling of wetlands, and provides that these activities in wetlands may occur if a three-part test is satisfied: 1) the dredging and fill is for a use designated in the policy to be an allowable use, 2) there are no feasible less environmentally damaging alternatives, and 3) feasible mitigation measures have been provided to minimize adverse environmental effects. As detailed below, the project qualifies as allowable dredging or filling of wetlands under Section 30233(a)(4), has been designed to be the least environmentally damaging alternative, and includes measures to minimize adverse environmental effects.

Section 30233(a)(4) of the Coastal Act provides that the filling of wetlands is permitted for incidental public service purposes, including but not limited to, burying cables and pipes, inspection of piers, and maintenance of existing intake and outfall lines. The project involves the installation of a diversion structure for the VAPP, which will serve as needed redundancy for the existing Venice Pumping Plant to avoid potential catastrophic sewage spills into the Grand Canal, Ballona Lagoon, and coastal waters. A temporary cofferdam and dewatering will allow for excavation for the construction of a new diversion structure below the Grand Canal. Once the diversion structure is installed and sealed, the Grand Canal would be backfilled using the stockpiled dredged material. These impacts to wetlands can be permitted since the proposed construction provides for an incidental public service. Therefore, the proposed development is consistent with Section 30233(a)(4) of the Coastal Act with regard to uses which include dredging and fill within wetlands.

For projects involving diking, dredging, and filling, the Commission must ensure that the proposed project has no feasible less environmentally damaging alternative consistent with Section 30233 of the Coastal Act. The applicant considered the following alternatives and concluded there was no feasible less environmentally damaging alternative to the proposed project.

> Alternative 1: No Project.
> The applicant could opt to leave the lots vacant as is and not construct the VAPP. This alternative is not less environmentally damaging because it would not provide the redundancy needed to allow the existing pumping plant to operate safely, and there would continue to be a potential for a catastrophic sewer spill into the streets, Ballona Lagoon, Grand Canal, and the ocean. In the case of flooding or failure of the existing pumping plant, temporary aboveground pumps and generators would need to be used, resulting in high noise levels, nuisance odors, and air quality impacts. In addition, construction of the surface

parking lot includes soil removal and remediation to address elevated levels of lead and TPH-d contaminants. If left in place, these contaminants could pose a risk to water quality, particularly during storm events when runoff may carry pollutants into nearby waterways.

Alternative 2: Construct the VAPP and Permanently Vacate Hurricane Street between Canal Court and Esplanade.
This alternative would be identical to the proposed project, except that Hurricane Street would be permanently vacated between Canal Court and Esplanade. This alternative would not reduce the environmental impacts to wetlands. In addition, it would impact public access to the lagoon/canal and beach.

Alternatives Considered but Rejected as Infeasible:
Several other alternatives were not analyzed in the EIR because they were considered infeasible during scoping. These included: use of temporary at-grade pumps with external piping at existing pumping plant, demolition of the pumping plant and building a new plant, expansion of the existing pumping plant and installation of pumps and piping below grade, construction of VAPP underground at the proposed site location with an offsite control room, and to construct a VAPP at another location, which was considered infeasible because it needs to be near the existing plant.

For the reasons stated above, the Commission finds that the proposed development is consistent with the second test of Section 30233(a) because there is no feasible less environmentally damaging alternative that accomplishes the project goals.

Wetland Impacts and Mitigation

The final policy "tests" required under Sections 30230 and 30233 are respectively, "marine resources shall be maintained...Special protection shall be given to areas and species of special biological and economic significance" and that wetland "mitigation measures have been provided to minimize adverse environmental effects". The subtidal mud bottom is marine habitat reviewed and protected under Section 30230. There are no species of special biological or ecological significance in this area and therefore no mitigation is necessary - the benthic algae and invertebrates occupying the area will naturally recolonize. In adherence to Section 30233, the applicant is significantly restoring the impacts to the coastal salt marsh habitat at a minimum 4:1 mitigation ratio. The impacted area of non-native grassland on the slope adjacent to the coastal salt marsh is not sensitive however the applicant is restoring it with native species appropriate for transitional wetland habitat. These actions are discussed below.

The November 2024 Venice Auxiliary Pumping Plant Habitat Restoration Plan (HRP) estimates that construction activities, including the placement and removal of the cofferdam and dredging, will last less than 12 months and disturb approximately 1,342 square feet of subtidal mud bottom, 108 square feet of coastal salt marsh wetland, and 463 square feet of non-native grassland (transitional wetland buffer). The subtidal bottom areas will naturally be recolonized by native algae and epifaunal and infaunal

invertebrates upon completion of the project. The coastal salt marsh will be significantly restored with native species including saltwort, Parish's glasswort, saltgrass, alkali heath, marsh jaumea, pickleweed, and wooly sea-blite. **Special Condition 15(c)** requires the applicant to add spike rush to the coastal salt marsh plant palette. The impacted non-native grassland will be significantly restored to appropriate transitional wetland buffer habitat. **Special Condition 15(c)** requires the applicant to remove California sagebrush, bluff buckwheat, and western ragweed from the plant palette and add the appropriate quantity of seacliff buckwheat, silver dune lupine, beach evening primrose, California croton, pink sand verbena, and red sand verbena to the deerweed, chaparral sunflower, coastal goldenbush, and seaside heliotrope plant palette. As stated above, spike rush, which is used for nesting by the federally and state endangered Ridgeway Rail, is required by **Special Condition 15(c)** to be added to the coastal salt marsh plant palette. Also, as stated above, **Special Condition 15(c)** requires the host plant (seacliff buckwheat) of the federally endangered El Segundo blue butterfly to be added to the transitional wetland buffer habitat plant palette. Ballona Lagoon is a target location identified in the USFWS recovery plan for this very rare butterfly. With the changes required by **Special Condition 15(c)** the coastal salt marsh and transitional wetland buffer habitat plant palettes include nearly all of the species planted just east of the project as part of the Ballona Lagoon Enhancement Plan. Additionally, should any review be needed by USFWS or California Department of Fish and Wildlife, **Special Condition 5**, requires the applicant to obtain any relevant authorizations from those agencies and should those agencies' requirements necessitate changes to the project, those changes would need to be reviewed by the Executive Director to determine if a CDP amendment is necessary.

The 1,342 square feet of subtidal mud bottom area will naturally be recolonized by native algae and epifaunal and infaunal invertebrates following completion of the project (Figure 6, Arcadis 2024 HRP). The 108 square feet of impacts to coastal salt marsh habitat resulting from ground disturbance necessary to bring in project dredging equipment and for installation of the temporary cofferdam (water diversion structure) are permanent requiring a 4:1 mitigation ratio. The applicant proposes to significantly restore 524 square feet of coastal salt marsh (accomplishing a 4.85:1 mitigation ratio) with the appropriate native species listed above and required by **Special Condition 15(c)** (Figure 6, Arcadis Nov. 2024 HRP). The coastal salt marsh mitigation will occur in the disturbance footprint and immediately to the east of this area (Figure 6, Arcadis Nov.2024 HRP). The 463 square feet of non-native grassland (on the slope immediately above the coastal salt marsh) does not require mitigation, but the applicant will restore and enhance 566 square feet of this area into appropriate transitional wetland buffer habitat (accomplishing a 1.22:1 mitigation ratio) with the native species listed above in the disturbance footprint and to the west and east of it (Figure 6, Arcadis Nov. 2024 HRP).

The applicant is required to comply with the provisions of **Special Condition 15**, which includes submitting a final revised Habitat Restoration Plan in substantial conformance

with Arcadis' November 2024 HRP, submitting a habitat impact verification report within 60 days of construction completion, and updates to the Table 5 title and plant palette.

Improper treatment and disposal of water from dewatering activities could have adverse impacts on coastal resources; therefore, a final dewatering plan should be prepared in advance of the intended construction to ensure proper handling of water encountered as a result of the cofferdam. Thus, the Commission imposes **Special Condition 7**, which requires a final dewatering plan prior to issuance of a coastal development permit. In addition, the applicant must provide evidence that the appropriate permits have been obtained from the corresponding agencies.

Lighting

Nighttime lighting can disturb birds and other wildlife residing and/or foraging within the adjacent habitat and wetland areas. Pursuant to **Special Condition 12**, the Commission requires that exterior night lighting installed on the project site to be of low intensity, low glare design, and be hooded to direct light downward onto the subject parcel(s) to prevent adverse impacts to wildlife and sensitive bird species. These measures will help ensure that adjacent wetland wildlife are adequately protected from the effects of light pollution and building-related hazards.

Conclusion

As proposed by the applicant and conditioned by the Commission, the project will ensure that the project construction will not adversely affect the biological productivity and functional capacity of coastal waters or wetlands. Therefore, the Commission finds that the proposed development, as conditioned, will maintain and enhance the functional capacity of the habitat, maintain and restore optimum populations of marine organisms, and protect human health consistent with the requirements of Sections 30231 and 30233.

F. Water Quality

Relevant water quality protection policies of Chapter 3 of the Coastal Act and the Venice LUP are listed in **Appendix A** of this report.

A. Construction Impacts to Water Quality

To install the diversion structure beneath the Grand Canal, a temporary cofferdam composed of sheeting and soldier piles must be installed. Both the installation and removal of the cofferdam will disturb existing sediments in the canal. However, with the implementation of appropriate regulatory permits—such as a Section 401 Water Quality Certification—Best Management Practices (BMPs) would be required to minimize water quality impacts, including turbidity, associated with the installation and use of the temporary cofferdam.

Construction BMPs

The proposed development across the three wetland-adjacent sites bordering the Grand Canal and Ballona Lagoon presents the potential for adverse impacts to coastal waters during construction, including polluted runoff and the erosion or dispersion of construction materials, debris, or waste, thereby reducing the biological productivity of coastal waters. For instance, soil stockpiles could erode, causing sedimentation of wetlands. Sediment discharged into coastal waters may also cause turbidity, which can shade and reduce the productivity of marine photosynthetic species and cause cascading effects throughout the whole ecosystem. Accordingly, effective controls are necessary during the construction phase to protect the surrounding wetland resources. The City submitted several Best Management Practices (BMPs) it proposes to implement including, but not limited to, the application of hydraulic mulch to provide a temporary protection from wind and water erosion, regular street sweeping, placement of sandbag barriers, and protection of storm drain inlets. To ensure that water quality impacts (e.g., increased turbidity) are reduced to the maximum extent feasible during construction and that the applicant implements appropriate BMPs to preserve water quality and biological productivity, and prevent runoff into the adjacent wetlands, a comprehensive Construction and Pollution Prevention Plan consistent with the requirements of **Special Condition 6**, is required.

Construction Staging

In addition, the City proposes two equipment and materials staging areas: one adjacent to Grand Canal at 3821 S. Via Dolce, and the other adjacent to Ballona Lagoon at 128 Hurricane Street. If not properly sited and managed, construction equipment and activity in these areas could result in physical disturbance to the adjacent wetlands. To prevent such impacts, **Special Condition 6** also requires the submittal of a detailed construction staging plan. This plan must demonstrate that all construction equipment and activity will be confined to designated staging areas and identified construction corridors, and that no equipment and materials will be placed in locations where they could impact wetland resources. At a minimum, the plan must include the following components: a site plan that depicts the limits of the staging area(s); construction corridor(s); construction site; and the location of construction fencing, temporary job trailers, and other equipment in relation to existing wetlands.

As such, the requirements to provide a construction and pollution prevention plan ensure that the proposed project prevents construction-related adverse impacts to water quality of nearby coastal waters, including the adjacent wetlands, Grand Canal and Ballona Lagoon. Additionally, should any review be needed by the Regional Water Quality Control Board, **Special Condition 5**, requires the applicant to obtain any relevant authorizations from that agency. Therefore, the project, as conditioned, is consistent with Coastal Act sections 30230, 30231, and 30233.

Soil Contamination and Site Remediation

The Phase II Environmental Site Assessment (ESA), dated October 2018, was conducted to evaluate the subsurface for the presence of hazardous materials associated with former oil production activities. The site currently contains a former oil production well that was discovered during the geophysical investigation. The ESA conducted limited soil and groundwater sampling. Testing revealed the presence of lead and total petroleum hydrocarbons (TPH), particularly weathered diesel and oil. Soil samples taken from depths of two to five feet showed contaminant levels above that allowed for residential or commercial use. Poor-quality groundwater was found between four and six feet, but all groundwater contamination remained below screening levels for non-drinking water use. The ESA was later amended in 2020 with recommendations for site cleanup. These recommendations include excavating approximately 260 cubic yards of soil—160 cubic yards confirmed as contaminated, plus an additional 100 cubic yards for testing as a precaution.

Excavation will take place in three areas across five separate locations. Two of these sites are located near the oil well and were selected due to elevated levels of lead and TPH-diesel in soil borings. Two additional sites in a second area and one site in a third area also exceeded residential screening levels for the same contaminants.

To ensure the site is clean before backfilling, 51 soil samples will be collected from about 100 cubic yards of soil for confirmation testing. Soil and debris will then be transported to licensed disposal facilities. Materials within acceptable limits will be handled as non-hazardous waste, while anything exceeding safety thresholds will be treated as hazardous waste. All trucks leaving the site will be inspected to ensure loads are properly covered and clean. Any small spills that occur will be contained and cleaned according to safety guidelines.

Because the site contains hazardous materials, it falls under California Health and Safety Code regulations. The City will follow the Bureau of Engineering (BOE) standards for managing contaminated soil. These standards require a site-specific Health and Safety plan, OSHA trainings, and compliance with air quality regulations for soil testing and handling

If strong petroleum odors are detected—which may indicate the presence of harmful volatile organic compounds (VOCs)—the South Coast Air Quality Management District (SCAQMD) must be notified. Soil testing will then determine the level of contamination. If VOCs exceed 50 parts per million, a mitigation plan will be required. This plan may involve vapor suppression, soil covers, containerization, or full removal of the contaminated material from the site.

Although the City has provided results from an initial site assessment and has included preventative measures to accompany proposed project activities, the project, as proposed, includes the removal and disposal of potentially hazardous materials located in close proximity to coastal waters and areas utilized by the public, and still holds potential for water quality and hazardous material impacts. **Special Condition 16**

requires the City to submit a Final Remediation Plan to ensure that all potentially hazardous materials on site would be fully identified, delineated, and addressed throughout the proposed project and **Special Condition 17**, ensuring appropriate disposal/recycling of any debris materials transported off site by requiring the City to provide evidence to the Executive Director of an appropriately permitted and licensed disposal site for all debris material – hazardous and non-hazardous – that would be generated by the proposed project for offsite transport.

A. Post-Construction Impacts to Water Quality

In addition to construction-related concerns, the proposed development also poses a risk of polluted runoff entering coastal waters over the life of the project. To address this, the development incorporates several on-site stormwater capture, treatment and drainage strategies designed to remove pollutants, minimize runoff and preserve water quality.

Permeable Yard Area

Venice LUP Policy I.A.7.b requires that development at the VAPP site provide an open, permeable yard area of at least 450 square feet for a thirty-foot-wide lot, and at least six hundred square feet for a forty-foot-wide lot. An average front yard setback of fifteen feet and no less than ten feet for any portion of the yard, is required to provide the minimum permeable yard area. Structures are required by the LUP to be set back from waterways in order to enhance visual quality and public recreation, protect marine resources, and to provide an area on the site for water percolation. The Commission has consistently required new development to conform with those policies, including along the Grand Canal and Ballona Lagoon. No building extensions, including stairs or balconies, are allowed within or above this area, except for permeable decks.

In this case, the proposed site for the VAPP has a lot width of 78 feet 5 inches, which requires approximately 1,176 square feet of permeable yard area. The City has provided a 10-foot 2-inch landscaped front yard setback along 73 feet 4 inches of the canal-facing property line. This area is included in the total proposed 2,932 square feet of permeable yard area, consistent with Section I.A.7.b. Similarly, the proposed surface parking lot has a lot width of 35 feet, which would require 525 square feet of permeable yard area and a total of 1,074 square foot permeable yard area is proposed.

To maintain an open and visible access corridor, enhance visual quality, and preserve the water quality and biological productivity of the adjacent wetlands, each project site must include an uncovered and permeable yard area totaling no less than fifteen times the width of the lot. This area must be maintained between the front property line (facing the Grand Canal or Ballona Lagoon) and any proposed development. In this case, the requirement equates to 525 square feet for 128 Hurricane Street (15 feet x 35 feet) and 1,176 square feet for 3813 Esplanade (15 feet x 78.5 feet).

On-site Drainage

For the proposed VAPP site at 3813 and 3817 Esplanade, the City proposes to manage on-site run-off through catch/drain basins with all the flows directed via storm drain pipes into the pump station wet well for treatment.

For the proposed surface parking lot at 128 Hurricane Street, the City would install a catch basin at the southeast corner of the parking lot, where surface runoff would be directed based on the sites flow patterns. Stormwater runoff, along with any potential contaminants collected from the parking surface, will flow into this catch basin. The catch basin would be equipped with inlet grate size (24 inches by 40 inches) adequate to handle an 85th percentile 24-hour storm event. The catch basin incorporates a filtration system fitted with petroleum absorbent pads to filter the runoff and prevent pollutants from entering the surrounding environment. The catch basin would be connected via a pipe to a newly proposed six-foot-wide bioswale, also designed to treat the 85th percentile 24-hour storm event, south of the parking lot and west of the catch basin, which is intended to provide additional stormwater treatment and infiltration. The bioswale would consist of a multi-layered design: a six- to twelve-inch layer of top soil, underlain by a three-inch washed gravel layer, and a lower twelve-inch layer of coarse washed gravel to facilitate on-site percolation. At the downstream end of the bioswale, an overflow storm drain pipe would be installed to convey excess stormwater into Ballona Lagoon during high-flow events.

The proposed surface parking lot at 128 Hurricane Street is a site where there is a greater potential for adverse water quality impacts due to the presence of the existing contaminated soil, pollutants that would be generated from the proposed 2,500 square foot impervious parking lot within 100 feet of coastal waters, and since the applicant is proposing to discharge the captured and filtered stormwater into Ballona Lagoon. Therefore, pursuant to **Special Condition 8 (Water Quality and Hydrology Plan)**, the site must be designed to treat/filter stormwater runoff on-site for the 85th Percentile 24-Hour Storm Event to remove all pollutants of concern and prevent polluted runoff from entering coastal waters, and must provide a maintenance plan to ensure the filtration device performs adequately.

Landscaping

The City has proposed a plant palette for both the VAPP site and the parking lot that consist of very low to low water-use species, none of which are listed as invasive species by the California Invasive Plant Council (Cal-IPC). The City proposes to landscape the ten-foot setback area of the VAPP site and install stabilized decomposed granite around the site's perimeter. Impermeable paving is planned for the area above the underground wet wells and valve vault, the front entrance of the electrical building, and the new sidewalk along Hurricane Street.

For the surface parking lot site, the City proposes to landscape a large portion of the front yard area in the southern section, as well as the northwest and northeast corners of the lot. To ensure the front yard maintains an open and permeable yard, **Special Condition 1** requires the applicant to utilize decomposed granite, or similar permeable

material, and concrete footings for the bike rack area. Similarly, **Special Condition 1** requires the applicant to relocate the three-dimensional public art installation out of the buffer setback area to ensure visual quality and protect the biological productivity of the lagoon. Once the artwork is approved, a portion of the landscaping will be removed to accommodate its installation.

To ensure that yard areas provide on-site percolation of stormwater and reduction of runoff, and that water quality is preserved, **Special Condition 13** requires the applicant to utilize only drought tolerant, low water use, non-invasive plant species and water conservative irrigation systems for any new landscaping.

Conclusion

The development, as proposed and further conditioned, improves adjacent habitat areas by removing invasive plant species and incorporates design features and construction measures to minimize the effect of construction and post-construction activities on the marine environment, biological productivity, and coastal water quality. Therefore, the Commission finds that the proposed development, as conditioned, conforms to Sections 30230 and 30231 of the Coastal Act regarding the protection of water quality to protect marine resources, promote the biological productivity of coastal waters and protect human health.

G. Oil Spill Prevention

Relevant oil spill policies of Chapter 3 of the Coastal Act and the Venice LUP are listed in **Appendix A** of this report.

Coastal Act Section 30232 states that protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such substances, and effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.

The proposed project at 128 Hurricane Street involves the re-abandonment of a former oil well and the removal and cleanup of contaminated soil located within close proximity to wetlands, including the Ballona Lagoon and Grand Canal. This work will take place on the site of a planned surface parking lot. According to the EIR Addendum, the oil well (McDonald 2) is located in the northwest corner of the lot and extends 5,860 feet below ground. The well was originally plugged in 1932 under outdated standards, with cement seals placed at various depths and the remaining space filled with heavy mud. Subsequent monitoring has documented evidence of past leakage, underscoring the potential risk of hydrocarbons reaching surrounding habitats. Given the sites adjacency to sensitive habitat areas that support [insert key species or habitat types], even minor releases pose a significant threat to biological productivity, water quality, and ecological integrity. The proposed re-abandonment is therefore necessary not only to address the existing risks of leaks but also to provide long-term protection against future discharges.

The City submitted a Removal Action Workplan for the oil well completed by AECOM dated July 17, 2020. According to the report, AECOM will use a qualified subcontractor

with expertise in Southern California oil production well drilling and abandonment to re-abandon this oil well according to the current CalGEM requirements. As part of the workplan, AECOM proposes the following re-abandonment scope of work, including but not limited to, obtaining CalGEM permits, installing blowout preventer equipment approved by CalGEM, drilling out old cement and cleanout the well to a total re-abandon depth, cementing and perforating the well, scheduling all required CalGEM inspections, and properly disposing of waste generated from the well's re-abandonment.

Re-abandonment activities inherently involve disturbing the existing well casing and installing new barriers, which can result in localized releases of hydrocarbons, fluids, or other hazardous materials if not properly controlled. Equipment malfunctions, line breaks, or improper handling of fluids during cementing and plugging operations could allow small to moderate quantities of hydrocarbons or other contaminants to escape. While the project does not present the scale of risk associated with a major well blowout, the site's history of leakage underscores the even low-volume discharges are possible and, given the well's proximity to wetlands and other sensitive habitats, could cause disproportionate impacts to water quality and biological resources. In particular, sheens, contaminated soils, or mobilization of hydrocarbons in shallow groundwater or tidal channels could adversely impact habitat functions and species dependent on these areas.

In light of these activity-specific risks and the well's history of leakage, the absence of a project-specific Oil Spill Prevention and Response Plan (OSPRP) leaves a significant gap in ensuring effective onsite preparedness and response. Industry-standard practices and CalGEM oversight provide important safeguards, but they do not substitute for a tailored plan that addresses the unique conditions of this site, identifies a reasonable worst-case spill scenario, and demonstrates that adequate containment and cleanup capacity will be available in the event of an accidental spill. To close this gap and ensure consistency with Coastal Act Section 30232, the Commission therefore requires, through **Special Condition 9**, the preparation and implementation of a project-specific OSPRP prior to commencement of re-abandonment activities.

The required project-specific OSPRP, including identification of a reasonable worst-case spill scenario and demonstration of adequate onsite response capacity, ensures that effective site-specific safeguards are in place. The OSRP requires appropriate spill prevention practices, pre-positioned containment and cleanup equipment, worker training, immediate notification protocols, and third-party spill response contractors to ensure capacity for larger incidents beyond what onsite crews can handle. These measures provide a precautionary but necessary layer of protection to prevent, contain, and respond to releases during re-abandonment activities. When combined with the permanent sealing of the well to modern standards, the project as conditioned both addresses near-term construction related spill risks and eliminates the long-term risk of hydrocarbon leakage. Together, these measures satisfy the requirements of Coastal Act Section 30232 by ensuring effective protection, containment, and cleanup capacity for accidental spills.

As such, **Special Condition 9** requires a project specific OSPRP to ensure that appropriate measures and equipment are in place to prevent a potential spill at the project site and to effectively contain the spills should such a spill event occur. Therefore, the project, as conditioned, is consistent with Coastal Act Section 30232.

H. Archaeological, Paleontological, and Tribal Cultural Resources

Relevant archaeological, paleontological, and tribal cultural resources of Chapter 3 of the Coastal Act and the Venice LUP are listed in **Appendix A** of this report.

The City proposes 7,324 cubic yards of cut, 5,864 cubic yards of fill and a net cut of 1,460 cubic yards for all work associated with the VAPP, including the area of the temporary cofferdam and permanent placement of the diversion structure and inlet pipe, the wet well and valve vault, and the improvements under the public right-of-way. Excavation depths vary across the site with maximum depths of 30 feet for the wet well and valve vault and 24 feet for the diversion structure. Such activities have the potential to impact in-ground resources including archaeological, tribal cultural, and paleontological resources. Section 30244 of the Coastal Act requires reasonable mitigation measures for development that would adversely impact archaeological or paleontological resources. LUP Policy I.F.6. also requires reasonable mitigation measures for any impacts to such resources, preceded by preliminary cultural resources record search.

The applicant submitted a geotechnical report by Geotechnical Professionals Inc. dated September 29, 2015, and an Updated Geotechnical Report for the VAPP prepared by the City of Los Angeles Geotechnical Engineering Group (GEO) dated December 14, 2015, which include characterization of the onsite soils via borings and published geological maps for the area. The report describes the site as underlain by roughly three to four feet of artificial fill, likely installed as a part of past construction activities. Although the report characterizes the type of fill (i.e., silty sand and alluvial sediments below), the potential for in-ground resources may still exist as these sediment types may have overlapped with Native American use of this area or old enough that paleontological resources may be encountered.

To better understand the potential for archaeological, including some tribal cultural resource deposits, to exist onsite, a records search was conducted on September 1, 2015, at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton. No archaeological resources were recorded onsite or in the half-mile buffer area. In addition, the applicant requested a Sacred Lands File Search for the site from the Native American Heritage Commission (NAHC) on November 2, 2015. NAHC reviewed its Sacred Lands File and indicated in a letter sent to ICF International on November 3, 2015 that there were Native American resources recorded in the area. The applicant notified all tribal representatives provided as contacts by the NAHC of the proposed development and invited consultation. The applicant received two replies, from the Gabrieleño Band of Mission Indians – Kizh Nation and the Fernandeño Tataviam Band of Mission Indians. The Gabrieleño Band of Mission Indians – Kizh Nation replied on November 30, 2015, stating that the area is sensitive and in the location of a village known to have existed in Ballona Wetlands. The EIR requires

mitigation measure MM CUL-1 (Archaeological and/or Tribal Cultural Resource) to stop all work immediately if any prehistoric artifact is encountered, and if the archeologist determines that an artifact may qualify as a tribal cultural resource, a Native American monitor will be consulted. The contractor is required to stop all work within 30 feet of the exposure of these finds until a qualified archaeologist can be retained to evaluate the find and if significant, they shall be avoided or impacts shall be mitigated.

In accordance with the Commission's adopted Tribal Consultation Policy, on January 31, 2024, Commission staff notified all tribal representatives provided as contacts by the NAHC of the proposed development and invited consultation. On March 14, 2024, staff consulted with Chair Salas of the Gabrieleño Band of Mission Indians – Kizh Nation, who described the potential to encounter tribal archaeological resources during the proposed grading work. Commission staff did not receive responses from other contacted tribes.

Regarding the potential for encountering paleontological resources the local CDP and EIR state that the subject site and the immediate area are not known to contain paleontological resources. No mitigation measures were proposed for the protection of paleontological resources.

To reduce potential impacts to tribal cultural and archaeological resources, **Special Condition 14 (Archaeological and Tribal Cultural Resource Monitoring and Treatment Plan)** requires all Gabrieleño-affiliated tribal representatives on the NAHC contact list to be invited and allowed to monitor all project activities that could impact archaeological and tribal cultural resources along with a qualified archaeologist. If any potential tribal and/or archaeological resources are discovered, **Special Condition 14** requires construction to pause until the appropriate parties are notified and a Supplemental Archaeological Plan (SAP) is developed in consultation with Tribes listed on the NAHC contact list. The applicants must also notify the Executive Director of the discovery and submit the SAP for their review and approval at which time the Executive Director would determine whether a CDP amendment is required per **Special Condition 14.**

Therefore, as conditioned, the Commission finds that the proposed development conforms to the requirements of Section 30244 of the Coastal Act, as well as LUP policy I.F.6, regarding mitigation of potential tribal cultural and archaeological resources impacts.

I. Local Coastal Program

Coastal Act Section 30604(a) states, in relevant part:

> (a) Prior to certification of the Local Coastal Program, a Coastal Development Permit shall be issued if the issuing agency, or the Commission on appeal, finds that the proposed development is in conformity with the provisions of Chapter 3 (commencing with Section 30200) of this division and that the permitted development will not prejudice the ability of the local government to prepare a local

coastal program that is in conformity with the provisions of Chapter 3 (commencing with Section 30200).

The City of Los Angeles does not have a certified Local Coastal Program for the Venice area. The City of Los Angeles Land Use Plan (LUP) for Venice was effectively certified on June 14, 2001, and the City is in the process of a comprehensive update. The Commission's standard of review for the proposed development is the Chapter 3 policies of the Coastal Act. The Venice LUP is advisory in nature and may provide guidance.

As conditioned, the proposed development is consistent with Chapter 3 of the Coastal Act. As discussed above, the required LUP amendment associated with the subject project will allow the project to be carried out in a manner consistent with the Venice LUP. Therefore, approval of the project, as conditioned by the Commission, will not prejudice the ability of the local government to prepare an LCP that is in conformity with the provisions of Chapter 3 of the Coastal Act.

J. California Environmental Quality Act (CEQA)

Section 13096(a) of the Commission's regulations requires Commission approval of coastal development permit applications to be supported by a finding showing the application, as conditioned by any conditions of approval, to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). The findings above are incorporated herein by reference.

Under Section 15251(c) of Title 14 of the California Code of Regulations, the Commission's CDP regulatory process has been certified as the functional equivalent to the CEQA process. As a certified regulatory program, Section 21080.5(d)(2)(A) of CEQA still applies to the Commission's CDP regulatory process and prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available, which would substantially lessen any significant adverse effect which the activity may have on the environment.

The City of Los Angeles is the lead agency for purposes of CEQA. As such, the City determined that the proposed development required an Environmental Impact Report (EIR). The Final EIR for the project was released in March 2017. In its findings, the City determined that the project and its EIR were consistent with the CEQA requirements.

The proposed project has been conditioned in order to be found consistent with the Chapter 3 policies of the Coastal Act. As conditioned, there are no feasible alternatives or additional feasible mitigation measures available which would substantially lessen any significant adverse effect which the development may have on the environment. Therefore, the Commission finds that the proposed project, as conditioned to mitigate the identified impacts, is the least environmentally damaging feasible alternative, has no remaining significant environmental effects, either individual or cumulative, and complies with the applicable requirements of the Coastal Act to conform to CEQA.

APPENDIX A – RELEVANT COASTAL ACT AND VENICE LUP POLICIES

A. PUBLIC ACCESS

Section 30210 of the Coastal Act states:

> In carrying out the requirement of Section 4 of Article 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resources areas from overuse.

Section 30212.5 of the Coastal Act states:

> Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, or overcrowding or overuse by the public of any single area.

Section 30252 of the Coastal Act states:

> The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing non automobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

LUP Policy II. A. 2. Expansion of Public Beach Parking Supply states, in relevant part:

> The construction of new public parking facilities should be implemented, as well as maximizing the use of existing ones by restriping existing parking lots or converting them to multi-level structures where consistent with other Coastal Act policies. …

LUP Policy II. A. 3. Parking Requirements states, in relevant part:

> The parking requirements outlined in the following table shall apply to all new development, any addition and/or change of use. The public beach parking lots and the Venice Boulevard median parking lots shall not be used to satisfy the parking requirements of this policy. …

> Public Utility Facility not having a Business Office on the premises: 2 spaces; plus 1 space for each 500 square feet of floor area

LUP Policy I. C. 11. Public Facility.

> Land designated as Public Facility on the Land Use Plan Map includes publicly-owned and operated facilities such as public libraries, public schools, fire and police stations, community services, and utilities (i.e. sewer, transportation, water and power). Public Facilities shall be developed in accordance with the policies of the certified LUP so that the design, scale and height of structures on land designated as Public Facility is compatible with adjacent uses and the neighboring community. Adequate off-street parking shall be required for all new or expanded public facilities consistent with Policy II.A.3.

B. DEVELOPMENT AND VISUAL RESOURCES

Section 30250(a) of the Coastal Act states, in relevant part:

> New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources.

Section 30251 of the Coastal Act states, in relevant part:

> The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

Section 30253 of the Coastal Act states, in relevant part:

> New development shall:
>
> (a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.
>
> (b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding areas or in any way require the construction of protective devices that would substantially alter natural land forms along bluffs and cliffs.

... (d) Minimize energy consumption and vehicle miles traveled.

(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.

LUP Policy I.A.5 Preserve and Protect Stable Multi-Family Neighborhoods.

Preserve and protect stable multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained and improved.

LUP Policy I.A.7.b. Multi-family Residential - Low Medium II Density

Ballona Lagoon and Grand Canal West Bank Properties North of Ironside

Use: Two units per lot including duplexes.

Density: One unit per 1,500 square feet of lot area

Esplanade: The Esplanade (City right-of-way) shall be maintained and improved in order to provide for continuous public pedestrian access along Ballona Lagoon and the Grand Canal waterway.

Grand Canal and Lagoon Buffer/Setback: In order to provide a setback for public access, visual quality, and to protect the biological productivity of the canals, an average setback of 15 feet, but not less than 10 feet, shall be maintained in the front yard adjacent to the property line nearest the water.

Yards: Minimum side yard of 3 ½ feet. An open, permeable yard of at least 450 square feet for a 30-foot wide lot, and at least 600 square feet for a 40-foot wide lot, shall be maintained between the lagoon/canal property line and the front of any structure. A minimum 10-foot front yard setback, with a required 15-foot setback average, shall provide the required permeable front yard area. No building extensions, including stairs and balconies, shall be placed in or over the required permeable front yard area with the exception of permeable decks. The total combined height of any deck, deck railings, garden walls and/or fences situated within the required permeable front yard area shall not exceed 6 feet above the elevation of the adjacent public walkway.

Height: Not to exceed 30 feet within 60 horizontal feet of the mean high tide line of Ballona Lagoon, Grand Canal or inland side of the Esplanade (City right-of-way), whichever is furthest from the water. Beyond 60 horizontal feet, one foot in additional height is permitted for each two additional horizontal feet to a maximum height of 38 feet. No portion of any structure (including roof access structures, roof deck railings and architectural features) shall exceed the 30-foot height limit within 60 horizontal feet of the mean high tide line of Ballona Lagoon,

> Grand Canal or inland side of the Esplanade (City right-of-way), whichever is furthest from the water. Notwithstanding other policies of this LUP, chimneys, exhaust ducts, ventilation shafts and other similar devices essential for building function may exceed the specified height limit in a residential zone by five feet. (See LUP Policy I.A.1 and LUP Height Exhibits 13-16).
>
> Fill: No fill shall be permitted in the lagoon. No fill may be placed in the lagoon buffer except for the minimum amount necessary for habitat restoration and public access.

LUP Policy I. D. 1. Canals and Ballona Lagoon Waterways states, in relevant part:

> The Venice estuaries and wetlands including the Ballona Lagoon, Venice Canals, and Grand Canal south of Washington Boulevard, are designated in the Land Use Plan as natural and coastal recreational resources, and are rezoned to the "Open Space" designation.
>
> Adjacent Use/Development: The only permitted development adjacent to the canals and lagoon shall be habitat restoration, single-family dwellings, public parks and walkways, subterranean or surface public parking lots, maintenance activities and emergency repairs.

LUP Policy I. E. 2. Scale, states:

> New development within the Venice Coastal Zone shall respect the scale and character of community development. Buildings which are of a scale compatible with the community (with respect to bulk, height, buffer and setback) shall be encouraged. All new development and renovations should respect the scale, massing, and landscape of existing residential neighborhoods. Lot consolidations shall be restricted to protect the scale of existing neighborhoods. Roof access structures shall be limited to the minimum size necessary to reduce visual impacts while providing access for fire safety. In visually sensitive areas, roof access structures shall be set back from public recreation areas, public walkways, and all water areas so that the roof access structure does not result in a visible increase in bulk or height of the roof line as seen from a public recreation area, public walkway, or water area. No roof access structure shall exceed the height limit by more than ten (10') feet. Roof deck enclosures (e.g. railings and parapet walls) shall not exceed the height limit by more than 42 inches and shall be constructed of railings or transparent materials. Notwithstanding other policies of this LUP, chimneys, exhaust ducts, ventilation shafts and other similar devices essential for building function may exceed the specified height limit in a residential zone by five feet.

LUP Policy I. E. 3., Architecture, states:

> Varied styles of architecture are encouraged with building façades which incorporate varied planes and textures while maintaining the neighborhood scale and massing.

LUP Policy IV. B. 3. Ballona Lagoon Development Standards

C. COASTAL HAZARDS

Section 30253 of the Coastal Act states, in relevant part:

> New development shall:
>
> (a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.
>
> (b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding areas or in any way require the construction of protective devices that would substantially alter natural land forms along bluffs and cliffs.
>
> …(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.

Section 30270 of the Coastal Act states:

> The commission shall take into account the effects of sea level rise in coastal resources planning and management policies and activities in order to identify, assess, and, to the extent feasible, avoid and mitigate the adverse effects of sea level rise.

LUP Policy IV. G. 1. Flood Setback.

> Potential flood hazard to residents along the west bank of the Ballona Lagoon and the east bank of the Grand Canal shall be alleviated by increasing the development setback in the Silver Strand area and along the banks of the Grand Canal and Ballona Lagoon (see Policies I.A.4 and 7), and by controlling erosion along the banks by the use of native flora.
>
> Implementation Strategies: Regulations regarding the use of native flora, setbacks, and higher floor and driveway elevations to mitigate potential for erosion and flooding, and to provide for habitat protection, shall be consistent with the Venice Canals Rehabilitation Plan approved by Coastal Commission Coastal Development Permit 5-91-584, and the Ballona Lagoon Enhancement Plan approved by Coastal Commission Coastal Development Permit 5-95-152 and amendments.

LUP Policy IV. G. 2. Hazard Mitigation for New Construction.

> Special development standards shall be developed for those areas within the Venice Coastal Zone which present potential flood and liquefaction hazards.
>
> Implementation Strategies: A pre-grading inspection, subject to the satisfaction of the City of Los Angeles Department of Building and Safety, shall be required for those areas in the Venice Coastal Zone subject to potential liquefaction hazards. The Department of Building and Safety (B&S) is responsible for determining that a possibility of inundation exists; B&S refers the applicant to Bureau of Engineering (BOE) who completes an inundation report; and B&S obtains any necessary waivers. Potential flood areas shall be subject to the Flood Insurance Rate Maps published by the Federal Emergency Management Agency (FEMA).

LUP Policy IV. G. 3. Shoreline Protection.

> The City shall study potential hazards to oceanfront properties caused by wave erosion, tsunamis and flooding. No new shoreline protection projects shall be approved until such studies are completed.

D. WATER QUALITY & BIOLOGICAL RESOURCES

Section 30230 of the Coastal Act states, in relevant part:

> Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance…

Section 30231 of the Coastal Act states, in relevant part:

> The biological productivity and the quality of coastal waters…appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams

Coastal Act Section 30233 states, in relevant part:

> (a) The diking, filling, dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following:
>
> > 4. Incidental public service purposes, including but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines.

LUP Policy I. D. 1. Canals and Ballona Lagoon Waterways states, in relevant part:

> The Venice estuaries and wetlands including the Ballona Lagoon, Venice Canals, and Grand Canal south of Washington Boulevard, are designated in the Land Use Plan as natural and coastal recreational resources, and are rezoned to the "Open Space" designation.
>
> Adjacent Use/Development: The only permitted development adjacent to the canals and lagoon shall be habitat restoration, single-family dwellings, public parks and walkways, subterranean or surface public parking lots, maintenance activities and emergency repairs.

LUP Policy IV. B. 7. Grand Canal Rehabilitation.

> The Grand Canal between Hurricane Street and Washington Boulevard shall be restored and maintained in order to improve water quality, aquatic habitat, and public pedestrian access along the waterway in a manner that is sensitive to the privacy of adjoining residents.

LUP Policy IV. C. 1. Stormwater Runoff.

> All new public and private development, substantial rehabilitation, redevelopment or related activity, which discharges stormwater runoff into the Ocean, Ballona Lagoon, Grand Canal south of Washington Boulevard or the Venice Canals shall be designed and conducted in compliance with the County-wide Municipal National Pollution Discharge Elimination System (NPDES) Stormwater Permit, issued by the California Regional Water Quality Control Board (RWQCB), the RWQCB approved Standard Urban Stormwater Mitigation Plan, and the NPDES General Permit for Stormwater Discharges Associated with Construction Activity, issued by the State Water Resources Control Board (SWRCB), where applicable. Methods to improve water quality, such as the mitigation of the first-flush stormwater runoff entering coastal waterways, shall be imposed as conditions of development by the City of Los Angeles in accordance with SWRCB and RWQCB recommendations and regulations, and the Santa Monica Bay Restoration Project Action Plan in order to protect, restore, and where feasible, enhance the water quality and habitat of these waterways.

LUP Policy IV. C. 2. Water Quality.

> The methods to improve water quality, recommended in California's Plan for the Control of Non-Point Source Pollution (January 2000), such as watershed planning and management programs, and habitat restoration projects, shall be considered and implemented by the City of Los Angeles where feasible opportunities exist. Selected Best Management Practices (BMPs) or suites of BMPs shall be designed to treat, infiltrate or filter the stormwater runoff from each runoff event up to and including the 85th percentile, 24-hour runoff event for volume based BMPs and/or the 85th percentile, 1 hour event, with an appropriate safety factor, for flow-based BMPs.

E. Archaeological and Tribal Cultural Resources

Section 30244 of the Coastal Act states:

> Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

LUP Policy I. F. 6. Archaeological Resources states, in relevant part:

> Significant archaeological resources shall be protected from permanent loss. A preliminary cultural resources record search to determine the existence of significant archeological sites shall be required for developments which require more than minimal grading. Mitigation plans for the protection of such resources shall be required. If, during construction, any archaeological resources are discovered, work shall be stopped to prevent further disturbance of the resources, and the proper authorities shall be immediately notified.

F. Oil Spill

Coastal Act Section 30232 states:

> Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.

G. Land Use

LUP Policy I. C. 1. Industrial Land Use, in relevant part,

> The design, scale and height of structures in areas designated for industrial land uses shall be compatible with adjacent uses and the neighboring community.

LUP Policy I. C. 6. Hazardous Uses.

> Hazardous industrial uses shall not be located adjacent to residential uses.

APPENDIX B – CULTURAL RESOURCES SIGNIFICANCE TESTING PLAN PROCEDURES

A. An applicant seeking to recommence construction following discovery of the cultural deposits shall submit a Significance Testing Plan for the review and approval of the Executive Director. The Significance Testing Plan shall identify the testing measures that will be undertaken to determine whether the cultural deposits are significant. The Significance Testing Plan shall be prepared by the project archaeologist(s), in consultation with the Native American monitor(s), and the Most Likely Descendent (MLD) when State Law mandates identification of a MLD. The Executive Director shall make a determination regarding the adequacy of the Significance Testing Plan within 10 working days of receipt. If the Executive Director does not make such a determination within the prescribed time, the plan shall be deemed approved and implementation may proceed.

   1. If the Executive Director approves the Significance Testing Plan and determines that the Significance Testing Plan's recommended testing measures are de minimis in nature and scope, the significance testing may commence after the Executive Director informs the permittee of that determination.

   2. If the Executive Director approves the Significance Testing Plan but determines that the changes therein are not de minimis, significance testing may not recommence until after an amendment to this permit is approved by the Commission.

   3. Once the measures identified in the significance testing plan are undertaken, the permittee shall submit the results of the testing to the Executive Director for review and approval. The results shall be accompanied by the project archeologist's recommendation as to whether the findings are significant. The project archeologist's recommendation shall be made in consultation with the Native American monitors and the MLD when State Law mandates identification of a MLD. The Executive Director shall make the determination as to whether the deposits are significant based on the information available to the Executive Director. If the deposits are found to be significant, the permittee shall prepare and submit to the Executive Director a supplementary Archeological Plan in accordance with subsection B of this appendix and all other relevant subsections. If the deposits are found to be not significant, then the permittee may recommence grading in accordance with any measures outlined in the significance testing program.

B. An applicant seeking to recommence construction following a determination by the Executive Director that the cultural deposits discovered are significant shall submit a supplementary Archaeological Plan for the review and approval of the Executive Director. The supplementary Archeological Plan shall be prepared by the project archaeologist(s), in consultation with the Native American monitor(s), the Most Likely Descendent (MLD) when State Law mandates identification of a MLD, as well as others identified in the special condition. The supplementary Archeological Plan shall identify proposed investigation and mitigation measures.

   The range of investigation and mitigation measures considered shall not be constrained by the approved development plan. Mitigation measures considered

may range from in-situ preservation to recovery and/or relocation. A good faith effort shall be made to avoid impacts to cultural resources through methods such as, but not limited to, project redesign, capping, and placing cultural resource areas in open space. In order to protect cultural resources, any further development may only be undertaken consistent with the provisions of the Supplementary Archaeological Plan.

1. If the Executive Director approves the Supplementary Archaeological Plan and determines that the Supplementary Archaeological Plan's recommended changes to the proposed development or mitigation measures are de minimis in nature and scope, construction may recommence after the Executive Director informs the permittee of that determination.
2. If the Executive Director approves the Supplementary Archaeological Plan but determines that the changes therein are not de minimis, construction may not recommence until after an amendment to this permit is approved by the Commission.

C. Prior to submittal to the Executive Director, all plans required to be submitted pursuant to this special condition, except the Significance Testing Plan, shall have received review and written comment by a peer review committee convened in accordance with current professional practice that shall include qualified archeologists and representatives of Native American groups with documented ancestral ties to the area. Names and qualifications of selected peer reviewers shall be submitted for review and approval by the Executive Director. The plans submitted to the Executive Director shall incorporate the recommendations of the peer review committee. Furthermore, upon completion of the peer review process, all plans shall be submitted to the California Office of Historic Preservation (OHP) and the NAHC for their review and an opportunity to comment. The plans submitted to the Executive Director shall incorporate the recommendations of the OHP and NAHC. If the OHP and/or NAHC do not respond within 30 days of their receipt of the plan, the requirement under this permit for that entities' review and comment shall expire, unless the Executive Director extends said deadline for good cause. All plans shall be submitted for the review and approval of the Executive Director.

APPENDIX C – SUBSTANTIVE FILES

1. Policies of the Venice Land Use Plan cited in report.
2. City of Los Angeles Local Coastal Development Permit Case No. DIR-2017-4167-PUB-CDP-SPP-1A, dated September 13, 2022.
3. City of Los Angeles Local Coastal Development Permit Case No. DIR-2017-4173-CDP-SPP-1A, dated September 13, 2022.
4. Materials associated with CDP Application No. 5-24-0123
5. Environmental Impact Report (EIR)'s Mitigation Monitoring and Reporting Program (MMRP), dated May 2017.
6. Habitat Restoration Plan - Arcadis, dated November 2024.
7. California Coastal Commission's Sea Level Rise Policy Guidance[25] (2024 update)

[25] https://www.coastal.ca.gov/climate/slrguidance.html

CALIFORNIA COASTAL COMMISSION
South Coast District Office
301 E Ocean Blvd., Suite 300
Long Beach, CA 90802-4830
(562) 590-5071

Th12a, Th12b, Th13a

A-5-VEN-22-0068, A-5-VEN-22-0069, 5-24-0123
(City of Los Angeles Department of Public Works)

August 29, 2025

EXHIBITS

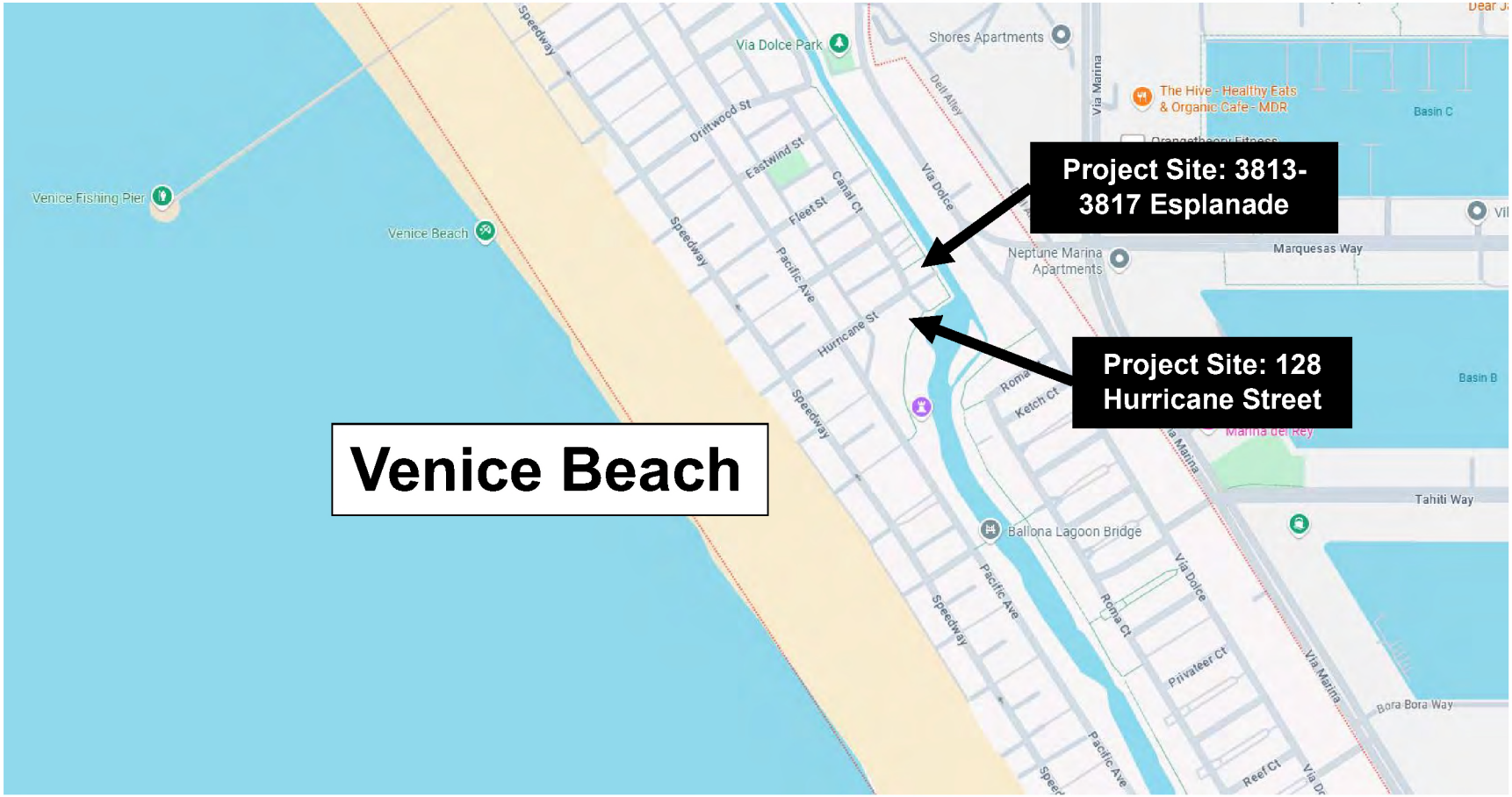
Table of Contents:

Exhibit 1 - Project Location

Exhibit 2 - City-Approved Plans

Exhibit 3 - Appeals

Exhibit 4 - Project Plans (De Novo/Dual)


Project Site: 3813-3817 Esplanade
Project Site: 128 Hurricane Street
Venice Beach
Venice Fishing Pier
Venice Beach
Via Dolce Park
Shores Apartments
The Hive - Healthy Eats & Organic Cafe - MDR
Basin C
Neptune Marina Apartments
Marquesas Way
Basin B
Marina del Rey
Tahiti Way
Ballona Lagoon Bridge
Bora Bora Way
Speedway
Driftwood St
Eastwind St
Fleet St
Canal Ct
Via Dolce
Via Marina
Pacific Ave
Hurricane St
Ketch Ct
Roma Ct
Privateer Ct
Reef Ct


Pacific Ave
Galleon St
Canal Ct
Grand Canal
VAPP
Parking Lot
Dell Alley
Galleon St
Pacific Ave
Galleon St Aly
Hurricane St
Pacific Ct
Ballona Lagoon
S Esplanade E
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Speedway
Pacific Ave
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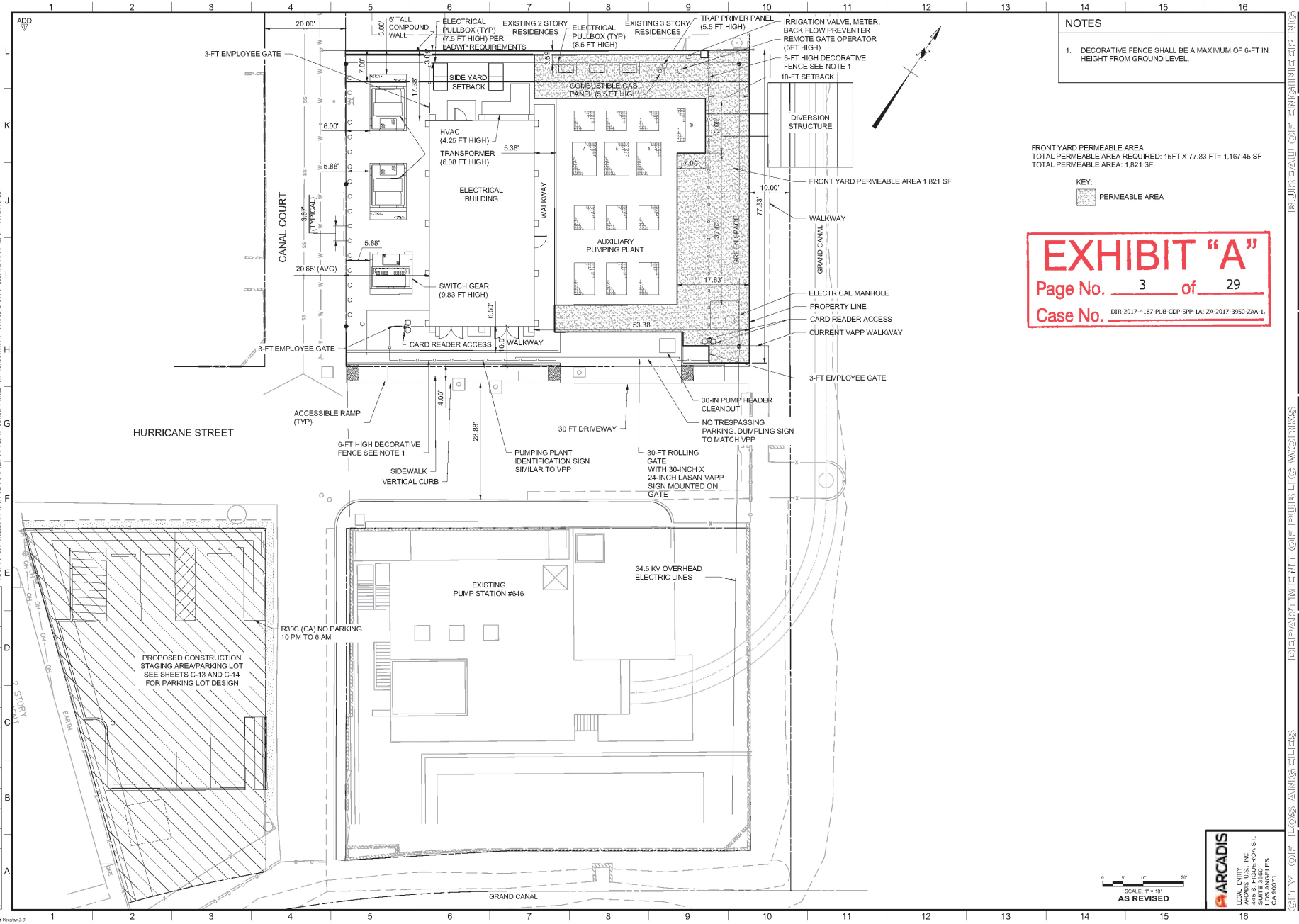
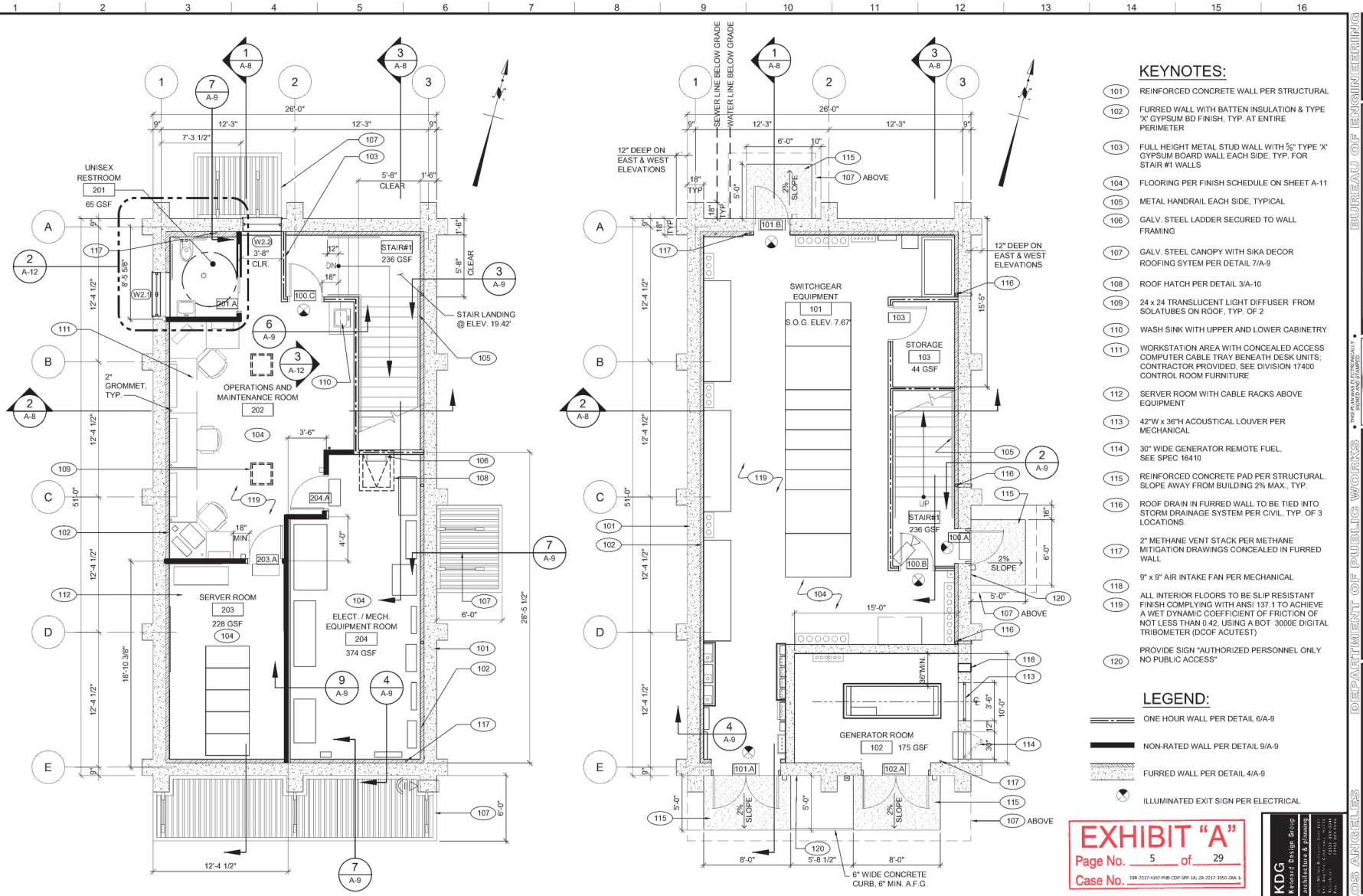
Ironsides St
History of Ballona Lagoon Marker
Ketch Ct
Speedway
S Esplanade E



California Coastal Commission
A-5-VEN-22-0068, A-5-VEN-22-0069, 5-24-0123
Exhibit 2
Page 1 of 12



SECOND FLOOR PLAN
SCALE: 1/4" = 1'-0"

FIRST FLOOR PLAN
SCALE: 1/4" = 1'-0"

KEYNOTES:

101 REINFORCED CONCRETE WALL PER STRUCTURAL

102 FURRED WALL WITH BATTEN INSULATION & TYPE 'X' GYPSUM BD FINISH, TYP. AT ENTIRE PERIMETER

103 FULL HEIGHT METAL STUD WALL WITH 5/8" TYPE 'X' GYPSUM BOARD WALL EACH SIDE, TYP. FOR STAIR #1 WALLS

104 FLOORING PER FINISH SCHEDULE ON SHEET A-11

105 METAL HANDRAIL EACH SIDE, TYPICAL

106 GALV. STEEL LADDER SECURED TO WALL FRAMING

107 GALV. STEEL CANOPY WITH SIKA DECOR ROOFING SYTEM PER DETAIL 7/A-9

108 ROOF HATCH PER DETAIL 3/A-10

109 24 x 24 TRANSLUCENT LIGHT DIFFUSER FROM SOLATUBES ON ROOF, TYP. OF 2

110 WASH SINK WITH UPPER AND LOWER CABINETRY

111 WORKSTATION AREA WITH CONCEALED ACCESS COMPUTER CABLE TRAY BENEATH DESK UNITS; CONTRACTOR PROVIDED. SEE DIVISION 17400 CONTROL ROOM FURNITURE

112 SERVER ROOM WITH CABLE RACKS ABOVE EQUIPMENT

113 42"W x 36"H ACOUSTICAL LOUVER PER MECHANICAL

114 30" WIDE GENERATOR REMOTE FUEL, SEE SPEC 16410

115 REINFORCED CONCRETE PAD PER STRUCTURAL. SLOPE AWAY FROM BUILDING 2% MAX., TYP.

116 ROOF DRAIN IN FURRED WALL TO BE TIED INTO STORM DRAINAGE SYSTEM PER CIVIL, TYP. OF 3 LOCATIONS.

117 2" METHANE VENT STACK PER METHANE MITIGATION DRAWINGS CONCEALED IN FURRED WALL

118 9" x 9" AIR INTAKE FAN PER MECHANICAL

119 ALL INTERIOR FLOORS TO BE SLIP RESISTANT FINISH COMPLYING WITH ANSI 137.1 TO ACHIEVE A WET DYNAMIC COEFFICIENT OF FRICTION OF NOT LESS THAN 0.42, USING A BOT 3000E DIGITAL TRIBOMETER (DCOF ACUTEST)

120 PROVIDE SIGN "AUTHORIZED PERSONNEL ONLY NO PUBLIC ACCESS"

LEGEND:

ONE HOUR WALL PER DETAIL 6/A-9

NON-RATED WALL PER DETAIL 9/A-9

FURRED WALL PER DETAIL 4/A-9

ILLUMINATED EXIT SIGN PER ELECTRICAL

EXHIBIT "A"
Page No. 5 of 29
Case No. DIR-2017-4167-PUB-CDP-SPP-1A; ZA-2017-3950-ZAA-1-

KDG Kenyon Design Group architecture & planning

ARCADIS
LEGAL ENTITY: ARCADIS U.S., INC.
445 E. FIGUEROA ST. SUITE 1500
LOS ANGELES CA 90071

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING

ENGINEERING CITY OF LOS ANGELES

CDP NO. C922

INDEX NO. D-35238

NO.	REVISIONS:	DATE:	BY:
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-

LICENSED ARCHITECT JAMES K. KIRCHER No. C-47967 STATE OF CALIFORNIA

THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED

GARY LEE MOORE, P.E. CITY ENGINEER

DESIGN GROUP	ENGINEER:	LIC NO.	DATE:
DESIGNED BY:	DEAN HAWKINS		8/31/17
DRAWN BY:	CATHY CARPIO		8/31/17
CHECKED BY:	DEAN HAWKINS		8/31/17
APPROVED BY:	JAMES SILCOTT		8/31/17

HORIZONTAL CONTROL: NAD83 (2007) NAVD 88 (2020) MAPPED IN NAD83 (2007) EPOCH 1997.5
VERTICAL CONTROL: (BASED ON CITY OF LOS ANGELES MONUMENTATION) EPOCH 1985.5

SHEET TITLE: ELECTRICAL BUILDING FLOOR PLANS

PROJECT: VENICE AUXILIARY PUMPING PLANT

ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923

DRAWING NO. A-3

SHEET 41 OF 140 SHEETS

DESIGN DATE (DESIGN STAGE ONLY)

Sheet Version 3.0

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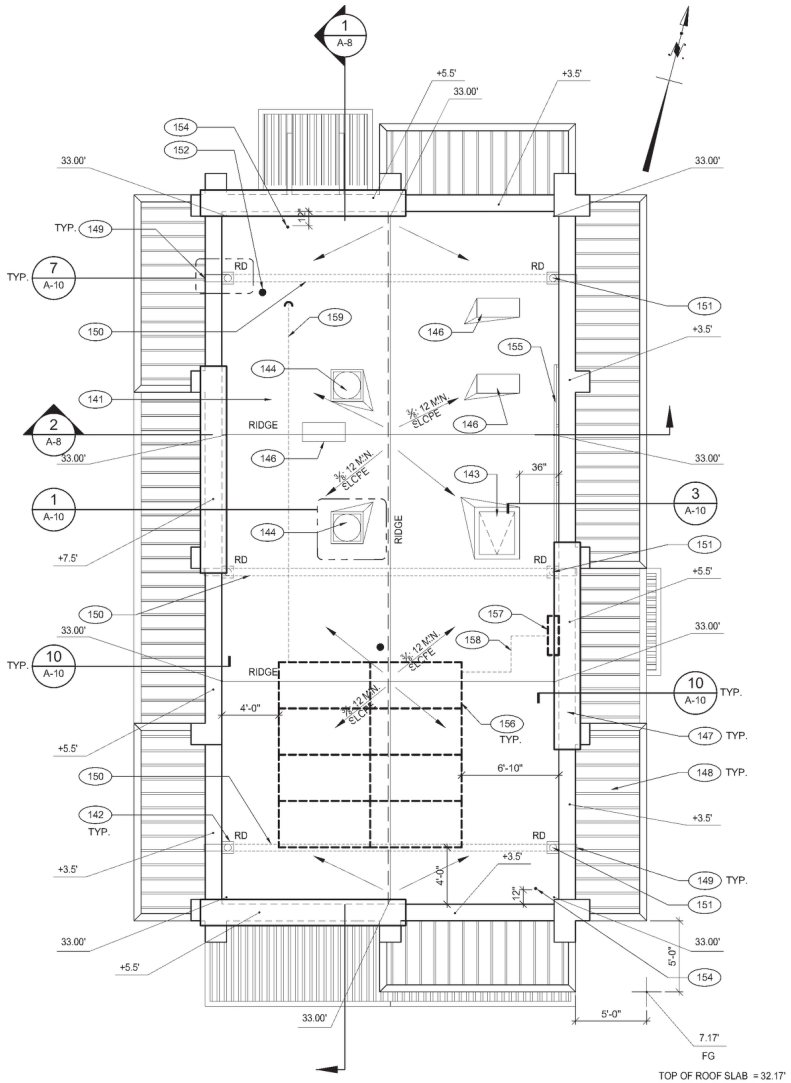
California Coastal Commission
A-5-VEN-22-0068, A-5-VEN-22-0069, 5-24-0123
Exhibit 2
Page 2 of 12



KEYNOTES:

141 PVC COOL ROOFING SYSTEM, TYPICAL

142 ROOF AND OVERFLOW DRAIN PER DETAIL 7/A-10, TYP. OF 6

143 ROOF HATCH PER DETAIL 3/A-10

144 27" x 27" SOLATUBES, TYP. OF 2 SEE DETAIL 1/A-10 (RR 25251)

145 ROUTING OF ELECTRICAL TO WATER HEATER SYSTEM BY ELECTRICAL ENGINEER

146 MECHANICAL EQUIPMENT SEE MECHANICAL.

147 METAL COPING OVER PARAPET PER DETAIL 11/A-10

148 EXTRUDED ALUMINUM LOUVER EYEBROW CANOPY

149 OVERFLOW SCUPPER, TYPICAL OF 6

150 ROOF DRAIN TO EXTEND BENEATH ROOF FRAMING TO EAST SIDE, TYP. OF 3

151 ROOF DRAIN TO BE PLACED WITHIN FURRED WALL AND TIED BELOW GRADE TO STORM WATER SYSTEM PER PLUMBING & CIVIL PLANS, TYP. OF 3

152 VENT STACK FROM RESTROOM PER MECHANICAL

153 NOT USED

154 METHANE VENT STACK @ +12" AFS, 12" MIN. OFFSET FROM PARAPET

155 METAL GUARDRAIL (42" HIGH MIN.)

156 FUTURE PHOTOVOLTAIC PANELS (8 @ 39" x 77")

157 FUTURE INVERTER AND CONDUIT

158 PATH WAY TO ELECTRICAL PANEL

159 PATHWAY TO WATER HEATER

FUTURE SOLAR ARRAY BREAKDOWN (NOT IN CONTRACT)	
TOTAL ROOF AREA	1152 SF
EQUIPMENT, HATCHES, ETC.	- 50 SF
NET ROOF AREA	1102
15% FUTURE SOLAR ARRAY	x 15%
FUTURE PROPOSED ARRAY AREA REQUIREMENT	165 SF
SOLAR AREA REQUIRED	165 SF
SOLAR AREA PROVIDED	166.83 SF
FUTURE POTENTIAL SOLAR ARRAY (COMPLIES)	166.83 SF

EXHIBIT "A"
Page No. 7 of 29
Case No. DIR-2017-4167-PUB-CDP-SPR-1A; ZA-2017-3950-ZAA-1

KDG Kennard Design Group architecture & planning
2321 Mission Street, Suite 202, San Francisco, CA 94110
T: (415) 285-2191 F: (415) 285-2195

ARCADIS
LEGAL ENTITY:
ARCADIS U.S., INC.
445 S. FIGUEROA ST.
SUITE 3050
LOS ANGELES
CA 90071

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING
VERTICAL CONTROL: (BAR) LA (NAVD 88 (2009))
HORIZONTAL CONTROL: (BARS) NAD 83 (2007) EPOCH 1991.5

GARY LEE MOORE, P.E. CITY ENGINEER DATE:
DESIGN GROUP
ENGINEER: HARMIK AGHANIAN LIC. NO. 8/31/17
DESIGNED BY: DEAN HAWKINS 8/31/17
DRAWN BY: CATHY CARPIO 8/31/17
CHECKED BY: DEAN HAWKINS 8/31/17
APPROVED BY: JAMES SILCOTT 8/31/17

THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED

V. NO. | REVISIONS: | DATE: | BY:

CD NO. C922
INDEX NO. D-35238

ENGINEERING CITY OF LOS ANGELES

SHEET TITLE: ELECTRICAL BUILDING ROOF PLAN
PROJECT: VENICE AUXILIARY PUMPING PLANT
ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923
DRAWING NO. A-5
SHEET 43 OF 140 SHEETS

DESIGN DATES (DESIGN STAGE ONLY)

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A-5-VEN-22-0068, A-5-VEN-22-0069, 5-24-0123
Exhibit 2
Page 3 of 12

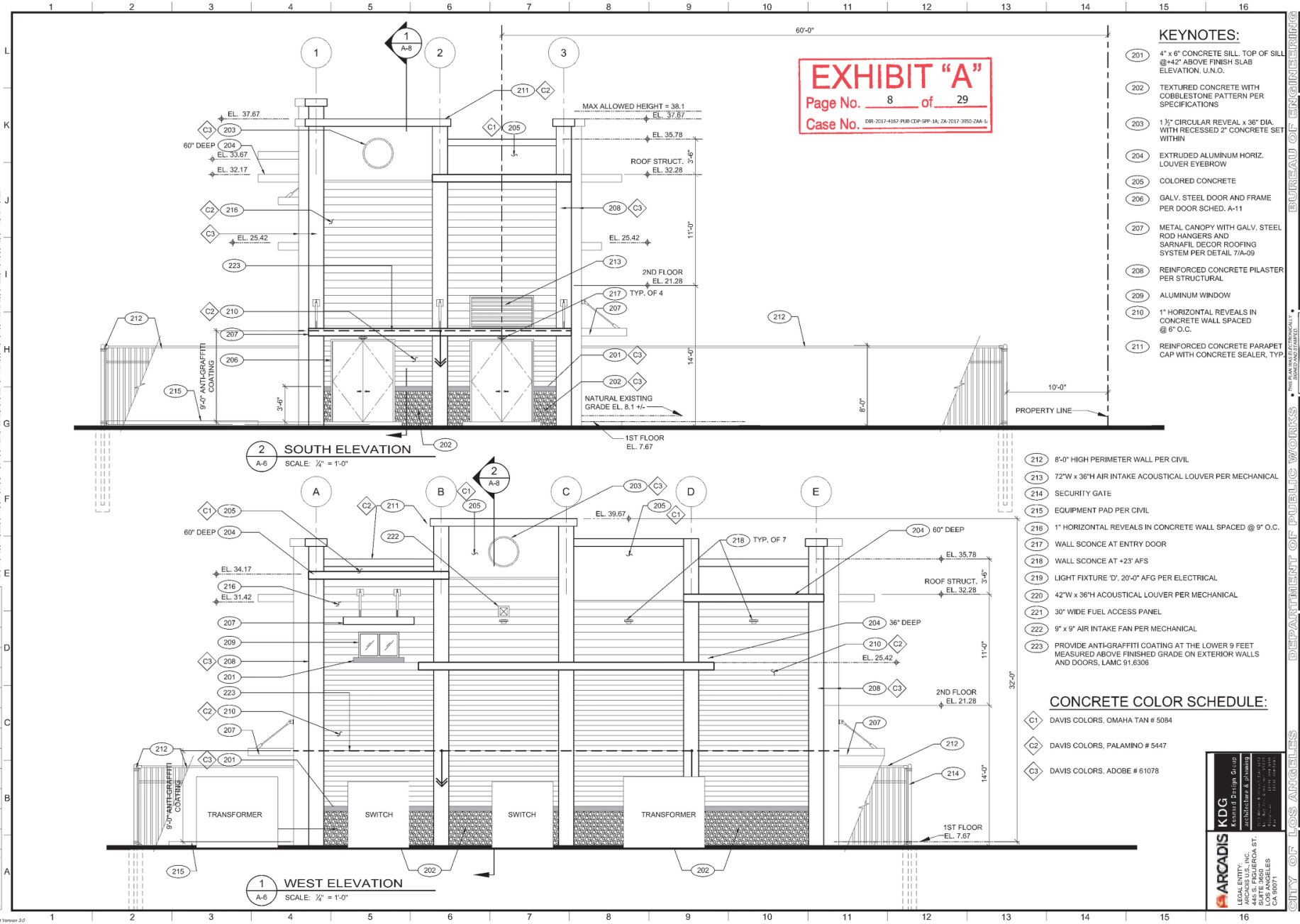
EXHIBIT "A"
Page No. 8 of 29
Case No. DIR-2017-4167-PUB-CDP-SPP-1A; ZA-2017-3952-ZAA-1A
KEYNOTES:
201 4" x 6" CONCRETE SILL. TOP OF SILL @+42" ABOVE FINISH SLAB ELEVATION, U.N.O.
202 TEXTURED CONCRETE WITH COBBLESTONE PATTERN PER SPECIFICATIONS
203 1 ½" CIRCULAR REVEAL x 36" DIA. WITH RECESSED 2" CONCRETE SET WITHIN
204 EXTRUDED ALUMINUM HORIZ. LOUVER EYEBROW
205 COLORED CONCRETE
206 GALV. STEEL DOOR AND FRAME PER DOOR SCHED. A-11
207 METAL CANOPY WITH GALV. STEEL ROD HANGERS AND SARNAFIL DECOR ROOFING SYSTEM PER DETAIL 7/A-09
208 REINFORCED CONCRETE PILASTER PER STRUCTURAL
209 ALUMINUM WINDOW
210 1" HORIZONTAL REVEALS IN CONCRETE WALL SPACED @ 6" O.C.
211 REINFORCED CONCRETE PARAPET CAP WITH CONCRETE SEALER, TYP.
212 8'-0" HIGH PERIMETER WALL PER CIVIL
213 72"W x 36"H AIR INTAKE ACOUSTICAL LOUVER PER MECHANICAL
214 SECURITY GATE
215 EQUIPMENT PAD PER CIVIL
216 1" HORIZONTAL REVEALS IN CONCRETE WALL SPACED @ 9" O.C.
217 WALL SCONCE AT ENTRY DOOR
218 WALL SCONCE AT +23' AFS
219 LIGHT FIXTURE 'D', 20'-0" AFG PER ELECTRICAL
220 42"W x 36"H ACOUSTICAL LOUVER PER MECHANICAL
221 30" WIDE FUEL ACCESS PANEL
222 9" x 9" AIR INTAKE FAN PER MECHANICAL
223 PROVIDE ANTI-GRAFFITI COATING AT THE LOWER 9 FEET MEASURED ABOVE FINISHED GRADE ON EXTERIOR WALLS AND DOORS, LAMC 91.6306
CONCRETE COLOR SCHEDULE:
C1 DAVIS COLORS, OMAHA TAN # 5084
C2 DAVIS COLORS, PALAMINO # 5447
C3 DAVIS COLORS, ADOBE # 61078
2 SOUTH ELEVATION
A-6 SCALE: ¼" = 1'-0"
1 WEST ELEVATION
A-6 SCALE: ¼" = 1'-0"
MAX ALLOWED HEIGHT = 38.1
EL. 37.67
EL. 35.78
ROOF STRUCT. 3'-6"
EL. 32.28
EL. 25.42
2ND FLOOR EL. 21.28
1ST FLOOR EL. 7.67
NATURAL EXISTING GRADE EL. 8.1 +/-
EL. 39.67
EL. 34.17
EL. 31.42
EL. 33.67
EL. 32.17
60" DEEP
36" DEEP
9'-0" ANTI-GRAFFITI COATING
TYP. OF 4
TYP. OF 7
11'-0"
14'-0"
32'-0"
3'-6"
8'-0"
10'-0"
60'-0"
PROPERTY LINE
TRANSFORMER
SWITCH
SWITCH
TRANSFORMER
CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING
ENGINEERING
CITY OF LOS ANGELES
GARY LEE MOORE, P.E. CITY ENGINEER
LIC. NO.
DESIGN GROUP
ENGINEER: DEAN HAWKINS 9/31/17
DESIGNED BY: DEAN HAWKINS 9/31/17
DRAWN BY: CATHY CARPIO 9/31/17
CHECKED BY: DEAN HAWKINS 9/31/17
APPROVED BY: JAMES SILCOTT 9/31/17
DATE:
BY:
NO. REVISIONS:
V ADDENDUM 1
INDEX NO. D-35238
CSP NO. C922
PRE-PLAN SHEET APPROVAL SIGNED AND STAMPED
LICENSED ARCHITECT JAMES E. SILCOTT NO. C-14760 STATE OF CALIFORNIA
VERTICAL CONTROL: (SAMPLE) NAVD 88 (2000)
HORIZONTAL CONTROL: SHARP SYSTEMS ZONE 5 EPOCH 1991.35
SHEET TITLE: ELECTRICAL BUILDING EXTERIOR ELEVATIONS
PROJECT: VENICE AUXILIARY PUMPING PLANT
ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA
WORK ORDER NO. SZC12923
DRAWING NO. A-6
SHEET 44 OF 140 SHEETS
KDG Kimley Design Group architecture & planning
ARCADIS
LEGAL ENTITY: ARCADIS U.S., INC. 445 S. FIGUEROA ST. SUITE 3650 LOS ANGELES CA 90071
REVISION DATES (CERTIFICATE OF CORRECTION)
THE CITY OF LOS ANGELES OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF ELECTRONIC COPIES OF THIS PLAN SHEET
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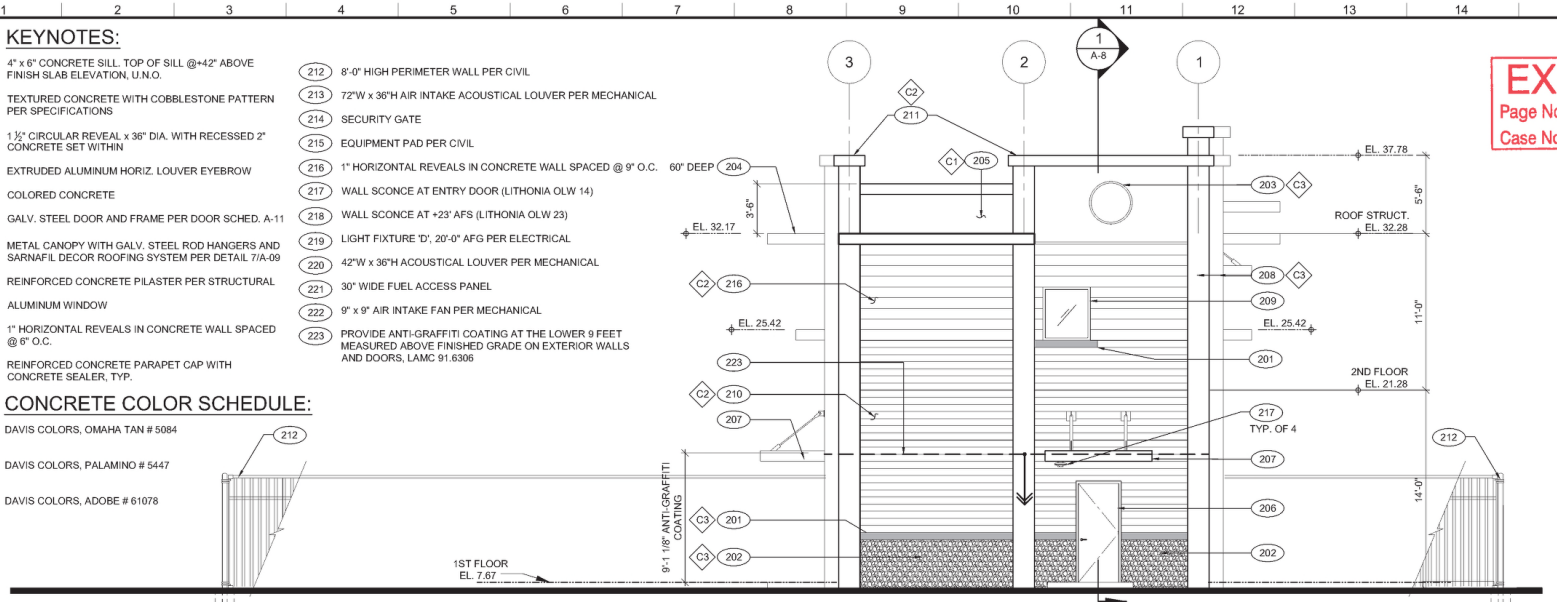
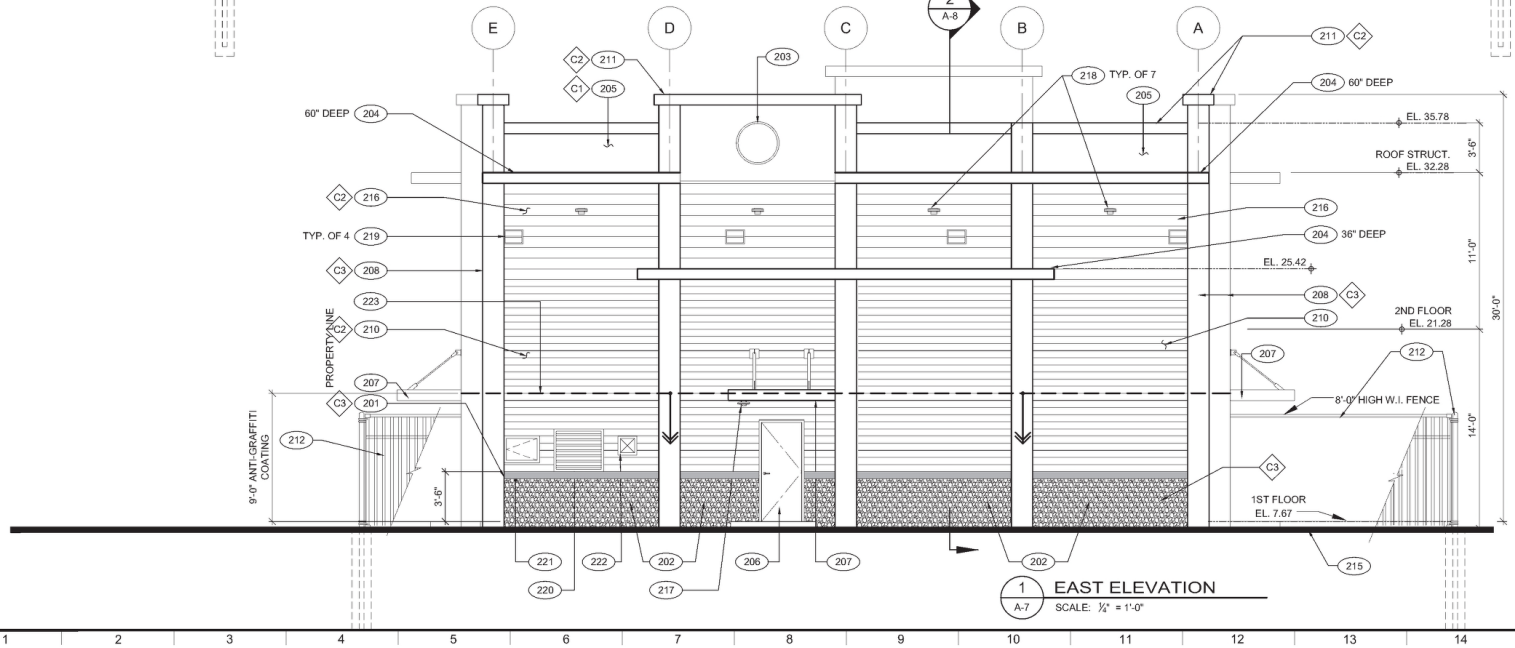
204 EXTRUDED ALUMINUM HORIZ. LOUVER EYEBROW
205 COLORED CONCRETE
206 GALV. STEEL DOOR AND FRAME PER DOOR SCHED. A-11
207 METAL CANOPY WITH GALV. STEEL ROD HANGERS AND SARNAFIL DECOR ROOFING SYSTEM PER DETAIL 7/A-09
208 REINFORCED CONCRETE PILASTER PER STRUCTURAL
209 ALUMINUM WINDOW
210 1" HORIZONTAL REVEALS IN CONCRETE WALL SPACED @ 6" O.C.
211 REINFORCED CONCRETE PARAPET CAP WITH CONCRETE SEALER, TYP.
212 8'-0" HIGH PERIMETER WALL PER CIVIL
213 72"W x 36"H AIR INTAKE ACOUSTICAL LOUVER PER MECHANICAL
214 SECURITY GATE
215 EQUIPMENT PAD PER CIVIL
216 1" HORIZONTAL REVEALS IN CONCRETE WALL SPACED @ 9" O.C. 60" DEEP
217 WALL SCONCE AT ENTRY DOOR (LITHONIA OLW 14)
218 WALL SCONCE AT +23' AFS (LITHONIA OLW 23)
219 LIGHT FIXTURE 'D', 20'-0" AFG PER ELECTRICAL
220 42"W x 36"H ACOUSTICAL LOUVER PER MECHANICAL
221 30" WIDE FUEL ACCESS PANEL
222 9" x 9" AIR INTAKE FAN PER MECHANICAL
223 PROVIDE ANTI-GRAFFITI COATING AT THE LOWER 9 FEET MEASURED ABOVE FINISHED GRADE ON EXTERIOR WALLS AND DOORS, LAMC 91.6306

CONCRETE COLOR SCHEDULE:

C1 DAVIS COLORS, OMAHA TAN # 5084
C2 DAVIS COLORS, PALAMINO # 5447
C3 DAVIS COLORS, ADOBE # 61078



2 A-7 NORTH ELEVATION
SCALE: ¼" = 1'-0"



1 A-7 EAST ELEVATION
SCALE: ¼" = 1'-0"

EXHIBIT "A"
Page No. 9 of 29
Case No. DIR-2017-4167-PUB-CDP-SPP-1A; ZA-2017-3952-ZAA-1

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING
ENGINEERING CITY OF LOS ANGELES
GARY LEE MOORE, P.E. CITY ENGINEER
DESIGN GROUP
ENGINEER: HARWIK ASHANIAN LIC. NO. DATE: 8/31/17
DESIGNED BY: DEAN HAWKINS 8/31/17
DRAWN BY: CATHY CARPIO 8/31/17
CHECKED BY: DEAN HAWKINS 8/31/17
APPROVED BY: JAMES SILCOTT 8/31/17
THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED
LICENSED ARCHITECT JAMES K. SILCOTT No. C-27967 STATE OF CALIFORNIA
V. NO. REVISIONS: DATE: BY:
DEP NO. C922
INDEX NO. D-35238
SHEET TITLE: ELECTRICAL BUILDING EXTERIOR ELEVATIONS
PROJECT: VENICE AUXILIARY PUMPING PLANT
ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA
KDG Kevanz Design Group architecture & planning
ARCADIS
LEGAL ENTITY: ARCADIS U.S. INC. 445 S. FIGUEROA ST. SUITE 3050 LOS ANGELES CA 90071
WORK ORDER NO. SZC12923
DRAWING NO. A-7
SHEET 45 OF 140 SHEETS

THE CITY OF LOS ANGELES OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF ELECTRONIC COPIES OF THIS PLAN SHEET.
REVISION DATE (FOR CITY USE ONLY)
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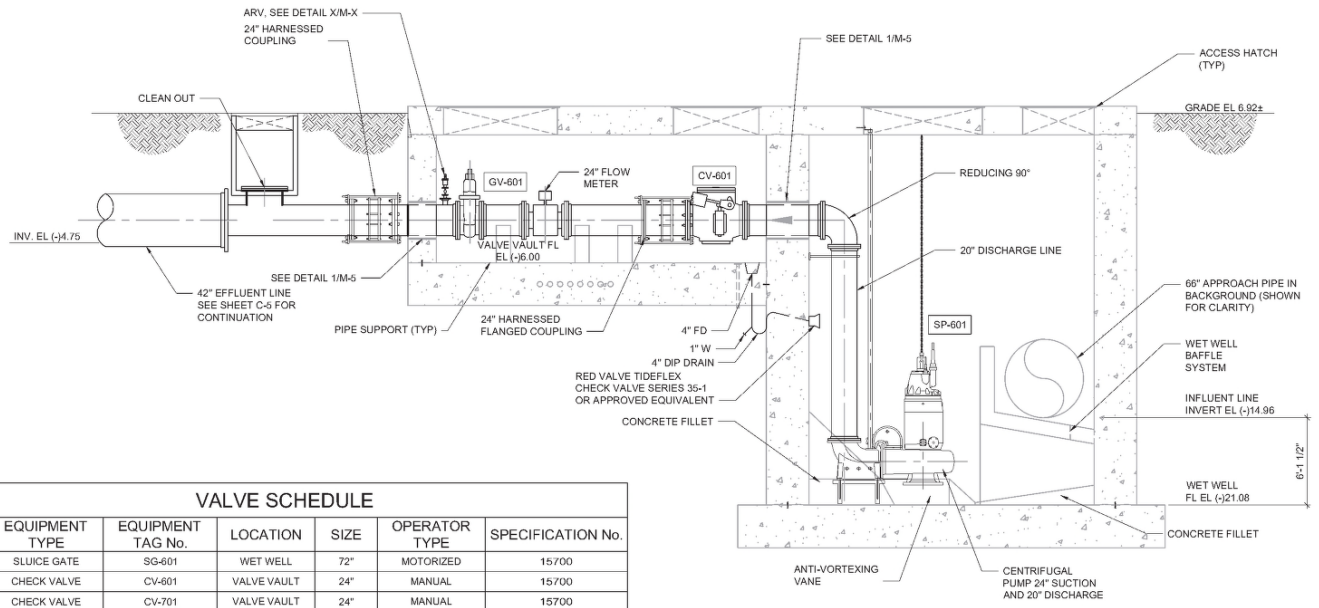
California Coastal Commission
A-5-VEN-22-0068, A-5-VEN-22-0069, 5-24-0123
Exhibit 2
Page 5 of 12

GENERAL SHEET NOTES

1. PROVIDE ELECTRIC OPERATED TRAP PRIMER TO THE 4" FLOOR DRAIN.



VALVE SCHEDULE

REF	EQUIPMENT TYPE	EQUIPMENT TAG No.	LOCATION	SIZE	OPERATOR TYPE	SPECIFICATION No.
1	SLUICE GATE	SG-601	WET WELL	72"	MOTORIZED	15700
2	CHECK VALVE	CV-601	VALVE VAULT	24"	MANUAL	15700
3	CHECK VALVE	CV-701	VALVE VAULT	24"	MANUAL	15700
4	CHECK VALVE	CV-801	VALVE VAULT	24"	MANUAL	15700
5	GATE VALVE	GV-601	VALVE VAULT	24"	MANUAL	15700
6	GATE VALVE	GV-701	VALVE VAULT	24"	MANUAL	15700
7	GATE VALVE	GV-801	VALVE VAULT	24"	MANUAL	15700
8	CHECK VALVE	CV-602	VALVE VAULT	4"	MANUAL	15700

M-2	SECTION A
SCALE: 1/4" = 1'-0"	M-3

EXHIBIT "A"
Page No. 23 of 29
Case No. DIR-2017-4167-PUB-CDP-SPP-1A; ZA-2017-3950-ZAA-1

SCALE: 1/4" = 1'-0"

ARCADIS
LEGAL ENTITY: ARCADIS U.S., INC. 445 S. FIGUEROA ST. SUITE 3650 LOS ANGELES CA 90071

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING

GARY LEE MOORE, P.E. CITY ENGINEER
DESIGN GROUP
ENGINEER: DAN RYAN LIC. NO. M34945 DATE: 8/31/17
DESIGNED BY: DAN RYAN 8/31/17
DRAWN BY: JEFF RAY 8/31/17
CHECKED BY: GREG BAZYDOLA 8/31/17
APPROVED BY: GREG BAZYDOLA 8/31/17

VERTICAL CONTROL: (SAMPLE) NAVD 88 (2000)
HORIZONTAL CONTROL: (SAMPLE) NAD83, ZONE 5, EPOCH 1991.5

SHEET TITLE: SECTION A
PROJECT: VENICE AUXILIARY PUMPING PLANT
ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923
DRAWING NO. M-3
SHEET 72 OF 140 SHEETS

ENGINEERING CITY OF LOS ANGELES

CIP NO. C922
INDEX NO. D-35238

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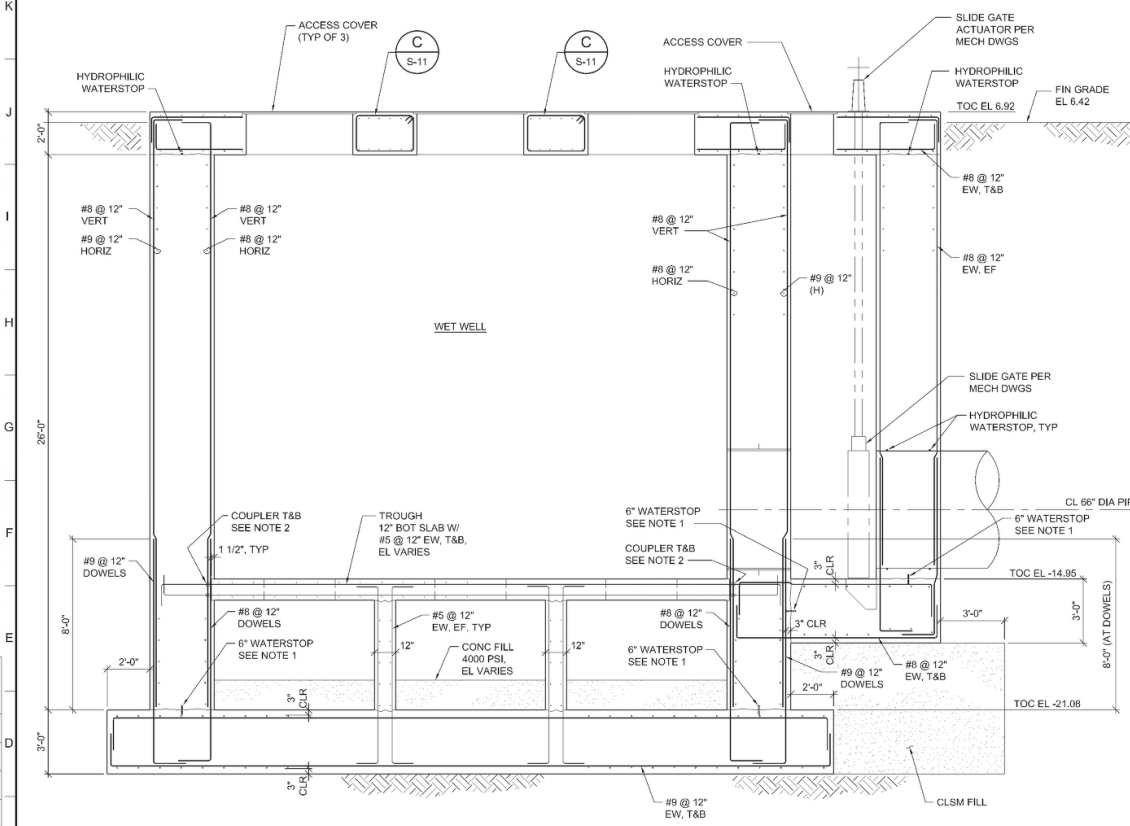
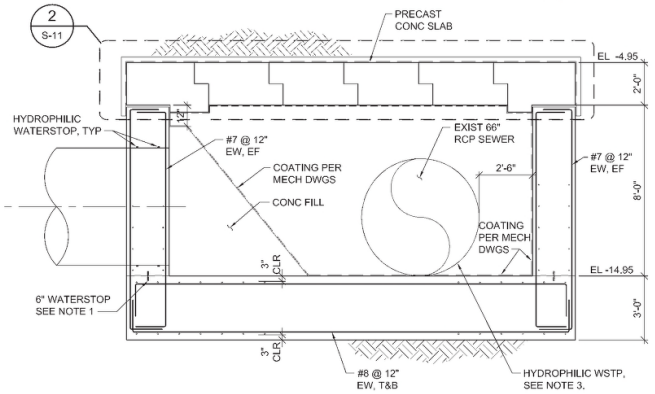
Sheet Version 3.0





DIVERSION STRUCTURE

S-5, S-6	SECTION A
SCALE: 3/8" = 1'-0"	S-8

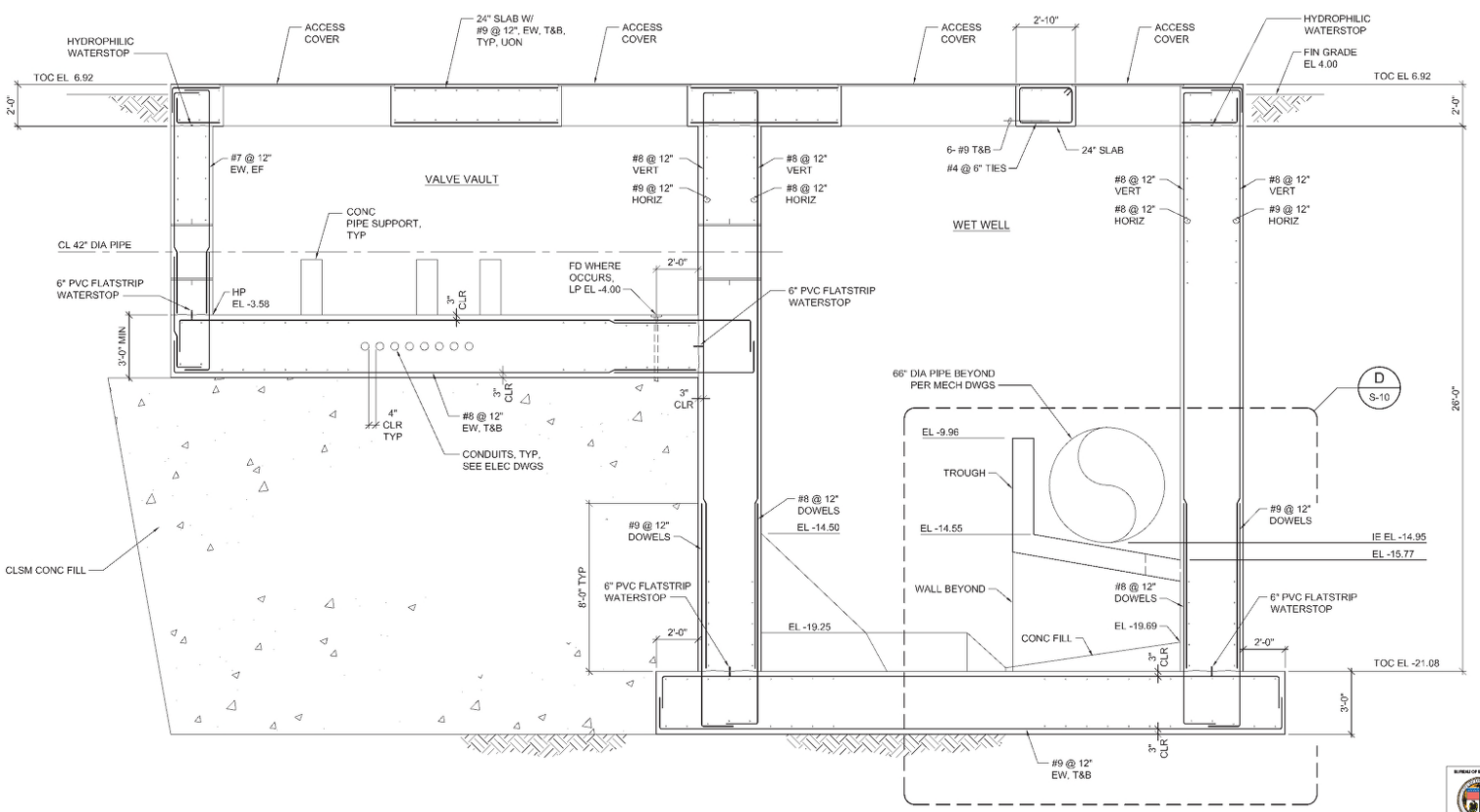
NOTES:

1. 6" WATERSTOP SHALL BE "GREENSTREAK 679", FLAT-RIBBED, PVC.
2. REINFORCING STEEL COUPLERS SHALL BE "ERICO, LENTON COUPLERS", THREADED MECHANICAL CONNECTORS, ICC-ES ER-3967.
3. THERE WILL BE TWO HYDROPHILIC WATERSTOP SPACED AT 6" FROM EACH FACE OF CONCRETE WALL.

EXHIBIT "A"
Page No. 27 of 29
Case No. DIR-2017-4167-PUB-CDP-SPP-1A; ZA-2017-3950-ZAA-1

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING
ENGINEERING
CITY OF LOS ANGELES
INDEX NO. D-35238
CDP NO. C922
GARY LEE MOORE, P.E. CITY ENGINEER
ENGINEER: SUBHASH PATEL DATE: 8/31/17
DESIGN GROUP LIC. NO. 54233
DESIGNED BY: HUNG-I WU 8/31/17
DRAWN BY: JANE NIEDERKORN 8/31/17
CHECKED BY: SUBHASH PATEL 8/31/17
APPROVED BY: VENU KOLLI 8/31/17
SHEET TITLE: PUMPING FACILITY AND DIVERSION STRUCTURE SECTION
PROJECT: VENICE AUXILIARY PUMPING PLANT
ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA
Beyaz & Patel
ARCADIS
WORK ORDER NO. SZC12923
DRAWING NO. S-8
SHEET 58 OF 140 SHEETS

California Coastal Commission
A-5-VEN-22-0068, A-5-VEN-22-0069, 5-24-0123
Exhibit 2
Page 7 of 12



S-05	SECTION B
SCALE: 3/8" = 1'-0"	S-09

EXHIBIT "A"
Page No. 28 of 29
Case No. DIR-2017-4167-PUB-CDP-SPP-1A; ZA-2017-3950-ZAA-1A

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING

ENGINEERING
CITY OF LOS ANGELES

NO.	REVISIONS:	DATE:	BY:
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CDP NO. C922
INDEX NO. D-35238

THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED
06-06-18

GARY LEE MOORE, P.E. CITY ENGINEER DATE: 8/31/17
DESIGN GROUP
ENGINEER: SUBHASH PATEL LIC. NO. S-4233 8/31/17
DESIGNED BY: HUNG I WU 8/31/17
DRAWN BY: JANE NEEDERKORN 8/31/17
CHECKED BY: SUBHASH PATEL 8/31/17
APPROVED BY: VENKI KOLI 8/31/17

SHEET TITLE: PUMPING FACILITY AND DIVERSION STRUCTURE SECTION
PROJECT: VENICE AUXILIARY PUMPING PLANT
ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA

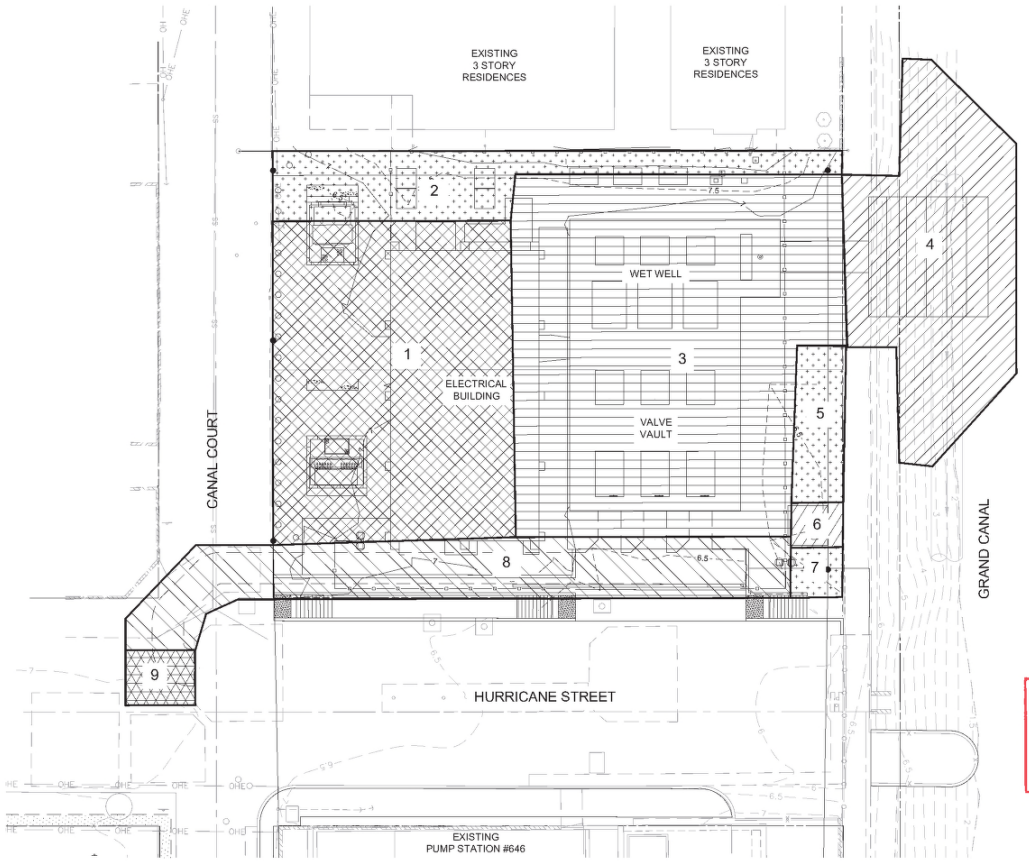
VERTICAL CONTROL: SAMPLE NAVD 88 (2006)
HORIZONTAL CONTROL: SAMPLE NAD 83 (2007), EPOCH 1991.8

WORK ORDER NO. SZC12923
DRAWING NO. S-9
SHEET 59 OF 140 SHEETS

Beyaz & Patel
BEYAZ & PATEL INC.
8510 BALBOA BLVD.
SUITE 210
NORTHRIDGE
CA 91325

ARCADIS
LEGAL ENTITY:
ARCADIS U.S., INC.
445 S. FIGUEROA ST.
SUITE 2800
LOS ANGELES
CA 90071

THE CITY OF LOS ANGELES DOES NOT WARRANT THE ACCURACY OR COMPLETENESS OF ELECTRONIC COPIES OF THIS PLAN SHEET. THE ELECTRONIC COPIES SHALL NOT BE RELIED UPON AS AS-BUILTS. ANY PARTIES USING AS-BUILTS SHALL INDEMNIFY AND HOLD HARMLESS THE CITY FROM ANY AND ALL LIABILITIES ARISING FROM THE USE OF AS-BUILTS.



EXCAVATION LEGEND

- EXCAVATION DEPTH 0-6 FT
- EXCAVATION DEPTH 6-7 FT
- EXCAVATION DEPTH 11-12 FT
- EXCAVATION DEPTH 14-15 FT
- EXCAVATION DEPTH 23-24 FT
- EXCAVATION DEPTH 29-30 FT

CUT AND FILL ESTIMATE

SURFACE ESTIMATE

CUT: 69 CY
FILL: 10 CY
NET: 59 CY CUT

OVERALL EXCAVATION ESTIMATE

	CUT	FILL	NET CUT/FILL
AREA 1:	1,850 CY	770 CY	1,080 CY CUT
AREA 2:	510 CY	510 CY	0 CY
AREA 3:	11,340 CY	5,360 CY	5,980 CY CUT
AREA 4:	5,730 CY	2,030 CY	3,700 CY CUT
AREA 5:	20 CY	10 CY	10 CY CUT
AREA 6:	30 CY	30 CY	0 CY
AREA 7:	N/A	N/A	N/A
AREA 8:	1,530 CY	560 CY	970 CY CUT
AREA 9:	1,080 CY	175 CY	905 CY CUT

TOTAL: 17,290 CY 8,580 CY 8,710 CY CUT

NOTES:

1. FILL ESTIMATE IS NATIVE FILL. ENGINEERED FILL IS NOT ESTIMATED IN THIS ESTIMATE.
2. EXCAVATION IN TRENCHES WILL BE BACKFILLED WITH PIPE BEDDING AS INDICATED IN THESE PLANS AND NATIVE FILL.
3. SURFACE ESTIMATE IS SURFACE GRADING ONLY AND NOT EXCAVATION.
4. ESTIMATES DO NOT INCLUDE ANY ADJUSTMENT FACTORS.

EXHIBIT "A"
Page No. 16 of 29
Case No. DIR-2017-4173-CDP-SPP-1A; ZA-2017-3953-CU-1A

SCALE: 1" = 10'

ARCADIS
LEGAL ENTITY:
ARCADIS U.S. INC.
445 S. FIGUEROA ST.
SUITE 3400
LOS ANGELES
CA 90071

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING
ENGINEERING CITY OF LOS ANGELES

NO.	REVISIONS:	DATE	BY:
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-

CD NO. C922
INDEX NO. D-35238

GARY LEE MOORE, P.E. CITY ENGINEER
DESIGN GROUP
ENGINEER: JERA PRIOR LIC. NO. CA-78899 DATE 5/31/17
DESIGNED BY: MANUEL ALVAREZ 5/31/17
DRAWN BY: JERA PRIOR 5/31/17
CHECKED BY: GREG BASYDOLA 5/31/17
APPROVED BY: YEWI KOLI 5/31/17

SHEET TITLE: CUT AND FILL EXHIBIT
PROJECT: VENICE AUXILIARY PUMPING PLANT
ADDRESS: 133 HURRICANE STREET
LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923
DRAWING NO. C-16
SHEET 24 OF 140 SHEETS

THE CITY OF LOS ANGELES OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF ELECTRONIC COPIES OF THIS PLAN SHEET

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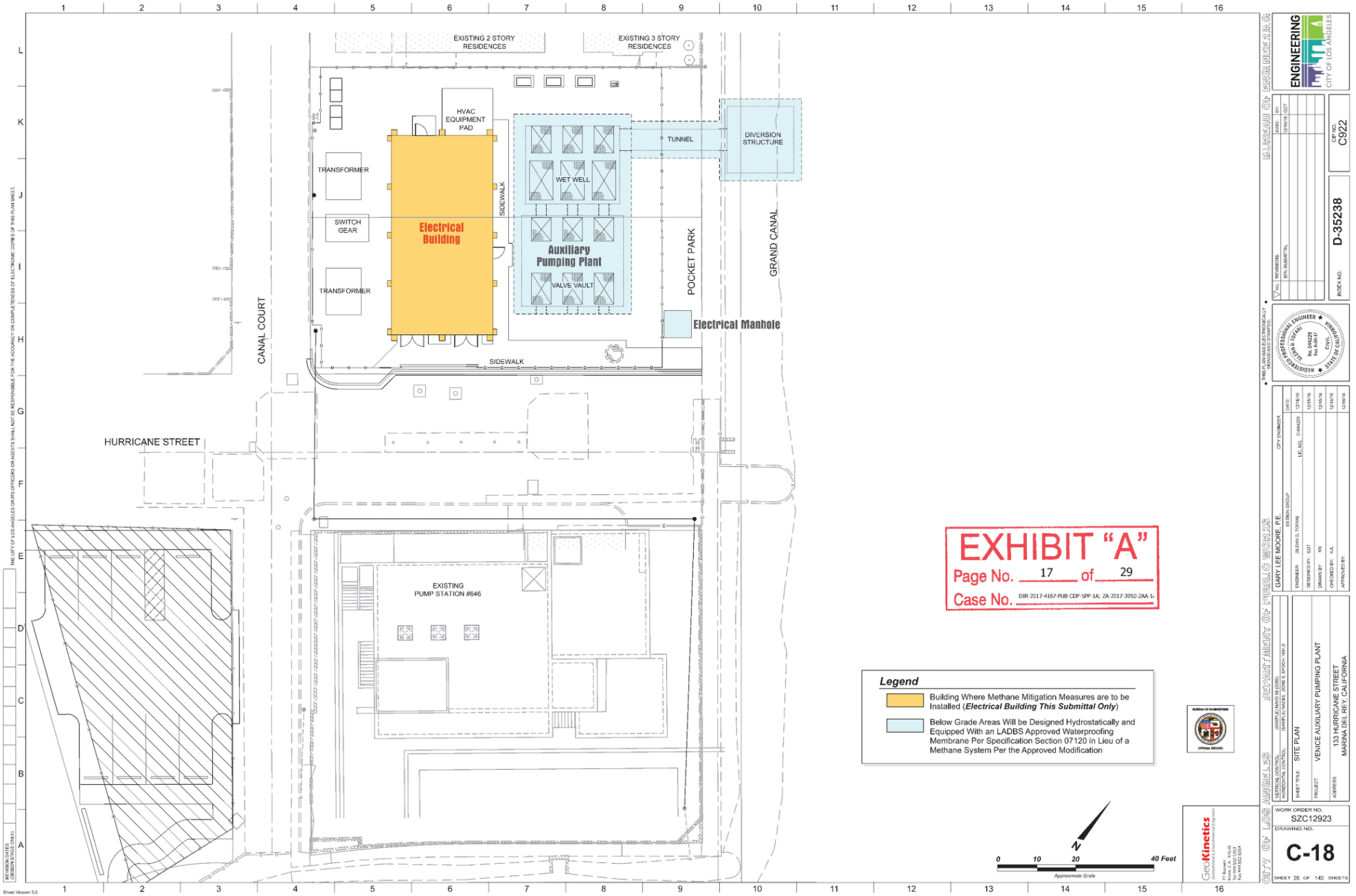
California Coastal Commission
A-5-VEN-22-0068, A-5-VEN-22-0069, 5-24-0123
Exhibit 2
Page 9 of 12



California Coastal Commission
A-5-VEN-22-0068, A-5-VEN-22-0069, 5-24-0123
Exhibit 2
Page 10 of 12

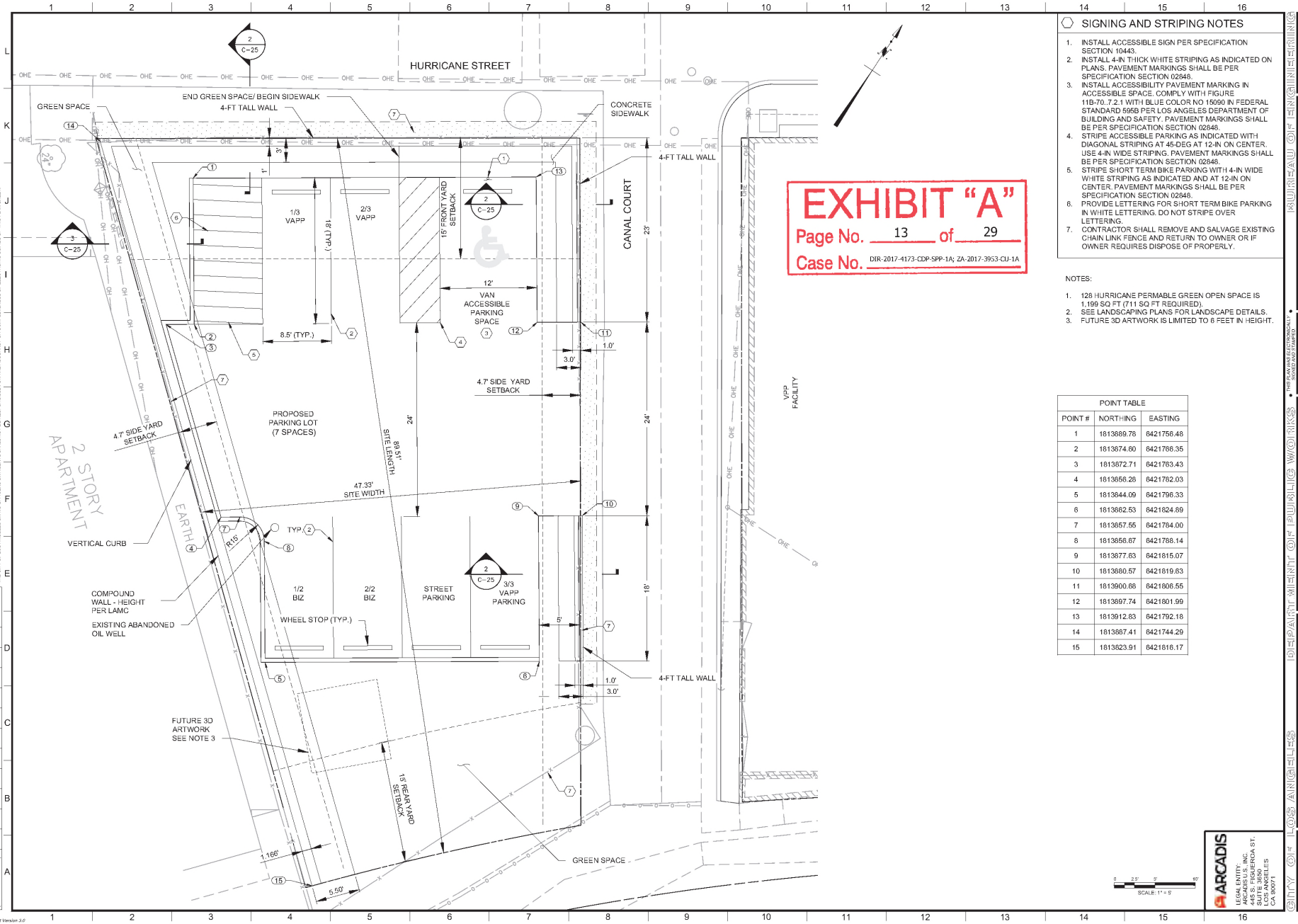


EXHIBIT "A"
Page No. 13 of 29
Case No. DIR-2017-4173-CDP-SPP-1A; ZA-2017-3953-CU-1A

SIGNING AND STRIPING NOTES

1. INSTALL ACCESSIBLE SIGN PER SPECIFICATION SECTION 10443.
2. INSTALL 4-IN THICK WHITE STRIPING AS INDICATED ON PLANS. PAVEMENT MARKINGS SHALL BE PER SPECIFICATION SECTION 02848.
3. INSTALL ACCESSIBILITY PAVEMENT MARKING IN ACCESSIBLE SPACE. COMPLY WITH FIGURE 11B-70..7.2.1 WITH BLUE COLOR NO 15090 IN FEDERAL STANDARD 595B PER LOS ANGELES DEPARTMENT OF BUILDING AND SAFETY. PAVEMENT MARKINGS SHALL BE PER SPECIFICATION SECTION 02848.
4. STRIPE ACCESSIBLE PARKING AS INDICATED WITH DIAGONAL STRIPING AT 45-DEG AT 12-IN ON CENTER. USE 4-IN WIDE STRIPING. PAVEMENT MARKINGS SHALL BE PER SPECIFICATION SECTION 02848.
5. STRIPE SHORT TERM BIKE PARKING WITH 4-IN WIDE WHITE STRIPING AS INDICATED AND AT 12-IN ON CENTER. PAVEMENT MARKINGS SHALL BE PER SPECIFICATION SECTION 02848.
6. PROVIDE LETTERING FOR SHORT TERM BIKE PARKING IN WHITE LETTERING. DO NOT STRIPE OVER LETTERING.
7. CONTRACTOR SHALL REMOVE AND SALVAGE EXISTING CHAIN LINK FENCE AND RETURN TO OWNER OR IF OWNER REQUIRES DISPOSE OF PROPERLY.

NOTES:

1. 126 HURRICANE PERMABLE GREEN OPEN SPACE IS 1,199 SQ FT (711 SQ FT REQUIRED).
2. SEE LANDSCAPING PLANS FOR LANDSCAPE DETAILS.
3. FUTURE 3D ARTWORK IS LIMITED TO 8 FEET IN HEIGHT.

POINT TABLE		
POINT #	NORTHING	EASTING
1	1813889.78	6421756.48
2	1813874.60	6421766.35
3	1813872.71	6421763.43
4	1813856.26	6421782.03
5	1813844.09	6421796.33
6	1813862.53	6421824.89
7	1813857.55	6421784.00
8	1813856.67	6421788.14
9	1813877.63	6421815.07
10	1813880.57	6421819.63
11	1813900.88	6421806.55
12	1813897.74	6421801.99
13	1813912.83	6421792.18
14	1813887.41	6421744.29
15	1813823.91	6421816.17

ARCADIS
LEGAL ENTITY: ARCADIS U.S. INC.
445 S. FIGUEROA ST. SUITE 3400
LOS ANGELES CA 90071

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING
ENGINEERING
CITY OF LOS ANGELES
INDEX NO. D-31898
CD NO. C922
V NO. | REVISIONS: | DATE | BY
THIS PLAN IS ELECTRONICALLY SIGNED AND STAMPED
GARY LEE MOORE, P.E. CITY ENGINEER DATE:
DESIGN GROUP
ENGINEER: JENA PRIOR LIC NO.
DESIGNED BY: MANUEL ALVAREZ 8/31/17
DRAWN BY: NICHOLAS DANIELAS 8/31/17
CHECKED BY: GREG SIADYCOLA 8/31/17
APPROVED BY*: VENU ADLI 8/31/17
VERTICAL CONTROL: NAVD 88 (2006)
HORIZONTAL CONTROL: NAD83 (2007) EPOCH 1997.5
SHEET TITLE: PARKING LOT SITE, STRIPING & SIGNING PLAN
PROJECT: VENICE AUXILIARY PUMPING PLANT
ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA
WORK ORDER NO. SZC12923
DRAWING NO. C-13
SHEET 21 OF 140 SHEETS

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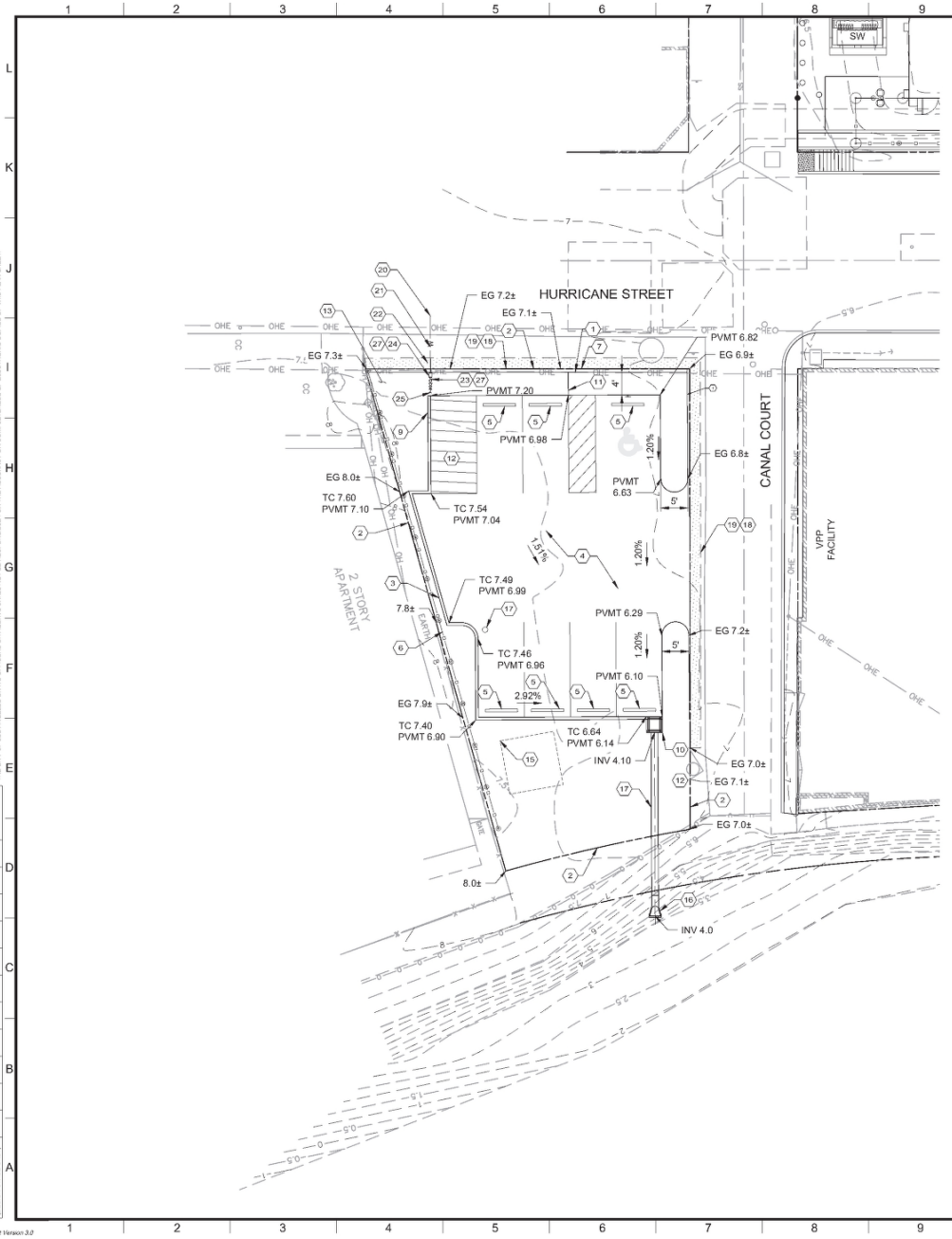

PAVING AND GRADING NOTES

1. CONSTRUCT SIDEWALK PER BOE STANDARD PLAN S-444-0. WIDTH AS NOTED.
2. MATCH EXISTING GRADE ALONG PROPERTY BOUNDARY.
3. CONSTRUCT TYPE A CURB PER BOE STANDARD PLAN S-410-2.
4. CONSTRUCT PAVEMENT SECTION PER DETAIL ON SHEET C-15.
5. INSTALL PRECAST CONCRETE WHEEL STOP AND ANCHOR PER MANUFACTURER'S RECOMMENDATIONS.
6. FUTURE DECORATIVE WALL.
7. INSTALL 3-FT HIGH PARKING WALL PER DETAIL ON SHEET C-15.
8. GRADES INDICATED ON PLAN ARE FINISH GRADE UNLESS OTHERWISE NOTED AS TOP OF CURB OR OTHER GRADE ELEVATION.
9. CONSTRUCT 5-FT CURB TERMINATION PER DETAIL ON SHEET C-7.
10. INSTALL CATCH BASIN PER BOE STANDARD PLAN S-355-0 WITH CATCH BASIN INSERT. CATCH BASIN SHALL BE MODIFIED SO THAT IT IS ONLY 2 FEET DEEP. CATCH BASIN INSERT SHALL BE CAPABLE OF HANDLING THE FIRST 3/4-IN OF RUNOFF FROM A STORM EVENT. CATCH BASIN INSERT SHALL BE MADE OF A FILTRATION SYSTEM THAT WILL ALLOW POLLUTANTS TO BE REMOVED WITHOUT RELEASING THEM. CATCH BASIN INSERT SHALL BE DRAINPAC BY UNITED STORMWATER OR EQUIVALENT.
11. END GREEN SPACE/ BEGIN SIDEWALK.
12. NO PARKING.
13. GREEN SPACE.
14. EXISTING ABANDONED OIL WELL. PROTECT IN PLACE.
15. FUTURE 3D ARTWORK.
16. INSTALL PRECAST CONCRETE FLARED END SECTION PER CALTRANS STANDARD DETAIL D94B.
17. INSTALL 8-IN RCP STORM DRAIN PIPE PER BOE STANDARD DETAIL S-241 (SLOPE 0.33%).
18. INSTALL ASPHALT PAVEMENT. MATCH SECTION AND TYPE OF EXISTING ASPHALT IN HURRICANE AND CANAL STREETS (BASE AND ASPHALT). COMPACT BASE TO 95% RELATIVE DENSITY.
19. SAWCUT EXISTING ASPHALT TO CLEAN EDGE AND REMOVE (2-FT WIDTH).
20. INSTALL 8-IN BY 1 1/2-IN TAPPING SLEEVE AND VALVE. SURVEY DID NOT SHOW WATER IN HURRICANE STREET, HOWEVER, A FIELD VISIT ON APRIL 11, 2018 UTILITY LOCATION INFORMATION INDICATED AN EXISTING WATER LINE ON THE NORTHWEST SIDE OF THE STREET.
21. 1 1/2-IN WATER SERVICE IN TRENCH PER BOE STANDARD DETAIL S-251-1, CASE 1, MODIFIED SUCH THAT TYPE A MATERIAL SHALL EXTEND A MINIMUM OF 4-IN ABOVE THE TOP OF PIPE.
22. 1 1/2-IN WATER METER PER WATER COMPANY REQUIREMENTS.
23. INSTALL 1 1/2-IN VALVE.
24. INSTALL 1 1/2-IN BACKFLOW PREVENTER. SEE DETAIL SHEET C-7.
25. SEE IRRIGATION PLANS FOR CONTINUATION.
26. IF AN EXISTING WATER SERVICE EXISTS FOR THIS LOT, CONTRACTOR MAY USE EXISTING WATER SERVICE AND PROVIDE THE WATER METER, VALVE AND BACKFLOW PREVENTER.
27. METER BOX AND BACKFLOW PREVENTER LOCATIONS ARE APPROXIMATE. CONTRACTOR SHALL PLACE THEM SO THAT THEY DO NOT CONFLICT WITH OTHER APPURTENANCES.

EXHIBIT "A"
Page No. 15 of 29
Case No. DIR-2017-4173-CDP-SPP-1A; ZA-2017-3953-CU-1A

SCALE: 1" = 10'

ARCADIS
LEGAL ENTITY
ARCADIS U.S., INC.
445 S. FIGUEROA ST.
SUITE 3050
LOS ANGELES
CA 90071

CITY OF LOS ANGELES — DEPARTMENT OF PUBLIC WORKS — BUREAU OF ENGINEERING

ENGINEERING — CITY OF LOS ANGELES

NO.	REVISIONS:	DATE	BY
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-

INDEX NO. D-35238
CIP NO. C922

"PW CANVAS ELECTRONICALLY SIGNED AND STAMPED"

GARY LEE MOORE, P.E. — CITY ENGINEER — DATE: 8/31/17

DESIGN GROUP — LIC. NO.

ENGINEER:	JENA PRIOR	8/31/17
DESIGNED BY:	MANUEL ALVAREZ	8/31/17
DRAWN BY:	NICHOLAS CANDELAS	8/31/17
CHECKED BY:	GREG BASYDOLA	8/31/17
APPROVED BY:	VENU KOLLI	8/31/17

VERTICAL CONTROL: NAVD 88 (2000)
HORIZONTAL CONTROL: NAD83 ZONE 5 EPOCH 1991.5

SHEET TITLE: PARKING LOT PAVING, GRADING & DRAINAGE PLAN
PROJECT: VENICE AUXILIARY PUMPING PLANT
ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923
DRAWING NO. C-14
SHEET 22 OF 140 SHEETS

THE CITY OF LOS ANGELES OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF ELECTRONIC COPIES OF THIS PLAN SHEET.

XREFS: None IMAGES: None
User: Prior Spec: PWLE_STANDARD File ID: \\prodfs\c_proj\083332002 - Venice Pump Station\2-SHEETS\02-C-CIVIL\SP-EX02.DWG Scale: 1:1 Date: 08/23/2017 Time: 15:44 Layout: Blank
Sheet Version: 3.0

VAPP

CALIFORNIA COASTAL COMMISSION
SOUTH COAST DISTRICT OFFICE
301 E. OCEAN BLVD., SUITE 300
LONG BEACH, CA 90802
(562) 590-5071
SOUTHCOAST@COASTAL.CA.GOV

APPEAL FORM

Appeal of Local Government Coastal Development Permit

Filing Information (STAFF ONLY)

District Office: South Coast

Appeal Number: _____

Date Filed: _____

Appellant Name(s): _____

APPELLANTS

IMPORTANT. Before you complete and submit this appeal form to appeal a coastal development permit (CDP) decision of a local government with a certified local coastal program (LCP) to the California Coastal Commission, please review the appeal information sheet. The appeal information sheet describes who is eligible to appeal what types of local government CDP decisions, the proper grounds for appeal, and the procedures for submitting such appeals to the Commission. Appellants are responsible for submitting appeals that conform to the Commission law, including regulations. Appeals that do not conform may not be accepted. If you have any questions about any aspect of the appeal process, please contact staff in the Commission district office with jurisdiction over the area in question (see the Commission's contact page at https://coastal.ca.gov/contact/#/).

Note regarding emailed appeals. Please note that emailed appeals are accepted ONLY at the general email address for the Coastal Commission district office with jurisdiction over the local government in question. For the South Coast district office, the email address is SouthCoast@coastal.ca.gov. An appeal emailed to some other email address, including a different district's general email address or a staff email address, will be rejected. It is the appellant's responsibility to use the correct email address, and appellants are encouraged to contact Commission staff with any questions. For more information, see the Commission's contact page at https://coastal.ca.gov/contact/#/).

VAPP

1. Appellant information[1]

Name: Genevieve Morrill

Mailing address: 3809 Esplanade, MDR, CA 90292

Phone number: 310-890-1246

Email address: gmorrill@wehochamber.com

How did you participate in the local CDP application and decision-making process?

☐ Did not participate ☒ Submitted comment ☒ Testified at hearing ☐ Other

Describe: Attended community meeting and CPC hearing

If you did *not* participate in the local CDP application and decision-making process, please identify why you should be allowed to appeal anyway (e.g., if you did not participate because you were not properly noticed).

Describe: N/A

Please identify how you exhausted all LCP CDP appeal processes or otherwise identify why you should be allowed to appeal (e.g., if the local government did not follow proper CDP notice and hearing procedures, or it charges a fee for local appellate CDP processes).

Describe: Appealed City decision to City Planning Commission.

[1] If there are multiple appellants, each appellant must provide their own contact and participation information. Please attach additional sheets as necessary.

VAPP

2. Local CDP decision being appealed[2]

Local government name: City of LA Department of Public Works/BOE

Local government approval body: City Planning Commission

Local government CDP application number: No. 5-VEN-22-0075

Local government CDP decision: ☒ CDP approval ☐ CDP denial[3]

Date of local government CDP decision: Sept. 13, 2022

Please identify the location and description of the development that was approved or denied by the local government.

Describe: See attached (Attachment 1)
VAPP
Local Permit DIR-2017-~~4167~~-CDP-SPP-1A
(4167)

[2] Attach additional sheets as necessary to fully describe the local government CDP decision, including a description of the development that was the subject of the CDP application and decision.

[3] Very few local CDP denials are appealable, and those that are also require submittal of an appeal fee. Please see the appeal information sheet for more information.

VAPP

3. Applicant information

Applicant name(s): City of Los Angeles Dept. of Public Works/BOE

Applicant Address: Attn: Jonathan Cuevas

4. Grounds for this appeal[4]

For appeals of a CDP approval, grounds for appeal are limited to allegations that the approved development does not conform to the LCP or to Coastal Act public access provisions. For appeals of a CDP denial, grounds for appeal are limited to allegations that the development conforms to the LCP and to Coastal Act public access provisions. Please clearly identify the ways in which the development meets or doesn't meet, as applicable, the LCP and Coastal Act provisions, with citations to specific provisions as much as possible. Appellants are encouraged to be concise, and to arrange their appeals by topic area and by individual policies.

Describe: See attached (Attachment 2)

[4] Attach additional sheets as necessary to fully describe the grounds for appeal.

5. Identification of interested persons

On a separate page, please provide the names and contact information (i.e., mailing and email addresses) of all persons whom you know to be interested in the local CDP decision and/or the approved or denied development (e.g., other persons who participated in the local CDP application and decision making process, etc.), and check this box to acknowledge that you have done so.

☑ Interested persons identified and provided on a separate attached sheet

ALSO: SEE P.C. HEARING (APPEAL) AUGUST 18, 2022

6. Appellant certifications[5]

I attest that to the best of my knowledge, all information and facts in this appeal are correct and complete.

Print name Genevieve Morrill

Signature

Date of Signature 12.18.22

7. Representative authorization[6]

While not required, you may identify others to represent you in the appeal process. If you do, they must have the power to bind you in all matters concerning the appeal. To do so, please complete the representative authorization form below and check this box to acknowledge that you have done so.

None

☐ I have authorized a representative, and I have provided authorization for them on the representative authorization form attached.

[5] If there are multiple appellants, each appellant must provide their own certification. Please attach additional sheets as necessary.

[6] If there are multiple appellants, each appellant must provide their own representative authorization form to identify others who represent them. Please attach additional sheets as necessary.

STATE OF CALIFORNIA - NATURAL RESOURCES AGENCY GAVIN NEWSOM, *GOVERNOR*

CALIFORNIA COASTAL COMMISSION
455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105-2219
VOICE (415) 904-5200
FAX (415) 904-5400

DISCLOSURE OF REPRESENTATIVES

If you intend to have anyone communicate on your behalf to the California Coastal Commission, individual Commissioners, and/or Commission staff regarding your coastal development permit (CDP) application (including if your project has been appealed to the Commission from a local government decision) or your appeal, then you are required to identify the name and contact information for all such persons prior to any such communication occurring (see Public Resources Code, Section 30319). The law provides that failure to comply with this disclosure requirement prior to the time that a communication occurs is a misdemeanor that is punishable by a fine or imprisonment and may lead to denial of an application or rejection of an appeal.

To meet this important disclosure requirement, please list below all representatives who will communicate on your behalf or on the behalf of your business and submit the list to the appropriate Commission office. This list could include a wide variety of people such as attorneys, architects, biologists, engineers, etc. If you identify more than one such representative, please identify a lead representative for ease of coordination and communication. You must submit an updated list anytime your list of representatives changes. You must submit the disclosure list before any communication by your representative to the Commission or staff occurs.

Your Name _____

CDP Application or Appeal Number _____

Lead Representative

Name _____
Title _____
Street Address. _____
City _____
State, Zip _____
Email Address _____
Daytime Phone _____

Your Signature _____

Date of Signature _____

Additional Representatives (as necessary)

Name _____
Title _____
Street Address. _____
City _____
State, Zip _____
Email Address _____
Daytime Phone _____

Name _____
Title _____
Street Address. _____
City _____
State, Zip _____
Email Address _____
Daytime Phone _____

Name _____
Title _____
Street Address. _____
City _____
State, Zip _____
Email Address _____
Daytime Phone _____

Name _____
Title _____
Street Address. _____
City _____
State, Zip _____
Email Address _____
Daytime Phone _____

Your Signature _____

Date of Signature _____

VAPP

Attachment 1
Development Approved
VAPP

Re: **Application No. 5-VEN-22-0075**

Please be advised that on November 18, 2022, our office received notice of local action on the coastal development permit described below:

Local Permit #:	DIR-2017-4167-PUB-CDP-SPP, DIR-2017-4167-PUB-CDP-SPP-1A
Applicant(s):	City of Los Angeles Department of Public Works - Bureau of Engineering, Attn: Johnathan Cuevas
Description:	Construction of a new two-story, 2,500 square-foot wastewater pumping plant (built across two lots at 133 East Hurricane Street and 3813 South Esplanade), to supplement the capacity of the existing Venice Pumping Plant (VPP) for conveyance of wastewater to the Hyperion Treatment Plant; seven vehicle parking spaces and four bicycle parking spaces are provided offsite at 128 East Hurricane Street.
Location:	3813 and 3817 South Esplanade Venice, CA 90292 (APN(s): 4225008904, 4225008904)

VAPP

Attachment 2

Grounds for appeal

Venice Auxiliary Pump Plant

The VAPP project has not been designed to respect the residential community or the sensitive coastal location in which it is located. The heavy equipment associated with the facility including gigantic transformers should be moved away from residences and closer to the existing pump plant. The design is not visually compatible with the neighborhood. The project violates the Coastal Act as it does not respect the character of the community and may have adverse impacts on water quality, sensitive habitat and coastal resources.

The outdoor equipment is located too close to an adjoining residential use, without any landscape buffer. This public facility does not need to be in this sensitive location adjacent to an ESHA and unique lagoon. The City application does not adequately consider sea level rise, potential impacts to sensitive species and other environmental concerns.

The proposed facility does not conform to the Venice LUP as follows:

1. The use is an industrial facility on a site identified as Low Medium residential in the Ballona Lagoon West subarea of the certified Venice Land Use Plan (LUP). Greater protect and buffering should be afforded the residential neighbors as this is a residentially zoned and designated property.

2. Conflicts with Policy 1.A.5 that seeks to preserve and protect stable multifamily neighborhoods

3. Conflicts with Policy I.C.1 that states that the scale and design of such facilities much be compatible with adjacent and neighboring uses. Although the single building has been designed to meet the height and setback requirements of the LUP, the project involves numerous areas of equipment including transformers, HVAC equipment, wells and power poles that have not been sited in a way that is compatible. The site is too small for the project and does not allow a buffer of landscaping along all sides that face residential uses.

4. Conflicts with Policy 1.C.6 that states that hazardous industrial uses shall not be located adjacent to residential areas. In addition, the existing pump plant is not maintained in a manner which is compatible with the area, is allowed to be covered with graffiti, litter and exterior equipment. Coastal access is impeded by the existing plant because the City does not maintain the landscaping and walkway around the plant to allow visitors to enjoy and access the lagoon.

5. Conflicts with Policy 1.D.1 that states that the only permitted development adjacent to the canal and lagoon shall be habitat restoration, single family homes and parks.

6. Conflicts with Policy 1.E.2 that requires new development to respect the scale and character of the community. Visuals prepared by the City and enclosed with this appeal show that the site will be dominated by three ten foot tall transformers (without any screening), power poles and other industrial features.

7. Conflicts with Policy IV.B.7 that requires a plan to rehabilitate the grand canal between Hurricane and Washington and maintain the habitat

Parking Lot

CALIFORNIA COASTAL COMMISSION
SOUTH COAST DISTRICT OFFICE
301 E. OCEAN BLVD., SUITE 300
LONG BEACH, CA 90802
(562) 590-5071
SOUTHCOAST@COASTAL.CA.GOV

APPEAL FORM

Appeal of Local Government Coastal Development Permit

Filing Information (STAFF ONLY)

District Office: South Coast

Appeal Number: _____

Date Filed: _____

Appellant Name(s): _____

APPELLANTS

IMPORTANT. Before you complete and submit this appeal form to appeal a coastal development permit (CDP) decision of a local government with a certified local coastal program (LCP) to the California Coastal Commission, please review the appeal information sheet. The appeal information sheet describes who is eligible to appeal what types of local government CDP decisions, the proper grounds for appeal, and the procedures for submitting such appeals to the Commission. Appellants are responsible for submitting appeals that conform to the Commission law, including regulations. Appeals that do not conform may not be accepted. If you have any questions about any aspect of the appeal process, please contact staff in the Commission district office with jurisdiction over the area in question (see the Commission's contact page at https://coastal.ca.gov/contact/#/).

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Parking Lot

Parking Lot

1. Appellant information[1]

Name: Genevieve Morrill

Mailing address: 3809 Esplanade, MDR, CA 90292

Phone number: 310-890-1246

Email address: gmorrill@wehochamber.com

How did you participate in the local CDP application and decision-making process?

☐ Did not participate ☒ Submitted comment ☒ Testified at hearing ☐ Other

Describe: Attended community meeting and CPC hearing

If you did *not* participate in the local CDP application and decision-making process, please identify why you should be allowed to appeal anyway (e.g., if you did not participate because you were not properly noticed).

Describe: N/A

Please identify how you exhausted all LCP CDP appeal processes or otherwise identify why you should be allowed to appeal (e.g., if the local government did not follow proper CDP notice and hearing procedures, or it charges a fee for local appellate CDP processes).

Describe: Appealed City decision to City Planning Commission.

[1] If there are multiple appellants, each appellant must provide their own contact and participation information. Please attach additional sheets as necessary.

Parking Lot

2. Local CDP decision being appealed[2]

Local government name: City of LA Department of Public Works/BOE

Local government approval body: City Planning Commission

Local government CDP application number: No. 5-VEN-22-0074

Local government CDP decision: ☒ CDP approval ☐ CDP denial[3]

Date of local government CDP decision: Sept. 13, 2022

Please identify the location and description of the development that was approved or denied by the local government.

Describe: See attached (Attachment 1)
Parking Lot
Local permit DIR-2017-4173-CDP-SPP-1A

2 Attach additional sheets as necessary to fully describe the local government CDP decision, including a description of the development that was the subject of the CDP application and decision.

3 Very few local CDP denials are appealable, and those that are also require submittal of an appeal fee. Please see the appeal information sheet for more information.

Parking Lot

3. Applicant information

Applicant name(s): City of LA, Dept. of Public Works, Bureau of Engineering

Applicant Address: Attn: Jonathan Cuevas

4. Grounds for this appeal[4]

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Describe: See attached (Attachment 2)

[4] Attach additional sheets as necessary to fully describe the grounds for appeal.

Parking Lot

5. Identification of interested persons

On a separate page, please provide the names and contact information (i.e., mailing and email addresses) of all persons whom you know to be interested in the local CDP decision and/or the approved or denied development (e.g., other persons who participated in the local CDP application and decision making process, etc.), and check this box to acknowledge that you have done so.

☑ Interested persons identified and provided on a separate attached sheet

ALSO: SEE P.C. HEARING – AUGUST 18, 2022 (APPEAL)

6. Appellant certifications[5]

I attest that to the best of my knowledge, all information and facts in this appeal are correct and complete.

Print name Genevieve Morrill

Signature

Date of Signature 12-18-22

7. Representative authorization[6]

While not required, you may identify others to represent you in the appeal process. If you do, they must have the power to bind you in all matters concerning the appeal. To do so, please complete the representative authorization form below and check this box to acknowledge that you have done so.

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Your Name _____

CDP Application or Appeal Number _____

Lead Representative

Name _____
Title _____
Street Address. _____
City _____
State, Zip _____
Email Address _____
Daytime Phone _____

Your Signature _____

Date of Signature _____

Additional Representatives (as necessary)

Name _____
Title _____
Street Address. _____
City _____
State, Zip _____
Email Address _____
Daytime Phone _____

Name _____
Title _____
Street Address. _____
City _____
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Email Address _____
Daytime Phone _____

Name _____
Title _____
Street Address. _____
City _____
State, Zip _____
Email Address _____
Daytime Phone _____

Name _____
Title _____
Street Address. _____
City _____
State, Zip _____
Email Address _____
Daytime Phone _____

Your Signature _____

Date of Signature _____

Parking Lot

Attachment 1
Approved Development
Parking Lot

Re: Application No. 5-VEN-22-0074

Please be advised that on November 18, 2022, our office received notice of local action on the coastal development permit described below:

Local Permit #:	DIR-2017-4173-CDP-SPP, DIR-2017-4173-CDP-SPP-1A
Applicant(s):	City of Los Angeles Department of Public Works - Bureau of Engineering Attn: Johnathan Cuevas
Description:	Construction of a new surface parking lot providing seven vehicle parking spaces and four bicycle parking spaces for the Venice Auxiliary Pumping Plant, in addition to landscaping and a new public art installation
Location:	128 E Hurricane Street, Venice, CA 90292 (APN: 4225010016)

Parking Lot

Attachment 2

Grounds for appeal

VAPP Parking Lot

The VAPP Parking Lot project has not been designed to respect the residential community or the sensitive coastal location in which it is located. The project includes unnecessary parking and with add an unsecured empty fenced area immediately adjacent to residences. The project violates the Coastal Act as it does not respect the character of the community and may have adverse impacts on water quality, sensitive habitat and coastal resources.

The VAPP plant will not require the number of employees or visitors served by the parking lot. The public portion of the lot will be a haven for RVs and encampments, and should at least be secured each day. Instead of unneeded parking, a portion of this property closes to the existing pump plant could be used for equipment, so that the industrial facility can be adequately screen and buffered from residents.

The proposed facility does not conform to the Venice LUP as follows:

1. The use is a parking lot for an industrial facility on a site identified as Low Medium residential in the Ballona Lagoon West subarea of the certified Venice Land Use Plan (LUP). Greater protect and buffering should be afforded the residential neighbors as this is a residentially zoned and designated property.

2. Conflicts with Policy 1.A.5 that seeks to preserve and protect stable multifamily neighborhoods

3. Conflicts with Policy I.C.1 that states that the scale and design of such facilities much be compatible with adjacent and neighboring uses. An open parking lot with no security or landscape buffer is not compatible with the neighboring homes.

4. Conflicts with Policy 1.C.6 that states that hazardous industrial uses like the VAPP served by this parking lot shall not be located adjacent to residential areas. In addition, the existing pump plant is not maintained in a manner which is compatible with the area, is allowed to be covered with graffiti, litter and exterior equipment. Coastal access is impeded by the existing plant because the City does not maintain the landscaping and walkway around the plant to allow visitors to enjoy and access the lagoon.

5. Conflicts with Policy 1.D.1 that states that the only permitted development adjacent to the canal and lagoon shall be habitat restoration, single family homes and parks—not parking lots for industrial facilities.

6. Conflicts with Policy 1.E.2 that requires new development to respect the scale and character of the community.

7. Conflicts with Policy IV.B.7 that requires a plan to rehabilitate the grand canal between Hurricane and Washington and maintain the habitat



WEST ELEVATION - CANAL CT



NORTHWEST ELEVATION - CANAL CT



PARKING AREA, NORTH VIEW



PARKING AREA, HURRICANE ST, SOUTH VIEW



SOUTHEAST ELEVATION - HURRICANE ST



VICINITY MAP



ASSESSOR'S MAP

PROJECT INFORMATION:

OWNER:
CITY OF LOS ANGELES - BUREAU OF ENGINEERING

VENICE AUXILIARY PUMPING PLANT (VAPP)
133 E. HURRICANE STREET & 3813 S. ESPLANADE
LOS ANGELES, CA 90292
APN: 4225-008-904

PARKING LOT
128 1-3 E. HURRICANE ST
LOS ANGELES, CA 90292
APN: 4225-010-901

BUILDING HEIGHT:

IN ACCORDANCE WITH CBC CHAPTER 2, "BUILDING HEIGHT" IS DEFINED AS: "THE VERTICAL DISTANCE FROM GRADE PLANE TO THE AVERAGE HEIGHT OF THE HIGHEST ROOF SURFACE." FOR THIS BUILDING, TOP OF ROOF STRUCTURAL SLAB IS 24'-6" ABOVE FIRST FLOOR SLAB, PLUS 6" ABOVE GRADE, PLUS 8" RIGID INSULATION, SO 24'-6" + 6" + 6" (AVERAGE ROOF SURFACE); BUILDING CODE HEIGHT = 25'-6"; ZONING CODE HEIGHT = 45'. THE PARAPET IS NOT INCLUDED. PARAPET HEIGHT VARIES FROM 2'6-6" TO 32'-0" ABOVE FINISH GRADE. BUILDING CANNOT EXCEED HEIGHT OF ADJACENT BUILDINGS IF USING SECTION 19.00.4.6.

DEFERRED APPROVALS:

SEPARATE PERMITS REQUIRED AS PART OF THIS PROJECT ARE LISTED BELOW:

1. MECHANICAL SYSTEMS
2. PLUMBING SYSTEMS
3. ELECTRICAL SYSTEMS
4. EQUIPMENT ANCHORAGE
5. FIRE PROTECTION SYSTEM

FIRE SEPARATION:

BUILDING IS OF TYPE IIB UNSPRINKLERED CONSTRUCTION. WALL SURFACE AREAS (TOP OF FLOOR SLAB TO TOP OF ROOF STRUCTURE) ARE 637 SF, NORTH AND SOUTH; 1249.5 SF WEST AND EAST. ALL EXTERIOR OPENINGS ARE 45 MIN. RATED, PER CBC TABLE 705.8, FOR 'PROTECTED' OPENINGS:

NORTH:
OPENINGS ALLOWED:75%;
ACTUAL: 5.4%

WEST:
OPENINGS ALLOWED: NO LIMIT;
ACTUAL: 0.8%

SOUTH:
OPENINGS ALLOWED: 45%;
ACTUAL: 17.9%

EAST:
OPENINGS ALLOWED: NOT REQUIRED;
ACTUAL: 2.9%

ALL FIRE SEPARATION DISTANCES ARE COMPLIANT.

BUILDING SET-BACKS:

NORTH: SET-BACK IS 16'-9" (TO EXISTING HOUSES).
RESIDENTIAL REQUIRED SETBACK = 7'-10".
PF REQUIRED SETBACK = NONE.

WEST: SET-BACK IS 19'-8" (TO STREET).
RESIDENTIAL REQUIRED SETBACK = 10'-0".
PF REQUIRED SETBACK = NONE.

SOUTH: SET-BACK IS 8'-6" (TO STREET).
RESIDENTIAL REQUIRED SETBACK = 7'-10".
PF REQUIRED SETBACK = NONE.

EAST: SET-BACK IS 52'-4" (TO PROPERTY LINE).
RESIDENTIAL REQUIRED SETBACK = 15'-0".
PF REQUIRED SETBACK = NONE.

ALL SET-BACKS ARE COMPLIANT WITH RESIDENTIAL WATERWAY ZONE "RW2-1".

PROJECT SCOPE SUMMARY:

THE VENICE AUXILIARY PUMPING STATION (VAPP) IS DESIGNED TO SUPPLEMENT THE EXISTING VENICE PUMPING PLANT (VPP) BY PROVIDING ADDITIONAL OPERATIONAL RELIABILITY THROUGH STANDBY PUMPING CAPACITY. THE VENICE PUMPING PLANT (VPP) CONSISTS OF FIVE PUMPS WITH A TOTAL DESIGN CAPACITY OF 18 MILLION GALLONS PER DAY (MGD) FOR CONVEYING WASTEWATER INTO THE CENTRAL RECEPTOR SEWER. DURING PEAK WEATHER FLOWS, ALL FIVE PUMPS MUST BE ONLINE TO HANDLE THE INCREASED VOLUME, RESULTING IN AN ELEVATED RISK OF SPILLS DUE TO THE LACK OF BYPASS OR STANDBY PUMPS. THE VPP IS A CRITICAL FACILITY, WITH NO CURRENT DIVERSION STRUCTURES TO BYPASS AND NO REDUNDANCY IN ITS OPERATION, MAKING IT VULNERABLE DURING HIGH-DEMAND PERIODS. THE NEW VAPP PROJECT WILL PROVIDE OPERATIONAL RELIABILITY AND REDUCE THE RISK OF A SPILL DURING PEAK FLOW WEATHER CONDITIONS. THE PROJECT IMPROVEMENTS INCLUDE CONSTRUCTION OF A SEWER DIVERSION STRUCTURE IN THE GRAND CANAL, A NEW UNDERGROUND PUMP STATION BUILDING WITH THREE SUBMERSIBLE PUMPS, AN ABOVE GROUND ELECTRICAL ROOM, AN INTERCONNECTING SEWER/FORCE MAIN PIPE NETWORK AND A NEW PARKING LOT FOR PUBLIC USE.

VENICE COASTAL ZONE SPECIFIC PLAN NOTES:

SECTION 10. LAND USE AND DEVELOPMENT REGULATIONS FOR SUBAREAS. IN ADDITION TO THE REGULATIONS IN SECTION 9, THE FOLLOWING REGULATIONS SHALL APPLY WITHIN EACH OF THE SPECIFIED SUBAREAS IN THE SUB-SECTIONS BELOW.

A. BALLONA LAGOON WEST BANK.

1. HEIGHT. WITHIN 60 FEET OF THE MEAN HIGH TIDE OF THE BALLONA LAGOON OR INLAND SIDE OF THE ESPLANADE (CITY RIGHT-OF-WAY), WHICHEVER IS FURTHEST FROM THE WATER AS DETERMINED BY A LICENSED SURVEYOR, VENICE COASTAL DEVELOPMENT PROJECTS SHALL NOT EXCEED A MAXIMUM HEIGHT OF 30 FEET. BEYOND 60 HORIZONTAL FEET, ONE ADDITIONAL FOOT IN HEIGHT IS PERMITTED FOR EACH TWO ADDITIONAL HORIZONTAL FEET TO A MAXIMUM HEIGHT OF 38 FEET. NO PORTION OF ANY STRUCTURE (INCLUDING ROOF ACCESS STRUCTURES, ROOF DECK RAILINGS AND ARCHITECTURAL FEATURES) SHALL EXCEED THE 30 FOOT HEIGHT LIMIT WITHIN 60 HORIZONTAL FEET OF THE MEAN HIGH TIDE LINE OF BALLONA LAGOON OR THE INLAND SIDE OF THE ESPLANADE, WHICHEVER IS FURTHEST FROM THE WATER.

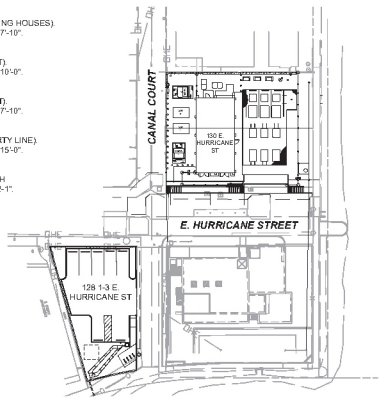
2. LAGOON BUFFER/SET-BACK/YARDS.

(b) LOTS LOCATED NORTH OF IRONSIDES STREET:

(1) ALL VENICE COASTAL DEVELOPMENT PROJECTS SHALL BE SET BACK AN AVERAGE OF 15 FEET BUT NOT LESS THAN TEN FEET FROM THE LOT LINE NEAREST TO THE WATER. ACTUAL IS 52'-4".

(2) AN OPEN, PERMEABLE YARD WITH AN AREA OF AT LEAST 15 TIMES THE LOT WIDTH AND A MINIMUM OF 450 SQUARE FEET SHALL BE MAINTAINED BETWEEN THE PROPERTY LINE THAT FACES THE WATER AND THE FRONT OF ANY STRUCTURE. NO BUILDING EXTENSIONS, INCLUDING STAIRS AND BALCONIES, SHALL BE ALLOWED IN THE REQUIRED PERMEABLE YARD AREA, EXCEPT FOR GROUND LEVEL PERMEABLE DECKS THAT DO NOT EXCEED 18 INCHES IN HEIGHT.

(3) THE COMBINED HEIGHT OF ANY DECKS, RAILINGS, GARDEN WALLS AND FENCES SITUATED WITHIN THE REQUIRED PERMEABLE YARD SHALL NOT EXCEED SIX FEET ABOVE THE ELEVATION OF THE ADJACENT PUBLIC WALKWAY. THE SIDEYARD SHALL BE CONSISTENT WITH LAMC REQUIREMENTS, BUT SHALL NOT BE LESS THAN 3 1/2 FEET.



SITE PLAN

PROJECT DATA:

OWNER:	CITY OF LOS ANGELES	
CONSTRUCTION TYPE:	IIB	
OCCUPANCY:	B - OFFICE GROUP	
BUILDING HEIGHT:	32' - 6" ABOVE FINISHED GRADE	
LAMC ALLOWABLE HEIGHT:	35' - 0" ABOVE FINISHED GRADE	
FIRST FLOOR		OCCUPANTS
SWITCHGEAR 101	830 SF	3
GENERATOR 102	175 SF	1
SUB-TOTALS	1005 SF	4
SECOND FLOOR		
UNISEX RESTROOM 201	65 SF	1
WORKSTATIONS 202	375 SF	4
SERVICE ROOM 203	228 SF	1
ELME EQUIP 204	374 SF	2
SUB-TOTALS	1042 SF	8
STAIR # 1	236 SF	-
TOTAL AREA	2283 SF	
ALLOWABLE =	23,000	
	= 0.09 < 1.0 COMPLIES	

PARKING SUMMARY:

PARKING REQUIRED:

BUILDING AREA 2283 = + 2 SPACES = 7 SPACES
OCCUPANCY B FACTOR 500

Beach Impact Zone Parking	2 Spaces
Replacement Street Parking Required for Coastal Access	2 Spaces
Total Spaces Required:	11 Spaces

PARKING PROVIDED:

On-Site	3 Spaces
Off-Site	8 Spaces
Four Bike Parking Spaces Suitable for One Automobile Parking Space	1 Space
Total Spaces Provided:	12 Spaces

NOTE:

MOST SITE PARKING IS LOCATED ON NEARBY PARCEL DUE TO LIMITED AVAILABILITY TO PLACE PARKING STALLS ON IMMEDIATE SITE, SEE CIVIL DRAWINGS.

	1ST FLOOR		2ND FLOOR		TOTAL SF
LAMC (ZONING)	900.77	+	992.27	=	1893.04
LABC (BLD'G)	1152.02	+	992.27	=	2144.29
LAUSD (SCHOOL)	1328.00	+	1166.25	=	2492.25

ZONING:

VENICE AUXILIARY PUMPING PLANT (VAPP)
133 E. HURRICANE STREET & 3813 S. ESPLANADE

ZONING
CURRENT: RESIDENTIAL WATERWAY ZONE "RW2-1"

FUTURE: PUBLIC FACILITY ZONE "PF"

LAND USE DESIGNATION
CURRENT: LOW MEDIUM II RESIDENTIAL
FUTURE: PUBLIC FACILITY

PARKING LOT
128 1-3 E. HURRICANE ST

ZONING
CURRENT: RESIDENTIAL WATERWAY ZONE "RW2-1"

FUTURE: PUBLIC FACILITY ZONE "PF"

LAND USE DESIGNATION
CURRENT: LOW MEDIUM II RESIDENTIAL

FUTURE: PUBLIC FACILITY

SUBJECT SITE IS LOCATED WITHIN:

TSUNAMI HAZARD AREA
LIQUEFACTION AREA
FLOOD ZONE AE
METHANE ZONE

ARCADIS
LEGAL ENTITY: ARCADIS U.S., INC
333 S. HOPE STREET, SUITE 2200
LOS ANGELES, CA 90071

ENGINEERING
CITY OF LOS ANGELES

NO.	REVISIONS:	BY	DATE

INDEX NO. D-31898
CSP NO. C922

THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED

TED ALLEN, P.E. — CITY ENGINEER

ENGINEER:	JENA PRIOR	LIC. NO. EA 79899	DATE: 9/2025
DESIGNED BY:	LUDWING PEREZ		9/2025
DRAWN BY:	C. PUTTEWDWDA		9/2025
CHECKED BY:	LUDWING PEREZ		9/2025
APPROVED BY:	HECTOR KRAS		9/2025

DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING

CITY OF LOS ANGELES ANGELI LTGS
MERIDIAN: SAN BERNARDINO MONUMENTATION: NAD83, ZONE 5, EPOCH 1991.5 HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

SHEET TITLE: PROJECT SUMMARY COVER SHEET
PROJECT: VENICE AUXILIARY PUMPING PLANT
ADDRESS: 133 E. HURRICANE STREET LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923
DRAWING NO. G-8
SHEET OF SHEETS

THE CITY OF LOS ANGELES OR ITS OFFICERS OR AGENTS, SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF ELECTRONIC COPIES OF THIS PLAN SHEET.

REVISION DATES (DESIGN STAGE ONLY)

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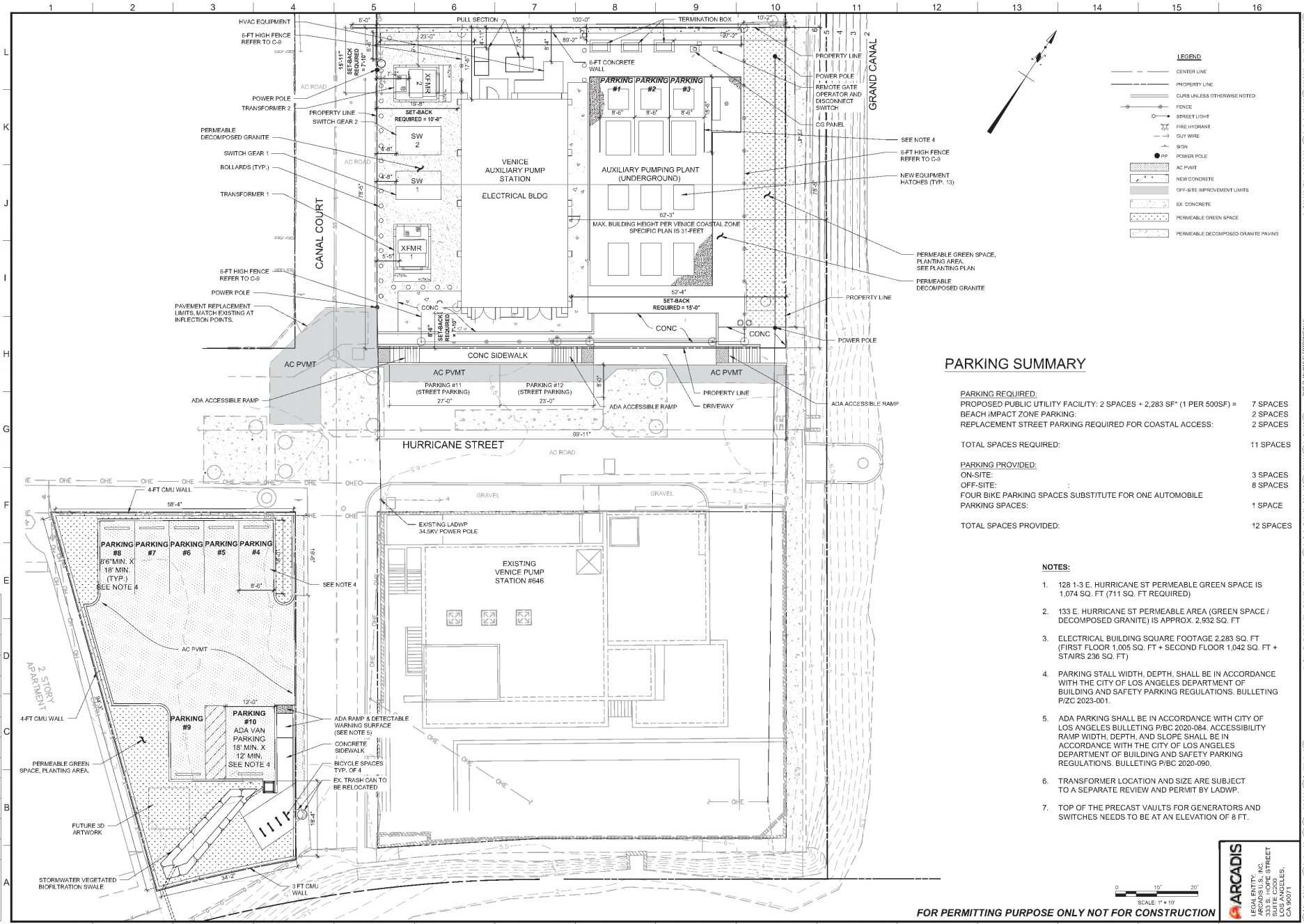

PARKING SUMMARY

PARKING REQUIRED:

PROPOSED PUBLIC UTILITY FACILITY: 2 SPACES + 2,283 SF* (1 PER 500SF) =	7 SPACES
BEACH IMPACT ZONE PARKING:	2 SPACES
REPLACEMENT STREET PARKING REQUIRED FOR COASTAL ACCESS:	2 SPACES
TOTAL SPACES REQUIRED:	11 SPACES

PARKING PROVIDED:

ON-SITE:	3 SPACES
OFF-SITE:	8 SPACES
FOUR BIKE PARKING SPACES SUBSTITUTE FOR ONE AUTOMOBILE PARKING SPACES:	1 SPACE
TOTAL SPACES PROVIDED:	12 SPACES

NOTES:

1. 128 1-3 E. HURRICANE ST PERMEABLE GREEN SPACE IS 1,074 SQ. FT (711 SQ. FT REQUIRED)
2. 133 E. HURRICANE ST PERMEABLE AREA (GREEN SPACE / DECOMPOSED GRANITE) IS APPROX. 2,932 SQ. FT
3. ELECTRICAL BUILDING SQUARE FOOTAGE 2,283 SQ. FT (FIRST FLOOR 1,005 SQ. FT + SECOND FLOOR 1,042 SQ. FT + STAIRS 236 SQ. FT)
4. PARKING STALL WIDTH, DEPTH, SHALL BE IN ACCORDANCE WITH THE CITY OF LOS ANGELES DEPARTMENT OF BUILDING AND SAFETY PARKING REGULATIONS. BULLETING P/ZC 2023-001.
5. ADA PARKING SHALL BE IN ACCORDANCE WITH CITY OF LOS ANGELES BULLETING P/BC 2020-084. ACCESSIBILITY RAMP WIDTH, DEPTH, AND SLOPE SHALL BE IN ACCORDANCE WITH THE CITY OF LOS ANGELES DEPARTMENT OF BUILDING AND SAFETY PARKING REGULATIONS. BULLETING P/BC 2020-090.
6. TRANSFORMER LOCATION AND SIZE ARE SUBJECT TO A SEPARATE REVIEW AND PERMIT BY LADWP.
7. TOP OF THE PRECAST VAULTS FOR GENERATORS AND SWITCHES NEEDS TO BE AT AN ELEVATION OF 8 FT.

SCALE: 1" = 10'

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ARCADIS
LEGAL ENTITY: ARCADIS U.S., INC.
333 S. GRAND AVENUE, SUITE 2200
LOS ANGELES, CA 90071

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING
ENGINEERING CITY OF LOS ANGELES
INDEX NO. D-31898
CIP NO. C922
NO. REVISIONS DATE BY
THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED
TED ALLEN, P.E. CITY ENGINEER DATE
ENGINEER: JENA PRIOR LIC. NO. DA 73669 8/2025
DESIGNED BY: LUDWING PEREZ 8/2025
DRAWN BY: C. PUTTES2WDA 8/2025
CHECKED BY: LUDWING PEREZ 8/2025
APPROVED BY: HECTOR ARIAS 8/2025
DEPARTMENT OF PUBLIC WORKS CITY OF LOS ANGELES
SURVEY CONTROL: NAD83, ZONE 5, EPOCH 1991.5
VERTICAL CONTROL: NAVD 88 (GEOID 12B)
HORIZON CONTROL:
SHEET TITLE: OVERALL SITE PLAN
PROJECT: VENICE AUXILIARY PUMPING PLANT
ADDRESS: 133 E. HURRICANE STREET LOS ANGELES, CALIFORNIA
WORK ORDER NO. SZC12923
DRAWING NO. C-0
SHEET OF SHEETS

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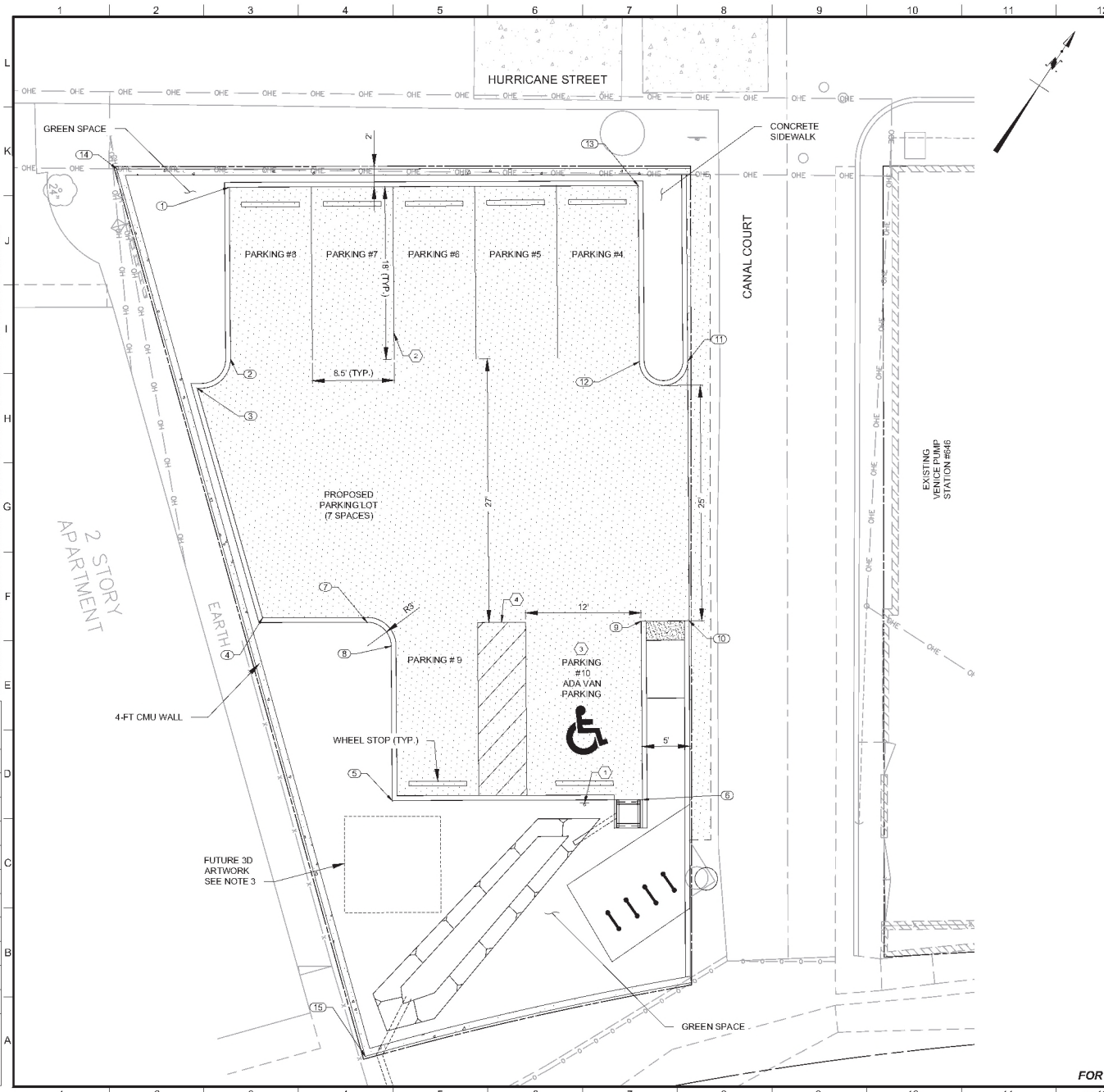
User:TRAMA231 Space:AUS-NCBSERD File:C:\USERS\TRAMA231\DOCUMENTS\ACCURACIS ACCURAU-3920\NGS\WPP PRE EXP 2 DESIGN AND PERMITTING\PROJECT FILES (%)_WIP\XR_ARC_CIVIL\C3-SWPPP.DWG Scale=1:1 Saved:Jan 6/30/2025 Time:09:48
REVISION DATES (DESIGN STAFF ONLY)
Sheet Version 3.0



SIGNING AND STRIPING NOTES

1. INSTALL ACCESSIBLE SIGN PER SPECIFICATION SECTION 10443.
2. INSTALL 4-IN THICK WHITE STRIPING AS INDICATED ON PLANS. PAVEMENT MARKINGS SHALL BE PER SPECIFICATION SECTION 02848.
3. INSTALL ACCESSIBILITY PAVEMENT MARKING IN ACCESSIBLE SPACE. COMPLY WITH FIGURE 11B-70...7.2.1 WITH BLUE COLOR NO 15090 IN FEDERAL STANDARD 595B PER LOS ANGELES DEPARTMENT OF BUILDING AND SAFETY. PAVEMENT MARKINGS SHALL BE PER SPECIFICATION SECTION 02848.
4. STRIPE ACCESSIBLE PARKING AS INDICATED WITH DIAGONAL STRIPING AT 45-DEG AT 12-IN ON CENTER. USE 4-IN WIDE STRIPING. PAVEMENT MARKINGS SHALL BE PER SPECIFICATION SECTION 02848.

NOTES:

1. 128 HURRICANE PERMABLE GREEN OPEN SPACE IS 1,199 SQ FT (711 SQ FT REQUIRED).
2. SEE LANDSCAPING PLANS FOR LANDSCAPE DETAILS.
3. FUTURE 3D ARTWORK IS LIMITED TO 6 FEET IN HEIGHT.

POINT TABLE		
POINT #	NORTHING	EASTING
1	1813892.10	6421754.96
2	1813877.12	6421764.71
3	1813872.71	6421763.43
4	1813856.28	6421782.03
5	1813847.54	6421803.62
6	1813861.65	6421825.46
7	1813861.74	6421791.41
8	1813861.01	6421794.86
9	1813877.21	6421815.35
10	1813879.92	6421819.54
11	1813902.55	6421804.84
12	1813899.84	6421800.63
13	1813915.16	6421790.67
14	1813887.40	6421744.10
15	1813823.64	6421815.60

SCALE 1" = 5'

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ARCADIS
LEGAL ENTITY: ARCADIS U.S., INC
2355 CRENSHAW BLVD
SUITE 1200
LOS ANGELES, CA 90071

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING
ENGINEERING
CITY OF LOS ANGELES

VTRC	RFI-193240				
DATE					
BY*					

INDEX NO. D-31898
CIP NO. C922

* THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED

TED ALLEN, P.E. CITY ENGINEER
DATE: 8/2025

ENGINEER:	JENA PRIOR	8/2025
DESIGNED BY:	MANUEL ALVAREZ	8/2025
DRAWN BY:	NICHOLAS CANDELAS	8/2025
CHECKED BY:	GREG BASTIDAS	8/2025
APPROVED BY:	VENU KOLLI	8/2025

SHEET TITLE:	PARKING LOT SITE, STRIPING & SIGNING PLAN
PROJECT:	VENICE AUXILIARY PUMPING PLANT
ADDRESS:	133 HURRICANE STREET LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923
DRAWING NO. C-13
SHEET 21 OF SHEETS

HORIZONTAL CONTROL: NAD83 (2011) NAD83, ZONE 5, EPOCH 1991.5
VERTICAL CONTROL: NAVD88

XREFS None IMAGES None
User Prior Scale:FRINE STANDARD File:D:\acad\c_proj\063320002 - Venice Pump Station\2-SHEETS\03-C-CIVIL\SP-EX02.DWG Scale:1:1 Date:05/22/2017 Time:15:44 Layout:Blank
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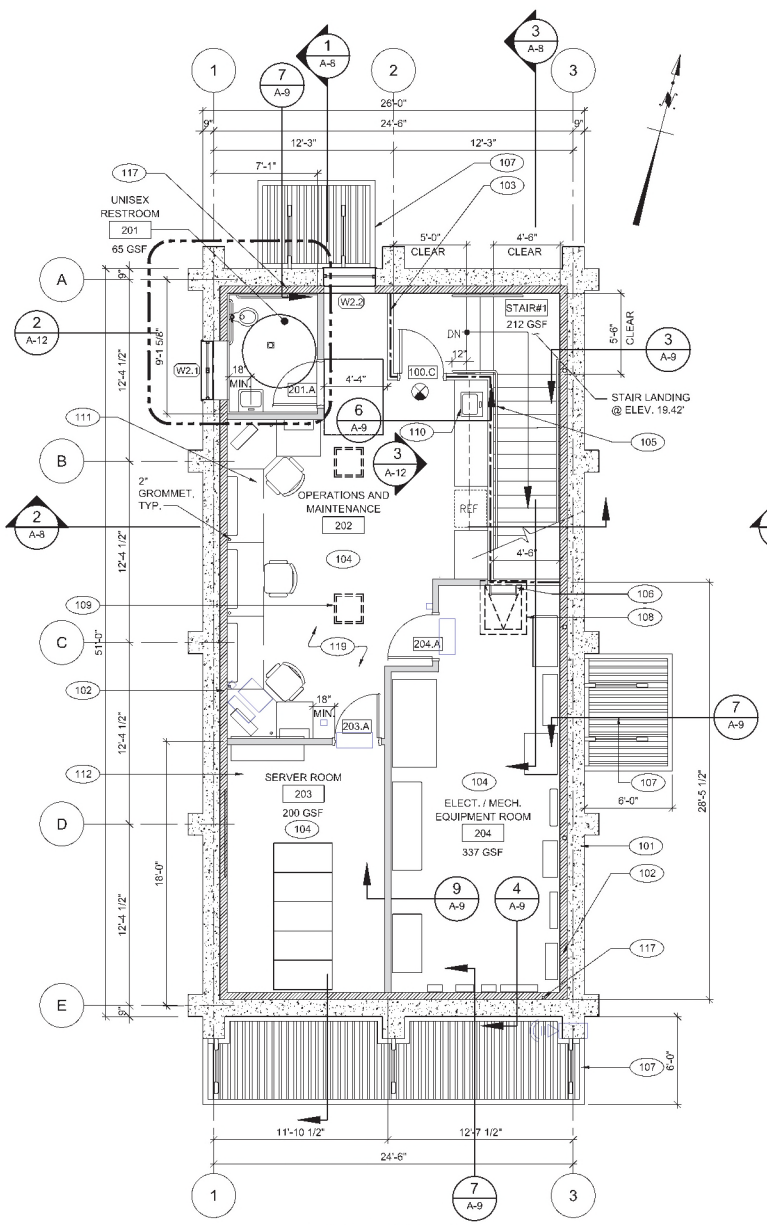
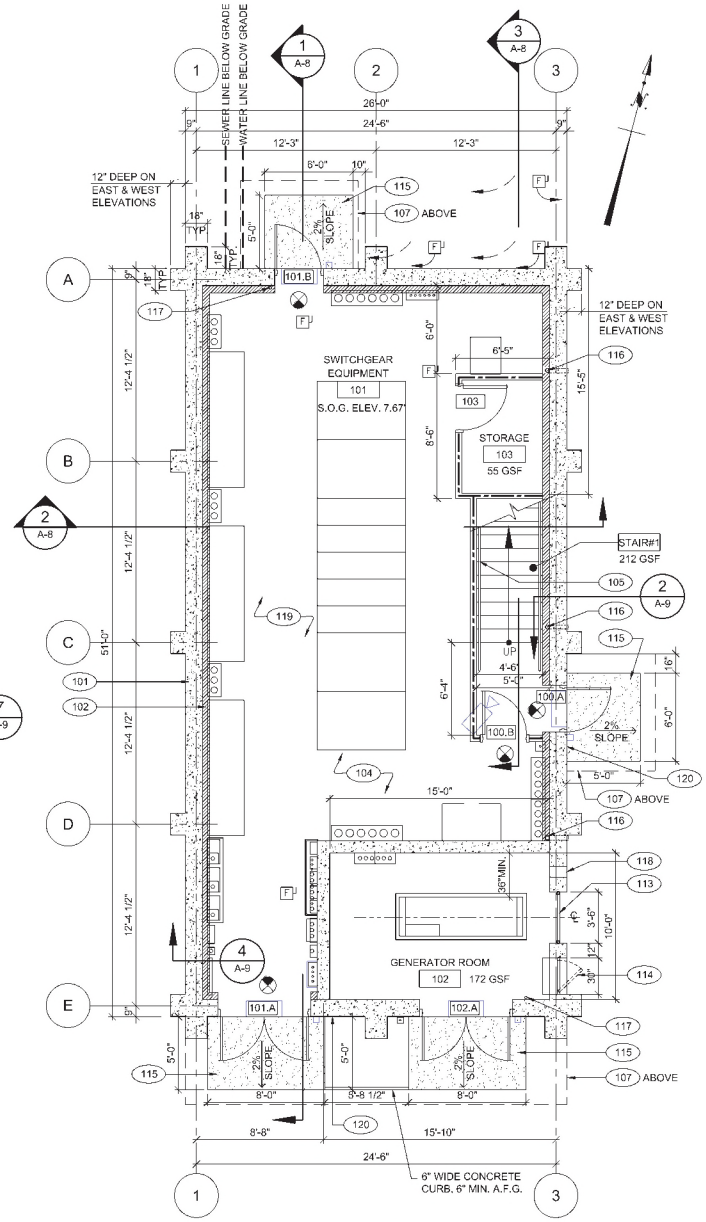
Exhibit 4
Page 3 of 9



SECOND FLOOR PLAN
SCALE: 1/4" = 1'-0"



FIRST FLOOR PLAN
SCALE: 1/4" = 1'-0"

KEYNOTES:

101 REINFORCED CONCRETE WALL PER STRUCTURAL

102 FURRED WALL WITH BATTEN INSULATION & TYPE 'X' GYPSUM BD FINISH, TYP. AT ENTIRE PERIMETER

103 FULL HEIGHT METAL STUD WALL WITH ⅝" TYPE 'X' GYPSUM BOARD WALL EACH SIDE, TYP. FOR STAIR #1 WALLS

104 FLOORING PER FINISH SCHEDULE

105 METAL HANDRAIL EACH SIDE, TYPICAL

106 GALV. STEEL LADDER SECURED TO WALL FRAMING

107 GALV. STEEL CANOPY WITH SIKA DECOR ROOFING SYTEM PER DETAIL 7/A-9

108 ROOF HATCH PER DETAIL 3/A-10

109 24 x 24 TRANSLUCENT LIGHT DIFFUSER FROM SOLATUBES ON ROOF, TYP. OF 2

110 WASH SINK WITH UPPER AND LOWER CABINETRY

111 WORKSTATION AREA WITH CONCEALED ACCESS COMPUTER CABLE TRAY BENEATH DESK UNITS; CONTRACTOR PROVIDED, SEE DIVISION 17400 CONTROL ROOM FURNITURE

112 SERVER ROOM WITH CABLE RACKS ABOVE EQUIPMENT

113 42"W x 36"H ACOUSTICAL LOUVER PER MECHANICAL

114 30" WIDE GENERATOR REMOTE FUEL, SEE SPEC 16410

115 REINFORCED CONCRETE PAD PER STRUCTURAL. SLOPE AWAY FROM BUILDING 2% MAX., TYP.

116 ROOF DRAIN IN FURRED WALL TO BE TIED INTO STORM DRAINAGE SYSTEM PER CIVIL, TYP. OF 3 LOCATIONS. EXTEND THROUGH CONCRETE WALL AT LOWEST POINT POSSIBLE.

117 2" METHANE VENT STACK PER METHANE MITIGATION DRAWINGS CONCEALED IN FURRED WALL

118 9" x 9" AIR INTAKE FAN PER MECHANICAL

119 ALL INTERIOR FLOORS TO BE SLIP RESISTANT FINISH COMPLYING WITH ANSI 137.1 TO ACHIEVE A WET DYNAMIC COEFFICIENT OF FRICTION OF NOT LESS THAN 0.42, USING A BOT 3000E DIGITAL TRIBOMETER (DCOF ACUTEST)

120 PROVIDE SIGN "AUTHORIZED PERSONNEL ONLY NO PUBLIC ACCESS"

LEGEND:

ONE HOUR WALL PER DETAIL 6/A-9

NON-RATED WALL PER DETAIL 9/A-9

FURRED WALL PER DETAIL 4/A-9

ILLUMINATED EXIT SIGN PER ELECTRICAL

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ARCADIS
LEGAL ENTITY: ARCADIS U.S., INC.
333 S. HOPE STREET
SUITE C200
LOS ANGELES, CA 90071

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS • THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED

BUREAU OF ENGINEERING

ENGINEERING
CITY OF LOS ANGELES

NO.	REVISIONS	DATE	BY
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-	-	-	-
-	-	-	-
-	-	-	-

INDEX NO. D-31898

CIP NO. C922

TED ALLEN, P.E. CITY ENGINEER

		DATE
ENGINEER:	DESIGN GROUP DAVID JOHNSON	6/2025
DESIGNED BY:	DEAN HAWKINS/ DAVID JOHNSON	6/2025
DRAWN BY:	CATHY DARPIO	6/2025
CHECKED BY:	DAVID JOHNSON	6/2025
APPROVED BY:	DAVID JOHNSON	6/2025

VERTICAL CONTROL: NAVD 88 (2009)
HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

SHEET TITLE: ELECTRICAL BUILDING FLOOR PLANS

PROJECT: VENICE AUXILIARY PUMPING PLANT

ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923

DRAWING NO. A-3

SHEET 34 OF SHEETS

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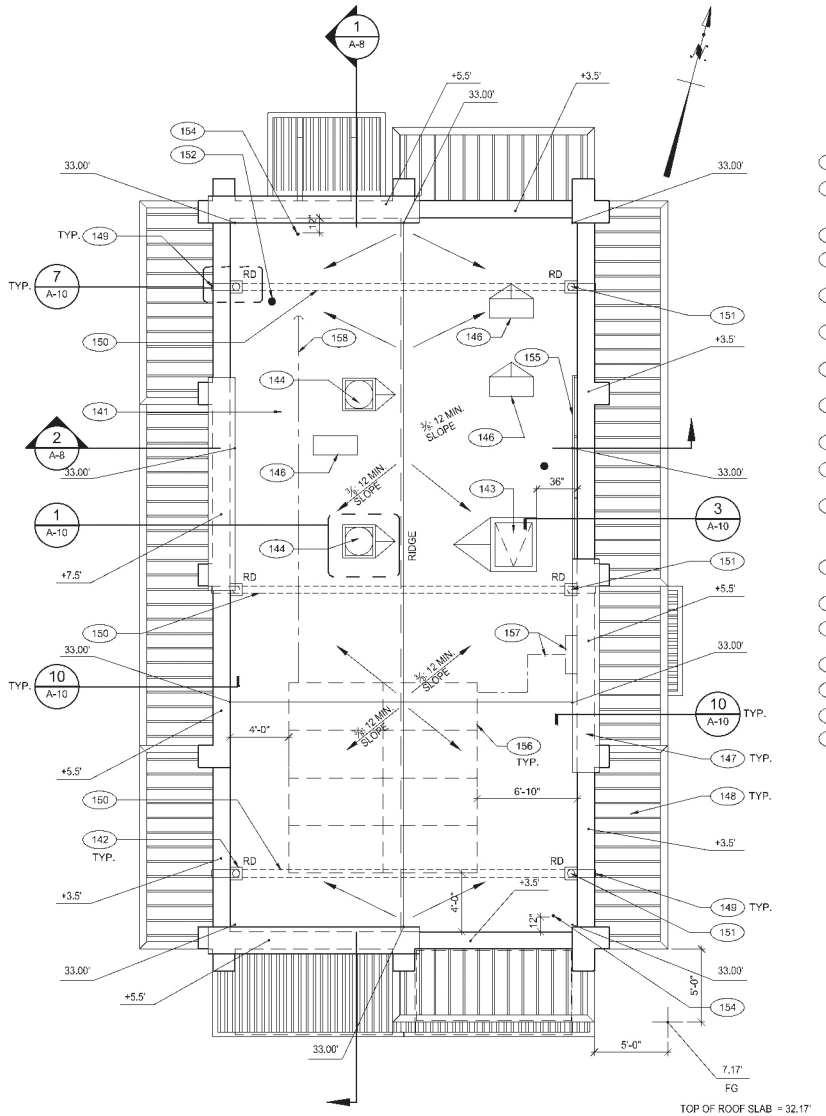
A-5-VEN-22-0068, A-5-VEN-22-0069, 5-24-0123
Exhibit 4
Page 4 of 9



TOP OF ROOF SLAB = 32.17'
TOP OF1ST FLR SLAB = 7.67'

ROOF PLAN
SCALE: 1/4" = 1'-0"

KEYNOTES:

141 PVC COOL ROOFING SYSTEM, TYPICAL

142 ROOF AND OVERFLOW DRAIN PER DETAIL 7/A-10, TYP. OF 6

143 ROOF HATCH PER DETAIL 3/A-10

144 27" x 27" SOLATUBES, TYP. OF 2 SEE DETAIL 1/A-10 (RR 25251)

145 ROUTING OF ELECTRICAL TO WATER HEATER SYSTEM BY ELECTRICAL ENGINEER

146 MECHANICAL EQUIPMENT SEE MECHANICAL.

147 METAL COPING OVER PARAPET PER DETAIL 11/A-10

148 EXTRUDED ALUMINUM LOUVER EYEBROW CANOPY

149 OVERFLOW SCUPPER, TYPICAL OF 6

150 ROOF DRAIN TO EXTEND BENEATH ROOF FRAMING TO EAST SIDE, TYP. OF 3

151 ROOF DRAIN TO BE PLACED WITHIN FURRED WALL AND TIED BELOW GRADE TO STORM WATER SYSTEM PER PLUMBING & CIVIL PLANS, TYP. OF 3

152 VENT STACK FROM RESTROOM PER MECHANICAL

153 NOT USED

154 METHANE VENT STACK @ +12" AFS, 12" MIN. OFFSET FROM PARAPET

155 METAL GUARDRAIL (42" HIGH MIN.)

156 FUTURE PHOTOVOLTAIC PANELS (8 @ 39" x 77")

157 FUTURE INVERTER AND CONDUIT

158 FUTURE PLUMBING FROM FUTURE SOLAR ARRAY TO WATER HEATER

FUTURE SOLAR ARRAY BREAKDOWN (NOT IN CONTRACT)

TOTAL ROOF AREA		1152 SF
EQUIPMENT, HATCHES, ETC.	-	50 SF
NET ROOF AREA		1102
15% FUTURE SOLAR ARRAY	x	15%
FUTURE PROPOSED ARRAY AREA REQUIREMENT		165 SF
SOLAR AREA REQUIRED		165 SF
SOLAR AREA PROVIDED		166.83 SF
FUTURE POTENTIAL SOLAR ARRAY (COMPLIES)		166.83 SF

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ARCADIS
LEGAL ENTITY*
ARCADIS U.S., INC.
333 S. HOPE STREET
SUITE 2200
LOS ANGELES, CA 90071

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING

ENGINEERING
CITY OF LOS ANGELES

NO.	REVISIONS	DATE	BY
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-

INDEX NO. D-31898
CPP NO. C922

THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED

TED ALLEN, P.E. CITY ENGINEER

ENGINEER:	DESIGN GROUP	DATE:
DESIGNED BY:	DEAN HAWKINS/ DAVID JOHNSON	6/2025
DRAWN BY:	CATHY CARPO	6/2025
CHECKED BY:	DAVID JOHNSON	6/2025
APPROVED BY:	DAVID JOHNSON	6/2025

LIC NO.24844

DEPARTMENT CONTROL NAD83 SURVEY
HORIZONTAL CONTROL NAD83 ZONE 5, EPOCH 1991.8

SHALL I TELL:

PROJECT: VENICE AUXILIARY PUMPING PLANT

ADDRESS: 133 HURRICANE STREET
LOS ANGELES, CALIFORNIA

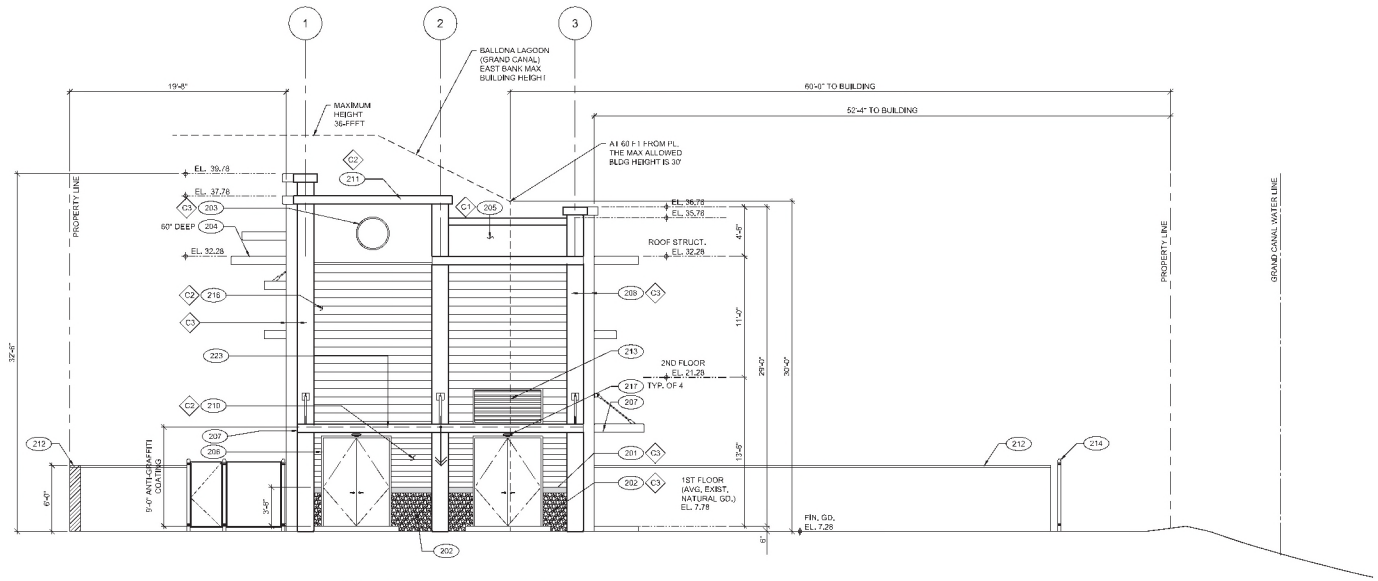
ELECTRICAL BUILDING ROOF PLAN

WORK ORDER NO.
SZC12923

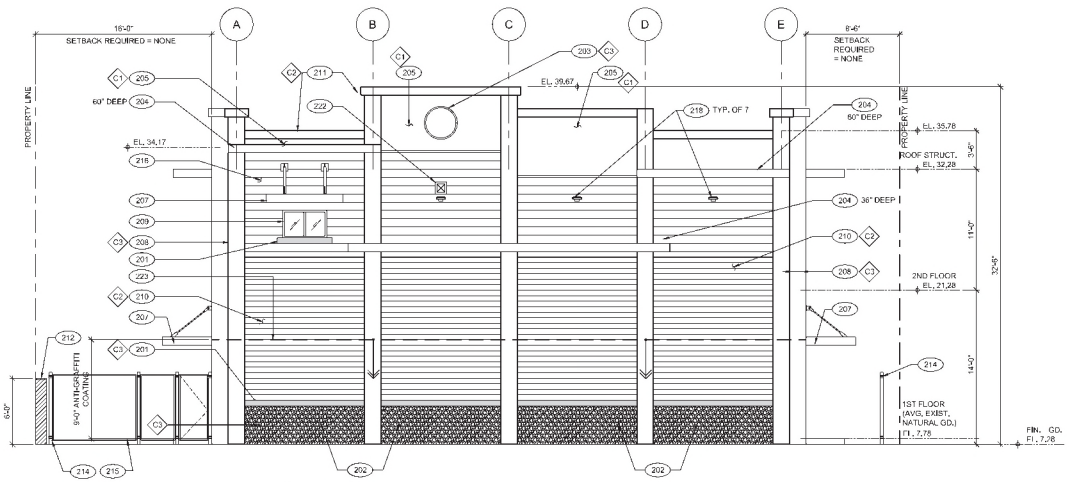
DRAWING NO.
A-5

SHEET 36 OF SHEETS

California Coastal Commission
A-5-VEN-22-0068, A-5-VEN-22-0069, 5-24-0123
Exhibit 4
Page 5 of 9



2 SOUTH ELEVATION
A-6 SCALE: ¼" = 1'-0"



1 WEST ELEVATION
A-6 SCALE: ¼" = 1'-0"

KEYNOTES:

201 4" x 6" CONCRETE SILL, TOP OF SILL @+42" ABOVE FINISH SLAB ELEVATION, U.N.O.

202 TEXTURED CONCRETE WITH COBBLESTONE PATTERN PER SPECIFICATIONS

203 1 ½" CIRCULAR REVEAL x 36" DIA. WITH RECESSED 2" CONCRETE SET WITHIN

204 EXTRUDED ALUMINUM HORIZ. LOUVER EYEBROW

205 COLORED CONCRETE

206 GALV. STEEL DOOR AND FRAME PER DOOR SCHED. A-11

207 METAL CANOPY WITH GALV. STEEL ROD HANGERS AND SARNAFIL DECOR ROOFING SYSTEM PER DETAIL 7/A-09

208 REINFORCED CONCRETE PILASTER PER STRUCTURAL

209 ALUMINUM WINDOW

210 1" HORIZONTAL REVEALS IN CONCRETE WALL SPACED @ 6" O.C.

211 REINFORCED CONCRETE PARAPET CAP WITH CONCRETE SEALER, TYP.

212 6'-0" HIGH CMU WALL PER CIVIL

213 72"W x 36"H AIR INTAKE ACOUSTICAL LOUVER PER MECHANICAL

214 SECURITY FENCE &/OR GATE

215 EQUIPMENT PAD PER CIVIL

216 1" HORIZONTAL REVEALS IN CONCRETE WALL SPACED @ 9" O.C.

217 WALL SCONCE AT ENTRY DOOR (LITHONIA OLW 14)

218 WALL SCONCE AT +23' AFS (LITHONIA OLW 23)

219 LIGHT FIXTURE 'D', 20'-0" AFG PER ELECTRICAL

220 42"W x 36"H ACOUSTICAL LOUVER PER MECHANICAL

221 30" WIDE FUEL ACCESS PANEL

222 9" x 9" AIR INTAKE FAN PER MECHANICAL

223 PROVIDE ANTI-GRAFFITI COATING AT THE LOWER 9 FEET MEASURED ABOVE FINISHED GRADE ON EXTERIOR WALLS AND DOORS, LAMC 91.6306

224 SLIDING GATE

CONCRETE COLOR SCHEDULE:

C1 DAVIS COLORS, OMAHA TAN # 5084

C2 DAVIS COLORS, PALAMINO # 5447

C3 DAVIS COLORS, ADOBE # 61078

FOR PERMITTING PURPOSE ONLY NOT FOR CONSTRUCTION

ARCADIS
LEGAL ENTITY: ARCADIS U.S., INC.
333 S. HOPE STREET
SUITE C200
LOS ANGELES, CA 90071

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS • THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED •

BUREAU OF ENGINEERING

ENGINEERING
CITY OF LOS ANGELES

NO.	REVISIONS	DATE	BY
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-

INDEX NO. D-31898

CIP NO. C922

TED ALLEN, P.E. CITY ENGINEER

		DATE
ENGINEER:	DESIGN GROUP DAVID JOHNSON	6/2025
DESIGNED BY:	DEAN HAWKINS/ DAVID JOHNSON	6/2025
DRAWN BY:	CATHY CARPIO	6/2025
CHECKED BY:	DAVID JOHNSON	6/2025
APPROVED BY:	DAVID JOHNSON	6/2025

VERTICAL CONTROL: NAVD 88 (2009)
HORIZONTAL CONTROL: NAD83, ZONE 5, EPOCH 1991.5

SHLL.1 TITLE: ELECTRICAL BUILDING EXTERIOR ELEVATIONS

PROJECT: VENICE AUXILIARY PUMPING PLANT

ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923

DRAWING NO. A-6

SHEET 37 OF SHEETS

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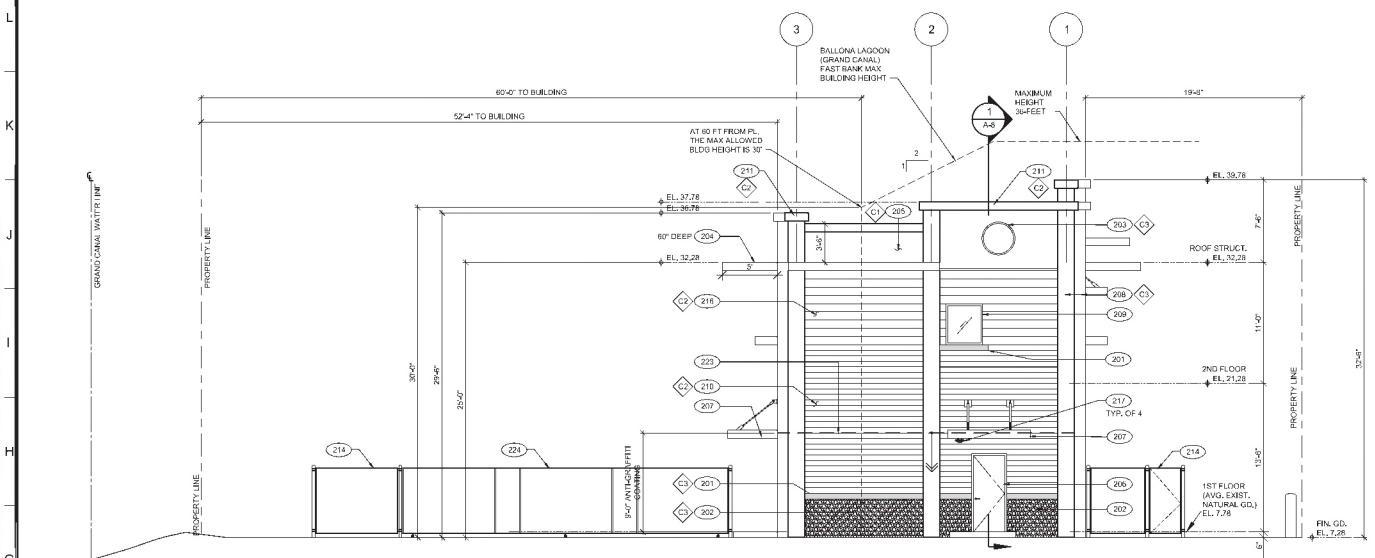
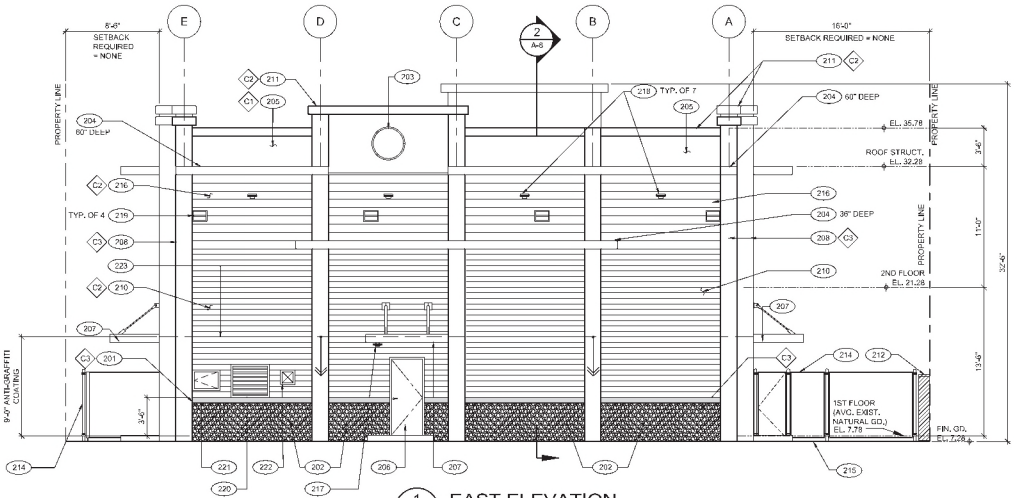
REVISION DATES (DESIGN STAGE ONLY)

Sheet Version 3.0

California Coastal Commission
A-5-VEN-22-0068, A-5-VEN-22-0069, 5-24-0123
Exhibit 4
Page 6 of 9



2 NORTH ELEVATION
A-7 SCALE: ¼" = 1'-0"



1 EAST ELEVATION
A-7 SCALE: ¼" = 1'-0"

KEYNOTES:

201 4" x 6" CONCRETE SILL. TOP OF SILL @+42" ABOVE FINISH SLAB ELEVATION, U.N.O.

202 TEXTURED CONCRETE WITH COBBLESTONE PATTERN PER SPECIFICATIONS

203 1 ½" CIRCULAR REVEAL x 36" DIA. WITH RECESSED 2" CONCRETE SET WITHIN

204 EXTRUDED ALUMINUM HORIZ. LOUVER EYEBROW

205 COLORED CONCRETE

206 GALV. STEEL DOOR AND FRAME PER DOOR SCHED. A-11

207 METAL CANOPY WITH GALV. STEEL ROD HANGERS AND SARNAFIL DECOR ROOFING SYSTEM PER DETAIL 7/A-09

208 REINFORCED CONCRETE PILASTER PER STRUCTURAL

209 ALUMINUM WINDOW

210 1" HORIZONTAL REVEALS IN CONCRETE WALL SPACED @ 6" O.C.

211 REINFORCED CONCRETE PARAPET CAP WITH CONCRETE SEALER, TYP.

212 8'-0" HIGH CMU WALL PER CIVIL

213 72"W x 36"H AIR INTAKE ACOUSTICAL LOUVER PER MECHANICAL

214 SECURITY FENCE &/OR GATE

215 EQUIPMENT PAD PER CIVIL

216 1" HORIZONTAL REVEALS IN CONCRETE WALL SPACED @ 9" O.C.

217 WALL SCONCE AT ENTRY DOOR (LITHONIA OLW 14)

218 WALL SCONCE AT +23' AFS (LITHONIA OLW 23)

219 LIGHT FIXTURE 'D', 20'-0" AFG PER ELECTRICAL

220 42"W x 36"H ACOUSTICAL LOUVER PER MECHANICAL

221 30" WIDE FUEL ACCESS PANEL

222 9" x 9" AIR INTAKE FAN PER MECHANICAL

223 PROVIDE ANTI-GRAFFITI COATING AT THE LOWER 9 FEET MEASURED ABOVE FINISHED GRADE ON EXTERIOR WALLS AND DOORS, LAMC 91.6306

224 SLIDING GATE

CONCRETE COLOR SCHEDULE:

C1 DAVIS COLORS, OMAHA TAN # 5084

C2 DAVIS COLORS, PALAMINO # 5447

C3 DAVIS COLORS, ADOBE # 61078

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DOCUMENTATION DESIGN STAGE ONLY.

ARCADIS
LEGAL ENTITY: ARCADIS U.S., INC.
333 S. HOPE STREET SUITE 2200
LOS ANGELES, CA 90071

DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
ENGINEERING
CITY OF LOS ANGELES

NO.	REVISIONS	DATE	BY
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-

CD NO. C922
INDEX NO. D-31898

THIS PLAN WAS ELECTRONICALLY SIGNED AND STAMPED

CITY OF LOS ANGELES ENGINEERING

TED ALLEN, P.E. CITY ENGINEER

ENGINEER:	DAVID JOHNSON	LIC. NO. 24843
DESIGNED BY:	DEAN HAWKINS/ DAVID JOHNSON	
DRAWN BY:	CATHY DARPO	
CHECKED BY:	DAVID JOHNSON	
APPROVED BY:	DAVID JOHNSON	

DATE: 6/2025

DESIGN GROUP

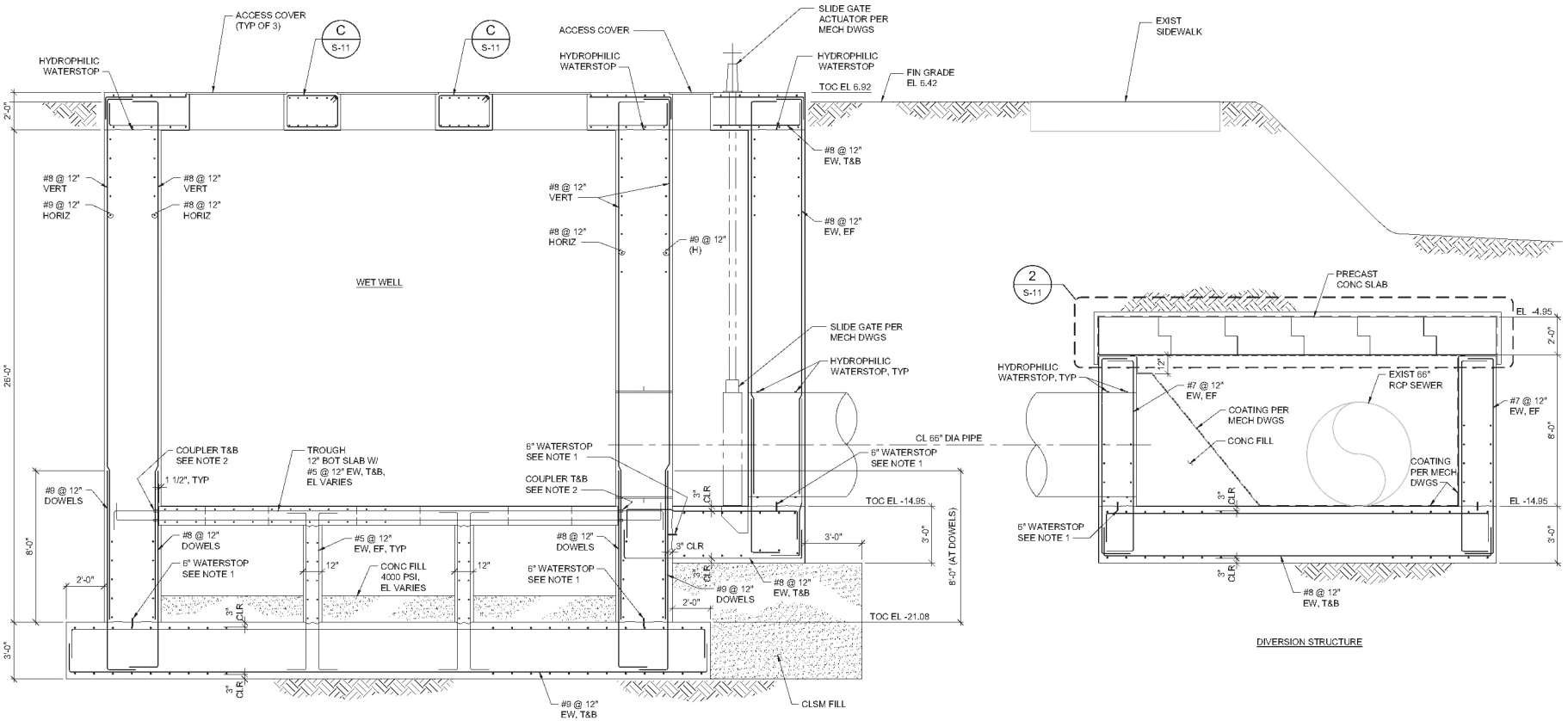
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
CITY OF LOS ANGELES, CALIFORNIA

HORIZONTAL CONTROL: NAD 83 (2007) ZONE 5, EPOCH 1991.5
VERTICAL CONTROL: NAVD 88 (GEOID 18)

SHEET TITLE: ELECTRICAL BUILDING EXTERIOR ELEVATIONS
PROJECT: VENICE AUXILIARY PUMPING PLANT
ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923
DRAWING NO. A-7
SHEET 38 OF SHEETS

Sheet Version 3.0



S-5, S-6	SECTION A
SCALE: 3/8" = 1'-0"	S-8

NOTES:

1. 6" WATERSTOP SHALL BE "GREENSTREAK 679", FLAT-RIBBED, PVC.
2. REINFORCING STEEL COUPLERS SHALL BE "ERICO, LENTON COUPLERS", THREADED MECHANICAL CONNECTORS, ICC-ES ER-3967.

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Beyaz & Patel
BEYAZ & PATEL, INC
16020 VIA FRONTERA
SUITE 200
SAN DIEGO
CA 92127

ARCADIS
LEGAL ENTITY: ARCADIS U.S., INC
2 L'ANSE AVENUE
SUITE: C200
LOS ANGELES,
CA 94071

CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS BUREAU OF ENGINEERING

ENGINEERING — CITY OF LOS ANGELES

INDEX NO. D-31898 | CP NO. C922

NO.	REVISIONS	DATE	BY

TED ALLEN, P.E. CITY ENGINEER
DESIGN GROUP
ENGINEER: SUBHASH PATEL — LIC. NO. 54339
DATE:
DESIGNED BY: HUNG-I WU
DRAWN BY: JANE NIEDERCORN
CHECKED BY: SUBHASH PATEL
APPROVED BY: VENU KOLLI

HORIZONTAL DATUM: NAD 83 (2007)
HORIZONTAL CONTROL: NAD83_2007_5_EPOCH 1997.5

SHEET TITLE: PUMPING FACILITY AND DIVERSION STRUCTURE SECTION

PROJECT: VENICE AUXILIARY PUMPING PLANT

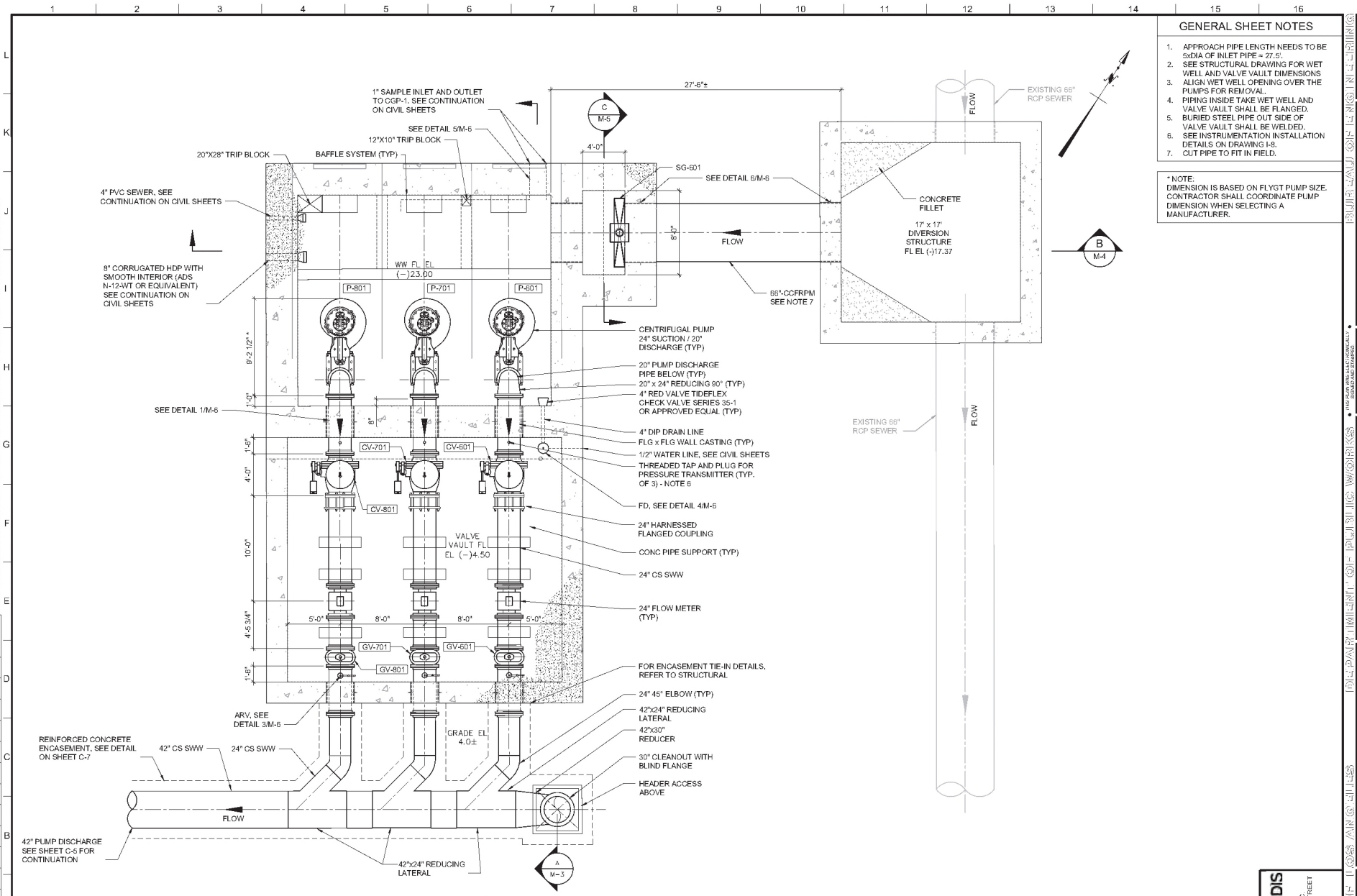
ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923

DRAWING NO. S-8

SHEET 58 OF SHEETS

California Coastal Commission
A-5-VEN-22-0068, A-5-VEN-22-0069, 5-24-0123
Exhibit 4
Page 8 of 9



PLAN
SCALE: 1/4" = 1'-0"

GENERAL SHEET NOTES

1. APPROACH PIPE LENGTH NEEDS TO BE 5xDIA OF INLET PIPE = 27.5'.
2. SEE STRUCTURAL DRAWING FOR WET WELL AND VALVE VAULT DIMENSIONS
3. ALIGN WET WELL OPENING OVER THE PUMPS FOR REMOVAL.
4. PIPING INSIDE TAKE WET WELL AND VALVE VAULT SHALL BE FLANGED.
5. BURIED STEEL PIPE OUT SIDE OF VALVE VAULT SHALL BE WELDED.
6. SEE INSTRUMENTATION INSTALLATION DETAILS ON DRAWING I-8.
7. CUT PIPE TO FIT IN FIELD.

* NOTE:
DIMENSION IS BASED ON FLYGT PUMP SIZE. CONTRACTOR SHALL COORDINATE PUMP DIMENSION WHEN SELECTING A MANUFACTURER.

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SCALE: 1/4" = 1'-0"

ARCADIS
LEGAL ENTITY: ARCADIS U.S., INC
2355 MAIN STREET
SUITE 220
IRVINE, CA 92614

CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
BUREAU OF ENGINEERING
ENGINEERING
CITY OF LOS ANGELES

CITY ENGINEER'S SEAL
REGISTERED CIVIL ENGINEER
DATE
LICENSE EXPIRES 06/30/2025

NO.	BY	DATE	APPROVED

INDEX NO. D-31898
CIP NO. C922

TED ALLEN, P.E. CITY ENGINEER
UC NO. M39845

		DATE
ENGINEER	DAN RYAN	09/2025
DESIGNED BY	DAN RYAN	09/2025
DRAWN BY	JEFF RAY	09/2025
CHECKED BY	GREG BAZYDOLA	09/2025
APPROVED BY	GREG BAZYDOLA	09/2025

HORIZONTAL CONTROL: NAD83 (2011) EPOCH 2010.0
VERTICAL CONTROL: NAVD88 GEOID18 ZONE 5, EPOCH 1991.35

SHEET TITLE: PLAN
PROJECT: VENICE AUXILIARY PUMPING PLANT
ADDRESS: 133 HURRICANE STREET LOS ANGELES, CALIFORNIA

WORK ORDER NO. SZC12923
DRAWING NO. M-2
SHEET 71 OF SHEETS

THE CITY OF LOS ANGELES OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR THE ACCURACY OR COMPLETENESS OF ELECTRONIC COPIES OF THIS PLAN SHEET.

CALIFORNIA COASTAL COMMISSION
South Coast District Office
301 E Ocean Blvd., Suite 300
Long Beach, CA 90802-4302
(562) 590-5071

Th12a
Th12b
Th13a

A-5-VEN-22-0068, A-5-VEN-22-0069, 5-24-0123
(CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS)
SEPTEMBER 8, 2025

CORRESPONDENCE

Outlook

FW: LASAN VAPP Project - Sept 11 agenda items

From SouthCoast@Coastal <SouthCoast@coastal.ca.gov>
Date Thu 9/4/2025 4:28 PM
To Doyle, Jennifer@Coastal <jennifer.doyle@coastal.ca.gov>

-----Original Message-----
From: Steve Bradbury <steve@mycyberstuff.com>
Sent: Thursday, September 4, 2025 4:25 PM
To: SouthCoast@Coastal <SouthCoast@coastal.ca.gov>; ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Subject: LASAN VAPP Project - Sept 11 agenda items

You don't often get email from steve@mycyberstuff.com. Learn why this is important <https://aka.ms/LearnAboutSenderIdentification>

I'm writing this letter regarding Appeal No. A-5-VEN-22-0068, Appeal No. A-5-VEN-22-0069 and Application No. 5-24-0123.

#1: Parking Lot @ 128 Hurricane St. I strongly oppose the parking lot at 128 Hurricane. This is a poorly thought out plan that is no longer necessary given the newly established employee parking spaces identified within the VAPP footprint.

* It will create materially more traffic on and around Hurricane St as people queue up for a parking space (see the Venice Pier parking lot all summer and on weekends).
* It will negatively impact residents by increasing air and noise pollution and decreasing our safety.
* There are no stated plans to enforce the dawn to dusk hours, proposed signage notwithstanding.
* The lot will become a haven for those who choose to live on the street and/or life to excess.

Most importantly, it will severely curtail emergency access for LADWP as well as first responders due to increased traffic on the surrounding streets. Does the Commission want to take responsibility for these scenarios when it could just as easily prevent them by removing the parking lot which nobody in the community wants?

For the record, LASAN made material changes to the project without any notification to the public or environmental review by creating these three on-site employee parking spaces. In addition, they seem to have identified multiple on-street parking spaces for public use. This means the parking lot at 128 Hurricane St is no longer necessary! Additionally, the community has proposed re-activating Phase Two of the Grand Canal Restoration Plan <https://engineering.lacity.gov/grand-canal-restoration-project> which would include a walk bridge at Driftwood St and 30-40 new parking spaces on Via Dolce. This materially addresses your primary mission of increasing public access far more than a small, impactful parking lot on a residential

street.

Of note, the city spent $2.7M through eminent domain to acquire 128 Hurricane St. That money could go a long way (and then some) to pay for the GC Restoration Plan AND important other environmental and public access improvements.

#2: Special Conditions: There are 19 special conditions proposed by Coastal Staff. That is far more than is the norm and points out how many unresolved issues still exist. It's hard to imagine how LASAN, with all the city budget cuts, and Coastal, with your staff limitations, will effectively monitor these conditions. I'm extremely concerned about how they will be monitored and managed. As such, I'm requesting Coastal require LASAN to hire and pay for an independent monitor for this specific purpose. The determination who should be hired would be made jointly by LASAN and community representatives to ensure objectivity and no bias.

#3 - Vibration, Noise and Property Damage - The original 2017 EIR (Environmental Impact Report) concluded that operational noise from the transformers would increase noise levels by 2.1 to 3.9 dB over the ambient background noise levels. The threshold of significance in the EIR is an increase of 5 dB over ambient. Since then, the transformers have been re-located (another change that we were told was not possible), materially increasing operational noise to adjacent residences above the threshold.

* The old VAPP mitigation plan stated "Project construction noise will exceed construction noise criteria provided by the LA CEQA Thresholds Guide. However, Section MM-NOI-3 of the same Mitigation plan, states noise control features will "reduce overall operational noise levels from all Project related sources to within 5 dB of existing ambient noise levels in the surrounding community (53-57 dB)." These two statements are in conflict. A new noise study should be required. Further, pile driving, grading, and jackhammer activities would be particularly disruptive to residents. The pile driving is predicted to result in a 44 dB increase over ambient noise levels at the adjacent property, with volumes reaching 98 dB. Demolition, paving, and site preparation all involve noise volumes with enormous increases over ambient noise levels.
* The VAPP mitigation plan also acknowledges "significant and unavoidable impact to surrounding land uses" including "ground-borne vibration levels that are distinctly perceptible at a receiving residential use or could potentially result in building damage." Section MM-NOI-2 of the mitigation plans does not adequately protect property from potential damage. In addition, Construction GEO-1 of the mitigation plan states the Project will "Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking and/or seismically related ground failure, including liquefaction."

As a property owner on Hurricane St, I'm extremely concerned about potential damage to my property. This is both a "quality of life" and "loss of property" issue for myself as well as all nearby residents, especially those closest to the construction site. LASAN has not adequately addressed these issues - "significant and unavoidable" does not work.

* LASAN should be required to retain an independent 3rd party, reasonably approved by the community, to review and recommend changes to the mitigation plans.
* The city should also provide independent (3rd party) noise and air quality monitoring devices whose results are available to the community in real time.
* If necessary, the city should distribute or reimburse the cost of high-quality air purifiers to impacted households (up to $500/unit).
* The city should be required to comply with residential noise thresholds including the provision of all

sound barriers necessary to comply with municipal code requirements and CEQA thresholds.

As we have consistently said, our intent is not to stop this critical infrastructure project. It is simply to mitigate its impact on the community. Please do right by the community. We are counting on you.

With appreciation,

Steve Bradbury

Hurricane St resident

Outlook

FW: LASAN VAPP Project - Sept 11 agenda items - Community Input

From SouthCoast@Coastal <SouthCoast@coastal.ca.gov>
Date Mon 9/8/2025 11:34 AM
To Doyle, Jennifer@Coastal <jennifer.doyle@coastal.ca.gov>

1 attachment (877 KB)
Hurricane Pumps Neighbor Letters.pdf;

From: Steve Bradbury <steve@mycyberstuff.com>
Sent: Thursday, September 4, 2025 4:43 PM
To: SouthCoast@Coastal <SouthCoast@coastal.ca.gov>; ExecutiveStaff@Coastal <ExecutiveStaff@coastal.ca.gov>
Subject: LASAN VAPP Project - Sept 11 agenda items - Community Input

You don't often get email from steve@mycyberstuff.com. Learn why this is important

This letter references Appeal No. A-5-VEN-22-0068, Appeal No. A-5-VEN-22-0069 and Application No. 5-24-0123.

As the current lead community representative for the VAPP project, it is important for you to contextually see how we have collectively responded to LASAN regarding this project over the last couple of years -see attached. Our community has consistently stated our intent is not to stop this critical infrastructure project. Our objective is to mitigate its impact including (but not limited to) damaging structural vibrations, excessive noise, exposure to toxins, lack of adequate emergency access and, most importantly, preventable damage to the Grand Canal and Ballona Lagoon ESHAs. LASAN has offered little in the way of concrete proposals while the community has demonstrated our commitment by putting forth many possible solutions which would require both sides to give a little. Yet, here we are still trying to find common ground.

This Application is not ready for prime time. There are too many outstanding issues as recognized by the 19 Special Conditions contained in the staff report.

Please do right by the community. Do not approve this application until these issues have been resolved. We are concerned LASAN will not be held accountable for their compliance.

With appreciation,

Steve Bradbury
Hurricane Pumps

Hurricane Pumps Neighbor Letters

(Last updated: 12/2/24)

Re: Venice Auxiliary Pump Plant (VAPP), 128 and 133 Hurricane;
DIR-2017-4167; ZA-2017-3950 (plant); DIR-2017-4173; ZA-2017-3953 (parking lot)

The following members of our community have expressed their POV on this issue to date. We anticipate additional written responses as this process continues.

2024 Neighbor Letters

MIKE BORASSI & GENEVIEVE MORRILL-BORASSI – (FORMERLY) 3811 ESPLANADE. (ORIGINAL APPELLANTS) 5

KENYA LEE & JOEY JACKSON – 3811 ESPLANADE 6

HARVEY PLOTNICK – 125 & 127 HURRICANE ST (PROPERTY OWNER) 7

LESLIE & MICHAEL ADLER – 3601 ESPLANADE 9

MICHAEL HOFFS – 110 HURRICANE ST 10

MICHAEL HOLT – 127 HURRICANE 11

BETHANY GORFINE – 3950 VIA DOLCE (OWNER AND CONDO BOARD PRESIDENT) 12

ELIANE GANS – 3933 ESPLANADE (PROPERTY OWNER) 13

ROBIN RUDISILL – 3003 OCEAN FRONT WALK 14

TING CHANG – 28 MAST 15

TOM DRUCKER & MARCIA SELIGSON DRUCKER – 4 LIGHTHOUSE 16

JENESA KURLAND – 4300 VIA DOLCE (CONDO OWNER) 17

ROBERT DIBIASE – 115 ½ HURRICANE ST (OWNER) 18

TRACI GAY – 310 WASHINGTON BLVD. 19

GARY STROMBERG – 125 HURRICANE ST 20

TING CHANG – 28 MAST 21

JENESA KURLAND – 4300 VIA DOLCE (CONDO OWNER)....22

PERRY ROD – 3818 PACIFIC AVE....23

MARY-DOROTHY LINE – 125 PRIVATEER MALL....24

MICHAEL HOFFS – 110 HURRICANE ST....25

2022-23 Neighbor Letters

MARY LAING – 115 HURRICANE ST....27

STEVE & KAREN BRADBURY – 109 HURRICANE ST (OWNERS)....28

ADAM GOLDBERG – 110 HURRICANE ST....29

ROBERT DIBIASE – 115 ½ HURRICANE ST (OWNER)....30

MURIEL BLAKE & JOHN LARKIN – 110 HURRICANE ST.....31

GARY STROMBERG – 125 HURRICANE....33

MIKE BORASSI & GENEVIEVE MORRILL-BORASSI – 3801 ESPLANADE....34

KRISTY CANON - 3809 ESPLANADE (BUILDING OWNER)....36

ROBERT & LUCIA WILLIAMS – 3805 ESPLANADE....37

ELIANE GANS – 3933 ESPLANADE (PROPERTY OWNER)....38

TANYA SPERO – 113 ½ HURRICANE ST....40

LARRY LESSER, MD & CLAUDE LESSER – 3609 ESPLANADE (OWNER)....41

JEFF LEE – 3701 ESPLANADE (OWNER)....42

CLARE BRONOWSKI – 3701 ESPLANADE (OWNER)....43

LESLIE & MICHAEL ADLER – 3601 ESPLANADE....44

JENNIFER KELTON – 3615 ESPLANADE....45

MELLY LIBURD – 120 ½ GALLEON (OWNER)....46

ANDREW FREEDMAN – 20 IRONSIDES 47

MARILYN MIKOS – 115 EASTWIND ST (OWNER) 50

ARIANNE FLEMMING & JUSTIN WASSER – 3812 PACIFIC 51

SUSAN AFRIAT & STEVE HYMAN – 4000 PACIFIC 52

BETHANY GORFINE – 3950 VIA DOLCE (OWNER AND CONDO BOARD PRESIDENT) 53

JONATHAN TILLMAN – 3719 VIA DOLCE 54

ROBIN RUDISILL 56

ADAM ROSE – 12 BUCCANEER ST. 57

ROBERT NAU – 4250 VIA DOLCE 58

FELICIA GLADE & MIKE PELLETIER – 116 GALLEON ST. 59

ELIANE GANS – 3933 ESPLANADE (OWNER) 60

JENESA KURLAND – 4300 VIA DOLCE (CONDO OWNER) 61

2024 Neighbor Letters

Mike Borassi & Genevieve Morrill-Borassi – (formerly) 3811 Esplanade. (original appellants)

Dear Chair and members of the Venice Neighborhood Council Land Use & Planning Committee,

My name is Genevieve Morrill, and my husband and I filed the appeals to both City of Los Angeles Planning Commission, and more recently the California Coastal Commission. This project has been ill-conceived from the beginning and too large for the space. Understanding that it is an essential utility we need in our region, we were simply asking them to consider making it more compatible for the neighborhood and less intrusive on the community. At the time we filed the PC appeal, the city has not met or reached out to the community since 2016.

We are a casualty of this pending project, as our building is situated on the canal directly next to the vacant lot where the VAPP will be built. We have been renters for 28 years on the Canal and due to the pending construction, the owner sold the building, and the buyer decided to live there which therefore meant we had to move and find a new place to live at a considerable increase in market-based rate rents.

In my day job, I am the CEO of a Chamber of Commerce and therefore understand planning, zoning, and development. I attest that a developer would never be allowed to get away with such egregious disruption to a residential neighborhood. To have transformers and electrical equipment next to someone's bedroom window when the design can be flipped so that these electrical boxes would be on a vacated side of the street with no residents. They claim this impossible and frankly its only because they have already designed the project. A developer would be made, no matter what the expense to redesign.

This project is not compatible to the neighborhood aesthetics; it is too large for the location; it has negative impact to our community members; mitigation measures are not sufficient; has negative impact on the environment and a protected canal; and creates areas for more unhoused to encamp. Additionally, our understanding is that this project is an industrial use in a residential zone and no zoning was amended for its purpose.

Please oppose this project and help support the community members.

Thank you,

Genevieve Morrill
Formerly 3801 Esplanade/Grand Corso

Kenya Lee & Joey Jackson – 3811 Esplanade

I am writing to express my deep concerns regarding the ongoing plans for the Venice Auxiliary Pumping Plant (VAPP) project near my home at 3809-3811 Esplanade St in Marina del Rey. For over seven years, our community has diligently attempted to engage with Public Works to address critical concerns related to this project. Unfortunately, our efforts have largely been met with inadequate responses, leaving us feeling overlooked and unsupported.

While I recognize the importance of the VAPP as a critical infrastructure initiative, I am deeply troubled by the substantial and long-term negative impacts the current construction plans will have on my family and our community. Specifically, my primary concerns include:

Exposure to Toxins: The project involves significant excavation directly next to my home, raising serious concerns about potential exposure to hazardous substances that could endanger the health of residents, particularly children.

Structural Vibrations: Intense vibrations from construction activities could compromise the structural integrity of nearby homes, including my own, potentially leading to costly and irreversible damage.

Extreme Noise Levels: Construction noise will significantly affect my household's quality of life, particularly for my young child, whose well-being and development depend on a quiet and stable living environment. I also work from home and need a conducive environment to conduct my business.

Improvement of inadequate emergency access during construction activities.
Having a family residing next to this project concerns us to have an adequate emergency plan,a well thought out plan for emergency services during the time of construction.

Our community has never sought to halt this essential project. Instead, we have consistently requested an open and meaningful dialogue with project stakeholders to ensure fairness and adequate mitigation of these impacts. However, to date, we have seen little action or acknowledgment of our concerns.

The health, safety, and quality of life of our residents must be prioritized as this project moves forward. We are not opposed to progress; we simply seek fairness and the opportunity to live without unnecessary ha.rm or disruption

Thank you for your attention to this matter. I look forward to your prompt response and to working collaboratively toward a solution that benefits both the community and the project's success.

Sincerely,
Kenya Lee
3811 Esplanade, 90292
313-999-0264

Harvey Plotnick – 125 & 127 Hurricane St (property owner)

I own a property on Hurricane Street in Marina del Rey. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP Project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on lives for multiple years. My primary concern are:

* Conformance with the certified Venice LUP Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas. Policy 1.C.1 states that the sale and design of industrial facilities must be compatible with adjacent and neighboring uses. Policy 1.A.5 that seeks to preserve and protect stable multifamily neighborhoods. Policy 1.D.1 states the only permit development adjacent to the grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.

*Meeting established public Benefit standards including a 10' landscaped irrigated buffer along all property lines. The performance stands applied to this project are applicable to those on a major or secondary highway, not a residential street.

* Adherence to court-mandated ESHA protections in the Ballona Lagoon/Grand Canal area including no dredging and/or use of heavy equipment both of which are parr of the project plan *The community that introduced elements of the Grand Canal Restoration Plan (Phase 2) to address some of these issues. It is not an all or nothing

*Mitigation of other EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas releases. The community has put forth concepts to address some of these issues including the grand Canal Restoration Plan

* Mitigation of "significant and unavoidable" construction-related issues including ground borne vibration which could result in residential building damage, and construction noise that exceeds LA CEQA Thresholds guidelines. Section MM-NOI-2 of the mitigation plans does not adequately protect property from potential damage. The current plan is for more reactive than proactive using terms such as "may include." "If considered appropriate," and "as feasible and practical." Also, there is no timely mechanism for issues to be addressed/project to be halted in the event damage is done. Section MM-NO-3 of the mitigation plan is also inadequate. It strains credibility to believe noise control features will "reduce overall operational noise levels from all Project related sources to within 5db of existing ambient noise levels in the surrounding community (53-57db)."

* Change to five day/week construction and more restricted hours in lieu of six days/week.

* Alternative parking for up to 25 cars, most owned by residents, that park on Hurricane St daily during non-summer days and weekends year round. Hurricane St parking will cease to exist during construction hours. Where do these cars park?

* Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted Street parking around the current Venice Pumping Plant (VPP), at

a savings of at least $3.5 million to the city. The community has proposed a viable alternative that does not require this lot.

* Modification of the project design so that it is compatible with the residentially zoned neighborhood. There was very little, if any, community input during the design process,

*Actionable protection of residential properties from dirt, dust and other construction impacts. The community has offered viable suggestions.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through respectful negotiations. PLEASE support this request for fairness,

Thank you,
Harvey Plotnick

Leslie & Michael Adler – 3601 Esplanade

I live along Esplanade Canal on Eastwind.

We have a few concerns:

1. Adherence to court-mandated ESHA protections in the surrounding lagoon area;

2. Mitigation of EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas release;

3. Mitigation of "significant and unavoidable" issues including ground-borne vibration, which could result in residential building damage, and construction noise that exceeds LA CEQA Thresholds guidelines;

4. Change to five day/week construction instead of proposed six days/week;

5. Modification of project design so that it is compatible with its residentially zoned neighborhood;

6. Protection of residential properties from dirt, dust and other construction impacts;

7. Upgrade of deficient maintenance plan for both the new and existing facility.

Thank you
Leslie & Mike Adler
3601 Esplanade

Michael Hoffs – 110 Hurricane St.

As a 20+ resident of 110 Hurricane Street, I am in strong support of the motion. This is a classic case of the city not listening to the boots on the ground describing why the installation of the parking lot is not only not needed but strongly opposed for security reasons. For VAPP personnel, alternative parking on Hurricane has been found in other areas within a half block or less of VAPP. Homeless encampments, drunken disorderly conduct and contempt for Hurricane residents, constant traffic to find parking in the lot, mounting trash and lack of city funds to police the area have not been addressed and frankly will not be before construction.

Please ask yourself, would you want this parking lot built on your street? If you would support installing the parking lot on your street, would you be concerned if the aforementioned was not thoroughly embedded in the parking plan before construction?

Thank you for listening, your time to think about Hurricane Street's resident thoughts and frankly the chance to use the funds suggested for the parking lot on something else that will benefit the area in greater need.

Sincerely,

Michael Hoffs
110 Hurricane St

Michael Holt – 127 Hurricane

Greetings,

I live on Hurricane St in Marina Del Rey.

For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on our lives for multiple years. My primary concerns are

- Mitigation of "significant and unavoidable" construction-related issues including ground-borne vibration which could result in residential building damage, and, construction noise that exceeds LA CEQA Thresholds guidelines.
- Change to five day/week construction and more restricted hours in lieu of six days/week.
- Off-site workspaces for home-based workers
    - The city says it will be managed by the construction company but there have not been any guarantees of location or suitability.
- Actionable protection of residential properties from dirt, dust and other construction impacts.
    - The community has offered viable suggestions.
- Alternative parking for up to 25 cars, most owned by residents, that park on Hurricane St daily during non-summer days and weekends year round
    - Hurricane St parking will cease to exist during construction hours. Where do these cars park?
- Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through respectful negotiations.

PLEASE support this request for fairness.

Thank you,

Michael Holt
127 Hurricane Street

Bethany Gorfine – 3950 Via Dolce (owner and condo board president)

As an association that lives across the lagoon from Hurricane, and an association that lived through the dual main project for five years, with drilling immediately outside our 7 buildings between Marquesas and Tahiti on Via Dolce and via Marina, we are still feeling the effects of the project. I will elaborate.

I would like to say a few things regarding the care of the Ballona Lagoon, and Grand Canal - parking issues, vibrations, care, concern and communication for and of neighbors, repairs, plumbing, mental health, 6 days of noise, chaos, construction, personnel are all issues. Day in. Day out.

Bethany Gorfine
President, Marina Strand Colony 1.
145 units

Eliane Gans – 3933 Esplanade (property owner)

To the Chairman of LUPC
To LUPC
To Traci Park

I have lived in my building on Esplanade & Hurricane (just 1/2 block from this proposed VAAP). for 35 years. **I love my neighborhood and my neighbors. I love the serenity and residential environment.**

1. **REGARDING VIBRATION:** This will disturb all residents and as a landlord I do not want any tenant moving as a result of vibration and constriction noise. This will impact my quality of life and my ability to support myself financially.

2. **INADEQUATE EMERGENCY ACCESS DURING CONSTRUCTION**: Children and animals, and elderly residents, **will be in danger** of obstruction in an emergency

4. **PARKING LOT:** The city has already eliminated 6 parking spaces on Hurricane—which was not necessary, and parking is a HUGE issue for residents and their families when visiting. Eliminating another parking lot is NOT A RESPONSIBLE ACTION.
WE MOVED TO THIS NEIGHBORHOOD FOR A REASON—AND THIS ENTIRE PROJECT WILL NEGATIVELY IMPACT THE QUALITY OF OUR LIVES.
The city should use the $2.5 million for a more advantageous purpose to actually enhance this community—so that the City could actually get more taxes if our properties were not devalued as a result of this VAAP project.

CLARIFYING #4. PARKING LOT: WE DO NOT WANT OR NEED A PARKING LOT. AND ESPECIALLY FOR NON-RESIDENTS.

5. PROJECT DESIGN: This is designed to look like a dungeon. Or a jail block. There is nothing that resembles a structure that one would consider to be compatible with the Beach and lagoon environment. The project design is not compatible with the residentially zoned neighborhood. Again, detracting anyone from wanting to live near this ugly eye sore. We need more beauty and aesthetics in our world, not a building that appears like a “block” house jail.

Sorry for being so blunt… but I wanted you to get the idea of our feelings.

Sincerely,

Robin Rudisill – 3003 Ocean Front Walk

Public Officials,

I live on Ocean Front Walk on the Marina Del Rey Peninsula. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more.

This project expands the pumping of sewage down to Dockweiler and is located in the middle of our residential neighborhood as well as in the middle of Environmentally Sensitive Habit Area (ESHA). It is an unacceptable land use for this area and yet it is critical infrastructure, and we understand it must move forward. However, the lack of concern shown regarding finding reasonable mitigations for the impacts on our residential neighborhood and the lack of protection and mitigations for the ESHA is appalling and unacceptable.

The construction plans as designed will have a painful, material impact on this community and surrounding ESHA for decades.

Our primary concerns are:

- **Mitigation measures in order to conform as closely as possible with the certified Venice LUP, the state policy guidance for determining conformance with the Coastal Act.**
    - Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas.
    - Policy I.C.1 states that the scale and design of industrial facilities must be compatible with adjacent and neighboring uses.
    - Policy 1.A.5 seeks to preserve and protect stable multifamily neighborhoods.
    - Policy 1.D.1 states the only permitted development adjacent to the Grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.
- **Elimination of the proposed parking lot at 128 Hurricane St.** for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city.
- **Modification of the project design** so that it is visually compatible with the residentially zoned neighborhood.

Given that this location is grossly incompatible with this location and never should have been allowed to happen, the City's Bureau of Engineering should be bending over backwards to keep the impacts on the residential neighborhood and surrounding ESHA to a bare minimum.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through reasonable and respectful negotiations in order to minimize impacts on the surrounding ESHA and residential neighborhoods.

PLEASE support this request for fairness. Please work with us to make reasonable changes to the project in order to protect our residential neighborhood and the ESHA.

Ting Chang – 28 Mast

To whom it may concern,

As a resident of the Marina Peninsula, I am writing to express my strong support for the Venice Neighborhood Council's (VNC) motion opposing the Venice Auxiliary Pumping Plant (VAPP) project as currently proposed under CPC-2024-2010-GPA-ZC-CU2-SPPC.

While I understand the necessity of infrastructure improvements, the current plan presents serious concerns that have not been adequately addressed by Los Angeles Public Works (LAPW). The project's non-conformance with the Venice Local Coastal Program (LUP) policies, particularly those aimed at protecting stable residential neighborhoods and preserving environmentally sensitive areas like the Grand Canal and Ballona Lagoon, is deeply troubling.

Moreover, the Environmental Impact Report (EIR) for the project has failed to address key issues, including the risk of habitat destruction, groundwater contamination, and methane gas release. The proposed six-day workweek for construction will significantly disrupt the lives of local residents, with excessive noise, vibration, and dust over an extended period. The plan's inadequate provision for emergency access during construction is another critical concern.

The addition of a parking lot at 128 Hurricane Street, which was not part of the original project, will only exacerbate traffic and safety issues in our community. The VNC's motion rightly calls for the elimination of this parking lot, proposing more suitable alternatives that would save the city millions of dollars while addressing community concerns.

I fully support the VNC's call for LAPW to engage in a meaningful, results-oriented dialogue with our community to address these issues. It is crucial that any development in our neighborhood is done thoughtfully, with full consideration of its impact on residents and the environment.

Thank you for your attention to this matter.

Sincerely,

Ting Chang
3933 Esplanade W.
Marina del Rey, CA 90292
(310) 339-4056

Tom Drucker & Marcia Seligson Drucker – 4 Lighthouse

As long-time Marina residents, we are opposed to this zoning change until Public Works addresses some of the issues below:

- Mitigation of "significant and unavoidable" issues including ground-borne vibration, which could result in residential building damage.
- Mitigation of construction noise that will exceed LA CEQA Thresholds guidelines.
- Potentially significant methane gas release (read the community feedback to the EIR Mitigation Plans via the website link below - starts on page 44).
- Inadequate emergency access during construction activities.
- Change to five day/week construction instead of proposed six days/week.
- 25 parking spaces that will be eliminated on Hurricane every day of construction. Where will these people park?
- Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), a savings of at least $2.5 million to the city.
- Conformance to the certified Venice LUP (Policies I.A.5, I.C.1, I.C.6, and I.D.1).
- Adherence to court-mandated ESHA protections in the surrounding Ballona Lagoon and Grand Canal.
- Mitigation of EIR issues related to loss of species and habitat, groundwater impact.
- Modification of project design so that it is compatible with its residentially zoned neighborhood.
- Protection of residential properties from dirt, dust and other construction impacts.
- Upgrade of deficient maintenance plan for both the new and existing facility.
- Compensation for lost property value - During construction, tenants may very well seek reduced rents or move out. Units may have to be re-rented at lower rates, if at all. As a result, property owners may have to sell at reduced valuations. This is not hypothetical. It has already occurred.
- Resident physical/mental issues due to construction.
- Real-time community recourse to on-site construction issues. Without teeth, there can be no enforcement.

Please include this email as part of the public record.

Sincerely,

Tom Drucker and Marcia Seligson Drucker

Jenesa Kurland – 4300 Via Dolce (condo owner)

Hello VNC Board -

The Venice Auxiliary Pumping Plant (Project) as designed should not occur within a Residential Zone; and regardless of Zone nomenclature, Project must avoid drilling/vibrating foundations. No home/building owner should be forced to have their foundations and structure compromised due to poor planning and poor execution by City of Los Angeles (City). A 'mere' cosmetic crack through drywall stems from a crack in building structure which stems from a foundation crack. In earthquake country, one cannot afford - literally - to have compromised foundations & structure. City Department of Public Works (LADPW) has well proved that they cannot be trusted to comply with EIR requirements nor fair guidelines. I still seethe with distain towards the Community Outreach folks' blatant lies during their Venice Dual Force Main (VDFM) project by simply writing to you now. Photographed pre-construction inspection survey by a third party contracted by City as a baseline and photographed post-construction inspection survey by City employees admitting to seeing cracks afterwards is meaningless.

If anyone pretends to think that Project's parking lot will become anything but a trash dump and under-housed tent camp, you know they are neither trustworthy nor grounded in reality; and therefore, should not be decision-maker.

Also, Project design detracts from the community. Given Project is within a beachside residential community, why cannot the building appear more contextually-friendly? I do not understand the difunctional brown slat awnings here & there which do not provide shade to anything. A small item, but indicative of City not paying attention to detail and nor Project's impact on community of taxpayers.

If absolutely nothing else, City needs to disallow work on Saturdays. City (work) projects drag on (& on), so there is no 'time is of the essence' condition which warrants six workdays.

City allows drilling, vibrating, pounding starting at 7:00AM. City allows spilling of groundwater mixed with the oil fields below us to spill out onto streets 24-7. Thus, enforceable penalties for non-compliance with the EIR need to be in writing and should be available to all on VNC website.

Thank you,
J. Kurland
Via Dolce

Robert DiBiase – 115 ½ Hurricane St (owner)

Oct 10, 2024

To: Los Angeles Planning Commission

Subject: Proposed Pumping Station Addition,128 Hurricane St & 3813 South Esplanade

Dear Commissioners:

I have lived on Hurricane St since 1977 and witnessed the new construction of the present Pumping Station and it was a vast improvement to the old pumping station. This proposed additional pumping station construction has made many of our local residents angry, because you are not letting us give you our opinions on what we feel are legitimate objections.

1. Why is the project needed anyway. It appears that the present pumping station is doing the job just fine right now.

2. This area is an environmentally protected area. Court mandated ESHA protections in the Ballona Lagoon/Grand Canal area INCLUDE NO DREDGING AND /OR USE OF HEAVY EQUIPMENT -- BOTH OF WHICH ARE PART OF THE PROJECT PLAN. THIS IS NOT ACCEPATABLE.
3. Conversations with my neighbors are telling me that traffic on the street and car parking loss due to construction equipment will be a major problem. The noise and the impact on the canal itself could be devastating.

4. Are the transformers in the new station generating Electromagnetic fields which are known to cause Cancer?

5. Is this project absolutely NECESSARY?

6. Our neighborhood residents demand to have input into this planning process and to negotiate a possible site farther down the coast. This is a residential neighborhood, and the pumping station does not even belong here.

Respectfully submitted
Robert DeBiase
115 ½ Hurricane St

Traci Gay – 310 Washington Blvd.

I strongly oppose Venice Auxiliary pumping plant going forward! I am a resident at 310 Washington Blvd., #604, marina Del Rey 90292

Gary Stromberg – 125 Hurricane St

I live on Hurricane St in Marina Del Rey. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on our lives for multiple years.

My primary concerns are safety and mitigation of "significant and unavoidable" construction-related issues. Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone. PLEASE support this request for fairness. Thank you.

Gary Stromberg
125 Hurricane St.
MDR

Ting Chang – 28 Mast

Hello,

My husband and I are residents of Mast Street in Marina Del Rey. For over seven years, our community has tried to work with Public Works to address significant concerns about the proposed VAPP project. Despite our persistent efforts, we've been met with empty promises and no real action.

This lack of consideration for our community's well-being is deeply disappointing. While I recognize the importance of this infrastructure project, the current construction plans, as proposed, will significantly and adversely impact our lives for years to come.

My main concerns are conformance with the certified Venice LUP (as homeowners we are held to the LUP and it is only fair that city projects are as well) and the upgrade of a deficient maintenance plan for both the new and existing facility (currently garbage is all over the canal and it looks like there has not been any efforts to maintain the sidewalk area).

We are not asking to halt the project but rather to engage in a meaningful dialogue with someone who has the authority and willingness to address these concerns through respectful and fair negotiations. Your support in ensuring this request for fairness is honored would be greatly appreciated.

Thank you for your attention.

Regards,

Ting Chang

Jenesa Kurland – 4300 Via Dolce (condo owner)

Dear City Representatives -

For over seven years our community has been **trying** to **collaborate** with Public Works to address critical concerns about the planned VAPP project. Though our efforts fall on deaf ears. We receive lip service and nothing more. This total lack of concern for our community is unacceptable.

Our community acknowledges this is a critical infrastructure project even if is a hazardous industrial facility located within our residential area. However, the construction plans as designed will have a painful, material impact on our lives for multiple years.

+ Change to five day/week construction and more restricted hours in lieu of six days/week.

+ Mitigation of other EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas release.

- The community has put forth concepts to address some of these issues including the Grand Canal Restoration Plan.

+ Mitigation of "significant and unavoidable" construction-related issues including ground-borne vibration which could result in residential building damage, and, construction noise that exceeds LA CEQA Thresholds guidelines

- Section MM-NOI-2 of the mitigation plans does not adequately protect property from potential damage. The current plan is far more reactive than proactive using terms such as "may include," "if considered appropriate," and "as feasible and practical." Also, there is no timely mechanism for issues to be addressed/project to be halted in the event damage is done.

Section MM-NOI-3 of the mitigation plan is also inadequate. It strains credibility to believe noise control features will "reduce overall operational noise levels from all Project related sources to within 5 dB of existing ambient noise levels in the surrounding community (53-57 db)."

+ Modification of the project design so that it is compatible with the residentially zoned neighborhood.

+ Upgrade of a deficient maintenance plan for both the new and existing facility.

- The existing VPP is ***not*** maintained in any meaningful way. There are environmental and safety issues. Garbage is strewn along the Grand Canal side of the structure which can readily fall into this ESHA. The sidewalk around the structure is in a constant state of disrepair to the point of being dangerous.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with AHJ and motivation to address these issues through respectful negotiations. PLEASE support this request for fairness. *Imagine* ***how you would feel in a similar situation****!?*

Thank you,
J. Kurland
Via Dolce, Marina del Rey

Perry Rod – 3818 Pacific Ave

To Whom It May Concern,

My 3-unit residential building is at 3818 Pacific Avenue in Marina Del Rey. We have been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. Although the industrial project is for critical infrastructure, the construction plans as designed require much more compatibility and dialogue with the immediately surrounding residentially zoned neighborhood. There was very little, if any, community input during the design process and this must change.

Thank you,

Perry Rod
Chief Investment Officer
Rod Capital Management

Mary-Dorothy Line – 125 Privateer Mall

I live on Privateer Mall in Marina Del Rey. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project.

All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on our lives for multiple years.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through respectful negotiations. PLEASE support this request for fairness.

Thank you.

Michael Hoffs – 110 Hurricane St.

As a 20+ resident of 110 Hurricane Street, I'm pleading with you to take a closer look at how the VAPP Project on Hurricane Street will affect the local neighborhood if our concerns are not faithfully considered. I am not alone on feeling the city is not listening to the boots on the ground describing why the installation of the parking lot is not only not needed but strongly opposed for security reasons. For VAPP personnel, alternative parking on Hurricane has been found in other areas within a half block or less of VAPP. Homeless encampments, drunken disorderly conduct and contempt for Hurricane residents, constant traffic to find parking in the lot, mounting trash and lack of city funds to police the area have not been addressed and frankly will not be before construction.

Please ask yourself, would you want this parking lot built on your street? If you would support installing the parking lot on your street, would you be concerned if the aforementioned was not thoroughly embedded in the parking plan before construction?

Thank you for listening, your time to think about Hurricane Street's resident thoughts and frankly the chance to use the funds suggested for the parking lot on something else that will benefit the area in greater need.

Sincerely,

Michael Hoffs

2022-23 Neighbor Letters

Mary Laing – 115 Hurricane St

ML **Mary Laing <mblaing1@aol.com>**
Hurricane Street Auxiliary Pumping Plant Project
To: Steve Bradbury <steve@mycyberstuff.com>

VNC Parking & Transport March 13, 2022 at 2:31 PM

Steve,

I would like to go on record that I oppose the current auxiliary pump plant project and parking lot that is being proposed at 133 Hurricane and the adjacent lot at 3813 South Esplanade.

I am a resident at 115 Hurricane for 20 years. Myself and my neighbors were forced to endure the disastrous nightmare construction of the existing pumping station constructed a few years ago. There was little to no community engagement or communication from the Public Works Department. Most importantly, the unkept promises from Public Works after the years of construction.

I understand that the current project is essential for the area, however I wane on trust due to past performance from Public Works. This is an industrial facility in a residential neighborhood and more care must be taken to buffer the use from existing homes and resources.

We as neighbors are also concerned that the parking lot will create an unsafe environment near our homes. What is the design? How will it be secured at night? We oppose moving forward with the project until these concerns are addressed.

I would like to voice my support for the VNC motion to rescind it's support of the project as it is currently configured.

Best,

Mary Laing
115 Hurricane St
MDR 90292

Steve & Karen Bradbury – 109 Hurricane St (owners)

July 27, 2022

My wife and I own 109 Hurricane St. We have lived here since 2007. During that time, we have experienced several city-led construction projects. None have effectively managed the impact on the community without our voices rising to generate awareness. The city's track record is dismal at best.

Now the city intends to build an auxiliary pumping station at the end of Hurricane St. While we understand the critical nature of this project, the fact there has been no meaningful community engagement since preliminary plans were shared in 2016 is abhorrent. It appears the project design has changed over that time including the addition of a sewage command and control center for entire city of Los Angeles. We thought this was simply an auxiliary pumping station to support the aging current plant.

The city cannot simply ramrod an industrial project down the throats of a neighborhood without incorporating our input. City employees work for the residents, not the other way around.

We understand one element of the plan is to create a public parking lot at 128 Hurricane. Why???? There are no other public lots on any MDR residential street. If there is truly a need for that much employee parking (which has never been adequately justified), it should be a 100% secure lot only accessible by pumping station workers. **No** public car spaces, **no** bike racks, **no** art installation, **no** use by beachgoers, **no** opportunity for homeless to camp out.

There have been recent suggestions the parking lot was incorporated into the plan to satisfy the coastal commission. Did the city ever convey this information to residents during the process? Did the city take a position that this would impact residents and push back? Does the city even care? We do.

We attended both community meetings (Zoom and in-person) conducted by Public Works. These were little more than sham, window-dressing efforts. The city representatives showed NO willingness to modify ANY aspect of the project to align with the interests of the community. This arrogance is unacceptable behavior by people whose job is to serve the community.

Our neighbors have spoken about many other issues with this project. We support them and request you reconsider all approvals for this project until the community has been given a meaningful opportunity to engage. We can work together. There's no reason to antagonize the community.

Thank you,

Steve & Karen Bradbury
109 Hurricane St., MDR

Adam Goldberg – 110 Hurricane St.

To Whom It May Concern/VNC:

I have lived on the Marina Peninsula since 2005 and on Hurricane St since 2013. Since 2013, the amount of construction and noise on Hurricane has increased with each year. And now, with the plans of building a parking lot along with a new pump station, it behooves us all to keep this to a minimum.

While I understand that the pump station is necessary, the parking lot is not. There is already plenty of parking for workers, so to add a space where the public can park, is completely unnecessary. This will not only cause more car and foot traffic on our small, little street, but it will also bring in an unwanted element. There is no doubt that the homeless population will find this parking lot and make it a place to loiter, make unwanted noise, and use drugs. I have a small child who does not need to see this, and there are plenty of other families who are in the same situation.

I am asking that you vote to make it so there is NOT a parking lot at the end of our street. We have endured enough over the last 5 years or so with street closures, construction that rattles our homes, and an increase in the homeless population in our neighborhood. Flatly, there is no reason/need for this parking lot and it will make life exponentially worse for those of us that live here.

Thank you for your time and assistance with this matter.

Best,
Adam M Goldberg
110 Hurricane St

Robert DiBiase – 115 ½ Hurricane St (owner)

HELLO STEVE: MY OPINION IS THAT THE PARKING LOT BE USED EXCLUSIVELY FOR THE PUMPING STATION EMPLOYEES AND THE HURRICANE ST RESIDENTS. IF THE LOT IS OPEN TO PEOPLE GOING TO THE BEACH THAT WOULD BE A NO-NO FOR ME, SINCE THEY ARE ALREADY PARKING ON THE STREET WHERE RESIDENTS USUALLY PARK.

BEST REGARDS

BOB DEBIASE

115 ½ HURRICANE ST

MARINA DEL REY, CA 90292

Muriel Blake & John Larkin – 110 Hurricane St.

RE: 128 Hurricane & 3813So. Esplanade, ZA 2017-3950-ZAA-1A;DIR-2017-4173-CDP-SPP-1A DIR-2017-4167-PUD-CDP-SPP; ZA 2017-3953-CU2
Sent

Muriel Blake murielblake@wealthbuildersinc.com

To: cpc@lacity.org, elizabeth.gallard@lacity.org

Cc: mike.bonin@lacity.org

Fri, Mar 4 at 5:30 PM

Dear Commissioners,

Please address and reply to the following important concerns of your constituents

No 1. I have been living at 110 Hurricane for 42 years. Our residence is located 1 building away from the proposed Pumping Plant construction. As you overwhelmingly know this is strictly an upscale residential neighborhood which was not intended to be used for Industrial purposes let alone a "Pumping Plant"; there must be many other locations which would be more suitable for a Pumping Plant...perhaps all of your neighborhoods. The last time this proposed new plant project was presented to our community was 5 years ago - in 2017. It's not clear from the "notice provided" five years ago, that there was any written response to our community's concerns regarding the impact on our residential street of a Pumping Plant.

a) So at this late date (2022) after five years, what are the architectural design and landscape design of your proposed industrial plant to fit in with the design of our residential neighborhood? What design steps have you taken to insure that this "plant" will it blend in with this residential design without it being a complete "eyesore" in this sought-after residential Marina Del Rey beach area. As well, our beautiful beach is exceedingly popular with those who live in the inner city and who look forward to spending the day in our neighboring beautiful beach. Of courses, it would be extremely negligent to not to note that this area is notably popularity with its shops and restaurants which bring revenue to your city.
b) b) What buffers will you provide between this proposed "Plant" and our dwellings?? Likewise, this block abuts sensitive wetlands so what buffers will be taken to protect this area?

No. 2.) I am extremely concerned about the proposed "Parking Lot" How many employees do you plan to have working at the "Plant" that it would necessitate of a Parking Lot??? And what about the residents on Hurricane St. that of the block? will there be a full time Guard?? How will it be secured at night? As you are alll well there is a large homeless population in our neighboring Venice. H ere there are vagrants who roam our street and, if not guarded at night they very well may seek refuge in the lot. It may well become a haven for car thefts or car parts theft. It brings an unsafe environment to those near homes and to the street parkers who come home after dark.. What measures will be taken to provide safety to the residents who live

next to this lot?

a) those of us on Hurricane Street recently lived through 3 years of construction in the same "plant area". The street was torn up, blocked with huge equipment, construction cranes, diggers etc. all emitting constant banging, dirt and dust; the workers parked their trucks up and down the entire street, leaving no space for the residents to park. this cannot go on once again with construction of your "Plant"

No. 3) Transformers proposed at this new location, generate electromagnetic field (EMF) known to cause cancer and we all believe to be a risk to our health and the community at large.

I, for one, oppose your moving forward with the proposed project until the above concerns are addressed, in writing, and sent to all those who reside near the proposed Industrial Plant.

Sincerely,
Muriel Blake
John Larkin
110 Hurricane St.
Marina del Rey, CA 90292

Muriel A. Blake, CFP®
WEALTHBUILDERS, INC.
11600 Washington Place #116D
Los Angeles, CA 90066
(310) 391-3921- phone
(310) 398-9859- fax

Gary Stromberg – 125 Hurricane

I'm writing to request that the equipment you are using to build this new facility, including transformers, HVAC and electrical panels be moved away from our residences and towards the existing pump plant on Hurricane, and that you shield the entire project with solid fencing. You have no idea how disruptive your project is to our little community.

Regards,

Gary Stromberg
125 Hurricane St.
(203) 984-4836

Mike Borassi & Genevieve Morrill-Borassi – 3801 Esplanade

(Note: On 2/28/22, Gen and Mike filed an appeal with the LA City Planning Commission. The following material has been taken from that appeal)

The goal of this appeal is to require Public Works to work with the community on a better design for this project which will fit within our community and will provide protection for adjoining residential neighbors from the impacts of this industrial-style facility on privacy, safety, noise and aesthetics.

- Public Works last presented this project to the community in 2017. The case has been on hold for almost 5 years. No additional information or contacts with the community were held during this time despite prior promises to work on design and mitigation. We have repeatedly asked for a new presentation of the project since changes were clearly made since the last City public hearings in 2017.
- The EIR for the project and prior presentations misrepresented the location of the project, which is in fact 10 -15 feet closer to the nearest residential structure than previously represented.
- The project is poorly designed to fit within its residentially zoned neighborhood. Noisy and dangerous equipment is located very close to two neighboring residential areas. However, on the other side, the project site is adjacent to a dead-end street and the exiting pump plant, and all noisy and dangerous equipment should be located nearer to this facility and away from residents.
- The project aesthetic design, proposed landscaping and “public art” has never been presented to the community and the simple elevation of the structure presented does not adequately show how this will fit into a 100% residential neighborhood.
- Public Works has a history at this location of poor maintenance of the existing facility and landscaping, as well as noisy and intrusive construction for years during the recent Dual Force Main project at this location. The community simply does not trust Public Works to fulfill its promises to keep this facility and the parking lot safe and attractive.
- The facility is adjacent to a sensitive wetland area and no effort is made to mitigate impacts or improve existing conditions.
- The proposed parking lot will be an attractive nuisance in this residential area and will not be secured or patrolled. City parking should continue to be on the street and the additional lot should be used for open space to buffer the facilities.
- The project approval and conditions do not properly include all required mitigation measures so that the community knows what must be done and enforced. The EIR, Addendum and MMRP plan are only found on an obscure Bureau of Engineering link and were not available to the neighbors.

The Venice Pump Plant has existed in this area for a long time. It is not well maintained. It has no landscaping or attractive fencing. It is never upgraded, cleaned, and graffiti is often left for months before painting. The existing plant is stark, abuts directly onto a sensitive waterway, is littered with trash and graffiti, with weeds poking through the scant gravel setbacks. Over the last five years, the site has been used as a staging area for the Hyperion Dual Force Main project, so the neighbors have endured constant construction traffic, noise, dust and equipment.

In order to build a safe and beneficial project here, Public Works must be required to include the following measures in the project:

- The project needs to mitigate its impact on the sensitive canal and lagoon. The existing pump plant has no vegetation whatsoever and the canal banks are not appropriately landscaped with native materials. Additional landscaping should be added to the existing facility including vines to cover walls which are frequently graffitied.
- Upgrades should be required to the aesthetics of the existing plant including painting, consideration of a mural, and additional planting in currently empty and trash filled planters and side yards.
- The new facility must be designed and landscaped in keeping with the residential area and sensitive lagoon.
- Provide a buffer of landscaping and walls between the new facilities and the directly adjacent residential buildings, including a minimum 6-foot block wall and 10 feet of landscaping between both the parking lot and the new facility and the nearest adjoining residential property to the north and west.
- Include an on-going obligation to clean and maintain the existing and new facilities when they are complete.

Adopt binding conditions of approval that clearly spell out all obligations in the future so that neighbors can monitor and enforce, including each requirement of the approvals and the MMRP.

For all of the above reasons, this project should not be approved, but should be sent back to the drawing board so that Public Works can design a compatible facility. To place this facility in a residential neighborhood in a sensitive wetland location requires careful consideration and strict conditions.

Kristy Canon - 3809 Esplanade (building owner)

From: **Cannon Enterprises, Inc.** <cannonenterprisesinc@gmail.com>
Date: Thu, Apr 14, 2022 at 8:16 AM
Subject: Auxiliary Pumping Plant in Venice
To: <cpc@lacity.org>, Elizabeth Gallardo <elizabeth.gallardo@lacity.org>, <mike.bonin@lacity.org>

To Whom it may concern,
I am the property owner directly north of the new pumping station location. This project is going to affect my income that is generated from my income property located at 3809 Esplanade. My current tenants may leave because of the project and the proximity of the industrial equipment to their bedrooms/ living space. It will be significantly harder to get market rent if some of the following concerns are not taken into account:

- The design is incompatible with the neighborhood
- No buffer from the project and residential homes
- We have health concerns of having transformers and electromagnetic fields near residential homes
- Equipment noise and construction impacts

I understand that this is a vital piece of infrastructure that the community needs, but my property being so close to the project and having owned this property for over 30 years, I feel my concerns are not being heard or given any value.

Thank you,
Kristy Cannon
--
Cannon Enterprises
8405 Pershing Dr. #500
Playa Del Rey, CA 90293
Phone: (310) 823-2082
Fax: (310) 823-2085

Robert & Lucia Williams – 3805 Esplanade

From: Lucia Williams <luciaw2012@gmail.com>
To: cpc@lacity.org, elizabeth.gallardo@lacity.org
Cc: mike.bonin@lacity.org

Mon. Feb 28. 2022 at 1:35 PM

Dear Commissioners:

We along with our neighbors are writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to community concerns as we were never shown a final architectural design or landscape plan. This is an industrial facility in a residential neighborhood abutting a sensitive wetland area--more care should be taken to buffer the use from existing homes and resources.

The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping and aesthetics.

Additionally, the transformers proposed within the new location generate electromagnetic field (EMF) known to cause cancer and we believe it to be a risk to our health and the community at large.

We are concerned that the parking lot will create an unsafe environment near homes and additionally will provide only two spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night? We understand that the project is essential for the area, however we wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication.

We oppose moving forward with the project until these concerns are addressed.

Sincerely,
Robert and Lucia Williams
3805 Esplanade
Marina del Rey, CA 90292

Eliane Gans – 3933 Esplanade (property owner)

From: Eliane Gans <elianegans@gmail.com>
Subject: Venice Axilliary Pumping Plant
Date: April 8, 2022 at 11:22:56 AM PDT
To: cpc@lacity.org, elizabeth.gallard@lacity.org, mike.bonin@lacity.org

To All of you, and to whom it may concern:

I have been a resident of my property at 3933 South Esplanade W. For over 35 years. I have endured cracked streets and lack parking for many years. And the pumping plant that reduces the value of my property.

I am writing to you today to voice my concerns and to object to the proposed Auxiliary Pumping Plant at the end of my street. At 133 East Hurricane and the adjacent lot at 3813 South Esplanade w. My property/residence will be impacted by this construction, and it will affect the future value or all of our properties.

- There has not been adequate community or resident communication
- The design has not been approved or reviewed by the residents or is not in keeping with the current neighborhood.
- The design should have a residential look and materials to blend with the residences and environment of the Lagoon.
- Residents should be given a chance veto review the design and comment and request any changes that are deemed necessary
- The proposed Pumping plant buttes right up against residential property—this is NOT OK.
- There are environmental and health concerns about the electronics, transformers and electromagnetic fields that will impact the residents
- Noise and equipment will destroy our wetland peace and quiet,,,,, and create parking and vehicle access problems. and in general create more congestion in an already contested neighborhood
- The unsecured parking lot will invite homeless people and will not create any additional parking and will even block any parking that might be accessible.
- There should be buffers between the parking and the residences.
- How will the parking lot be managed. And WHY are there only 2 public spaces, when parking is an issue already in this area
- There are no studies that I have seen, that address any environmental impact on our sensitive lagoon—which is why we all live here!!!
- Previous construction of this Public Works with the existing facility has had a bad track record for noise, debris, obstructions of the street and other problems.
- Past Public Works projects in our neighborhood have caused a barrage of constructions. Issues over 7 weeks causing discomfort to all neighbors and a lack or peace!

Lastly, what are the benefits to us, the residents? YOU do not live here, and have no knowledge about the very special residential area that this is, and why we have chosen to live here.

I AM STRONGLY OPPOSED TO THIS PROJECT—YOU HAVE NO RIGHT TO IMPACT OUR HOMES AND THE VALUES OF THIS NEIGHBORHOOD, AND OUR SAFETY AND HEALTH.

Thank you for reading this letter…. I hope that you will consider my concerns and dither concerns of all my neighbors—and or the entire Marina Peninsula!

Sincerely,

Eliane Gans
Owner
3933 Esplanade W.,
Marina Del Rey, CA 90292
(310) 339-4056

WE ARE ALL TENANTS OF 3933 South Esplanade W. and STRONGLY OPPOSE THIS PROJECT, AND WE DO NOT WISH TO MOVE AWAY AS A RESULT OF THIS PROJECT.
Hans Brofeldt
Wil Mavronicolas
Shawn Groshans
Kate Stone

ARTfully,
Eliane Gans
LONNY GANS & ASSOCIATES
Fine Art

Tanya Spero – 113 ½ Hurricane St

TS **Tanya Spero <tanya1040@aol.com>** VNC Parking & Transport March 12, 2022 at 2:35 PM

Re: Hurricane St Auxiliary Pumping Plant Project - It's A Mess

To: Rick <chucksteak897@yahoo.com>, Steve Bradbury <steve@mycyberstuff.com>

Hi Steve

I was forwarded the emails and I definitely would appreciate your representation. I allow you to represent me for this issue regarding the employee parking lot. I agree that the parking lot should not be built. It will bring more traffic and we have enough as it is on the weekends.
Thanks so much,
Tanya Spero

Sent from my iPhone

Larry Lesser, MD & Claude Lesser – 3609 Esplanade (owner)

From: Lawrence Lesser lessermd@mac.com

Date: Wed, Feb 23, 2022 at 5:03 PM

Subject: 128 Hurricane & So. Esplanade

To: <cpc@lacity.org>, <elizabeth.gallard@lacity.org>
Cc: mike.bonin@lacity.org

Dear commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plan project proposed at East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to the community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from existing homes and resources.The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics.

We are concerned that the parking lot will create an unsafe environment near homes, and additionally providing only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night. We understand that project is essential for the area, however we wane on trust due to past promised form Public Works and constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement of communication.

We oppose moving forward with the project until these concerns are addressed

We have been living in the area for 20 years, and never saw any attempt to fix the unpaved road abutting the proposed project. It is very unsafe to walk and a real eyesore.

Sincerely

Larry Lesser, MD, and Claude Lesser
Homeowner 3609 Esplanade. Marina del Rey 90292

Jeff Lee – 3701 Esplanade (owner)

From: Jeff Lee ilee@laurbanhomes.com

Date: Sun, Feb 27, 2022 at 12:11 PM

Subject: Venice Auxiliary Pump plant, March 10 hearing, Case ZA 2017-3950-ZAA-1A and related cases

To: <elizabeth.gallardo@lacity.org>
CC: cpc@lacity.org

Dear Planning Commission:

I have lived on Esplanade, two blocks from the proposed pump station, for twenty years raising my family. I am writing to oppose the current plans for the pump plant and parking lot.

I have been a real estate developer in the City of Los Angeles for over 40 years building over 40 projects through the City including hundreds of homes in CD 11.

The process followed by Public Works to design and permit the pump station would never be allowed for any private developer. For the past 40 years on every one of our developments we have had extensive community meetings, neighborhood council presentations, and meetings with the council office. We have been responsive to the community
and the council office.

In this case Public Works has been allowed to ignore the neighborhood keeping this case on hold for over four years. In 2016 we had a community meeting with representatives of the council office and the Department of Public Works. I was personally assured that my concerns of the community would be addressed and additional community meetings to
review design would be held. We asked many times when the City would respond which never happened. Had we treated the community this way in our business, our projects would never move forward. If we stonewalled the community for four years, our case would have been terminated.

I am not against the development of the pump station as the City needs to continually upgrade its infrastructure. The pump station is surrounded by 20' alleys and the ecologically sensitive Grand Canal. The community concerns need to be addressed including landscaping, design, construction, mitigation to enhance the area around the pump station, and continual maintenance. We lived through the construction work at this site for the Dual Force Main project, which was a disaster. We live on a daily basis with the eyesore of the existing pump station and lack of maintenance or pride in the neighborhood exhibited by Public Works.

I hope you will grant these appeals and require Public Works to live up to its promises.

Sincerely

Jeff Lee
3701 Esplanade

Clare Bronowski – 3701 Esplanade (owner)

CB **Clare Bronowski <clareb1050@gmail.com>** VNC Parking & Transport March 12, 2022 at 4:39 PM

Hurricane Pump Plant and Parking lot

To: Robert Thibodeau <robert.thibodeau@venicenc.org>, Jonathan Deer <virtualjonny@gmail.com>, Cc: Steve Bradbury <steve@mycyberstuff.com> Details

We live two blocks from the Venice Pump Plant, and we write to support the VNC Transportation Committee motion opposing the current plan for the Auxiliary pump plant and parking lot.
We are concerned that the current plan does not protect the nearby residences from noise, privacy and industrial type activities. Public Works needs to rethink the plan and include buffers, privacy walls, landscaping, security measures and long term maintenance to protect the neighborhood and the sensitive canal and lagoon area. The parking lot must be locked and secured when not in use by Public Works employees. The entire area must be well maintained, not allowed to be full of weeds, trash and graffiti as it currently is.

Thank you.
Clare Bronowski and Jeff Lee

Leslie & Michael Adler – 3601 Esplanade

April 24, 2022

To: Los Angeles Planning Commission

Re: 128 Hurricane & 3813 So. Esplanade
ZA2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A | DIR-2017-4167-PUB-CDP-SPP; ZA2017-3953-
CU

Email: cpc@lacity.org; elizabeth.gallardo@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from existing homes and resources.

The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics. Additionally, the transformers proposed within the new location generate an electromagnetic field (EMF) known to cause cancer and we believe to be a risk to our health and the community at large. We are concerned that the parking lot will create an unsafe environment near homes, and additionally provide only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night?

We understand that the project is essential for the area, however we wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication.

We oppose moving forward with the project until these concerns are addressed.

Sincerely,

Leslie and Michael Adler
Neighbor
3601 Esplanade MDR-Home Owner

Jennifer Kelton – 3615 Esplanade

On Mon, Apr 25, 2022 at 8:43 AM Nomad1800 <nomad1800@aol.com> wrote:

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade.

Please note that one of my main concerns is the public parking lot. I am not sure why it is needed? And it will only create problems - as you also are very aware of, and also based on the current state of homeless and transients in our area.

Jennifer Kelton
3615 Esplanade
MDR, CA 90292

Melly Liburd – 120 ½ Galleon (owner)

Wed, Apr 13, 2022 at 3:04 PM
Melly Liburd mellyliburd@yahoo.com

April 8, 2022

To: Los Angeles Planning Commission
Re: 128 Hurricane & 3813 So. Esplanade
ZA2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP.1A | DIR-2017-4167-PUB-CDP-SPP: ZA2017-3953-CU

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this proiect was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or If there was any response to community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to butter the use from existing nomes and resources

The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics. Additionally, the transformers proposed within the new location, generate electromagnetic field (EMF) known to cause cancer and we believe to be a risk to our health and the community at large.

We are concerned that the parking lot will create an unsafe environment near homes, and additionally providing only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night?

We understand that project is essential for the area, however vie wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication.

We oppose moving forward with the project until these concerns are addressed

Sincerely,
Melanie Liburd
120 1/2 Galleon Street, Marina Del Rey, CA 90292
Homeowner

Andrew Freedman – 20 Ironsides

April 13, 2022

To: Los Angeles Planning Commission
Re: Proposed Venice Auxiliary Pumping Plant (VAPP) 3813 S. Esplanade, 3817 S. Esplanade and 3913 S. Esplanade W. (128 E. Hurricane Street)
ZA 2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A; DIR-2017-4167-PUB-CDP-SPP; ZA 2017-3953-CU

Via Email: cpc@lacity.org; elizabeth.gallardo@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

In addition to the very astute comments made by Genevieve Morrill and other neighbors, I would like to share my concerns.

General
The Contract Documents for this project were submitted and cleared by Los Angeles Department of Building and Safety in 2017 without any public notice or review. Approval by two agencies (LA City Planning Department and California Coastal Commission) which both require public notification and public review, is only now being sought. Typically, Planning and Coastal clearances are the first to be addressed, not the last. The Public review of this project has been severely lacking, and City officials have both a legal and moral obligation to make sure the citizens of Los Angeles are heard.

This project spans two existing lots (which both front the Grand Canal) without an approved lot-tie agreement. All lot-tie agreements must go through a Public Hearing and review process. This has not been done, and all further consideration of this project should be suspended until the proper Public Hearing process has been completed and the lot-tie agreement approved.

The front yards of the two City lots of the proposed VAPP both face the Esplanade (Grand Canal). The rear yards of these two City lots face Canal Court. Hurricane Street is located along the side yard of only one of the parcels. The use of 133 and 139 Hurricane Street as the project address is both inaccurate and misleading. All references to 133 and 139 Hurricane Street for this project should be changed to 3813 and 3817 South Esplanade, respectively.

Design Issues
The recent Joint Determination letter from the LA City Director of Planning and Zoning Administrator states the following: "*As proposed, the project is visually compatible with the character of the area and will enhance the visual quality of the existing neighborhood.*" I couldn't disagree more.

The existing VPP is a one-story building surrounded by a sound wall, painted in neutral colors. It is quiet and odorless, and its low massing minimizes its effect on neighboring residences. In contrast, the proposed VAPP has a large concrete-walled Electrical Building that is oriented in a north-south direction – 90 degrees from the adjacent residences – which would form a 32-foot-high solid wall, not only blocking views to the Grand Canal, but creating shadows (between 10 am and 3 pm) directly onto all adjacent residences located to the north and west.

A recent change to the flood zone map in the Venice area was made effective by FEMA on April 21, 2021. As a participant to the National Flood Insurance Program (NFIP), the City of Los Angeles is required to enforce the flood clearance requirement for new construction and substantial improvement projects.

The two lots where the future VAPP is to be located were affected by this flood zone map update. The new Base Flood Elevation (BFE) is 8 feet above sea level and all new buildings require that the Lowest Finished Floor Elevation (LFFE) be at 9 feet (8 feet + 1 foot of free board) per LA City Ordinance 186952.

The current design for the VAPP has the Lowest Finished Floor Elevation (LFFE) at 7.67 feet – 16 inches below the minimum required level per the new FEMA requirements. Note, the building generator, all switchgear electrical equipment for the pump motors, and all exterior transformers will be underwater during a flood. This will lead to the complete failure of the pumps and a catastrophic environmental disaster. **The entire VAPP must be redesigned accordingly.**

The 32-foot Electrical Building height is excessive and unnecessary. It is twice the height of the existing VPP. The BFE issue noted above will only make this tall building even taller. Further, the current two-story design has no elevator to accommodate disabled employees, with the only restroom and office located on the second floor. **The Electrical Building should be changed to a one-story structure and reoriented in an east-west direction along Hurricane Street.**

These design changes would allow for a large open buffer area for the residences located directly to the north, eliminate shadows, reduce the project's visual impact, be more compatible with the existing VPP, accommodate disabled employees, and better comply with the Venice Coastal Zone Specific Plan.

The three large transformers (each 6.5' to 7' tall) located within the required setback are unacceptable. They are located outside the decorative fencing and surrounded by 19 steel bollards along the entire Canal Court property line. These transformers would be an eyesore. Additionally, they will generate noise. They must be repositioned out of sight and away from any adjacent residences. If a one-story VAPP were U-shaped facing the existing Venice Pumping Plant, the transformers could be placed within the recessed U-shape with direct access to Hurricane Street, but out of sight from adjacent residences.

The HVAC equipment for the Electrical Building is located outside near the north property line and in direct view from adjacent residences. This equipment will generate noise and heat, and should be relocated away from residences (perhaps on the roof) and screened from view.

Parking Lot/Green Space

The proposed public artwork located in the green space south of the proposed parking has <u>not</u> been designed or specifically defined. The design and massing of this proposed artwork should be clearly presented as part of the formal public review process prior to any project approval. In addition, the City must provide written assurances as part of the Conditions of Approval for this project that no artificial lighting, sound or kinetic movement will be associated with the public art. Landscaping shown in the same area as the public art should be revised accordingly prior to further public review.

The accessible aisle for the van parking space shown at 3913 S. Esplanade W. (128 E. Hurricane Street) should be located on the passenger side. The current configuration does not meet either Federal or State Accessibility Code requirements, and should be redesigned.

I oppose any further action on this project, including an indefinite postponement of the April 28, 2022 Public Hearing, until these issues are addressed and corrected.

Sincerely,

Andrew Freedman
20 Ironsides #18, Venice, CA 90292

Steve Freedman
732 Howard St., Venice, CA 90292

Marilyn Mikos – 115 Eastwind St (owner)

To Whom It May Concern:

I stand OPPOSED to the way in which the above referenced Pumping Plant is being constructed. Although I understand the sewage plant is a necessary evil, there are many issues that have not been taken into consideration with the construction design of the project.

I have lived in the same building (which I own) for 33 years. There has been literally zero attention paid to upgrading the infrastructure of this residential area by the City. The "roads" are in dire need of repair, including "Speedway" (which will be adjacent to the Plant) which floods every time it rains. The potholes are ridiculous and no amount of calls to have them repaired gets any attention at all. Yet, you seem to have a burning desire to build an industrial structure right smack dab in the middle of a lovely residential community.

This Plant is being constructed in the MIDDLE OF A BEAUTIFUL RESIDENTIAL AREA...People literally live inches away from where transformers will be housed, which could conceivably cause grave health concerns @ electromagnetic fields. The actual construction of the Plant will disrupt the entire neighborhood with noise, dust, etc. The last time Public Works did construction in this area, several people became ill from the particulate matter in the air and were forced to move. Add to this, the beautiful Lagoon and the indiginous flora and fauna that reside there (and have for decades) - all of which will be disrupted.

There has literally been no communication with the immediate community about what the plans are. From what we "understand", the design is incompatible with the community; further, you have offered no benefit to the community, not only aesthetically (no buffer between the Plant and the community), but also concerning the health and well being (including safety) of the people who live here. Why would you build an industrial project in the middle of a residential zone? It is beyond my comprehension.

I am in dire opposition to moving forward with this project until these (and other) concerns are addressed. I sincerely hope you will, for once, consider the concerns of those of us who live in the community. We pay taxes...and we vote.

Sincerely,

Marilyn Mikos (owner)
115 Eastwind
MdR 90292
marilyn.mikos@gmail.com

Arianne Flemming & Justin Wasser – 3812 Pacific

To Whom it May Concern,

We are residents of 3812 Pacific Ave, located at the corner of Pacific and Hurricane. We have heard the news that the City of Los Angeles plans to construct a large sewage plant at the two vacant lots at the end of Hurricane.

We are writing to express our great concern with this plan for a number of reasons.

First, and most importantly to us, we understand the building for the plant will house transformers, emitting electromagnetic fields. EMFs have been known to cause cancer and as residents we are seriously concerns about how this plant will put our health and the health of the neighborhood at risk.

Further, we love the ecological reserve and lagoon near our house, this plant could have significant impact on the ecological health and well-being of this sensitive lagoon.

Finally, we are concerned that the parking lot proposed near the plant will create an unsafe environment on our street. We are concerned about how the lot will be managed and controlled and secured and the potential safety risks it poses to the community.

We oppose moving forward with the project until these concerns are addressed.

Sincerely,

Arianne Flemming and Justin Wasser

3812 Pacific Ave Marina Del Rey 90292

Susan Afriat & Steve Hyman – 4000 Pacific

Susan Afriatafriats@gmail.com

To: elizabeth.gallardo@lacity.org

Dear Commissioner:

Thu, Mar 3, 2022 at 8:49 AM

We are neighbors writing to share our concerns regarding the Venice Pumping Plant projected proposed at the above addresses. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017. It is impossible to determine from the notice provided what the final design is or if there was
any response to community concerns - we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from existing homes and resources.

We have many concerns: the parking lot will create an unsafe environment near homes; buffers are needed between industrial and parking uses and the adjoining homes, etc.

We understand the project is essential for the area; however, past experience has led us to not trust the promises and assurances that will be made. We oppose moving forward until these concerns are addressed

Thank you for listening to our concerns.

Susan Afriat and Steve Hyman
4000 Pacific Avenue
310-893-4616

Bethany Gorfine – 3950 Via Dolce (owner and condo board president)

On Mar 15, 2022, at 8:53 PM, Bethany Gorfine <Bethany@federalhill.tv> wrote:

Sent from Bethany's iPhone

I live at 3950 Via Dolce, Our 145 unit condo complex (of which I'm HOA president) faces the lagoon and pumping plant site.

I don't appreciate when a design and proposal has been approved and then changed without notifications to the community including the VNC.

SIze does matter, construction matters especially to homeowners on via Dolce as well as surrounding Hurricane.

It was hard enough to to live through the past 5 years of construction and now more years across from us where sound really travels over the lagoon.

We just lived through 4 apartment complexes 2 hotels, and the sewer project.
It's relentless.

We understand the need for an additional plant for the community but keep it simple, small, and no public parking which will turn it into a hangout- luring outsiders into the community.

Adding bicycle racks? An art exhibit? We don't want folks congregating on Hurricane - especially on weekends. It's a huge liability to our community on the Strand that is already experiencing massive intrusions and thefts.

Thank you.

Jonathan Tillman – 3719 Via Dolce

April 13, 2022

To: Los Angeles Planning Commission
Re: 128 Hurricane & 3813 So. Esplanade
ZA 2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A | DIR-2017-4167-PUB-CDP-SPP; ZA 2017-3953- CU

cpc@lacity.org; elizabeth.gallardo@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from exisXng homes and resources. The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics. **Moreover, a licensed architect should be hired to design the structure's exterior and its landscaping.**

Additionally, the transformers proposed within the new location, generate electromagnetic field (EMF) known to cause cancer and we believe to be a risk to our health and the community at large.

We are concerned that the parking lot will create an unsafe environment near homes, and additionally providing only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night?

We understand that project is essential for the area, however we wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication. **One such promise was to repair Via Dolce and Marquesas Way to the extent they were damaged due to construction activity. The applicant, however, left portions of those roads with deep ruts and broken pavement until the community complained to their local representatives. Therefore, continuing community oversight is essential to make sure there is compliance with applicant's obligations in this project.**

We oppose moving forward with the project until these concerns are addressed. Sincerely,

Jonathan Tillman
3719 Via Dolce
Marina del Rey, CA 90292

P.S. If the location of the power boxes endanger the residents of the adjoining property, the city may be liable for inverse condemnation.

Robin Rudisill

April 27, 2022

Los Angeles Planning Commission

Re: 128 Hurricane & 3813 So. Esplanade
ZA2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A
DIR-2017-4167-PUB-CDP-SPP; ZA2017-3953-CU

Honorable City Planning Commissioners:

I live in the area surrounding this project. The last time this project was presented to the community was in 2017, five years ago, and I participated in the hearing down at the Corinth hearing room at that time, expressing numerous concerns. I am deeply concerned that as an "interested party" (I filled out a speaker card and signed a list to be emailed all determinations, as I do at every hearing I attend) I was not notified of any hearings or determinations since that time. I only found out about this hearing because someone asked me how I felt about it. I do not understand why so much time has passed. This should be explained to the community.

This is a sensitive wetland area, surrounded by ESHA, in the Dual Permit Jurisdiction Coastal Zone. I cannot think of a more sensitive area in the Los Angeles Coastal Zone. See attached certified Venice Land Use Plan map. Aesthetics in such a sensitive area should be paramount, and the project must be designed to be compatible with the surrounding residential neighborhood.

This is an industrial facility in a residential neighborhood and as such buffers must be provided between the industrial and parking uses and the adjoining homes. The surrounding community must be given an opportunity to review the architectural design or landscape plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics.

I am also concerned that the parking lot will create an unsafe environment near homes and that only two spaces would be provided to the public. Please inform us re. the design, how the lot will be managed and controlled, and how will it be secured at night. Please put the project on hold until all of these concerns are addressed.

Sincerely,

For the Love of Los Angeles
and our precious Coast,
Robin Rudisill
(310) 721-2343

Adam Rose – 12 Buccaneer St.

I live at 12 Buccaneer, so I'm a few blocks away. That's why I opened my questions/comments by noting that precedence with concerns should go to closer residents (who will deal with this around-the-clock). That said, my girlfriend and I walk a loop around Grand Canal (at least to Lighthouse Bridge) almost daily, so we must pass this site on foot at least 300 times per year. We also help out with local cat rescues, and over the years there have been a number who've lived and/or been caught along the canal. We're night owls and tend to walk around midnight, so we also try to keep an eye out for issues at odd hours (hence why I got them to adjust the new lights on the old plant a few months ago).

From what you just sent me, it seems there are a lot of issues they need to address. I'm a bit fatalistic about this project in the sense that it's reasonable they'll eventually need more capacity (the alternative seems terrible!) It's a big question about how they get there, so I support your pushback on multiple fronts because it needs to be reasonable for those closest. In terms of more ancillary things that my girlfriend and I were thinking about:

- We're still wary of the new plant's noise and vibrations under normal operation (i.e., after construction is done). I was relieved they said the motors will be underground and with more modern technology. However, I'd love to see some sort of engineering report that confirms the noise/vibration projections.

- If this project is going to happen, they should ensure it adds to the community in other ways, including aesthetics. Instead of the harsh floodlights like the older building, maybe decorative street lamps or sconces with proper shading so they don't shine on other people's property or glare across the canal (possibly interrupting wildlife). Some greenery on the walls would be nice (bougainvillea, jasmine or some kind of ivy so it grows up the walls). Alternately, I like the idea of the art project or at least some fun but not garish colors. I think our most "controversial" suggestion may be benches, as I can imagine some folks are wary of them attracting long-term homeless to stay. These could be smaller size, or maybe a series of chair-width seats. With this being such a popular walking area, it never ceases to amaze me that the only benches on the whole peninsula seem to be in the kids park on Via Dolce.

- I worry that EIRs only focus on certain types of wildlife and may not be accommodating for "common" waterfowl like ducks. Those fledglings bring a lot of joy to the community each spring! Unless the noise/vibrations are in issue, it might be nice if that flat area over the "pool" could have some bushes as a protective habitat for mothers and their young. I'd love to make sure the design considers potential places they might fall and get trapped, too, and holes big enough to get in and out of (but not so big people can get through, as the mentioned a security concern).

Robert Nau – 4250 Via Dolce

I am a concerned resident and a condo owner at 4250 Via Dolce. Thank you!

Felicia Glade & Mike Pelletier – 116 Galleon St.

Hi, as a resident living close to the hurricane pumps, I am very concerned about this project.

Please eliminate the parking lot, and instead use parking on the pump plant property or street. Having an unsecured lot will invite security issues that will affect our children who play outside around there and who we take walks with along the canals. Please have security Patrol planned for this residential area as this lot will attract unhoused people to a peaceful quiet and currently safe neighborhood.

Please adopt written recorded conditions of approval that clearly spell out all obligations in the future so that neighbors can monitor and enforce, including each requirement of the approvals and the MMRP, and mitigations during construction years.

Thank you for reading. I hope you protect nearby residents and our children.

Felicia

Eliane Gans – 3933 Esplanade (owner)

Aug 10, 2022

To President Millman and Honorable Commissioners
City Planning Commission

I am a resident on Pacific Court/ South Esplanade West- 1/2 block from the pumping station.

I have been a resident and own the three Unit property, where I reside, for the past 38 years. I feel that the residents of this community- especially the residents who live on the Canal, are being invaded, disrespected and disregarded.

We have moved to this community and this special area for reasons that the City Planning Commission may not understand. It is a peaceful, and non-commercial area with beautiful residences, lovely landscaping, water and peace.

Now we are being invaded with a design of the pumping station that is horrible, not in keeping with any structures in the neighborhood and will be an eye sore to any adjacent residences. The design, the noise from the transformers and other equipment will impact any neighboring homes and even visitors. The equipment may also be dangerous to the environment and to those of us who live here.

The City Planning Commission DOES NOT LIVE HERE. And We do! This is a matter of our well-being and our daily lives!

The parking lot is not necessary, and in addition -WHY HAVE YOU REMOVED 4 PARKING SPACES necessary to the residents on Hurricane?? This area already has limited parking! This is not necessary, and another invasion and destruction of our quality of life in our neighborhood.

Lastly, and importantly, all of our property values will be diminished. Who would want to live near a Pumping station that makes noise, spews chemicals into the air and looks ugly, and an eye sore to the neighborhood...

I respectfully request that you re-design the new facility and review the recommendations that you have received. I also request that you landscape the entire area. And, of course, protect the neighboring residences.

With a plea of hope for your consideration and revisions, as requested by all of us who are residents; and the requests made by Genevieve and Mile Morrill-Borassi. And Kristy Swanson.

These requests are truly from all of us in the neighborhood, and I respectfully ask for your assistance and re-consideration of the current plan.

Sincerely,

Eliane Gans
Property owner: 3933 Esplanade West, Marina del Rey, CA 90292

Jenesa Kurland – 4300 Via Dolce (condo owner)

Whatever City says they're going to do to mitigate or their useless report says regarding noise, vibration, home damage, etc. is all BS rhetoric: City takes no responsibility and homeowner is helpless. Their preconstruction survey of one's home carries as much weight as blank pieces of paper.

Strumwasser &Woocher

1250 6th Street, Suite 205
Santa Monica, California 90401
Telephone: (310) 576-1233
Facsimile: (310) 319-0156
www.strumwooch.com

Michael J. Strumwasser
Beverly Grossman Palmer
Dale Larson
Salvador E. Pérez
Julia Michel †
Tessa Baizer
Samantha McNichols

Senior Counsel:
Fredric D. Woocher
Bryce Gee
Andrea Sheridan Ordin

† Also admitted to practice in Washington

September 3, 2025

California Coastal Commission
455 Market Street,
Suite 300
San Francisco, CA 94105

Via email only to ExecutiveStaff@coastal.ca.gov

RE: September 11, Items 12a, 12b & 13a.

Dear Coastal Commissioners:

This firm writes on behalf of Kenya Lee, the owner of the property immediately adjacent to the proposed Venice Auxiliary Pumping Plant on Esplanade. Ms. Lee is the closest resident to the proposed construction. Ms. Lee resides in this premises along with her family and young child, and rents the second unit on the property to a tenant. Ms. Lee greatly appreciates the inclusion of proposed Special Condition 1D that requires that the concrete pads and termination boxes that were proposed to be located within the required setback area to be moved outside of the setback. This condition will mitigate some of the impacts of this proposal once it is constructed.

Ms. Lee submits the attached two letters analyzing the proposal and its environmental review. Ms. Lee's request is modest: if the City wishes to construct this facility in the Coastal zone, it should mitigate *all* of its impacts. The City has acknowledged that the noise during the construction phase will require it to provide daytime work locations to residents who work at home. If it is willing to provide those, it should likewise recognize those like Ms. Lee who both work and care for their children at home. The estimated 98dB noise of pile driving at her residence will undoubtedly make it uninhabitable.

While this facility may serve the public broadly, it is clear that Ms. Lee is bearing very heavily the externalities of its construction. The Commission should require the City to fully mitigate the construction impacts on the very closest neighbor.

Yours truly,

Beverly Grossman Palmer

Attachment

Strumwasser &Woocher

1250 6th Street, Suite 205
Santa Monica, California 90401
Telephone: (310) 576-1233
Facsimile: (310) 319-0156
www.strumwooch.com

Michael J. Strumwasser
Beverly Grossman Palmer
Dale Larson
Salvador E. Pérez
Julia Michel †
Tessa Baizer
Samantha McNichols

Senior Counsel:
Fredric D. Woocher
Bryce Gee
Andrea Sheridan Ordin

† Also admitted to practice in Washington

July 25, 2025

Jennifer Doyle
Coastal Program Analyst
California Coastal Commission
South Cast District
301 E. Ocean Blvd. ,Suite 300
Long Beach, CA 90802

Via email only: Jennifer.doyle@coastal.ca.gov

RE: Venice Auxiliary Pumping Plant – August 14 agenda items 16a, 16b, and 17a

Dear Ms. Doyle:

This firm writes on behalf of Kenya Lee, the owner of the residential property located at 3811 Esplanade, *immediately adjacent* to the proposed Venice Auxiliary Pumping Plant (VAPP). As designed and approved by the City, the proposed industrial facility would have *zero setbacks* from Ms. Lee's property, with large structures housing electrical cabinets constructed within the sideyard setback area along the property line. This project is not ready for review by the Commission: **A zone change application is necessary to rezone the site from residential to public facilities, and the pending application has not been brought for public hearing.** Moreover, the project's approval would violate policies of the Coastal Act, of the Venice LUP and Coastal Zone Specific Plan, and would rest on an inadequate review under the California Environmental Quality Act.

This project will impact ESHA, as the City proposes to construct in one of the few unlined waterways directly connected with the Pacific via the Ballona Lagoon. The proposal would place an additional industrial facility that would handle the sewage of millions of residents without even providing the minimal standard sideyard between that facility and our client's home. The

proposal's environmental impacts on ESHA and on our client are significant, and adequate mitigation has yet to be provided or proposed.

Coastal Act Policies

The project does not conform to the following Coastal Act policies:

> *Section 30253 (a): Minimize risks to life and property in areas of high geologic, flood, and fire hazard.*
>
> *Section 30253 (b): Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.*

The project is located in area that is known to be vulnerable to sea level rise, flooding and liquefaction. The City relies on the Marina del Rey tide gate's operation to prevent sea level rise in the Ballona Lagoon, but such reliance presumes continued maintenance and operation of those manmade devices. The City's approval acknowledges that extreme flooding or malfunction of the flood gate could lead to flooding of this facility, but does not disclose the impacts of such potential flooding on the environment.

> *Section 30260: (a) Coastal-dependent industrial facilities shall be encouraged to locate or expand within existing sites and shall be permitted reasonable long-term growth where consistent with this division.*
>
> *(b) Notwithstanding subdivision (a), where new or expanded coastal-dependent industrial facilities cannot feasibly be accommodated consistent with other policies of this division, they may nonetheless be permitted in accordance with this section and Sections 30261 and 30262 if all of the following conditions are met:*
>
> *(1) Alternative locations are infeasible or more environmentally damaging.*
>
> *(2) Permitting the development would not adversely affect the public welfare.*
>
> *(3) Adverse environmental effects are mitigated to the maximum extent feasible.*
>
> *(4) The new or expanded coastal-dependent industrial facility is not an oil and gas development, refinery, or petrochemical facility.*

New industrial uses like the VAPP that depend on being near the coast can *only* be approved if "adverse environmental effects are mitigated to the maximum extent feasible." The City has not

completed habitat mitigation long-promised for the Ballona Lagoon, and the (out-of-date) Environmental Impact Report (EIR) discloses impacts to neighboring residents from the construction and operation of the VAPP. The Commission must require the City to go beyond what it has committed to and mitigate "to the maximum extent feasible."

> *Section 30230: Marine resources shall be maintained, enhanced, and, where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.*
>
> *Section 30231: The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.*
>
> *Section 30240:*
>
> *(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.*
>
> *(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.*

The VAPP does not comply with the above policies, given its location adjacent to the Grand Canal and Ballona Lagoon, as well as the direct impacts on the Grand Canal to construct the subsurface piping components and sluice gates. The project's EIR acknowledges that Southern Coastal Salt March occurs within the area that will be disturbed by the project.

Venice Coastal Zone Land Use Plan Policies

> *Policy I.A.1.b: "preserve the nature and character of existing residential neighborhoods" "No more than two lots may be consolidated in the Ballona Lagoon West, Ballona Lagoon (Grand Canal) East ..."*

VAPP alters, and do not preserve, the residential character. By expanding the existing facility onto three vacant lots, the City's plan violates the LUP policy regarding lot consolidation.

> *Policy I.A.7.b. Multi-Family Residential – Low Medium II Density – Ballona Lagoon and Grand Canal West Bank Properties North of Ironside*

The LUP requires "minimum side yard of 3 ½ feet." The City approved a project that does not provide a minimum side yard in violation of the LUP.

> *Policy I.D.1: Canals and Ballona Lagoon Walkways. Adjacent Use/Development: "The only permitted development adjacent to the canals and lagoon shall be habitat restoration, single-family dwellings, public parks and walkways, subterranean or surface public parking lots, maintenance activities and emergency repairs. . . . New construction along the Canals and Ballona Lagoon shall comply with standards for setbacks, noise barriers, pervious surfacing with drainage control measures to filter storm run-off and direct it away from environmentally sensitive habitat areas, buffer areas in permanent open space, land dedication for erosion control, and wetland restoration including off-site drainage improvements.*

The VAPP does not comply with this policy because it is not of the type of permissible permitted development, and does not utilize the correct setback from neighboring residential properties.

> *Policy IV.B.7. Grand Canal Rehabilitation. The Grand Canal between Hurricane Street and Washington Boulevard shall be restored and maintained in order to improve water quality, aquatic habitat, and public pedestrian access along the waterway in a manner that is sensitive to the privacy of adjoining residents.*
>
> *Policy V. A. 3. Infrastructure. New sewer, storm drain, and water lines shall be installed using the least environmentally disturbing method feasible.*

Both of the above policies require significant limitations on projects like the proposed VAPP that would impact the habitat in the Grand Canal.

Venice Coastal Zone Specific Plan

Section 10.A.2 (b)(4): The sideyard shall be consistent with LAMC requirements but shall not be less than 3 ½ feet

Section 11.B.4 Building Separation. A minimum of five feet shall be provided between commercial and residential buildings.

As set forth above, the zero yard setback in the north sideyard is in violation of these policies which require setbacks.

California Environmental Quality Act

The EIR for this project was completed in 2017, but failed to disclose that habitat for the El Segundo blue butterfly (the sea cliff buckwheat) was planted in the area south of Washington Boulevard as part of the Grand Canal restoration. The area is included in the El Segundo blue butterfly US Fish and Wildlife Service Recovery Plan for the species. In addition, several Special Status species -- wooly seablite, southwestern spiny rush, and red sand verbena—were present in the project area, and the EIR provides inadequate mitigation for the potential loss of these species.

Conclusion

This project is not ready for the Commission's consideration, because the City has not yet completed the legislative process of changing the project's zoning to permit this public, industrial, use. There is no reason to place this item for consideration now. Moreover, the proposal authorizes development activity that could detrimentally affect the Grand Canal and Ballona Lagoon habitat areas, and which does not comply with basic and important zoning protections for neighboring residents. Please require the City to completely mitigate environmental impacts and to respect the zoning rules it committed to in the LUP and Venice Coastal Zone Specific Plan.

If the Commission permits the project to proceed, it must mitigate the impacts of the project both on the natural resources in the Grand Canal and Ballona Lagoona, and on neighboring residents, including most plainly Ms. Lee, who will be subjected to unwanted noise and air quality impacts. The EIR concluded that construction noise and vibration impacts would be significant and unmitigated. In fact, the EIR found that the proposed pile driving would exceed the thresholds for potential vibration damage at nearby structures. The Commission should require the City to take all measures to mitigate these impacts. The Mitigation Monitoring Program includes a requirement that the City "work with the construction contractor to identify potential offsite shared office space that could be made available to residents in the immediate vicinity that work at home during weekday construction hours. The space would ideally have internet service and meeting room space." (BMP NOI-1.) More than needing space during the day, a family like Ms.

Lee's with a young child needs more permanent off site relocation during the construction process. This project serves many, but Ms. Lee is bearing nearly all of the impact of the construction. This need not be the case.

I am available to discuss this matter at your convenience.

Yours truly,

Beverly Grossman Palmer
Strumwasser & Woocher LLP

Strumwasser &Woocher

1250 6th Street, Suite 205
Santa Monica, California 90401
Telephone: (310) 576-1233
Facsimile: (310) 319-0156
www.strumwooch.com

Michael J. Strumwasser
Beverly Grossman Palmer
Dale Larson
Salvador E. Pérez
Julia Michel †
Tessa Baizer
Samantha McNichols

Senior Counsel:
Fredric D. Woocher
Bryce Gee
Andrea Sheridan Ordin

† Also admitted to practice
in Washington

August 20, 2025

Jennifer Doyle
Coastal Program Analyst
California Coastal Commission
South Cast District
301 E. Ocean Blvd. ,Suite 300
Long Beach, CA 90802

Via email only: Jenn.fer.doyle@coastal.ca.gov

RE: Venice Auxiliary Pumping Plant

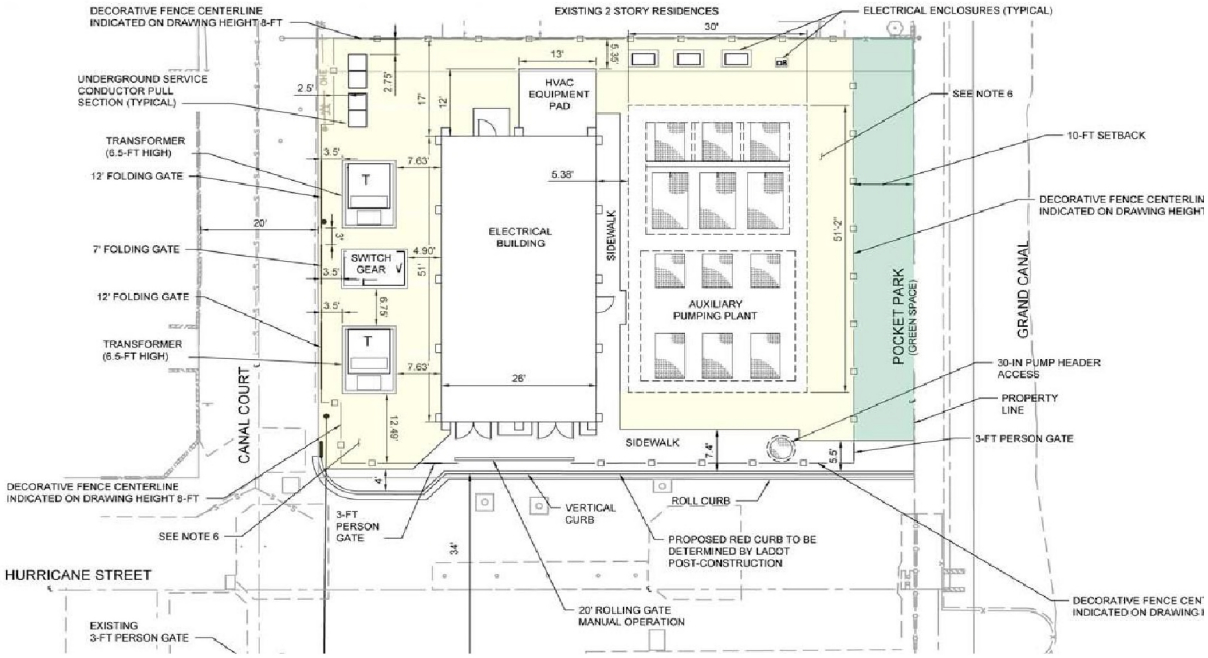
Dear Ms. Doyle:

This firm writes on behalf of Kenya Lee, the owner of the residential property located at 3811 Esplanade. Thank you for speaking with me about the proposed Venice Auxiliary Pumping Plant project last week. This letter follows up on that conversation, in which you asked about the project's environmental impacts on Ms. Lee, one of the closest (if not the closest) neighboring residents. The purpose of this letter is to provide more specific examples of the impact on Ms. Lee, including where the impact may be greater than identified in the EIR due to design changes since the EIR's introduction.

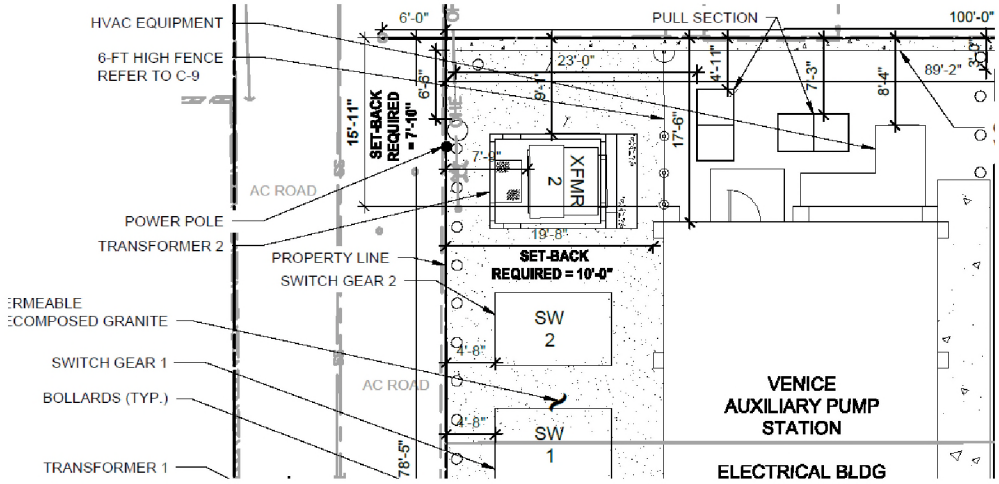
Operational Noise Impacts: Likely Impact For Ms. Lee Due to Design Change

You provided me with July 2025 site plans subsequent to our call. I have compared the July 2025 site plan with the plan included in the 2017 EIR. There is at least one notable change directly relevant to Ms. Lee, which I would like to bring to your attention. The project includes two electrical transformers which are located on the western edge of the property. At the time the project was analyzed in the 2017 EIR, the northern most transformer was located at some distance from the northern property line. The distance is not depicted on the site plans, but based on the scale on the plans in the EIR (Figure ES-3), it appears to be roughly 30 feet from the property line. The EIR reports that the distance between the northern transformer and sensitive

Receptor 2 (Ms. Lee's residence) is 27 feet. (See Table 3.9-16, page 3.9-28.) An excerpt of the EIR site plan is included below for reference.



In comparison, the location of the northern transformer has shifted meaningfully to the north – and **closer to Receptor 2 (Ms. Lee)** on the July 2025 site plans. On the July 2025 plans, a distance of approximately 9 feet between the northern transformer and the northern property line is depicted. This is **three times closer** than analyzed in the EIR.



The new location of the northern transformer is especially concerning given the noise analysis in the EIR at the northern transformer's original location. Has the City been asked to provide an updated noise analysis for this impact? If not, it should be requested to do so.

The original 2017 EIR concluded that operational noise from the transformers (combined) at Receptor 2 (Ms. Lee) would increase noise levels by 2.1 to 3.9 dB over the ambient background noise levels. The threshold of significance in the EIR is an increase of 5 dB over ambient.

Given that the northern transformer has been located three times closer to Receptor 2 (Ms. Lee) than was analyzed, it is likely that operational noise impacts have increased, and most likely have become significant. In general, change in noise volumes due to distance from a point source like the transformer is calculated using the inverse square law. The formula would be:

$56.3\ dB = 41.4\ dB - 20 * \log_{10}(9/50)$

This is far greater than the noise level used in the EIR's calculations of 46.8 dB, and would be cumulated with other operational noise. Given the total noise increase predicted at Receptor 2 (Ms. Lee) was not far from the 5 dB cutoff, the analysis must be re-done with proper noise distances. As I calculate it, the total increase over CNEL will be 11.2 dB, but the Commission should require the City to perform this analysis prior to considering the project.

MM-NOI-3 requires the City to reduce the overall operational noise to within 5dB of the existing community ambient noise levels using design features. (EIR, p. 3.9-31.) The Commission should require the City to explain how relocating the transformers *closer* to Ms. Lee's property is consistent with MM-NOI-3, and what design features have been incorporated to ensure that the overall operational noise, as mitigated, does not increase the operational noise impacts above the threshold of significance at Ms. Lee's residence. As the proponent of the project, the onus should be on the City to prove that it is actually going to mitigate the operational noise, even after altering the project that was analyzed in the EIR.

Other Construction Impacts for Ms. Lee: Significant and Unmitigable

The EIR concluded that that several impacts from the project were significant and unavoidable. These include construction noise, with impacts that would extend for the entirety of the two-year construction period. Pile driving, grading, and jackhammer activities would be particularly disruptive. The pile driving is predicted to result in a 44 dB increase over ambient noise levels at Receptor 2 (Ms. Lee), with volumes reaching 98 dB. (See EIR p. 3.9-21.) While pile driving is the loudest, demolition, paving, and site preparation all involve noise volumes with enormous increases over ambient noise levels.

Sounds levels exceeding 85dB are considered harmful. Every 3 dB rise over 85 dB reduces the safety by half. 85dB is a safe exposure for 8 hours, but at 91 dB, the safe exposure period is only two hours. (See https://www.asha.org/public/hearing/loud-noise-dangers/?srsltid=AfmBOoq5h-Gug3IPEc3un8s5p76Umz05jZkxmh5M-I-7zeTeiTz7EK2j.) A noise level of 98 dB at Ms. Lee's during pile driving would be unsafe at any duration. Ms. Lee and her young child cannot safely remain in their home during this type of construction.

In addition, Receptor 2 (Ms. Lee) would experience significant vibration impacts during most construction phases, with vibration levels ranging from 0.022-1.781 in/s PPV (page 3.9-23).

Building construction with pile driving would exceed both the annoyance threshold (0.04 in/s) and potential damage threshold (0.3 in/s) at this location (page 3.9-23).

Also of grave concern to Ms. Lee are the dust and particulate matter emissions during construction. With a young child resident in the neighboring home, the dust and particulate matter accompanying construction are a major issue. During construction phases including site preparation, excavation, and shoring, 48 haul trips a day will take place next to her home, on a narrow street not designed for frequent truck traffic.

All of these impacts will greatly interfere with Ms. Lee's ability to enjoy and reside safely in her property with her family. Ms. Lee and her family should not be the only ones burdened by the construction of this public facility.

Environmental Justice

As a community, Venice has been through periods of economic decline. In the 1950s, Venice was considered the "slum by the sea," which may in part explain the original Venice Pumping Plant being located on the shores of the Grand Canal and adjacent to Ballona Lagoon. In the 1930s, this area was considered of poor quality and the area around the VAPP was redlined as a "Grade D." It is likely the legacy of these attitudes that lead this neighborhood to host the pumping plant for sewage from the much of the westside of Los Angeles. The burden of addressing the additional sewage needs of the city will now fall on this community again, most notably during the construction of the VAPP. The Coastal Commission should ensure environmental equity by requiring the City to fully mitigate the impact of construction on the most directly impacted residents, including Ms. Lee.

I am available to discuss these concerns at your convenience.

Yours truly,

Beverly Grossman Palmer

Heal the Bay

1444 9th Street
Santa Monica, CA 90401

ph. 310-451-1500
fax 310-4961902

info@healthebay.org
www.healthebay.

September 5, 2025

California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

Sent Via E-mail to: ExecutiveStaff@coastal.ca.gov

RE: Venice Auxiliary Pumping Plant – Coastal Development Permit Appeals (A-5-VEN-22-0068, A-5-VEN-22-0069, and 5-24-0123) – Support

Dear Chair Cummings and Honorable Commissioners:

Heal the Bay is a non-profit environmental organization with 40 years of experience dedicated to making the coastal waters and watersheds of Greater Los Angeles safe, healthy, and clean. Our work is rooted in science, education, community action, and advocacy. We acknowledge that this work takes place on the unceded lands of the Tongva, Chumash, Fernandeño Tataviam Band of Mission Indians, and Kizh Nation tribes, and we honor their continued stewardship of these lands and waters. **We write this letter to provide support for the Venice Auxiliary Pumping Plant (VAPP) and urge the commission to move forward expeditiously in its de novo review should you find substantial issue with the project in its current form.**

The proposed project is critical to protecting one of Los Angeles' most sensitive and iconic coastal habitats: the Venice Canals, Ballona Lagoon, and the adjacent beaches. These areas are designated as Environmentally Sensitive Habitat Areas (ESHAs) and wetlands and are home to diverse species that are highly vulnerable to water quality degradation.

The existing Venice Pumping Plant is the largest wastewater pumping facility in Los Angeles and operates at or near capacity during wet weather events. This facility handles the vast majority of wastewater from the entirety of west Los Angeles and without additional redundancy, even a single failure during storms could result in untreated sewage spilling into the Grand Canal, Ballona Lagoon, or neighboring residential streets. Such a failure would not only endanger sensitive wetland habitats but also pose a severe public health threat to residents and beachgoers. The VAPP is designed specifically to prevent this type of catastrophic overflow by providing backup capacity and operational flexibility, thereby strengthening the resilience of the City's wastewater system.

The Coastal Act calls for the protection of marine resources, wetlands, and water quality (Sections 30230–30231), and requires minimizing hazards to life and property (Section 30253). The VAPP directly advances these goals by ensuring safe wastewater management adjacent to some of California's most sensitive coastal waters. This project not only reduces the risk of sewage spills but also improves the City's ability to carry out routine maintenance without compromising system performance, which is essential for long-term sustainability.

Heal the Bay

1444 9th Street
Santa Monica, CA 90401

ph. 310-451-1500
fax 310-4961902

info@healthebay.org
www.healthebay.

We commend Commission staff for a thorough review of this project and conditionally support the recommendation to find a substantial issue and proceed with de novo review. We also support the staff recommendation to approve the project with special conditions. These conditions, such as a Future Coastal Hazards Analysis and Adaptation Plan, enhanced stormwater treatment via bioswales, a robust Water Quality and Hydrology Plan, and a Final Habitat Restoration Plan, will ensure that the project not only provides critical wastewater infrastructure but also enhances environmental protections. Incorporating sea level rise and climate adaptation measures is critical to ensuring that the pumping plant remains operational under future climate conditions, protects adjacent wetlands from flooding, and maintains long-term water quality for the community and local ecosystems. We also recommend that construction-related impacts be carefully managed in accordance with the Final Habitat Restoration Plan to safeguard sensitive habitats during project implementation.

We believe the inclusion of requirements addressing **sea level rise adaptation, oil spill prevention, archaeological resource monitoring, and public parking/access improvements** demonstrates a balanced and forward-looking approach. These safeguards will allow the project to move forward responsibly while aligning with the Coastal Commission's mission to protect California's coast for present and future generations. **That said, this project has been ongoing for many years, and its timely completion is critical to protecting the surrounding community and ESHA from any wastewater spills.**

Any delay in moving this project forward increases the risk of a major wastewater spill into the canals and lagoon, with devastating consequences for water quality and ecological health. **Timely Commission action will ensure that this essential infrastructure project is advanced without unnecessary setbacks, while still upholding the highest standards of coastal protection.**

The Venice Auxiliary Pumping Plant represents a vital investment in Los Angeles' coastal resilience. It will protect sensitive habitats, prevent harmful sewage discharges, and strengthen the City's wastewater infrastructure against the challenges of climate change. **Heal the Bay supports the Coastal Commission staff's recommendation and urges the Commission to approve this project with the proposed conditions without delay**. Thank you for the opportunity to provide comments in support of this project.

Sincerely,

Emily Parker
Senior Marine Scientist
Heal the Bay



1444 9th Street
Santa Monica, CA 90401

ph. 310-451-1500
fax 310-4961902

info@healthebay.org
www.healthebay.

September 5, 2025

California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105

Re: Opposition to the Venice Auxiliary Pumping Plant ("VAPP") – **Coastal Development Permit**

Dear Chair and Commissioners,

I write as an immediately affected Venice resident and stakeholder living at **3809 Esplanade** to **oppose** the proposed **Venice Auxiliary Pumping Plant (VAPP)**. As currently designed and sited, the project **does not conform** to the **California Coastal Act** and the **certified Venice Local Coastal Program (LUP/LCP)**, and it would impose significant, avoidable impacts on adjacent homes, public access, environmentally sensitive habitat areas, and community character.

This project is not ready for the Commission's consideration, because the City has not yet completed the legislative process of changing the project's zoning to permit this public, industrial, use. There is no reason to place this item for consideration now. Moreover, the proposal authorizes development activity that could detrimentally affect the Grand Canal and Ballona Lagoon habitat areas, and which does not comply with basic and important zoning protections for neighboring residents. Please require the City to completely mitigate environmental impacts and to respect the zoning rules it is committed to in the LUP and Venice Coastal Zone-Specific Plan.

If the Commission permits the project to proceed, it must mitigate the impacts of the project both on the natural resources in the Grand Canal and Ballona Lagoona, and on neighboring residents, including most plainly me, Joey Jackson and my family who will be subjected to unwanted noise and air quality impacts. The EIR concluded that construction noise and vibration impacts would be significant and unmitigated. In fact, the EIR found that the proposed pile driving would exceed the thresholds for potential vibration damage at nearby structures. The Commission should require the City to take all measures to mitigate these impacts. The Mitigation Monitoring Program includes a requirement that the City "work with the construction contractor to identify potential offsite shared office space that could be made available to residents in the immediate vicinity that work at home during weekday construction hours. The space would ideally have internet service and meeting room space." (BMP NOI-1.) More than needing space during the day, a family like mine with a young child needs more permanent off site relocation during the construction process. This project serves many, but my family and I are bearing nearly all of the impact of the construction. This need not be the case.

1) ESHA & Biological Resources – Coastal Act §§30230, 30231, 30240

The site lies **adjacent to the Venice Canals/Grand Canal corridors** and associated riparian and urban-wildlife habitat. Construction vibration, vegetation removal, staging, and long-term operations **threaten ESHA and buffer integrity** in violation of **§30240** (requirement to protect ESHA against any significant disruption) and **§§30230–30231** (marine/biological productivity and water quality). The project lacks a **biologically adequate buffer** and enforceable, objective performance standards for noise, light, and spill/dewatering controls.

Requested Action: Deny the CDP or, at minimum, require a **biologically supported buffer**, pre-construction nesting bird surveys, ESHA fencing and monitoring, tree protection plans, and a **no-staging/no-laydown** restriction within the defined buffer.

2) Public Access & Recreation – Coastal Act §§30210–30212, 30252

Construction traffic, lane closures, equipment staging, and potential canal path interruptions would **interfere with public access** and coastal recreation contrary to **§§30210–30212 and 30252**. The submittal does not ensure **maximum feasible public access** during peak periods nor a robust detour/wayfinding plan.

Requested Action: Require a binding **Construction Access Management Plan** preserving continuous pedestrian/bicycle circulation, time-of-day limits (no weekends/holidays/peak beach hours), and on-site signage/monitors.

3) Hazards, Noise/Vibration, and Neighbor Safety – Coastal Act §30253

Pile driving, microtunneling, dewatering, and heavy trucking near residences present **substantial risk** of **settlement, vibration damage, and habitability disruption**, inconsistent with **§30253** (minimize risks to life and property; assure structural integrity; neither create nor contribute to instability). The record does not include enforceable **vibration thresholds**, **real-time monitoring**, nor a **property-condition survey/repair program** for immediately adjacent homes. Operational **odor/noise** and emergency overflow contingencies are also insufficiently bounded.

Requested Action: Require (a) **pre-/post-construction building condition surveys**, (b) **continuous vibration and noise monitoring** with public dashboards, (c) **stop-work exceedance triggers** and third-party engineer oversight, (d) funded **damage repair/relocation assistance** for affected residents if thresholds are exceeded, and (e) sea-level-rise and flooding resiliency consistent with best-available science.

4) Community Character & Visual Resources – Coastal Act §30251; Venice LUP

The facility's massing, equipment, screening, and 24/7 operational profile are **incompatible with the low-scale residential context**, adversely affecting scenic and visual qualities protected by **§30251** and Venice LUP community character policies.

Requested Action: Require design alternatives that **reduce bulk and height**, fully enclose noisy equipment, incorporate **context-sensitive architecture/landscaping**, and prohibit rooftop appurtenances visible from public corridors.

5) Inadequate Alternatives & CEQA Compliance

The submittal does not demonstrate that the chosen site/footprint is the **least environmentally damaging feasible alternative**, nor does it analyze reasonable alternatives such as: (1) siting within existing public utility envelopes farther from residences/ESHA; (2) **underground vault** designs with superior sound attenuation; (3) operational upgrades to reduce footprint; or (4) off-site consolidation. Design updates since the earlier environmental review appear **material**; under **Public Resources Code §21166** and **CEQA Guidelines §15162**, new or substantially more severe impacts require **subsequent/supplemental analysis**.

Requested Action: Deny without prejudice and direct preparation of a **supplemental environmental document** with a robust alternatives analysis; or continue the item and require an independently peer-reviewed **acoustics, geotechnical, hydrology, and biological** package.

If Approved Despite These Deficiencies – Essential Special Conditions

1. **Setbacks & Buffers:** Minimum, biologically supported **ESHA buffer**; no laydown/staging within buffer.
2. **Noise/Vibration:** Numeric **performance standards** at nearby property lines; continuous monitors; public reporting; enforceable penalties and work stoppage thresholds.
3. **Resident Protections:** Pre-/post-condition surveys; **relocation assistance** and repairs if exceedances occur; 24/7 **community liaison** and complaint hotline.
4. **Access Management:** Maintain continuous pedestrian/bike access; limit construction to weekdays, non-peak hours; detailed detour plan.
5. **Stormwater/Water Quality:** LID measures; dewatering/filtration plan; spill prevention/response with staff training and drills.
6. **Design/Screening:** Full enclosure of mechanical equipment; architectural treatment and landscaping consistent with Venice LUP.
7. **Sea-Level-Rise Resiliency:** Elevation/protection for critical equipment; emergency power and overflow containment plans reviewed by independent engineers.
8. **Monitoring & Reporting:** Independent third-party compliance monitor with authority to halt work for violations; quarterly public compliance reports.

Conclusion

The Commission's mandate is to **protect coastal resources and access while minimizing hazards**. The VAPP, as proposed, **fails to meet those standards**. I respectfully request that the Commission **deny** the CDP or, at minimum, **continue** the item and require the conditions and supplemental analyses described above.

Please include this letter in the **administrative record**. I reserve all rights to further comment, to appeal, and to seek appropriate remedies.

Thank you for your careful consideration.

Respectfully submitted,

Joey Jackson
Venice Resident / Affected Party

September 5, 2025

Th 12a, b & 13

The Honorable Meagan Harmon, Chair
Honorable Commissioners & Staff
California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105

Sent via email to Staff

Re: Appeal#A-5-VEN-22-0068, #A-5-VEN-22-0069; Application #5-24-0123, Applicant: City of Los Angeles (Sanitation), Location: Ballona Wetlands Grand Canal Lagoon and Hurricane Street VAPP site – ***OPPOSE unless further environmental mitigation is required for damage to the ESHA, and also alternative for better and increased public access***

Dear Commission Chair Harmon and Commissioners:

First, while we are understanding of the need for the City of Los Angeles to upgrade, enhance and expand its wastewater pumping plant at Venice – that pumps all sewage from the Pacific Palisades, Venice, Marina del Rey, and adjacent communities to the Hyperion Treatment Plant in Playa del Rey, **we are opposed to this application for the project as proposed by staff being approved,** because:

A) This area – both the wetlands of the Grand Canal Lagoon and Ballona Lagoon Marine Preserve, both of which are part of the historical Ballona Wetlands – AND the adjacent uplands, which mostly include native wetland plant populations – are designated in the Venice LUP (Local Coastal Program) as ESHA – Environmentally Sensitive Habitat Area – and while legally, it is not allowed to either cause damage to or "move" an ESHA, as the Court of Appeal found in the ***Bolsa Chica*** decision – there is not a way for this project to be upgraded and expanded without significant damage to the ESHA/wetlands;

B) Public Access will be impeded during the many, many months of construction of this project. Currently, there is a walk path that surrounds the VAPP structure, but that walk path will necessarily be blocked off during construction, which means the public will miss out on viewing of the Ballona Lagoon Marine Preserve on one side of the VAPP, and the Grand Canal Lagoon on the other side. There are additional mitigation measures the public interest groups included on this letterhead have proposed, and those alternatives/additions are detailed further below in this letter

C) there are less damaging, feasible alternative mitigation measures that the public has offered and explained to both City Sanitation staff and to the Commission – both for the ESHA and for Public Access that – if not required in the approval of this project will, indeed, mean that there will remain significant environmental impacts from the construction of this proposed project. Therefore, the CEQA

> equivalency requirement that the Coastal Commission must meet ***is not met*** unless those mitigation measures are considered and included in the project conditions;

SECOND, we agree that there IS substantial issue and support staff's recommendation to find Substantial Issue with the plan as submitted and approved for a CDP by the City of Los Angeles Planning Commission. As numerous members of the public stated at the hearing, the knowledgeable public was mostly dismissed and ignored during the proceedings.

While the staff report demonstrates a significant and complex situation exists with this proposed project and its unfortunate siting – we will go straight to the parts of the Coastal Act that we believe cannot legally be ignored.

ESHA (Environmentally Sensitive Habitat Area) – both the fully delineated wetlands in Grand Canal Lagoon and in the Ballona Lagoon Marine Preserve are designated as ESHA, as are the lagoon edges and associated uplands, which are part of the historical and current Greater Ballona Wetlands Ecosystem (GBWE). Not only will the area immediately adjacent to the proposed construction be impacted, and the lagoon itself with the "diversion structure," but since tidewaters flow throughout this system twice each day, lagoon/wetland and even ocean waters will be impacted by this project.

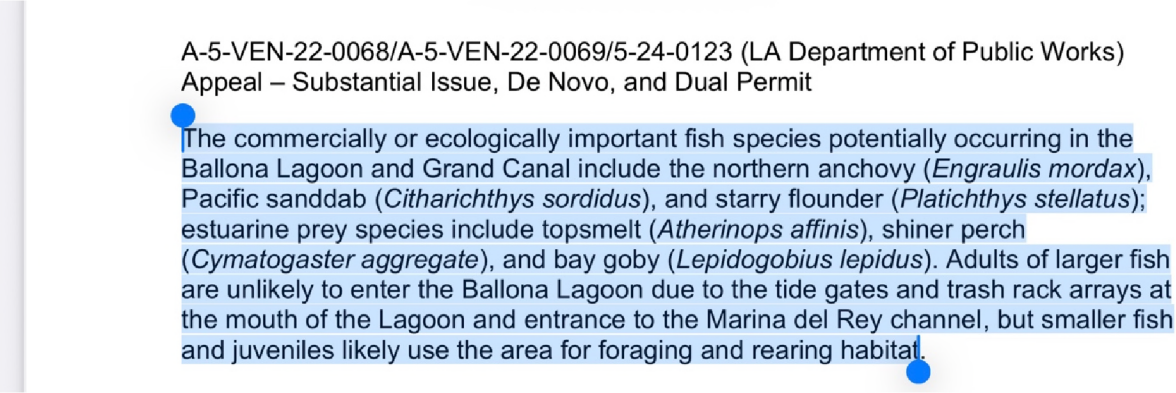
As we mentioned in our comments to the City Planning Department, the consultant firm(s) for this project and city staff have been severely lacking

in knowledge or understanding of how this fragile and complex system works and thrives. Why the City has not reached out to qualified biologists at the CA Department of Fish & Wildlife and the US Fish & Wildlife Service for their assistance is puzzling, especially since we have pointed out the serious inaccuracies and deficiencies of the reports we've reviewed.

We've appreciated time and attention from three different staff analysts at the Commission, and we ARE happy that finally ONE of the many inaccuracies in the City Sanitation's reports has been corrected, and we were listened to by Coastal staff about the fact that the endangered El Segundo Blue Butterfly has this area included in its Recovery Plan – and therefore, it was considered to be a good idea to plant the Coastal Buckwheat species that is appropriate for this species to expand its range and continue to recover. STILL, so much was not considered to be corrected or maybe lost in the many staff changes at Coastal and the stubborn refusal by Sanitation consultants/bureaucrats to listen to the knowledgeable public.

For instance, Fiddler Crab, *Leptuca crenulata*, a species that scientists think ought to be listed as a regional endangered species. will be impacted by this project, as well as numerous species of fish and other marine life. Biologist Robert van de Hoek has provided that information to at least two previous Coastal staff members, yet some of the same omissions appear to be included in the staff report.

For instance, a very few fish species are included in the staff report, as appearing to be identified by the City's newest consultants:



A-5-VEN-22-0068/A-5-VEN-22-0069/5-24-0123 (LA Department of Public Works)
Appeal – Substantial Issue, De Novo, and Dual Permit

The commercially or ecologically important fish species potentially occurring in the Ballona Lagoon and Grand Canal include the northern anchovy (*Engraulis mordax*), Pacific sanddab (*Citharichthys sordidus*), and starry flounder (*Platichthys stellatus*); estuarine prey species include topsmelt (*Atherinops affinis*), shiner perch (*Cymatogaster aggregate*), and bay goby (*Lepidogobius lepidus*). Adults of larger fish are unlikely to enter the Ballona Lagoon due to the tide gates and trash rack arrays at the mouth of the Lagoon and entrance to the Marina del Rey channel, but smaller fish and juveniles likely use the area for foraging and rearing habitat.

But, there does not seem to be acknowledgement of the California Horn Snail, *Cerithideopsis californica*, for instance, or other invertebrates, which are very important components of the ecosystem. The food sources of the many species of birds are crucial to the heath of this ecosystem. We also don't see a detailed bird species list – nor any analysis of the impacts of this proposed construction project to the presence of these birds – both during construction or after, as a result of impacts from the project. The birds come for the food, not for humans to take picture of – although we do enjoy doing that!

ESHA mitigation could be improved if – not only there were proper and complete surveys before and after the project, but also plantings needing to be finished as part of the Grand Canal Lagoon project.

PUBLIC ACCESS – walking paths will be impacted – both those that surround the VAPP structure and the public who might be thinking they are going to the beach or to a coastal lagoon, yet have no idea where there are.

We recommended that the City include elements of the long-stalled Grand Canal Lagoon project that public interest groups, including some of us as signatories to this letter, worked on more than a decade ago. Enhanced public access would include installing way-finding signage AND one or two free-span walk bridges crossing the lagoon from Via Dolce to Hurricane and from Via Dolce to Strongs/Driftwood – to make up for the public access loss during construction of the VAPP expansion project.

PUBLIC ACCESS – parking

D) Additionally, a far better public access solution than providing a small parking lot in the middle of a residential neighborhood that already is stressed from parking would be to include the public access/parking walk path also included in the Grand Canal Lagoon project that we worked on with the City Engineering Bureau.

That would include installing a walk path on the west bank of the Grand Canal Lagoon – between Washington Blvd. and Driftwood, necessarily moving some of that parking as well as adding more parking in a new angled parking regime on Via Dolce, which is parallel to the Grand Canal Lagoon.

CEQA-equivalency requirements

We recommend an alternative to the proposed staff report recommendation that would include the recommendations above that both ESHA mitigations and public access mitigations include finishing the

languishing Grand Canal Lagoon project Our recommendation would allow the Commission to comply with its findings that:

> ***Approval of the permit complies with the California Environmental Quality Act (CEQA) because either (1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or (2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.***
>
> There are absolutely ***feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment*** that would need to be considered in order to make up for the public's loss of access and damage to the ESHA during the time of construction. Those mitigation measures should be considered.

Sincerely,

Robert J. 'Roy' van de Hoek /s/
Robert J. 'Roy' van de Hoek
Biologist & Environmental Scientist
Ballona Institute

Wendy-Sue Rosen /s/
Wendy-Sue Rosen
President & Co-Founder
Protect Ballona Wetlands

Marcia Hanscom /s/
Marcia Hanscom
Community Organizer
Defend Ballona Wetlands

Dee Fromm /s/
Dee Fromm
Managing Director
Coastal Lands Action Network

Ballona Institute • Defend Ballona Wetlands •
Coastal Lands Action Network • Protect Ballona Wetlands
322 Culver Blvd., #317, Playa del Rey, CA 90293 ~ (310) 877-2634

Outlook

FW: Th12a, 12b, 13a--A-5-VEN-22-0068, A-5-VEN-22-0069, and 5-24-0123

From SouthCoast@Coastal <SouthCoast@coastal.ca.gov>
Date Mon 9/8/2025 11:30 AM
To Doyle, Jennifer@Coastal <jennifer.doyle@coastal.ca.gov>

From: Robin Rudisill <wildrudi@icloud.com>
Sent: Friday, September 5, 2025 4:52 PM
To: SouthCoast@Coastal <SouthCoast@coastal.ca.gov>; Doyle, Jennifer@Coastal <Jennifer.Doyle@coastal.ca.gov>
Subject: Th12a, 12b, 13a--A-5-VEN-22-0068, A-5-VEN-22-0069, and 5-24-0123

Honorable Commissioners and Staff:

The history of this pumping plant is that of a significant Environmental Justice issue. The attitudes that lead this neighborhood to host the original Venice Pumping Plant for sewage, located on the shores of the Grand Canal and adjacent to Ballona Lagoon and residences, are explained by the fact that in the 1930s this area was considered of poor quality, named "slum by the sea", and the area around the VAP was redlined as a "Grade D." This environmental wrong of siting this sewage pumping plant in the middle of ESHA and this neighborhood must be addressed, at a ***minimum***, by requiring the City to fully mitigate the impact of construction on the most directly impacted residents as well as on the ESHA.

This is essentially an industrial facility, even though it is called a Public Facility, located in a residential neighborhood. This is a sensitive wetland area, surrounded by ESHA, in the Dual Permit Jurisdiction Coastal Zone. I cannot think of a more sensitive area in the Los Angeles Coastal Zone. See attached certified Venice Land Use Plan map. Aesthetics and safety in such a sensitive area should be paramount, and the project must be designed to be compatible with the surrounding residential neighborhood. The project, as currently conditioned, remains way too impactful on the residents and the ESHA.

The first time I encountered this project was in 2017, eight years ago, and I participated in that City hearing, expressing numerous concerns. Please ask what has taken this project so long to go through the approval process. Recently, it was discovered that it has to go back to the City yet again, for approvals that were forgotten. This mishandling of the project all this time does not give comfort to us members of the public that the city will keep all of its promises in terms of proposed mitigations and compliance with all of your conditions.

The number of Special Conditions and the level of detail in those conditions is stunning! In our experience with other cases, when Special Conditions are violated, this does not rise to the level of Coastal Enforcement personnel getting involved, as there are other more important priorities. This tells us that noncompliance with conditions will likely not be addressed, which is unacceptable for a project such as this in an extremely sensitive location, adjacent to ESHA and residential uses. The only way we can see to solve this is to require a "Special Monitor" to inspect for compliance with all required

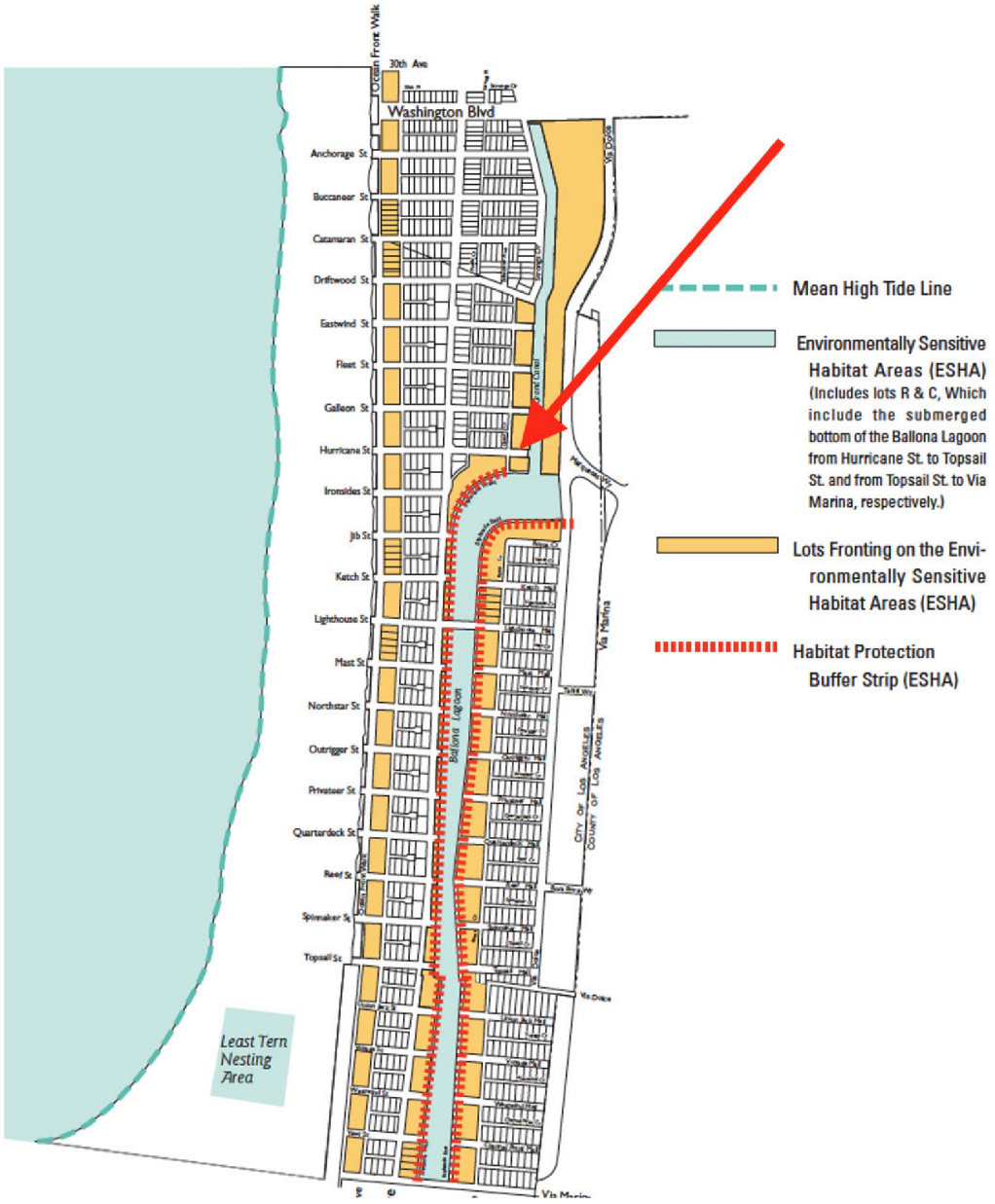
mitigations and conditions. This person should be independent and therefore should be selected by both the City and the Community.

There is adequate parking to run the facility on the property. There are no customers who visit this type of facility. The public parking lot is no longer needed and will be for the public only. The parking lot should be removed from the project. It will create an unsafe environment near homes. A parking lot like this has no business in the middle of a residential neighborhood. It is the ultimate "adding insult to injury" to not only have the impacts of this terrible project in the neighborhood and in the middle of ESHA, but to add an unnecessary parking lot and all of the associated adverse impacts. It is in no way compatible with the residential character and there is nothing else like it in the middle of a residential neighborhood in the entire Venice Coastal Zone. There will be increased exhaust in the area. We've seen nothing on how the lot will be required to be managed and controlled, and how it will be secured at night. It will be a magnet for campers and partiers and there will likely be noise and fumes of all kinds at all hours. Surrounding residents have already provided testimony to Staff that it was very difficult to get the City to address other campers on their property. Having to deal with this day in and day out impacts quality of life. The City should use the lot for staging during construction and then sell it when the project is complete, either providing funds to more effectively mitigate impacts on neighbors and ESHA or gaining much needed funds for the City's general fund. Also, there is an ESHA mitigation plan that provides for a small pedestrian bridge over the Grand Canal to expanded parking on Via Dolce, which is a feasible alternative that would substantially lessen significant adverse effects on the environment and on the neighbors.

Please continue this hearing on September 11th so that your talented Staff can take a little more time to work with the City and the Public and these serious issues can be more fully vetted.

For the Love of Los Angeles
and our precious Coast,
Robin Rudisill
(310) 721-2343

VENICE LUP POLICIES (certified by the Coastal Commission June 14, 2001)



CALIFORNIA COASTAL COMMISSION
South Coast District Office
301 E Ocean Blvd., Suite 300
Long Beach, CA 90802-4302
(562) 590-5071

Th12a
Th12b
Th13a

A-5-VEN-22-0068, A-5-VEN-22-0069, 5-24-0123
(CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS)
SEPTEMBER 10, 2025

CORRESPONDENCE

August 27, 2025

California Coastal Commission
South Coast District
301 E. Ocean Blvd, Suite 300
Long Beach, CA 90802

Re. Venice Auxiliary Pumping Plant (VAPP)
Appeal No. A-5-VEN-22-0068 (L.A. Department of Public Works, Venice)
Appeal No. A-5-VEN-22-0069 (L.A. Department of Public Works, Venice)
Application No. 5-24-0123 (L.A. Department of Public Works, Venice)

Dear Coastal Commission Staff:

We are writing collectively to express our serious concerns regarding the pending appeals and City application for the project at 128 E. Hurricane St/3913 S Esplanade West, 133-139 E Hurricane St/3817 S Esplanade, and 3813 E Esplanade for purposes of a Wastewater Pumping Plant, the Venice Auxiliary Pumping Plant (VAPP) to supplement the capacity of the existing Venice Pumping Plant (VPP) for conveyance of wastewater to the Hyperion Treatment Plant (Project). We respectfully ask you do not approve the Project until a number of critical issues have been resolved, and appropriate conditions added, as detailed below.

Construction of the VAPP will have a significant negative impact on this densely populated Venice community as well as the surrounding environment including the Grand Canal and Ballona Lagoon, both recognized as ESHA. Mitigating the Project's impact on the community and the environment should be paramount, not treated as throwaway considerations. While the community acknowledges the critical nature of this infrastructure project, our goal has been to incorporate modifications that will materially address the community's quality of life and mitigate substantial environmental damage to these environmentally sensitive habitat areas over a multi-year construction timeline.

Background: When the original VPP was built in the late 1950's, the Marina Peninsula was primarily comprised of oil derricks and marshland. During this time, Venice was considered the "slum by the sea," which may in part explain why the original VPP was located on the shores of the Grand Canal and adjacent to Ballona Lagoon. As far back as the 1930s, this area was considered of poor quality and the area around the VPP was redlined as a "Grade D." It is likely the legacy of these attitudes that lead this neighborhood to host the pumping plant for sewage from much of the westside of Los Angeles. The first residential properties on and around Hurricane St were constructed in the mid-1960's so design and other impactful attributes of the VPP were not material considerations when built.

Therefore, the signatories to this letter request the following project issues be addressed through the requirement of conditions, as follows:

1. **The Project Should Not Receive a Conditional Use Permit or Coastal Development Permit Without Meeting Specific Conditions**

The City has applied for a conditional use permit to override public benefit performance standards as required by LAMC 14.00.A.6 and 14.00.B.5. This conditional use permit should not be granted unless the City meets the following conditions. We request the Coastal Commission require these conditions:

a. A ten-foot landscaped buffer to be maintained and equipped with an automatic irrigation system in support of the previously agreed upon 6-foot solid block wall on the north property line next to 3811 Esplanade.
b. Shield the entire structure with unobtrusive fencing as well as landscaping of a height adequate to screen the transformers and power poles, noting that transformer access must be maintained.
c. Upgrade the existing VPP with landscaping, a new sidewalk, and all facilities, existing and new, shall be regularly cleaned, maintained, and patrolled for security. Los Angeles Sanitation and Environment (LASAN) has indicated they will update the VPP after construction of the VAPP. However, sidewalk safety work should be completed now.
d. Develop appropriate and suitable remediation plans, in conjunction with local environmental groups, to materially improve the current state of the Grand Canal/Ballona Lagoon ecosystem. LASAN has indicates support of the Grand Canal Restoration Plan through the Safe Clean Water Implementation Division (SCWID) but no specifics have been identified to date.

2. Lack of Conformity with the Certified Venice Land Use Plan (LUP)

The community is very concerned the Project does not conform to the LUP, which has been certified by both the City and Coastal Commission and is State policy guidance used to determine conformance with the Coastal Act. Given the following LUP conflicts with the Project, it clearly and materially does not conform with the Coastal Act:

- The Project conflicts with Policy I.A.5, which seeks to preserve and protect stable multifamily neighborhoods.
- The Project conflicts with Policy I.C.1, which states that the scale and design of industrial facilities must be compatible with adjacent and neighboring uses.
- The Project conflicts with Policy I.C.6, which states that hazardous industrial uses shall not be located adjacent to residential areas. While the community does not claim to be experts on the chemicals and operations to be used at the plant, the operation is industrial in nature and some operations of the plant could reasonably constitute a hazardous use for nearby residents due to the potential for activities such as (but not limited to) transformer explosions, equipment fumes, methane leaks, sewage overflows, etc.
- The Project conflicts with Policy I.D.1 that states that the only permitted development adjacent to the Grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks. The permit should only be granted if/when the City has

developed appropriate and suitable remediation plans to materially improve the current state of the Grand Canal/Ballona Lagoon ecosystem.

- The Project conflicts with Policy IV.A.2, which states that uses permitted in or adjacent to the Canals shall be implemented in a manner to protect the biological productivity of marine resources and maintain healthy populations of marine organisms.
- The Project conflicts with Policy V.A.1, which states that Public Services shall consider the competing needs of residents and visitors for the use of roadways, existing parking, etc. and shall be expanded in a manner that does not adversely affect residents. This is clearly not the case.
- The Project conflicts with Policy V.A.3, which states that infrastructure shall be installed using the least environmentally disturbed method feasible. There should be active engagement and mutual agreement with environmental groups who have specific experience in this ecosystem. The City has acted entirely on their own without any meaningful consultation.
- Public Works projects shall be reviewed for consistency with the Coastal Act and the Venice Land Use Plan through the Coastal Development Permit process as required by the Coastal Act.
- **The Project violates the court-ordered ESHA protections as well as the associated settlement agreement with the City protecting the Ballona Lagoon and Grand Canal. The current mitigation plans are insufficient to meet the protection requirements. The community strongly supports resolution of this issue.**

3. Significant and Unavoidable Hazards from Potential Release of Methane Gas and Other Chemical Hazards

The VAPP Mitigation Plan acknowledges "a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous chemicals into the environment." This includes encroachment or seepage of methane into the VAPP structure whose impact is considered potentially significant. Conditions requested from City and Coastal Commission:

a. LASAN will commit to soil vapor testing, which is insufficient. However, they will not commit to installation of detection devices. A sufficient number of detection devices should be placed throughout the community to provide ongoing accurate measurements. The data from these devices should be accessible to all community members in real time.
b. The Mitigation Plan should proactively address the same exposure concerns for the community as defined for workers on the Project.
c. Should any monitoring under the Mitigation Plan identify this or a related issue, the entire Project will be shut down immediately until a realistic plan can be put in place to mitigate both short and long-term impacts.

4. Significant & Unavoidable Residential Property Damage

The VAPP Mitigation Plan acknowledges "significant and unavoidable impact to surrounding land uses" including "ground-borne vibration levels that are distinctly perceptible at a

receiving residential use or could potentially result in building damage." Section MM-NOI-2 of the Mitigation Plan does not adequately protect property from potential damage.

In addition, Construction GEO-1 of the Mitigation Plan states the Project will "Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking and/or seismically related ground failure, including liquefaction." The plan to address residential impact uses terms such as "may include," "if considered appropriate," and "as feasible and practical." The discretion is left entirely to a project-assigned engineer. The City has strong motivation to look past issues that may arise as a path to completing the Project faster.

There must be an enforceable plan to cure defects caused by the Project to any adjacent or neighboring residential property. There is also no timely mechanism to address root causes in the event damage is done. The "process," as we have been told, will not mitigate additional damage before the cause is investigated and modified. Conditions requested from City and Coastal Commission:

a. An independent inspector, approved by the community and paid for by the City, shall be contracted to inspect all properties within 500' of the Project prior to construction to determine baseline conditions. Additional inspections shall take place no less than semi-annually or upon resident request for the duration of the Project.
b. Per Section 3 above, the on-site City representative shall be empowered to satisfactorily address these issues in real time or shut the Project down pending resolution.

5. Expected Reduction in Property Value

The anticipated severity of construction-related disruptions, including high-decibel noise, vibration, airborne debris, traffic blockage, and the potential release of subsurface gases such as methane will materially impact property values. Conditions requested from City:

a. We request the City collaborate with LA County to secure reduced property valuations/lower property taxes for all properties within 500' for the duration of the Project.

6. Appropriate Off-Site Workspace

Given the many "significant and unavoidable" issues identified on the Project, work from home conditions will be adversely impacted. Condition requested from the City and Coastal Commission:

a. The City shall guarantee in writing the provision of suitable, local workspace, reasonably approved by the community, for all impacted home-based workers located within 500' of the Project for the duration of all construction activities. Leaving this responsibility solely to the construction company without the City providing a written guarantee is unacceptable. LASAN has agreed to study community needs and will address this in the RFP but will not commit in writing to the community.

b. The City will survey the community every six months during the term of construction to determine how much workspace is needed.

7. Ongoing Noise, Air & Dust Release

The Mitigation Plan states "project construction noise will exceed construction noise criteria provided by the LA CEQA Thresholds Guide. However, Section MM-NOI-3 of the same Mitigation Plan, states noise control features will "reduce overall operational noise levels from all project-related sources to within 5 dB of existing ambient noise levels in the surrounding community (53-57 dB)." These two statements are in conflict. Conditions requested from City and Coastal Commission:

a. The City shall retain an independent 3rd party, reasonably approved by the community, to review and recommend changes to the mitigation plans.
b. The City shall provide independent (3rd party) noise and air quality monitoring whose results shall be available to the community in real time. If necessary, the City shall distribute or reimburse the cost of high-quality air purifiers to impacted households (up to $500/unit).
c. The City shall comply with residential noise thresholds including the provision of all sound barriers necessary to comply with municipal code requirements and CEQA thresholds.
d. Each construction day, the City shall erect temporary barriers of sufficient height to mitigate dust and dirt from impacting residential property. Barriers shall be removed at the end of each construction day to allow for street parking.

LASAN has indicated that a community outreach ambassador, and a contract admin inspector, will be on site every day. However, BLE requirements and timely response text/phone number with the inspector must be addressed. There should be regular meetings with the community to address issues. This has been discussed but no specifics have been provided.

8. Lack of Adequate Emergency Access & Preparedness

The Project will exacerbate ongoing issues of emergency egress and ingress, by expanding density, blocking routes (even temporarily), and adding equipment and workers into the potential hazard zone. Evacuation plans have been generally ad hoc and provided in the heat of the emergency. This approach has not been highly successful as recent problems with the Palisades Fire have demonstrated. Hazards facing the community include tsunami, tropical storm flooding, hazardous materials incidents and targeted violence, which will be complicated by the construction for the Project. LASAN has provided a contact at the L.A. Fire Department working with the Emergency Management Department regarding an emergency preparedness plan. In addition, the Project Mitigation Plan should include:

a. Identification of evacuation routes and emergency ingress routes.
b. Estimated evacuation times and numbers evacuated.
c. Mitigation of blocking of evacuation routes/cooperation with the evacuation process.
d. Effective alternatives to evacuation such as shelter in place.
e. Alert and warning procedures.

f. Addressing and including the needs of Persons with Disabilities and Access and Functional Needs (PDAFN).
g. Public education and practice.
h. The City should commit to installing a walk bridge across the Grand Canal at Driftwood St to provide additional ingress/egress to the project area. Note: this element is detailed in the previously approved Grand Canal Restoration Plan. The details of this plan can be found here: https://engineering.lacity.gov/grand-canal-restoration-project.

9. Excessive Construction Hours

The City plans for six day/week construction, 8 am to 5 pm. An internal City report produced seven months after the EIR was certified proposed a five-day construction work week as well as limitations on pile drivers, graders and jackhammers and haul trucks identical to these requested conditions we request from City and Coastal Commission:

a. Work shall be permitted Monday-Friday. Work shall be permitted on Saturday solely on an as-needed basis with advance written permission from LASAN and Council District-11.
b. Pile driver, grader, jackhammer: 9 am to 3 pm - No pile driver, grader or jackhammer work shall be conducted on Saturdays any time during the year.
c. Haul trucks to access local neighborhood streets: 9 am to 4 pm.

10. Lack of Street Parking on Hurricane St.

The Project proposes that all parking on Hurricane St will be removed during construction hours. This will displace 20-25 cars that park on the street during times of low demand, non-summer, non-holiday days, Monday-Saturday. Further, after construction, the City proposes using 128 Hurricane for employee parking and a public parking lot. This would be the only lot of its kind on the entire Marina Peninsula and is incompatible with the surrounding residential area. There is no community support for a public parking lot. It will materially increase traffic on a residential street, will become an easily accessible haven for campers, is not secure and LAPD does not have the resources to provide appropriate response when issues arise.

Note: The Coastal Commission is open to considering an alternate solution for the parking for the Project that does not include the public parking if the City presents this option.

Conditions requested from City and Coastal Commission:

a. A similar number of public parking spaces shall be made available from a combination of modified street parking restrictions on surrounding streets as well as on the South end of the Venice Pier parking lot, at no charge to residents.
b. After construction is completed, the City shall implement the community-proposed red-zone parking solution for employee parking - **see Exhibit A.**
c. The City shall support the community by actively seeking an alternate parking plan that does not include the separate lot and public parking.
d. Remove existing weekly no parking restrictions from Hurricane St to provide enhanced public parking.

e. At the completion of construction, the 128 Hurricane lot, which was purchased by the City for $2.7M, shall be sold to a private owner, the proceeds of which will be used to fund ESHA mitigation and an incremental increase for public parking related to the Project as well as other needs as directed by Council District-11 Councilmember Traci Park.

11. Lack of Binding Written, Recorded Conditions of Approval Between the & Construction Company

It is unclear how the contractual conditions between the City and construction company will be enforced and how resident complaints will be addressed in real time. Current plans indicate a process where complaints are filed with an on-site City representative and addressed in an undetermined future time frame. Conditions requested from City and Coastal Commission:

a. Adopt written, recorded conditions of approval that clearly spell out all obligations with meaningful penalties for non-performance so they can be monitored by the community and enforced by the City, including each requirement of the approvals and the Mitigation Monitoring and Reporting Program (MMRP) as well as timely mitigations during the construction.
b. Actively monitor and enforce all Project obligations including MMRP.
c. Commit a City representative to be on-site every day from start to end of Project work who is empowered to satisfactorily address issues in real time or immediately shut the Project down pending resolution.

12. Lack of Adequate Security

In early May a tent was pitched inside the fence at the VAPP site by two people who did not appear to be homeless. Despite the 24-hour presence of City employees at the adjacent VPP building, the tent remained in place for over one week. On 5/7, a fence sign was posted saying "this property closed to the public. No entry without permission LAMC Sec 41.24." **However, the tent was not initially removed until the community raised the issue with LASAN – See Exhibit B. This does not make sense. Why post a sign and not remove the violation?** This is not the first camping issue at either the future VAPP site or the VPP.

If LASAN cannot manage an empty lot and a 24/7 manned utility, it is not clear how it will provide adequate security for the entire plant, including the proposed parking lot. The current VPP plan as well as the VAPP Mitigation Plan are clearly insufficient to adequately address such security issues. Conditions requested from City and Coastal Commission:

a. Immediately, place cameras around the VPP and both empty lots. Monitor these cameras 24x7.
b. Consider a staffed LAPD sub-station or suitable alternative at the end of Hurricane St to proactively address safety issues.

13. Lack of a Clear VPP/VAPP Maintenance Plan

The current VPP is not maintained in any meaningful way. The issues go far beyond graffiti and painting. There are environmental and safety issues. Garbage is strewn along the Grand Canal and Ballona Lagoon sides of the structure which can and does readily fall into the water (ESHA protection issue). The sidewalk around the structure is in a constant state of disrepair to the

point of being dangerous. The VPP was, back in 2012, landscaped to (at least partially) help blend into the neighborhood and this was not maintained – **see Exhibit C.**

The VPP has been left in a state of disrepair for years. There was and is no maintenance plan. How the VAPP be different, what will become of the VPP as it is transitioned out of use, and what will eventually become of that structure and lot has not been addressed. Public Works has not ever provided a clear response. Conditions requested from City and Coastal Commission:
:

a. The City shall develop, in a timely manner, a meaningful maintenance plan for both the VPP and VAPP.
b. The City shall install safety railings around the VPP on the two sides facing the Lagoon
c. The City shall repair and maintain sidewalks surrounding the VPP.
d. The City shall plant and maintain environmentally appropriate plants and landscaping surrounding both the VPP and VAPP.
e. The City shall commit to short and long-term plans for the VPP after VAPP construction is completed.

14. Lack of Project Duration Clarity

As recently as March 11th, LASAN has stated the Project duration would be two years. During the May 5th LA City Planning hearing, the Project was given a Summer 2027 start date and completion in Fall, 2030. That is a 3+ year timeline. LASAN must be required to indicate what modifications have been made to the Project to cause a 50% increase in duration and how realistic this schedule is. The community should be given accurate information at all times. LASAN has indicated the timeline will be refined as discussions and the Project evolve.

Respectfully submitted,

Steve Bradbury
109 Hurricane St, MDR
Lead Representative
Hurricane St Community

Wendy Rosen
Co-Founder
Protect Ballona Wetlands

Kenya Lee
3811 Esplanade, MDR

Robin Rudisill
Venice, CA 90292

Mike Borassi & Genevieve Morrill-Borassi
Case Appellants
(former residents of 3811 Esplanade)

# # #

Exhibit A

8. Lack of Street Parking on Hurricane St.

The community has proposed the following red-zone solution for staff parking (identified in orange below). At the existing VPP, one employee is present at any given time. There is one on-site parking space to satisfy this requirement. Even if the VAPP requires multiple employees (in addition to the VPP employee, whose ongoing necessity is not clear), this plan will provide sufficient parking for employees and City officials and obviates the need for employee parking at 128 Hurricane.



Exhibit B
10. Lack of Adequate Security







Exhibit C
11. Lack of a Clear VPP/VAPP Maintenance Plan

VPP Maintenance Report Card



2012



2022



2024

VPP Maintenance Report Card - 2024







12.

VPP Maintenance Report Card - 2024







Venice Neighborhood Council

PO Box 550, Venice, CA 90294
venicenc.org

MOTION BACKGROUND: Los Angeles Public Works (LAPW) has proposed the Venice Auxiliary Pumping Plant (VAPP) at 128 Hurricane St and an associated parking lot for employees and limited public use at 133 Hurricane St, MDR. The residents acknowledge the VAPP is considered critical infrastructure. From 2017 through and including the final city approval process, LAPW never meaningfully and materially addressed issues raised by the community. In fact, the City Planning Commission instructed LAPW to meet with the community. Nothing changed because of those meetings despite a multitude of suggestions and proposals offered to LAPW. The issues include, but are not limited to:

1. Conformance with the certified Venice LUP (Policies I.A.5, I.C.1, I.C.6, and I.D.1);
2. Meeting established Public Benefit standards including a 10' landscaped, irrigated buffer along all property lines. The performance standards applied to this project are applicable to those on a major or secondary highway, not a residential street;
3. Adherence to court-mandated ESHA protections in the Ballona Lagoon/Grand Canal area including no dredging and/or use of heavy equipment both of which are part of the project plan;
4. Mitigation of EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas release. The community has put forth a plan to address some of these issues;
5. Mitigation of "significant and unavoidable" construction-related issues including ground-borne vibration which could result in residential building damage, and, construction noise that exceeds LA CEQA Thresholds guidelines;
6. Improvement of inadequate emergency access during construction activities;
7. Change to five day/week construction and more restricted hours in lieu of six days/week;
8. Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city;
9. Modification of the project design so that it is compatible with the residentially zoned neighborhood;
10. Actionable protection of residential properties from dirt, dust and other construction impacts;
11. Upgrade of a deficient maintenance plan for both the new and existing facility.

The intention of this motion is not to stop a necessary infrastructure project. It is to seek a meaningful, results-oriented dialogue with Public Works to identify reasonable solutions for these issues.

Venice Neighborhood Council

PO Box 550, Venice, CA 90294
venicenc.org

(sent via email)
Traci Park, LA City Council Person CD-11 - Councilmember.Park@lacity.org
Sean Silva, Venice Field Deputy, CD-11 - Sean.Silva@lacity.org
Juan Fregoso, District Director, CD-11 - Juan.Fregoso@lacity.org
Marqueece Harris-Dawson, LA City Council President - Marqueece.Harris-Dawson@lacity.org
Hydee Feldstein Soto, City Attorney - Hydee.FeldsteinSoto@lacity.org
Mike Davis, President Pro Tempore, LA Public Works Board of Commissioners - Mike.Davis@lacity.org
Teresa Villegas, Vice President, LA Public Works Board of Commissioners - Teresa.Villegas@lacity.org
Vahid Khorsand, Commissioner, LA Public Works Board of Commissioners - Vahid.Khorsand@lacity.org
Susana Reyes, Commissioner, LA Public Works Board of Commissioners - Susana.Reyes@lacity.org
Ted Allen, City Engineer, Bureau of Engineering - Ted.Allen@lacity.org
Chloe Seifert, Coastal Program Analyst, California Coastal Commission - Chloe.Seifert@coastal.ca.gov

On Sept 17 2024, the Venice Neighborhood Council Board of Officers passed the following motion by a vote of 13-4-0.

MOTION: The Venice Neighborhood Council opposes CPC-2024-2010-GPA-ZC-CU2-SPPC-- allowing the City of Los Angeles to obtain a General Plan Amendment (GPA) and Zone Change (ZC) from RW2-1 to Public Facilities at 133 Hurricane St., a Project Review (SPPC), and a Conditional Use for the construction, use, and maintenance of a public parking area in a residential zone (CU2) for the empty lots located at 128 Hurricane St/3913 Esplanade -- unless LA Public Works (LAPW) materially and in good faith addresses the community's serious issues with this project.

Sincerely,

Brian Averill
President
Venice Neighborhood Council

CALIFORNIA COASTAL COMMISSION
SOUTH COAST DISTRICT OFFICE
301 E. OCEAN BLVD, SUITE 300
LONG BEACH, CA 90802-4325
VOICE (562) 590-5071
FAX (562) 590-5084

Th12a
Th12b
Th13a

ADDENDUM

September 10, 2025

TO: Coastal Commissioners and Interested Parties

FROM: South Coast District Staff

SUBJECT: **ADDENDUM TO ITEM Th12a, Th12b, and Th13a, APPEAL NOS. A-5-VEN-22-0068 AND A-5-VEN-22-0069 AND APPLICATION NO. 5-24-0123 (LOS ANGELES DEPARTMENT OF PUBLIC WORKS) FOR THE COMMISSION MEETING OF THURSDAY, SEPTEMBER 11, 2025.**

This addendum is designed to achieve the following objectives. First, Section I updates the record by supplementing it with correspondence the Commission received before and after publication of the staff report on August 27, 2025, between September 4-5, 2025, and on September 9, 2025. Second, Section II provides responses to issues raised in the recent correspondence. Finally, Section III provides minor revisions to the staff report dated August 29, 2025.

I. CORRESPONDENCE RECEIVED

On August 27, 2025, September 4-5, 2025, and September 9, 2025, the Commission received eight letters in opposition and one letter in support of staff's recommendation.

CALIFORNIA COASTAL COMMISSION
SOUTH COAST DISTRICT OFFICE
301 E. OCEAN BLVD, SUITE 300
LONG BEACH, CA 90802-4325
VOICE (562) 590-5071
FAX (562) 590-5084

These letters are posted to the Commission's website as Correspondence for this item. The six letters of opposition generally raise the following issues: 1) Coastal Act & Venice LUP Compliance, 2) Environmental Justice, 3) Environmental Impacts, 4) Noise, Vibration, and Resident Safety, 5) Public Access and Parking Lot Impacts, 6) Community Character and Visual Resources, 7) Sea-Level Rise, Flooding, and Geologic Hazards, 8) Alternatives Analysis and CEQA Compliance, and 9) Monitoring and Accountability.

II. RESPONSE TO CORRESPONDENCE

The following responses are incorporated into the findings as a **Response to Comments** section to the staff report dated August 29, 2025, as Section VII.J. This would result in re-lettering the CEQA section to VII.K. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA).

Additionally, many comments received are not opposed to the project, rather they seek appropriate mitigation, some of which can be addressed through analysis of the project's consistency with Chapter 3 of the Coastal Act, others of which must be addressed through other state and local requirements. The letters suggest a long list of changes and/or conditions. The Commission's review and analysis considers the coastal resource impacts as protected by the Chapter 3 policies of the Coastal Act. The commission's findings and required conditions include those necessary for the commission to find the project consistent with the Coastal Act and find that the project will not prejudice the ability of the city to certify an LCP consistent with Chapter 3 of the Coastal Act.

1. Coastal Act & Venice LUP Compliance

The comment letters state that the project does not conform to the California Coastal Act or the certified Venice LUP, that a required zone change from residential to public facilities has not been completed or brought to public hearing, and that the project violates LUP policies on lot consolidation, side yard setbacks, and permissible development types. The letters also request that the project be denied or conditioned on zoning consistency and full compliance with LUP policies and require mitigation of all adverse environmental effects "to the maximum extent feasible," as required for industrial uses.

Response:

As addressed in the staff report, the City incorrectly found the project consistent with the residential land use designation of the certified Venice LUP. To resolve this

CALIFORNIA COASTAL COMMISSION
SOUTH COAST DISTRICT OFFICE
301 E. OCEAN BLVD, SUITE 300
LONG BEACH, CA 90802-4325
VOICE (562) 590-5071
FAX (562) 590-5084

inconsistency and avoid prejudicing a future LCP for the Venice segment of the City of Los Angeles, Special Condition 2 requires effective certification of an LUP amendment to change the land use designation of the project sites to allow the proposed public facility and establish appropriate development standards for this infrastructure at this site. In addition, although the LUP amendment is necessary for the public facility use proposed, the project as currently proposed with revisions to height and setback, as conditioned, ensure that the proposed auxiliary pumping plant is consistent with the existing residential development standards of the Venice LUP.

2. Environmental Justice
Some letters expressed concerns that the siting of the original and expanded pumping plant reflects a legacy of environmental injustice in a historically redlined and marginalized neighborhood and that the community would bear disproportionate environmental burdens. As such, directly affected residents seek for full mitigation of the impacts.

Response

It's important to recognize that certain types of facilities were historically sited in communities that were redlined or deemed 'undesirable' due to discriminatory policies and practices. While this area was historically designated as “Grade D – hazardous,” it is not currently identified as an environmental justice community under CalEnviroScreen. However, equity requires a broader lens. It means recognizing that communities not currently overburdened should not be automatically spared from hosting essential infrastructure, particularly when potential impacts can be effectively mitigated and the project aligns with established planning and environmental standards.

The proposed auxiliary pumping plant is a critical infrastructure project that would provide much-needed redundancy to protect both the immediately surrounding community and adjacent wetlands from the risk of sewage spills associated with the existing Venice Pumping Plant. Such spills would pose significant environmental and public health burdens if not addressed.

Environmental justice does not mean avoiding all impacts everywhere. Rather, it means ensuring that the benefits and burdens of infrastructure are distributed fairly. Supporting the equitable siting of necessary infrastructure, especially in areas with greater adaptive capacity, helps prevent further harm to historically marginalized communities and promotes a more just and resilient system overall.

3. Environmental Impacts

CALIFORNIA COASTAL COMMISSION
SOUTH COAST DISTRICT OFFICE
301 E. OCEAN BLVD, SUITE 300
LONG BEACH, CA 90802-4325
VOICE (562) 590-5071
FAX (562) 590-5084

Some letters raised concerns that the project is adjacent to the Grand Canal Lagoon and Ballona Lagoon and that construction and long-term operations threaten these habitats, native plant communities, and other species (e.g., fiddler crabs, California horn snails, and several species of fish). The letters also request biologically supported buffers, nesting bird surveys, ESHA fencing and monitoring, tree protection plans, no staging within ESHA, and that the project incorporate feasible, less-damaging alternatives and mitigation measures proposed by the public to meet CEQA-equivalency standards.

Response:
The Commission is requiring the applicant to implement numerous best management practices, as outlined in Special Conditions 6 to 9 and 16, to ensure that impacts to the lagoon, canal, and the species therein are reduced to the least damaging extent possible. The footprint of the work is a small 1,342 square foot area of mud bottom. Fiddler crabs, California horn snails, and the infaunal invertebrates living in the mud are common and extremely abundant invertebrates that are not protected under the Coastal Act or Venice LUP policies. Fish will not be impacted because they will naturally move out of the area during the coffer dam installation and dewatering process. While song, shore, and wading birds are found around the lagoon and canals, the Commission's biologist agree that the project will not adversely impact any of them as the birds will avoid foraging in or near the project area during construction and use other areas within the area to do so during the construction. Further, Special Condition 12 requires artificial night lighting to employ the best dark-skies technology to minimize glare and spillover and additionally requires light intensity be no greater than 0.01 footcandles (the limit for night light use near wetlands and ESHA) in the lagoon and canal to insure that any local or migrating birds are not adversely impacted by artificial night lighting.

4. Noise, Vibration, and Resident Safety
The comment letters raise several concerns, including construction noise and vibration (e.g., pile driving) that exceed CEQA thresholds and may damage nearby homes; operational noise from a relocated transformer that now exceeds significance thresholds due to its proximity to residences; and the presence of conflicting or outdated analyses in the City's project record, along with a lack of enforceable protections.

The letters request updated noise and vibration studies reflecting transformer relocation, pre-/post-construction building condition surveys, continuous monitoring with public dashboards, stop-work triggers and third-party oversight, funded repairs, relocation assistance, and air purifiers for impacted households, compliance with residential noise

CALIFORNIA COASTAL COMMISSION
SOUTH COAST DISTRICT OFFICE
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FAX (562) 590-5084

thresholds and sound barriers, and demonstration that MM-NOI-3 is still achievable given design changes.

Response:

To the extent that these concerns are related to coastal resource impacts, these impacts have been addressed through proposed mitigation measures. The EIR has several mitigation measures for noise and vibration. MM NOI-1 requires the preparation of and implementation of a construction noise control plan to include several measures including limiting construction hours, limit piles installed and extracted using vibration- and percussive-free methods, the creation of a construction mitigation coordinator, provide temporary noise barriers made up with sound-absorbing materials up to 20 feet tall around the project site, and a noise monitoring plan prepared by an acoustical/noise consultant who would to monitor exceedances and initiate additional abatement measures.

Mitigation measure MM NOI-3 addresses noise impacts created by building equipment related to operations. Additionally, the City has proposed to use a CMU wall along the north property line adjacent to the residences that could potentially mitigate any additional noise generated due to the relocation of the transformer closer to the adjacent residences. Furthermore, mitigation requires an acoustic consultant that would provide recommendations to address noise related concerns based on a review of the drawings.

The EIR asserts vibration impacts cannot be mitigated to less than significant levels with standard regulatory requirements or implementation of mitigation measures; and to address these impacts, mitigation measure MM NOI-2 requires the contractor to implement vibration reduction measures during project construction including the retention of a qualified structural or geotechnical engineer to conduct pre-construction surveys of adjacent neighboring structures and, if appropriate, monitoring during construction to check for vibration-related damage from equipment during its use.

Furthermore, mitigation measure BMP NOI-1 indicates that the City shall work with the construction contractor to identify potential offsite shared office space that could be made available to residents in the immediate vicinity that work at home during the weekday construction hours.

5. Public Access & Parking Lot Impacts

CALIFORNIA COASTAL COMMISSION
SOUTH COAST DISTRICT OFFICE
301 E. OCEAN BLVD, SUITE 300
LONG BEACH, CA 90802-4325
VOICE (562) 590-5071
FAX (562) 590-5084

The letters have raised concerns that the construction will block existing pedestrian paths and limit access to lagoon views and recreational areas. The comment letters also state that the proposed parking lot is unnecessary, incompatible with the residential neighborhood, and introduces traffic, noise, air pollution, and safety risks including that it may attract loitering and reduce emergency access. The comment letters are requesting to remove the parking lot from the project, to use the lot for temporary construction staging, then sell it to fund mitigation or public access improvements and then implement alternative parking solutions from the Grand Canal Restoration Plan (e.g., angled parking on Via Dolce). Additionally, the letters request the implementation of a Construction Access Management Plan with continuous pedestrian/bike access, time-of-day restrictions (no weekends/holidays/peak hours) and detour signage and on-site monitors. Community members also request that elements of the Grand Canal Restoration Plan be incorporated, including the installation of Wayfinding signage.

Response:
During construction, access to a limited portion of the existing Esplanade adjacent to the project site will be temporarily closed. However, most of the Esplanade along both the east and west sides of the Grand Canal and Ballona Lagoon will remain open for public access and recreation. Additionally, an access point to the Esplanade is located approximately 500 feet west at the intersection of Pacific Avenue and Jib Street. The EIR's parking assessment found that on a peak weekend day, on-street parking was nearly full, with only 12 spaces available, while 106 spaces remained in the nearby public lot. This indicates that the area experiences significant parking demand from both residents and visitors.

The proposed project, as conditioned, would enhance public access by providing additional daytime parking, helping to meet this demand and reducing the need for drivers to circulate through the neighborhood in search of spaces. The EIR also concluded that the parking lot would not result in a noticeable increase in ambient noise levels, and that any noise impacts would be less than significant.

To further address potential construction-related impacts, the EIR includes mitigation measure MM TRANS-2, which requires coordination with emergency service providers to provide advance notice of any lane closures, construction hours, and changes to local access, as well as to identify alternative routes where appropriate. In addition, Special Condition 19 requires a traffic control plan to minimize public right-of-way closures, a detour plan to reroute traffic, and the use of a flagman to direct traffic as needed.

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Furthermore, air quality was also addressed in the City's EIR that described that construction would contribute to air pollutant emissions, and mitigation was incorporated to ensure that the proposed project would not result in significant impacts on sensitive receptors (e.g., residences and the Grand Canal) would result. Mitigation measure MM AQ-1 requires construction equipment to meet robust emission standards.

Concerns raised about potential loitering or general safety issues related to the parking lot are noted; however, these are issues appropriately addressed by local enforcement.

Finally, the project is unrelated to the Grand Canal Rehabilitation Project, a concept introduced nearly two decades ago. At this time, the City is not proposing to implement a separate project that has not been fully evaluated at the local level.

6. Community Character and Visual Resources
The community has raised concerns that the facility's massing, equipment, and 24/7 operations are incompatible with the low-scale residential context. The community is asking for a redesign to reduce the originally proposed height and bulk, fully enclose or screen equipment, and apply context-sensitive architecture and landscaping and to prohibit rooftop appurtenances visible from public areas.

Response:
As addressed in the staff report, the City has proposed changes to the height and side yard setback of the proposed project. As such, the public facility is consistent with the local residential development standards of the Venice LUP which are meant to ensure that buildings are visually compatible with surrounding development. Moreover, many surrounding structures, excluding the existing Venice Pumping Plant, exceed 4,000 square feet and are built out to the maximum extent allowed, making the proposed facility comparatively modest in both scale and massing. While the power equipment located in the yard areas is larger than typical residential systems such as water heaters or HVAC units, it is essential to the facility's operation and must remain readily accessible to the Los Angeles Department of Water and Power for maintenance and servicing.

Additionally, both the existing and proposed facilities require minimal staffing and would not generate more activity than typical residential use. Limiting operations to less than 24 hours a day could compromise the facility's functionality, safety and reliability.

7. Sea-Level Rise, Flooding, and Geologic Hazards

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The comment letters also state that the site is vulnerable to sea-level rise, flooding, and liquefaction, the City's reliance on the Marina del Rey tide gate is not a guaranteed long-term solution, and that the EIR does not adequately disclose or mitigate the environmental consequences of potential flooding. The public is requesting that the City provide sea-level rise and flood resiliency measures based on best-available science and that the emergency power and overflow containment plans are reviewed by independent engineers.

Response:
Concerns related to sea level rise, flooding, and geologic hazards were thoroughly addressed in the staff report. As noted in Section III of this addendum, Special Condition 1 has been revised to require the City to submit final project plans that incorporate any LADBS-required structural modifications to address potential tsunami impacts.

8. Alternatives Analysis and CEQA Compliance
The letters state that the project does not demonstrate that it is the least environmentally damaging feasible alternative and note that changes to the design since the original review may require supplemental CEQA analysis. Members of the public are requesting a supplemental environmental document with a robust alternatives analysis and new peer-reviewed studies on acoustics, geotechnical conditions, hydrology, and biology.

Response:

The EIR is required to evaluate a reasonable range of alternatives that could feasibly achieve most of the project's basic objectives while avoiding or substantially reducing significant environmental impacts. However, it is not obligated to examine every conceivable alternative. Instead, the EIR must present a sufficient number of feasible options to enable decision-makers and the public to make a well-informed, reasoned choice between the proposed project and its alternatives.[1] Additionally, these changes were a part of the Commission's analysis and the City intends to bring forward an EIR addendum.

9. Monitoring and Accountability
Additionally, a couple of letters expressed a lack of trust in the City's and Commission's ability to fulfill mitigation and enforce the Commission's special conditions. These letters request to appoint an independent compliance monitor jointly selected by the City and

[1] Cal. Code Regs. Tit. 14, § 15126.6

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community and to require quarterly public compliance reports and real-time access to monitoring data.

Response:

While several concerns raised were not associated with impacts related to Chapter 3 protected coastal resources, the following response is provided to address the monitoring and accountability concerns. Coastal Commission staff take enforcement issues seriously. Mitigation Monitoring and Reporting Program (MMRP) was established pursuant to the CEQA. The MMRP ensures that all mitigation measures identified in the Environmental Impact Report (EIR) are properly implemented, scheduled, and maintained throughout the life of the proposed project. The construction contractor shall submit an Environmental Compliance Plan to document how the contractor intends to comply with all environmental measures applicable to the contract, including application of BMPs. LABOE Construction Management will also ensure that monitoring is documented in an Environmental Compliance Report and that deficiencies are promptly corrected. A designated environmental monitor with LABOE Construction Management will track and document compliance with mitigation measures, note any problems that may result, and take appropriate action to rectify problems. LABOE will monitor compliance with operational mitigation measures.

Additionally, mitigation measure MM NOI-1 requires a Construction Mitigation Coordinator that shall maintain good communication with the surrounding community regarding the schedule, duration, and progress of construction activities. A telephone number for affected parties would be provided for parties to ask questions or share any concerns. In addition, Special Condition 6.G requires a Construction Coordinator that will be required to investigate complaints and take remedial action, if necessary, within 24 hours of receipt of the complaint or injury.

Lastly, the City intends to prepare an EIR addendum to include the changes made since the EIR, including changes as a result of the Coastal Commission CDP, LADBS requirements, and potentially and plan check requirements.

III. ADDITIONAL CHANGES TO THE STAFF REPORT

In addition to adding a Response to Comments section as indicated in Section II of this addendum, the Commission staff report dated August 29, 2025, is also modified to make the following changes. Language to be added is shown in <u>underlined text</u>, and language to be deleted is identified by ~~strikethrough~~.

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a) On Page 36 – Add language to Special Condition 1 (Submittal of Final Plans) as follows:

1. **Submittal of Final Plans.** PRIOR TO ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit, in a form and content acceptable to the Executive Director, two (2) full-sized sets of final plans for the proposed development. The final plans shall be in substantial conformance with the plans submitted by the Bureau of Engineering Department of Public Works City of Los Angeles to the Commission, titled "Venice Auxiliary Pumping Plant" with W. O. - SZC12923 and dated June 2025, and shall be subject to the review and written approval of the Executive Director, and shall be revised to comply with the following:

   A. Relocate (to the south end of the parking spaces) or remove the three-dimensional public art installation

   B. Remove the CMU wall currently proposed along the southern property line of 128 Hurricane Street outside of the fifteen-foot required buffer setback area from the property line adjacent to the nearest water.

   C. Replace the concrete foundation in the bike rack area with a permeable surface material, such as decomposed granite or a comparable permeable alternative.

   D. Relocate the three concrete pads underneath the termination boxes outside of the minimum side yard setback of 3.5 feet.

   E. Confirmation, with substantiating information, including calculations for the volume of water produced by the 85th Percentile 24-hour Storm Event for the drainage area, that the final project design (catch basin and bioswale) includes treatment of 100 percent of the 85th Percentile 24-hour Storm Event for the stormwater that will discharge into Ballona Lagoon as part of the project for all pollutants of concern identified in the Hydrology Technical Memorandum dated August 15, 2016.

   F. Incorporate any design modifications required to comply with LADBS structural standards, including those necessary to address potential tsunami impacts at the proposed auxiliary pumping plant site, provided such modifications remain consistent with the Venice LUP. Any substantial changes shall require an amendment to this permit, unless the Executive Director determines that no amendment is legally required.

   Any proposed changes to the approved revised final plans shall be reported to the Executive Director. No changes to the approved revised final plans shall occur

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without a Commission amendment to this coastal development permit unless the Executive Director determines that no amendment is legally required.

b) On page 60 – correct the design life for the proposed facility as follows:

While the City has determined that the project has a ~~5~~60-year design life, the Commission's 2021 Guidance for Critical Infrastructure recommends analyzing longer timeframes given the high level of public investment and long funding and implementation of critical infrastructure projects which often assume long operating timelines for purposes of financing and can take decades to plan and implement significant upgrades or relocation.

c) On Page 65 – Add language to the findings about Special Condition 1.F

Commission staff are not certain about the extent of structural design changes that may be necessary to comply with the tsunami load standards of ASCE 7-16; however, the City (to clarify, the applicant: LA Department of Public Works) does not expect major design changes to be necessary. Special Condition 1.F requires the applicant to incorporate any design modifications to address potential tsunami impacts, and any substantial changes potentially requiring a CDP amendment. Any design changes to meet standards suitable to address tsunami impacts and comply with the LUP would ensure the proposed facility would ensure tsunami risks are minimized. Designing the facility for tsunami loads will significantly decrease the risk of catastrophic collapse and improve the ability of the VAPP to recover from an extreme tsunami event, therefore minimizing the risk of environmental or public health impacts.

d) On Page 76 – replace text with

Given the site's adjacency to coastal salt marsh habitat ~~sensitive habitat areas that support [insert key species or habitat types]~~, even minor releases pose a significant threat to biological productivity, water quality, and ecological integrity.

CPC-2024-2010-GPA-ZC-CU3-SPPC

Exhibit E: Correspondence

Ira Brown <ira.brown@lacity.org>

VAPP Concerns on Hurricane St, MDR

1 message

Adam Goldberg <adam@southdistrictfilms.com> Wed, May 21, 2025 at 10:29 AM
To: Ira.Brown@lacity.org

Hello Mr. Brown - I'm writing regarding Case #: CPC-2024-2010-GPA-ZC-CU3-SPPC. I live at/on 112 Galleon St, 90292 and am extremely concerned about the impact this construction project will have on (myself/my family) as well as our community because (pick one or two):

The Potential Release of Methane Gas and other Chemical Hazards - The city's mitigation plan acknowledges a significant hazard to the public involving the release of hazardous materials. This project should have (1) appropriate detection devices installed with real time data accessible by the community, (2) a plan to pro-actively address the same exposure concerns for the community as defined for workers and, (3) if an issue is discovered, the project should be shut down immediately until a solution is put in place.

Nearby Off-Site Workspace for Home-Based Workers - We need a guaranteed in writing provision of appropriate workspace for all impacted home-based workers.

Significant & Unavoidable Damage to Residential Property - The mitigation plan says there is potential for buildings to be damaged as well as substantial adverse effects including the risk of loss, injury or death involving strong seismic ground shaking or ground failure including liquefaction. How can a project be undertaken with this potential risk? What is the city's plan to protect residents and property?

Noise, Air & Dust Release - There should not be any noise exceeding CEQA guidelines. This includes the placement of sound barriers. There should also be ongoing independent 3rd party management monitoring all of these issues.

Improved Emergency Preparedness - After the Palisades and Altadena fires, it is clear there should be better preparation for any disaster. What is the plan for the Marina Peninsula? This project will only exacerbate potential issues. LASAN should take the lead to make this happen.

Alternative Street Parking on Hurricane - Where will 20-25 cars park when the street is shut down for construction each day? This doesn't even address the increased demand during the Summer.

Lack of Adequate Security - Last week a tent was pitched by two people inside the fence at the VAPP site. Despite the 24-hour presence of city employees at the VPP building, the tent has remained in place. Today (5/7) a sign was posted saying "this property closed to the public. No entry without permission LAMC Sec 41.24 was placed on the fence but the tent was not removed

Limited Construction Hours - No or limited construction on Saturdays. Limited hours all days for pile driving, jack hammering and haul trucks each day.

We are asking that you help us and doing the right thing, as we are the ones that are going to have to live with it.

Adam Goldberg

Adam Goldberg
www.southdistrictfilms.com
858-229-4602

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Ira Brown <ira.brown@lacity.org>

VAPP Concerns on Hurricane St, MDR

1 message

Alison Ashton <alison@contentkitchen.com> Thu, May 8, 2025 at 9:20 AM
To: Ira.Brown@lacity.org

Hello,

I'm writing regarding Case #: CPC-2024-2010-GPA-ZC-CU3-SPPC. I live on the MDR Peninsula, on Mast Street, just down the street from this proposed project, and am concerned about the impact this construction project will have on my family as well as our community because:

- **Potential Release of Methane Gas and other Chemical Hazards -** The city's mitigation plan acknowledges a *significant* hazard to the public involving the release of hazardous materials. This project should have (1) appropriate detection devices installed with real time data accessible by the community, (2) a plan to proactively address the same exposure concerns for the community as defined for workers and, (3) if an issue is discovered, the project should be shut down immediately until a solution is put in place.
- **Noise, Air & Dust Release -** There should not be *any* noise exceeding CEQA guidelines. This includes the placement of sound barriers. There should also be ongoing independent third-party management monitoring of all of these issues.
- **Improved Emergency Preparedness** - After the Palisades and Altadena fires, it is clear that better preparation for any disaster is an absolute must. ***What is the plan for the Marina Peninsula?*** This project will only exacerbate potential issues. LASAN must take the lead in making this happen.

Thank you for your attention to this matter.

Alison Ashton

Alison Ashton
310.460.8063
alison@contentkitchen.com

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Ira Brown <ira.brown@lacity.org>

CPC-2024-2010-GPA-ZC-CU3-SPPC, seeking phone call or virtual meeting

1 message

Beverly Palmer <bpalmer@strumwooch.com> Tue, Jan 6, 2026 at 11:52 AM
To: "ira.brown@lacity.org" <ira.brown@lacity.org>

Dear Ira,

I represent Kenya Lee, the resident and property owner closest to the proposed Venice Auxiliary Pumping Plant at 128 E. Hurricane Street. My client received the courtesy notice of the January 22 hearing.

I wanted to share some correspondence that we provided to the California Coastal Commission in August that reflects Ms. Lee's particular concerns about this proposal. We would like to arrange a phone call or virtual meeting with you to discuss possible mitigation measures that the City might require to ensure that Ms. Lee's family and home are not unduly impacted by this extensive construction project in close proximity to their residence. Please let me know when you might be available.

Thank you.

Beverly Grossman Palmer

Strumwasser & Woocher LLP

Phone: 310-576-1233

Direct: 310-933-5930

Email: bpalmer@strumwooch.com

1250 6th Street, Suite 205

Santa Monica, CA 90401

www.strumwooch.com

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250820 Letter to Doyle re Environmental Impacts.pdf
400K

Strumwasser &Woocher

1250 6th Street, Suite 205
Santa Monica, California 90401
Telephone: (310) 576-1233
Facsimile: (310) 319-0156
www.strumwooch.com

Michael J. Strumwasser
Beverly Grossman Palmer
Dale Larson
Salvador E. Pérez
Julia Michel †
Tessa Baizer
Samantha McNichols

Senior Counsel:
Fredric D. Woocher
Bryce Gee
Andrea Sheridan Ordin

† Also admitted to practice
in Washington

August 20, 2025

Jennifer Doyle
Coastal Program Analyst
California Coastal Commission
South Cast District
301 E. Ocean Blvd. ,Suite 300
Long Beach, CA 90802

Via email only: Jenn.fer.doyle@coastal.ca.gov

RE: Venice Auxiliary Pumping Plant

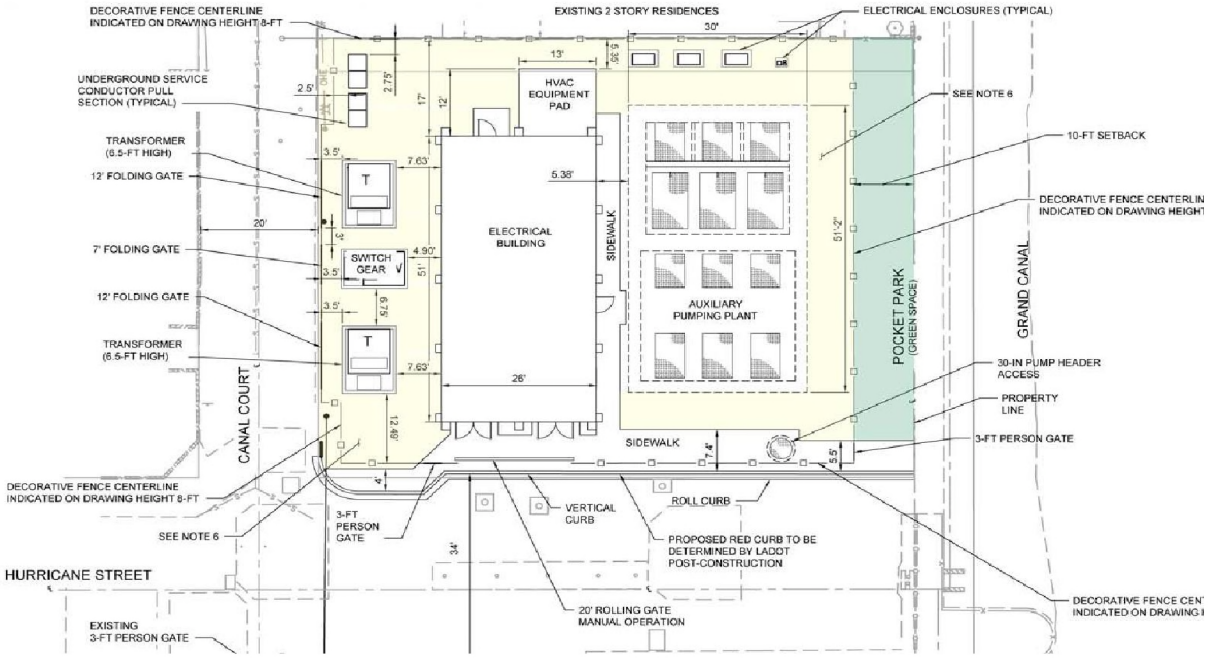
Dear Ms. Doyle:

This firm writes on behalf of Kenya Lee, the owner of the residential property located at 3811 Esplanade. Thank you for speaking with me about the proposed Venice Auxiliary Pumping Plant project last week. This letter follows up on that conversation, in which you asked about the project's environmental impacts on Ms. Lee, one of the closest (if not the closest) neighboring residents. The purpose of this letter is to provide more specific examples of the impact on Ms. Lee, including where the impact may be greater than identified in the EIR due to design changes since the EIR's introduction.

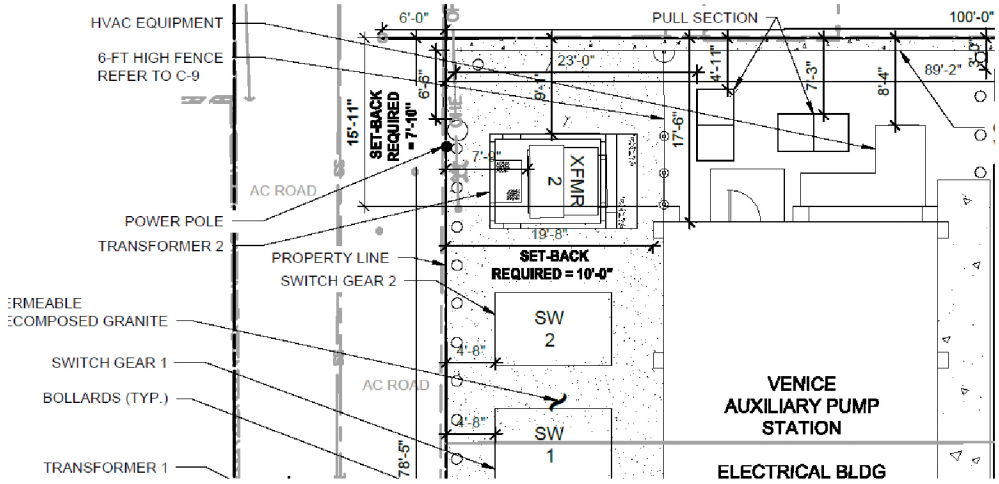
Operational Noise Impacts: Likely Impact For Ms. Lee Due to Design Change

You provided me with July 2025 site plans subsequent to our call. I have compared the July 2025 site plan with the plan included in the 2017 EIR. There is at least one notable change directly relevant to Ms. Lee, which I would like to bring to your attention. The project includes two electrical transformers which are located on the western edge of the property. At the time the project was analyzed in the 2017 EIR, the northern most transformer was located at some distance from the northern property line. The distance is not depicted on the site plans, but based on the scale on the plans in the EIR (Figure ES-3), it appears to be roughly 30 feet from the property line. The EIR reports that the distance between the northern transformer and sensitive

Receptor 2 (Ms. Lee's residence) is 27 feet. (See Table 3.9-16, page 3.9-28.) An excerpt of the EIR site plan is included below for reference.



In comparison, the location of the northern transformer has shifted meaningfully to the north – and **closer to Receptor 2 (Ms. Lee)** on the July 2025 site plans. On the July 2025 plans, a distance of approximately 9 feet between the northern transformer and the northern property line is depicted. This is **three times closer** than analyzed in the EIR.



The new location of the northern transformer is especially concerning given the noise analysis in the EIR at the northern transformer's original location. Has the City been asked to provide an updated noise analysis for this impact? If not, it should be requested to do so.

The original 2017 EIR concluded that operational noise from the transformers (combined) at Receptor 2 (Ms. Lee) would increase noise levels by 2.1 to 3.9 dB over the ambient background noise levels. The threshold of significance in the EIR is an increase of 5 dB over ambient.

Given that the northern transformer has been located three times closer to Receptor 2 (Ms. Lee) than was analyzed, it is likely that operational noise impacts have increased, and most likely have become significant. In general, change in noise volumes due to distance from a point source like the transformer is calculated using the inverse square law. The formula would be:

$56.3\ dB = 41.4\ dB - 20 * \log_{10}(9/50)$

This is far greater than the noise level used in the EIR's calculations of 46.8 dB, and would be cumulated with other operational noise. Given the total noise increase predicted at Receptor 2 (Ms. Lee) was not far from the 5 dB cutoff, the analysis must be re-done with proper noise distances. As I calculate it, the total increase over CNEL will be 11.2 dB, but the Commission should require the City to perform this analysis prior to considering the project.

MM-NOI-3 requires the City to reduce the overall operational noise to within 5dB of the existing community ambient noise levels using design features. (EIR, p. 3.9-31.) The Commission should require the City to explain how relocating the transformers *closer* to Ms. Lee's property is consistent with MM-NOI-3, and what design features have been incorporated to ensure that the overall operational noise, as mitigated, does not increase the operational noise impacts above the threshold of significance at Ms. Lee's residence. As the proponent of the project, the onus should be on the City to prove that it is actually going to mitigate the operational noise, even after altering the project that was analyzed in the EIR.

Other Construction Impacts for Ms. Lee: Significant and Unmitigable

The EIR concluded that that several impacts from the project were significant and unavoidable. These include construction noise, with impacts that would extend for the entirety of the two-year construction period. Pile driving, grading, and jackhammer activities would be particularly disruptive. The pile driving is predicted to result in a 44 dB increase over ambient noise levels at Receptor 2 (Ms. Lee), with volumes reaching 98 dB. (See EIR p. 3.9-21.) While pile driving is the loudest, demolition, paving, and site preparation all involve noise volumes with enormous increases over ambient noise levels.

Sounds levels exceeding 85dB are considered harmful. Every 3 dB rise over 85 dB reduces the safety by half. 85dB is a safe exposure for 8 hours, but at 91 dB, the safe exposure period is only two hours. (See https://www.asha.org/public/hearing/loud-noise-dangers/?srsltid=AfmBOoq5h-Gug3IPEc3un8s5p76Umz05jZkxmh5M-I-7zeTeiTz7EK2j.) A noise level of 98 dB at Ms. Lee's during pile driving would be unsafe at any duration. Ms. Lee and her young child cannot safely remain in their home during this type of construction.

In addition, Receptor 2 (Ms. Lee) would experience significant vibration impacts during most construction phases, with vibration levels ranging from 0.022-1.781 in/s PPV (page 3.9-23).

Building construction with pile driving would exceed both the annoyance threshold (0.04 in/s) and potential damage threshold (0.3 in/s) at this location (page 3.9-23).

Also of grave concern to Ms. Lee are the dust and particulate matter emissions during construction. With a young child resident in the neighboring home, the dust and particulate matter accompanying construction are a major issue. During construction phases including site preparation, excavation, and shoring, 48 haul trips a day will take place next to her home, on a narrow street not designed for frequent truck traffic.

All of these impacts will greatly interfere with Ms. Lee's ability to enjoy and reside safely in her property with her family. Ms. Lee and her family should not be the only ones burdened by the construction of this public facility.

Environmental Justice

As a community, Venice has been through periods of economic decline. In the 1950s, Venice was considered the "slum by the sea," which may in part explain the original Venice Pumping Plant being located on the shores of the Grand Canal and adjacent to Ballona Lagoon. In the 1930s, this area was considered of poor quality and the area around the VAPP was redlined as a "Grade D." It is likely the legacy of these attitudes that lead this neighborhood to host the pumping plant for sewage from the much of the westside of Los Angeles. The burden of addressing the additional sewage needs of the city will now fall on this community again, most notably during the construction of the VAPP. The Coastal Commission should ensure environmental equity by requiring the City to fully mitigate the impact of construction on the most directly impacted residents, including Ms. Lee.

I am available to discuss these concerns at your convenience.

Yours truly,

Beverly Grossman Palmer

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Ira Brown <ira.brown@lacity.org>

Re: VAPP Concerns on Hurricane St, MDR and Peninsula

1 message

Sean Silva <sean.silva@lacity.org> Mon, May 19, 2025 at 9:09 AM
To: ERNESTINE S ELSTER <eelster@g.ucla.edu>
Bcc: ira.brown@lacity.org

Good afternoon Dr. Elster,

Great to hear from you again, and thanks for reaching out to our office.

Thanks for sharing your thoughts and concerns regarding the VAPP project and its potential impacts to your community. Our office has been tracking the issue closely, working with community groups including the residents of Hurricane, joining and leading meetings with impacted stakeholders, and working directly with our departments -- principally LASAN and BOE -- in service of these discussions.

Some aspects of the issues you've raised will be addressed during the course of this period of time (approvals of entitlements and environmental review) and some will be addressed only once approvals are granted, as the departments will not be able to sign on a contractor, and therefore, have an agreement with a contractor that reflects these concerns. Our departments have indeed considered all of the above, and we can request that they make a response to your inquiries.

That said, we appreciate the concern about the VAPP overall and the environmental concerns as well.

We'd be happy to connect with you further if you would like to discuss with our team.

All the best,
Sean

TRACI PARK
COUNCILWOMAN
LOS ANGELES CITY COUNCIL
11TH DISTRICT

Sean Silva | Deputy, Venice | Planning Liaison
Office of Councilwoman Traci Park * 11th District
WESTCHESTER: 7166 W. Manchester Ave, LA, CA 90045
(310) 568-8772 TEL |
SIGN UP for the **Better11 Newsletter!**

***PLEASE NOTE:** E-mail correspondence with the Office of Councilwoman Traci Park may be subject to public disclosure under the California Public Records Act. *(including attachments)* *

---------- Forwarded message ---------
From: **Ernestine S. Elster** <eelster@g.ucla.edu>
Date: Fri, May 16, 2025 at 11:11 AM
Subject: VAPP Concerns on Hurricane St, MDR and Peninsula
To: Councilwoman Traci Park <councilmember.park@lacity.org>, <Ira.Brown@lacity.org>

To Ira Brown & Traci Park,

I'm writing regarding Case #: CPC-2024-2010-GPA-ZC-CU3-SPPC. The Peninsula and VNC is seeking mitigation issues to TO TRY TO PROTECT THE PENINSULA RESIDENTS AND THE PUBLIC FROM SERIOUS RISKS TO PROPERTY AND PHYSICAL SAFETY FROM THE CONSTRUCTION and from the traffic caused by this huge construction project in the midst of the already congested traffic on the Peninsula. We very much support the concerns of residents living closest to the plant.

I live at # 1 Westwind St and am extremely concerned about the impact this construction project will have on our Peninsula community. David Turnbulll, (12 1/2 Westwind St) wrote , " ,,,*all of us downstream/Peninsula residents ...hope that the Lagoon wetland and the riparian system associated with the Grand Canal/Ballona Creek will be restored. It seems clear to us (aa architechts) that the VAPP project is also an opportunity for the architecture of the new VAPP pumping station to be exemplary, and for the project to demonstrate the value of thoughtful landscape design, supporting a multitude of species, increasing biodiversity and cleaning the water as it floiws into and out of the canals".*

A listing of our concerns follows; we look forward to your responses.

1. The Potential Release of Methane Gas and other Chemical Hazards - The city's mitigation plan acknowledges a significant hazard to the public involving the release of hazardous materials. This project should have (1) appropriate detection devices installed with real time data accessible by the community, (2) a plan to pro-actively address the same exposure concerns for the community as defined for workers and, (3) if an issue is discovered, the project should be shut down immediately until a solution is put in place.

2. We need a guaranteed in writing provision of appropriate off - site work space for all impacted home-based workers.

3. Significant & Unavoidable Damage to Residential Property - THE MITIGATION PLAN SAYS THERE IS POTENTIAL FOR BUILDINGS TO BE DAMAGED AS WELL AS SUBSTANTIAL ADVERSE EFFECT INCLUDING THE RISK OF LOSS, INJURY OR DEATH INVOLVING STRONG SEISMIC GROUND SHAKING OR GOUND FAILURE INCLUDING LIQUIFACTION. How can a project be undertaken with this potential risk? What is the City's plan to protect residents and property and will the residents be given the opportunity to approve this critical plan?

4. Noise, Air & Dust Release - There should not be any noise exceeding CEQA guidelines. This includes the placement of sound barriers. There should also be ongoing independent 3rd party management monitoring all of these issues.

5. Improved Emergency Preparedness - After the Palisades and Altadena fires, it is clear there should be better preparation for any disaster. What is the plan for the Marina Peninsula? This project will only exacerbate potential issues. LASAN should take the lead to make this happen.

6. How will the daily traffic jams near the construction be safely mitigated in this densely populated area?. It is already difficult to get in and out of the Peninsula due to the high concentration of people living in a relatively small space with narrow streets along with the public enjoying the beaches and with construction trucks blocking the streets they will be impassable. And specifically there should be no construction work on the project on weekends. The streets are already packed with beach traffic and the public has the right to get to the public beaches and the residents to get in and out of their homes without having to try to safely navigate around construction machines and trucks.

7. Alternative Street Parking on Hurricane - Where will 20-25 cars park when the street is shut down for construction each day? This doesn't even address the increased demand during the Summer.

8. Lack of Adequate Security - Earlier in May, a tent was pitched by two people inside the fence at the VAPP site. Despite the 24-hour presence of city employees at the VPP building, the tent has remained in place. On May 7th, a sign was posted saying "this property closed to the public. No entry without permission LAMC Sec 41.24 was placed on the fence but the tent was not removed.

9. Limited Construction Hours - No construction on Saturdays and only limited hours all days for pile driving, jack hammering and haul trucks each day.

Yours Truly,

Ernestine Elster (1 Westwind Street); David Turnbull (12 1/2 Westwind St); Evelyn Tickle (12 1/2 Westwind St); Jonathan Sherin (16 Westwind St); Maran Christensen (12 Yawl St).
(partial list)

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Ira Brown <ira.brown@lacity.org>

Case No. CPC-2024-2010-GPA-ZC-CU3-SPPC/ 128-139 Hurricane Street/ Hearing May 5, 2025

1 message

Clare Bronowski <clareb1050@gmail.com> Sun, May 4, 2025 at 1:39 PM
To: "ira.brown@lacity.org" <ira.brown@lacity.org>

We have lived at Fleet and Esplanade just two blocks from the site of this project for more than 20 years.

This case represents the latest entitlement needed by Public Works to construct an industrial facility in a residential neighborhood. This project first came to the attention of the neighbors in 2017 when a Local Coastal Permit hearing was held. Despite community opposition, Public Works did not engage the community with any meaningful design of the project until after an appeal was heard by the Planning Commission in 2022.

We understand the importance of the infrastructure improvement but the community has begged Public Works to engage in meaningful redesign to make the facility fit better into the residential area and buffer the use from existing homes. Public Works has steadfastly maintained that the original project design made without any neighborhood input prior to 2017 cannot be changed -- this is like a developer saying they cannot adjust the original project design which is unacceptable. Public Works should be sent back to the drawing board to redesign the project so that the more obnoxious facilities are oriented towards the existing pump plant across Hurricane Street instead of towards residences.

Here are a few of our concerns and suggestions:

1. The project is not designed to aesthetically fit into the adjoining residential neighborhood. The project conflicts with Venice LUP Policy I.C.1 and Policy 1.E.2 which require that the scale and design of a project must be compatible with the adjacent and neighboring uses and must respect the character of the community. The project does not provide any setback, buffer, design features, or landscape treatment to blend the industrial facility into the neighborhood. The project cannot meet the findings for a CUP which require that "The project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties..and... the surrounding neighborhood."

2. Visuals prepared by LA Public Works and shared with the community show that the site will be dominated by three ten-foot tall transformers along Canal Court, oversized HVAC equipment on the north property line, industrial power poles and other industrial features. Although the "building" is setback, every inch of the property is covered with industrial equipment.
We request additional landscaping and screening on the sides of the project facing residential uses to the north and west. We also request that the transformers be moved to face the existing plant, not the neighbors. If not moved, the transformers must be screened by a solid rolling fence so they are not visible from Canal Court.

3. The site has a history of weeds, trash, graffiti and neglect by Public Works. This weekend a tent was occupied on the VAPP site behind the chain link fence. Public Works must maintain this project and the existing Pump Plant in first class condition, keep the area secure, remove graffiti, repair the canal sidewalk, and replace the landscaping which is now gravel. Public Works must patrol the site for safety and must post a sign with a 24-hour phone number for neighbors to report complaints.

4. Public Works has maintained that they cannot provide adequate landscaped buffers around this facility to protect the adjacent residences. If this is true, then they should admit that this site is not large enough for the facility they plan to construct. The facility should be downsized so that a ten foot landscape buffer can be provided to the west and north. Some of the equipment should be relocated to the "parking lot" which is another feature of this project. There is ample room for the facility if it were properly designed and made use of the two lots, and the street area of Hurricane Street.

Please take these concerns into consideration.

Clare Bronowski and Jeff Lee
3701 Esplanade
Venice

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Ira Brown <ira.brown@lacity.org>

VAPP Concerns on Hurricane St, MDR

1 message

Felicia Glade <fglade221@gmail.com> Fri, May 9, 2025 at 12:00 PM
To: Ira.Brown@lacity.org

Hi Ira,

I'm writing regarding Case #: CPC-2024-2010-GPA-ZC-CU3-SPPC. I live at 116 Galleon St. and am extremely concerned about the impact this construction project will have on my family as well as our community. I was diagnosed with oral and endometrial cancer in 2024 (I had zero risk factors for either unrelated cancer). I have a condition called Chronic Inflammatory Response Syndrome (CIRS), which is a genetic predisposition to not be able to clear certain toxins, it's recognized by the NIH. Toxins from the construction dust could lead to severe health issues for me and my family.

- The Potential Release of Methane Gas and other Chemical Hazards - The city's mitigation plan acknowledges a significant hazard to the public involving the release of hazardous materials. This project should have (1) appropriate detection devices installed with real time data accessible by the community, (2) a plan to pro-actively address the same exposure concerns for the community as defined for workers and, (3) if an issue is discovered, the project should be shut down immediately until a solution is put in place.
- Toxin and Dust Release - There should also be ongoing independent 3rd party management monitoring all of these issues.

As recently as March 11th, LASAN was saying this would be a two-year project. During Monday's meeting, they indicated the project would start Summer 2027 and end Fall 2030. That's over three years and way too long.

I'm afraid that we'll be forced to suffer lifelong health consequences or sell our house and move. I really don't want to move. We need your help.

Please let me know what you suggest.
Thanks,
Felicia

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Ira Brown <ira.brown@lacity.org>

VAPP Project

1 message

Harvey Plotnick <harvey45p@gmail.com> Mon, May 19, 2025 at 12:12 AM
To: Ira.Brown@lacity.org

Mr. Ira Brown,

I'm writing regarding Case #:CPC-2014-2010-GPA-ZC-CU3-SPPC. I am the owner of 125/127 Hurricane Street, Marina Del Rey, CA 9092 and am extremely concerned about the impact this construction project will have on my tenants and my building as well as the community because of the following reasons:

1. The Potential Release of Methane Gas and other Chemical Hazards - The city's mitigation plan acknowledges a significant hazard to the public involving the release of hazardous materials. This project should have (1) appropriate detection devices installed with real time data accessible by the community, (2) a plan to pro-actively address the same exposure concerns for the community as defined for workers and, (3) if an issue is discovered, the project should be shut down immediately until a solution is put in place.

2. Nearby Off-Site Workspace for Home-Based Workers - We need a guaranteed in writing provision of appropriate workspace for all impacted home-based workers. This space should be provided for the duration on construction activities.

3. Significant & Unavoidable Damage to Residential Property - The mitigation plan says there is potential for buildings to be damaged as well as substantial adverse effects including the risk of loss, injury or death involving strong seismic ground shaking or ground failure including liquefaction. Section MM-N-NOI-2 fo the mitigation plans does not adequately protect property from potential damage. There must be a plan to cure defects to any adjacent or neighboring residential property caused by the Project. How can a project be undertaken with this potential risk? What is the city's plan to protect residents and property?

4. Noise, Air & Dust Release - There should not be any noise exceeding CEQA guidelines. This includes the placement of sound barriers. The city should erect temporary barriers of sufficient height each construction day to minimize dust and dirt from impacting Residental property. There should also be ongoing independent 3rd party management monitoring all of these issues.

5. Improved Emergency Preparedness - After the Palisades and Altadena fires, it is clear there should be better preparation for any disaster. What is the plan for the Marina Peninsula? This project will only exacerbate potential issues.
LASAN should take the lead to make this happen.

6. Alternative Street Parking on Hurricane - Where will 20-25 cars park when the street is shut down for construction each day? This doesn't even address the increased demand during the Summer. The city proposes using 128 Hurricane for employee parking and a public parking lot. This would be the only lot of its kind on the entire Marina Peninsula. It is suggested the ate the completion of the construction, the 128 Hurricane lot resold to a private owner, the proceeds of which can be used to fund community benefits related to this project as well as other needs as directed by CD-`` Council member Tracy Park.

7. Lack of Adequate Security - Last week a tent was pitched by two people inside the fence at the VAPP site. Despite the 24-hour presence of city employees at the VPP building, the tent has remained in place. On (5/7) a sign was posted saying "this property closed to the public. No entry without permission LAMC Sec 41.24 was placed on the fence but the tent was not removed.

8. Limited Construction Hours - No or limited construction on Saturdays. Limited hours all days for pile driving, jack hammering and haul trucks each day.

9. Compensation For Lost Income (Landlords) - Given the circumstances described above, it is likely some tenants will feel forced to leave their current residences. This may impact the landlord's ability to find new tenants and/or maintain current rental income, which can be a vital revenue stream. How will landlords be compensated for this loss of income?

10. As recently as March 11th, LASAN was saying this would be a two-year project. During Monday's meeting, they indicated the project would start Summer 2027 and end Fall, 2030. That's over three years. What changed?

Thank you for your time and consideration to this very important matter.

Harvey Plotnick
Owner 125/127 Hurricane Sreet
Marina Del Rey, CA 90292

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Ira Brown <ira.brown@lacity.org>

Case No: CPC-2024-2010-GPA-ZC-CU2-SPPC (128 EHurricane Way)

1 message

Joey Jackson <egyptjackson814@gmail.com> Thu, Jan 8, 2026 at 4:07 AM
To: ira.brown@lacity.org

January 8, 2026

Via Submission for the Official Zoning Hearing Record

Re: Opposition to Zoning Change – Venice Auxiliary Pumping Plant (VAPP)
Project Site: 3813 Esplanade, Venice, CA

Honorable Commissioners,

I submit this letter for inclusion in the official record to formally state my opposition to any zoning change or land-use approval for the Venice Auxiliary Pumping Plant (VAPP) at or near **3813 Esplanade** until the City adopts clear, enforceable, resident-protective safeguards addressing health, safety, and habitability impacts to nearby homes. My family resides within close proximity of the proposed site. This is not a speculative concern. A zoning decision that increases the intensity of use and permits heavy construction activity near residences—without binding protections—constitutes an unreasonable transfer of risk onto residents.

1) Zoning approval requires compatibility with residential use and protection of health and safety

Zoning is not a ministerial step or a formality. It is a legal decision that must be supported by evidence and written findings that the proposed use is compatible with surrounding land uses, does not create a nuisance or hazardous condition, and will not unreasonably impair the health, safety, and welfare of neighboring residents. A project of this nature—heavy construction, ground disturbance, and subsurface work in an area with historic oil activity—requires enforceable conditions that prevent foreseeable impacts to nearby homes.

Approving a zoning change without such conditions is premature because it removes the final point of leverage the public has to ensure resident protections are mandatory rather than optional.

2) The record reflects known subsurface and contamination concerns in the project area

Based on materials presented in the Coastal Commission process and the City's own environmental discussions of oil-well re-abandonment and contaminated soil work in the vicinity, the City has acknowledged that legacy oil infrastructure in this area was abandoned under outdated standards and that prior leakage has been documented in the surrounding context. Where historic oil activity exists, and where subsurface pathways can transmit soil gas and vapors beyond a single parcel, a zoning decision must account for off-site risk and cumulative impacts—not simply the footprint of construction.

Subsurface conditions do not obey parcel lines. Utility trenches, vibration, drilling, and soil disturbance can alter pathways and increase migration risk. These are foreseeable consequences of the type of work contemplated for the VAPP. The City cannot reasonably approve a zoning change without first demonstrating—through independent, site-specific verification and monitoring plans—that nearby residences will be protected from migration, emissions, and habitability impacts during construction and afterward.

3) Coastal conditions are not the same as resident protections

I understand the Coastal Commission imposed multiple conditions intended to protect sensitive habitat and ensure regulatory compliance. However, those conditions do not equal resident protection. Environmental compliance aimed at wetlands or habitat does not necessarily address:

- whether residents will be exposed to elevated methane or soil-gas conditions;
- whether vapor intrusion protections are available if monitoring indicates risk;
- whether residents will be displaced or lose the use of their home during construction;
- whether there is a clear remedy if habitability is compromised.

In plain terms: even robust ecological protections can coexist with inadequate protections for families living nearby. Zoning is the appropriate place to require enforceable resident safeguards.

4) The project is not "ready" for a zoning change because critical safeguards are missing or not enforceable

Before any zoning change is approved, the City must adopt enforceable conditions of approval that include, at minimum:

A. Independent verification and transparency

- Independent third-party petroleum/environmental verification (not tied to City contractors) that subsurface risks have been evaluated and will not impact nearby homes.
- Public access to key technical documents, monitoring plans, and incident protocols.

B. Baseline testing and continuous monitoring for nearby homes

- Baseline soil-gas/methane/VOC testing for parcels within a defined radius of the project (at minimum 100 feet).
- Continuous monitoring during construction and for a defined long-term period post-construction, with public reporting.

C. Mandatory mitigation triggers and stop-work authority

- Clear thresholds that require immediate mitigation, including vapor intrusion controls where appropriate.
- Stop-work requirements when exceedances, migration indicators, or safety alarms occur.

D. Resident remedies and habitability protections

- A written relocation and habitability plan for residents if conditions arise that make occupancy unsafe or unreasonable.
- A defined compensation/remedy framework for loss of use, property impacts, and related costs attributable to the project.

E. Clear responsibility and enforceability

- An enforceable indemnification and responsibility framework—so residents are not forced to carry the burden of proving harm after impacts occur.
- A "re-opener" mechanism requiring additional mitigation if new evidence emerges.

Without these protections adopted as binding conditions of approval, the City cannot credibly make the necessary findings that a zoning change will not harm nearby residents or undermine residential habitability.

5) Approving zoning now improperly shifts known risk onto residents

I respectfully submit that approving this zoning change now would functionally shift the risk of subsurface conditions, emissions, construction impacts, and habitability disruptions onto families living nearby. That is not an acceptable policy outcome, and it is not what zoning is intended to do. The City may pursue infrastructure and cleanup; however, it must do so without sacrificing resident safety, health, and the basic expectation that homes remain habitable throughout construction.

Requested action

For the reasons stated above, I respectfully request that the Commission:

1. **Deny or continue** the zoning change request until enforceable resident-protective conditions are adopted; or, at minimum,
2. Condition any approval on binding safeguards that include baseline testing, continuous monitoring, mandatory mitigation triggers, stop-work protocols, a habitability/relocation plan, and a clear remedy framework for impacted residents.

Thank you for placing this letter into the official record and for considering the health, safety, and welfare of residents who will bear the real-world impacts of this decision.

Respectfully submitted,

Joey Jackson
3809 Property Owner(adjacent to VAPP)
Venice,CA

Joey Jackson zoning opposition letter.pdf
167K

Case No: **CPC-2024-2010-GPA-ZC-CU2-SPPC (128 Hurricane Way)**

January 8, 2026

Via Submission for the Official Zoning Hearing Record

Re: Opposition to Zoning Change – Venice Auxiliary Pumping Plant (VAPP)
Project Site: 3813 Esplanade, Venice, CA

Honorable Commissioners,

I submit this letter for inclusion in the official record to formally state my opposition to any zoning change or land-use approval for the Venice Auxiliary Pumping Plant (VAPP) at or near **3813 Esplanade** until the City adopts clear, enforceable, resident-protective safeguards addressing health, safety, and habitability impacts to nearby homes. My family resides within close proximity of the proposed site. This is not a speculative concern. A zoning decision that increases the intensity of use and permits heavy construction activity near residences—without binding protections—constitutes an unreasonable transfer of risk onto residents.

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Approving a zoning change without such conditions is premature because it removes the final point of leverage the public has to ensure resident protections are mandatory rather than optional.

2) The record reflects known subsurface and contamination concerns in the project area

Based on materials presented in the Coastal Commission process and the City's own environmental discussions of oil-well re-abandonment and contaminated soil work in the vicinity, the City has acknowledged that legacy oil infrastructure in this area was abandoned under outdated standards and that prior leakage has been documented in the surrounding context. Where historic oil activity exists, and where subsurface pathways can transmit soil gas and vapors beyond a single parcel, a zoning decision must account for off-site risk and cumulative impacts—not simply the footprint of construction.

Subsurface conditions do not obey parcel lines. Utility trenches, vibration, drilling, and soil disturbance can alter pathways and increase migration risk. These are foreseeable consequences of the type of work contemplated for the VAPP. The City cannot reasonably approve a zoning

change without first demonstrating—through independent, site-specific verification and monitoring plans—that nearby residences will be protected from migration, emissions, and habitability impacts during construction and afterward.

3) Coastal conditions are not the same as resident protections

I understand the Coastal Commission imposed multiple conditions intended to protect sensitive habitat and ensure regulatory compliance. However, those conditions do not equal resident protection. Environmental compliance aimed at wetlands or habitat does not necessarily address:

- whether residents will be exposed to elevated methane or soil-gas conditions;
- whether vapor intrusion protections are available if monitoring indicates risk;
- whether residents will be displaced or lose the use of their home during construction;
- whether there is a clear remedy if habitability is compromised.

In plain terms: even robust ecological protections can coexist with inadequate protections for families living nearby. Zoning is the appropriate place to require enforceable resident safeguards.

4) The project is not "ready" for a zoning change because critical safeguards are missing or not enforceable

Before any zoning change is approved, the City must adopt enforceable conditions of approval that include, at minimum:

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- Public access to key technical documents, monitoring plans, and incident protocols.

B. Baseline testing and continuous monitoring for nearby homes

- Baseline soil-gas/methane/VOC testing for parcels within a defined radius of the project (at minimum 100 feet).
- Continuous monitoring during construction and for a defined long-term period post-construction, with public reporting.

C. Mandatory mitigation triggers and stop-work authority

- Clear thresholds that require immediate mitigation, including vapor intrusion controls where appropriate.
- Stop-work requirements when exceedances, migration indicators, or safety alarms occur.

D. Resident remedies and habitability protections

- A written relocation and habitability plan for residents if conditions arise that make occupancy unsafe or unreasonable.
- A defined compensation/remedy framework for loss of use, property impacts, and related costs attributable to the project.

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- An enforceable indemnification and responsibility framework—so residents are not forced to carry the burden of proving harm after impacts occur.
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Without these protections adopted as binding conditions of approval, the City cannot credibly make the necessary findings that a zoning change will not harm nearby residents or undermine residential habitability.

5) Approving zoning now improperly shifts known risk onto residents

I respectfully submit that approving this zoning change now would functionally shift the risk of subsurface conditions, emissions, construction impacts, and habitability disruptions onto families living nearby. That is not an acceptable policy outcome, and it is not what zoning is intended to do. The City may pursue infrastructure and cleanup; however, it must do so without sacrificing resident safety, health, and the basic expectation that homes remain habitable throughout construction.

Requested action

For the reasons stated above, I respectfully request that the Commission:

1. **Deny or continue** the zoning change request until enforceable resident-protective conditions are adopted; or, at minimum,
2. Condition any approval on binding safeguards that include baseline testing, continuous monitoring, mandatory mitigation triggers, stop-work protocols, a habitability/relocation plan, and a clear remedy framework for impacted residents.

Thank you for placing this letter into the official record and for considering the health, safety, and welfare of residents who will bear the real-world impacts of this decision.

Respectfully submitted,

Joey Jackson
3709 /Property Owner
Venice,CA

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Ira Brown <ira.brown@lacity.org>

Proposed VAPP /3809-3811 Esplanade

1 message

Kenya Lee <kenyalee.kl@gmail.com> Wed, Aug 27, 2025 at 11:33 AM
To: ira.brown@lacity.org

Mr. Brown,
I live adjacent to the proposed VAPP project.This project will stop my living and enjoyment of my home during the construction phase.
I would like to enter the following attached letters into the record for the upcoming VAPP hearing for rezoning of the lot.
Please confirm receipt.

Thank You,
Kenya Lee

2 attachments

250725 Letter to Doyle (1).pdf
230K

250819 Letter to Doyle re environmental impacts (1).docx
839K

Strumwasser &Woocher

1250 6th Street, Suite 205
Santa Monica, California 90401
Telephone: (310) 576-1233
Facsimile: (310) 319-0156
www.strumwooch.com

Michael J. Strumwasser
Beverly Grossman Palmer
Dale Larson
Salvador E. Pérez
Julia Michel †
Tessa Baizer
Samantha McNichols

Senior Counsel:
Fredric D. Woocher
Bryce Gee
Andrea Sheridan Ordin

† Also admitted to practice in Washington

July 25, 2025

Jennifer Doyle
Coastal Program Analyst
California Coastal Commission
South Cast District
301 E. Ocean Blvd. ,Suite 300
Long Beach, CA 90802

Via email only: Jennifer.doyle@coastal.ca.gov

RE: Venice Auxiliary Pumping Plant – August 14 agenda items 16a, 16b, and 17a

Dear Ms. Doyle:

This firm writes on behalf of Kenya Lee, the owner of the residential property located at 3811 Esplanade, *immediately adjacent* to the proposed Venice Auxiliary Pumping Plant (VAPP). As designed and approved by the City, the proposed industrial facility would have *zero setbacks* from Ms. Lee's property, with large structures housing electrical cabinets constructed within the sideyard setback area along the property line. This project is not ready for review by the Commission: **A zone change application is necessary to rezone the site from residential to public facilities, and the pending application has not been brought for public hearing.** Moreover, the project's approval would violate policies of the Coastal Act, of the Venice LUP and Coastal Zone Specific Plan, and would rest on an inadequate review under the California Environmental Quality Act.

This project will impact ESHA, as the City proposes to construct in one of the few unlined waterways directly connected with the Pacific via the Ballona Lagoon. The proposal would place an additional industrial facility that would handle the sewage of millions of residents without even providing the minimal standard sideyard between that facility and our client's home. The

proposal's environmental impacts on ESHA and on our client are significant, and adequate mitigation has yet to be provided or proposed.

Coastal Act Policies

The project does not conform to the following Coastal Act policies:

> *Section 30253 (a): Minimize risks to life and property in areas of high geologic, flood, and fire hazard.*
>
> *Section 30253 (b): Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.*

The project is located in area that is known to be vulnerable to sea level rise, flooding and liquefaction. The City relies on the Marina del Rey tide gate's operation to prevent sea level rise in the Ballona Lagoon, but such reliance presumes continued maintenance and operation of those manmade devices. The City's approval acknowledges that extreme flooding or malfunction of the flood gate could lead to flooding of this facility, but does not disclose the impacts of such potential flooding on the environment.

> *Section 30260: (a) Coastal-dependent industrial facilities shall be encouraged to locate or expand within existing sites and shall be permitted reasonable long-term growth where consistent with this division.*
>
> *(b) Notwithstanding subdivision (a), where new or expanded coastal-dependent industrial facilities cannot feasibly be accommodated consistent with other policies of this division, they may nonetheless be permitted in accordance with this section and Sections 30261 and 30262 if all of the following conditions are met:*
>
> *(1) Alternative locations are infeasible or more environmentally damaging.*
>
> *(2) Permitting the development would not adversely affect the public welfare.*
>
> *(3) Adverse environmental effects are mitigated to the maximum extent feasible.*
>
> *(4) The new or expanded coastal-dependent industrial facility is not an oil and gas development, refinery, or petrochemical facility.*

New industrial uses like the VAPP that depend on being near the coast can *only* be approved if "adverse environmental effects are mitigated to the maximum extent feasible." The City has not

completed habitat mitigation long-promised for the Ballona Lagoon, and the (out-of-date) Environmental Impact Report (EIR) discloses impacts to neighboring residents from the construction and operation of the VAPP. The Commission must require the City to go beyond what it has committed to and mitigate "to the maximum extent feasible."

> *Section 30230: Marine resources shall be maintained, enhanced, and, where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.*
>
> *Section 30231: The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.*
>
> *Section 30240:*
>
> *(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.*
>
> *(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.*

The VAPP does not comply with the above policies, given its location adjacent to the Grand Canal and Ballona Lagoon, as well as the direct impacts on the Grand Canal to construct the subsurface piping components and sluice gates. The project's EIR acknowledges that Southern Coastal Salt March occurs within the area that will be disturbed by the project.

Venice Coastal Zone Land Use Plan Policies

> *Policy I.A.1.b: "preserve the nature and character of existing residential neighborhoods" "No more than two lots may be consolidated in the Ballona Lagoon West, Ballona Lagoon (Grand Canal) East ..."*

VAPP alters, and do not preserve, the residential character. By expanding the existing facility onto three vacant lots, the City's plan violates the LUP policy regarding lot consolidation.

> *Policy I.A.7.b. Multi-Family Residential – Low Medium II Density – Ballona Lagoon and Grand Canal West Bank Properties North of Ironside*

The LUP requires "minimum side yard of 3 ½ feet." The City approved a project that does not provide a minimum side yard in violation of the LUP.

> *Policy I.D.1: Canals and Ballona Lagoon Walkways. Adjacent Use/Development: "The only permitted development adjacent to the canals and lagoon shall be habitat restoration, single-family dwellings, public parks and walkways, subterranean or surface public parking lots, maintenance activities and emergency repairs. . . . New construction along the Canals and Ballona Lagoon shall comply with standards for setbacks, noise barriers, pervious surfacing with drainage control measures to filter storm run-off and direct it away from environmentally sensitive habitat areas, buffer areas in permanent open space, land dedication for erosion control, and wetland restoration including off-site drainage improvements.*

The VAPP does not comply with this policy because it is not of the type of permissible permitted development, and does not utilize the correct setback from neighboring residential properties.

> *Policy IV.B.7. Grand Canal Rehabilitation. The Grand Canal between Hurricane Street and Washington Boulevard shall be restored and maintained in order to improve water quality, aquatic habitat, and public pedestrian access along the waterway in a manner that is sensitive to the privacy of adjoining residents.*
>
> *Policy V. A. 3. Infrastructure. New sewer, storm drain, and water lines shall be installed using the least environmentally disturbing method feasible.*

Both of the above policies require significant limitations on projects like the proposed VAPP that would impact the habitat in the Grand Canal.

Venice Coastal Zone Specific Plan

Section 10.A.2 (b)(4): The sideyard shall be consistent with LAMC requirements but shall not be less than 3 ½ feet

Section 11.B.4 Building Separation. A minimum of five feet shall be provided between commercial and residential buildings.

As set forth above, the zero yard setback in the north sideyard is in violation of these policies which require setbacks.

California Environmental Quality Act

The EIR for this project was completed in 2017, but failed to disclose that habitat for the El Segundo blue butterfly (the sea cliff buckwheat) was planted in the area south of Washington Boulevard as part of the Grand Canal restoration. The area is included in the El Segundo blue butterfly US Fish and Wildlife Service Recovery Plan for the species. In addition, several Special Status species -- wooly seablite, southwestern spiny rush, and red sand verbena—were present in the project area, and the EIR provides inadequate mitigation for the potential loss of these species.

Conclusion

This project is not ready for the Commission's consideration, because the City has not yet completed the legislative process of changing the project's zoning to permit this public, industrial, use. There is no reason to place this item for consideration now. Moreover, the proposal authorizes development activity that could detrimentally affect the Grand Canal and Ballona Lagoon habitat areas, and which does not comply with basic and important zoning protections for neighboring residents. Please require the City to completely mitigate environmental impacts and to respect the zoning rules it committed to in the LUP and Venice Coastal Zone Specific Plan.

If the Commission permits the project to proceed, it must mitigate the impacts of the project both on the natural resources in the Grand Canal and Ballona Lagoona, and on neighboring residents, including most plainly Ms. Lee, who will be subjected to unwanted noise and air quality impacts. The EIR concluded that construction noise and vibration impacts would be significant and unmitigated. In fact, the EIR found that the proposed pile driving would exceed the thresholds for potential vibration damage at nearby structures. The Commission should require the City to take all measures to mitigate these impacts. The Mitigation Monitoring Program includes a requirement that the City "work with the construction contractor to identify potential offsite shared office space that could be made available to residents in the immediate vicinity that work at home during weekday construction hours. The space would ideally have internet service and meeting room space." (BMP NOI-1.) More than needing space during the day, a family like Ms.

Lee's with a young child needs more permanent off site relocation during the construction process. This project serves many, but Ms. Lee is bearing nearly all of the impact of the construction. This need not be the case.

I am available to discuss this matter at your convenience.

Yours truly,

Beverly Grossman Palmer
Strumwasser & Woocher LLP

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Ira Brown <ira.brown@lacity.org>

Re: May 5th Planning meeting/Opposition to Zoning Change Venice Auxiliary Pump Plant (VAPP), 128 and 133 Hurricane;

1 message

Kenya Lee <kenyalee.kl@gmail.com> Fri, May 2, 2025 at 3:55 PM
To: ira.brown@lacity.org

To:
City of Los Angeles Planning Department
200 N. Spring Street
Los Angeles, CA 90012

Re: Opposition to Zoning Change for Venice Auxiliary Pumping Plant – Venice Auxiliary Pump Plant (VAPP), 128 and 133 Hurricane;

DIR-2017-4167; ZA-2017-3950 (plant); DIR-2017-4173; ZA-2017-3953 (parking lot)

Dear Planning Commissioners,

I am writing to formally oppose the proposed zoning change (without conditions) to permit construction of the Venice Auxiliary Pumping Plant on a residentially zoned lot adjacent to my home. While I recognize the importance of maintaining the city's infrastructure, this project as currently proposed raises significant concerns regarding public safety, inadequate setbacks, environmental risk, and the disruption of residential life during and after construction.

It fails to meet appropriate setback requirements, creating serious proximity concerns to my home and increasing the risk of long-term structural and environmental damage to adjacent properties. Given the scale and industrial nature of the project, this lack of separation is not only inappropriate—**it is potentially hazardous.**

The transformers are less than four feet from bedroom windows.

This project does not meet the performance standards for a Public Benefit Project. **A zone change and general plan amendment are required for this project. Per Code, an eligible Public Benefit Project must be improved with a 10-foot landscaped, irrigated buffer along all property lines.**

Moreover, the construction process itself is expected to generate significant noise, debris, and emissions that make residential occupancy adjacent to the site unfeasible for the duration of the project. No clear mitigation or relocation plan has been presented for my family who will be forced to vacate our home due to intolerable conditions during construction. This raises equity and displacement concerns that must be addressed before any zoning change is considered.

In light of these issues, I respectfully request that the City of Los Angeles deny the proposed zoning change or require substantial revisions to the plan that include:

1.The project be redesigned so that there is a ten-foot landscaped buffer and 6-

foot solid block wall on the north property line next to our residential building.

2. The industrial equipment including transformers, HVAC and electrical panels be

moved away from residences and towards the existing pump plant along

Hurricane.

3. Shield the entire project with solid fencing including the transformers.

I have attached pictures to illustrate my concerns showing the area that will be removed, ultimately up against my home. These pictures have been provided to be placed in the record for the upcoming public meeting on May 5th.

Sincerely,
Kenya Lee

Owner of 3809 Gran Corso,(next to the proposed project)

313-999-0264

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2 attachments



1000034110.jpg
4571K



1000034112.jpg
4903K

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Ira Brown <ira.brown@lacity.org>

127 Hurricane VAPP

1 message

Michael Holt <mholt3333@gmail.com> Mon, May 5, 2025 at 12:12 PM
To: "ira.brown@lacity.org" <ira.brown@lacity.org>
Cc: Steve Bradbury <steve@mycyberstuff.com>

Greetings Ira,

As I was unfortunately unable to attend this morning's meeting I am attaching a brief video for your consideration and to be added to the public record.

Best,

Michael Holt

IMG_9564.mov

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Ira Brown <ira.brown@lacity.org>

VAPP Concerns on Hurricane St. MDR

1 message

Michael Holt <mholt3333@gmail.com> Thu, May 8, 2025 at 8:55 AM
To: ira.brown@lacity.org

I'm writing regarding Case #: CPC-2024-2010-GPA-ZC-CU3-SPPC. I live at 127 Hurricane, DIRECTLY across the street from the building site.

I am extremely concerned about the impact this construction project will have on my ability to earn a living and work from my home office.

I need a guaranteed in writing provision of appropriate workspace for all impacted home-based workers, like me.

It will be IMPOSSIBLE to work effectively with clients from home with this construction.

Also, as a holistic health practitioner who is very in tune with my well-being, I am highly concerned about the potential Release of Methane Gas and other Chemical Hazards - The city's mitigation plan acknowledges a significant hazard to the public involving the release of hazardous materials. This project should have (1) appropriate detection devices installed with real time data accessible by the community, (2) a plan to pro-actively address the same exposure concerns for the community as defined for workers and, (3) if an issue is discovered, the project should be shut down immediately until a solution is put in place.

And of course, Noise, Air & Dust Release - There should not be any noise exceeding CEQA guidelines. This includes the placement of sound barriers. There should also be ongoing independent 3rd party management monitoring all of these issues. Limited Construction Hours - No or limited construction on Saturdays. Limited hours all days for pile driving, jack hammering and haul trucks each day.

Thank you,

Michael Holt
127 Hurricane Street

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Ira Brown <ira.brown@lacity.org>

VAPP Concerns on Hurricane St, MDR

1 message

Mike Pelletier <mpelletier@gmail.com> Thu, May 8, 2025 at 2:44 PM
To: Ira.Brown@lacity.org

Hi,
I'm writing regarding Case #: CPC-2024-2010-GPA-ZC-CU3-SPPC. I live at 116 Galleon St. and am extremely concerned about the impact this construction project will have on my family as well as our community. My wife and daughter both have a condition called Chronic Inflammatory Response Syndrome (CIRS), which is a genetic predisposition to not be able to clear certain toxins, it's recognized by the NIH and **led to 2 cancers in my wife in 2024 (for which she had 0 risk factors, she's young and fit)**. Toxins from the construction dust could lead to severe health issues for my family.

- The Potential Release of Methane Gas and other Chemical Hazards - The city's mitigation plan acknowledges a significant hazard to the public involving the release of hazardous materials. This project should have (1) appropriate detection devices installed with real time data accessible by the community, (2) a plan to pro-actively address the same exposure concerns for the community as defined for workers and, (3) if an issue is discovered, the project should be shut down immediately until a solution is put in place.

- Toxin and Dust Release - There should also be ongoing independent 3rd party management monitoring all of these issues.

As recently as March 11th, LASAN was saying this would be a two-year project. During Monday's meeting, they indicated the project would start Summer 2027 and end Fall 2030. That's over three years and way too long.

I'm afraid that we'll be forced to suffer lifelong health consequences or sell our house and move.

Please let me know what you suggest.
Thanks,
Mike

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Ira Brown <ira.brown@lacity.org>

the proposed New Pumping Station at the end of Hurricane st

1 message

Robert Debiase <bobdebiase@ca.rr.com> Fri, May 16, 2025 at 2:59 PM
To: Ira.Brown@lacity.org

Hello Mr Brown : I have five concerns on the building of the New Pumping Station.

1. I would like to see a 5 day work week so that me and my tenants can relax on the weekends .
2. A soundproof barrier 15 to 20 feet tall that borders the building site And has a water irrigation system to wash the barrier as appropriate
3. Where can we park the 15 cars that usually use Hurricane for parking ?
4. I would like to see the City give the lot facing the lagoon to the Hurricane St owners , so we can use it for owner and tenant parking after the job is done..
5. I have seen two dead ducks in the past week along the lagoon , one on Pacific Ave near Topsail and one on Strongs Dr just North of Driftwood

Can we have a condition in the Project to upgrade the Lagoon South of Washington Blvd , so that when I do my walks , three times a week, I Can be proud of how well it is kept and when the THOUSANDS OF TOURISTS WALK ALONG THE LAGOON , THEY WOULD BE IMPRESSED AT HOW WELL LOS ANGELES IS TAKING CARE OF THE ENVIRONMENT !!!!

Hoping to have a discourse with your Planning team in the near future

Best regards

Bob DeBiase
115 ½ Hurricane St
Marina Del Rey Ca 90292

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Ira Brown <ira.brown@lacity.org>

VAPP hearing May 5, 2025 (CPC-2024-2010-GPA-ZC-CU3-SPPC)

1 message

Robin Rudisill <wildrudi@icloud.com> Mon, May 5, 2025 at 11:00 AM
To: Ira Brown <ira.brown@lacity.org>

Dear Ira,

I'm writing to provide you a written copy of my comments at the VAPP hearing today, May 5, 2025.

To convert residential zoning to Public Facilities for a project that has HUGE adverse impacts to the surrounding residential community and to an Environmentally Sensitive Habitat Area, ESHA, is just simply wrong and these areas MUST be protected with significant conditions.

This project violates numerous policies in the certified Venice Land Use Plan.

Policy V.A.1. Public Services SHALL consider the competing needs of residents and visitors for the use of roadways, existing parking, etc., and SHALL be expanded IN A MANNER that DOES NOT adversely affect residents.

Public Works projects SHALL be reviewed for consistency with the Coastal Act and the Venice Land Use Plan through the Coastal Development Permit process as required by the Coastal Act.

Policy I.C.1. The scale and design of industrial facilities MUST be compatible with adjacent and neighboring uses.

Policy 1.C.6. Hazardous industrial uses SHALL NOT be located adjacent to residential areas.

The operation IS industrial in nature and some operations of the plant could reasonably constitute a hazardous use for nearby residents due to the potential for activities such as (but not limited to) transformer explosions, equipment fumes, sewage overflows etc.

Policy 1.D.1. The ONLY permitted development adjacent to the Grand Canal and Ballona Lagoon SHALL BE habitat restoration, single family homes and parks.

Policy V.A.3. Infrastructure SHALL be installed using the least environmentally disturbing method feasible.

Policy IV.A.2. Uses permitted in or adjacent to the canals SHALL be implemented in a manner to protect the biological productivity of marine resources and maintain healthy populations of marine organisms.

Policy 1.A.5. Preserve and protect stable multifamily neighborhoods.

And several more applicable policies.

The Land Use Plan, certified by both the City and the Coastal Commission, is State Policy. Because this project violates literally every applicable LUP policy, it simply DOES NOT conform with the Coastal Act.

Ira, this is a sensitive wetland area, surrounded by ESHA, in the DUAL Permit Jurisdiction Coastal Zone. I cannot think of a more sensitive area in the Los Angeles Coastal Zone. Aesthetics in such a sensitive area should be paramount, and the project must be designed to be compatible with and to prevent harm to the surrounding residential neighborhood and the ESHA.

The City should be bending over BACKWARDS to keep the impacts on the residential neighborhood and the ESHA to a bare minimum.

The project is poorly designed to fit within this residentially zoned neighborhood. Transformers just a few feet away from bedroom windows? No buffer with the residential property to the north? ADDING a parking lot, which actually is unnecessary and is in no way compatible with the surrounding neighborhood?

Ira, you have a HUGE responsibility here. I've never seen anything quite like it. The City should have been phasing this facility out and moving it elsewhere, not expanding it!

The community's proposed conditions are smart and they are fair. This CDP is an opportunity for the City to provide for significant mitigations to the numerous unacceptable impacts, which should have been done from the beginning.

So, PLEASE help mitigate all of the significant unacceptable adverse impacts by only supporting this change from residential zoning by requiring the requested conditions.

Thank you very much!

For the Love of Los Angeles
and our precious Coast,
Robin Rudisill
(310) 721-2343

For the Love of Los Angeles
and our precious Coast,
Robin Rudisill
(310) 721-2343

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Ira Brown <ira.brown@lacity.org>

Serious Concerns re VAPP Project on Hurricane St (MDR)

1 message

Robin Rudisill <wildrudi@icloud.com> Thu, Nov 7, 2024 at 4:17 PM
To: Ira Brown <ira.brown@lacity.org>, Juliet Oh <juliet.oh@lacity.org>, lisa.webber@lacity.org, benet.gardner@lacity.org, christine.heinrich@lacity.org
Cc: Chloe.Seifert@coastal.ca.gov, Ted.Allen@lacity.org, Susana.Reyes@lacity.org, Vahid.Khorsand@lacity.org, Teresa.Villegas@lacity.org, Mike.Davis@lacity.org, Hydee.FeldsteinSoto@lacity.org, councilmember.harris-dawson@lacity.org, Marian Ensley <marian.ensley@lacity.org>, karen.bass@lacity.org, john.heath@lacity.org, Kevin James <kevin.james@lacity.org>, Marcia Hanscom <marciahanscom@gmail.com>, "Steve (brooks Neighbor) Williams" <stevenmwilliams99@gmail.com>, "Dani@Coastal Ziff" <Dani.Ziff@coastal.ca.gov>, "Vaughn, Shannon@Coastal" <shannon.vaughn@coastal.ca.gov>, Steve Hudson <Steve.Hudson@coastal.ca.gov>, Kate.Huckelbridge@coastal.ca.gov, Steve Bradbury <steve@mycyberstuff.com>, Brian Averill <brian.averill@venicenc.org>

CPC-2024-2010-GPA-ZC-CU2-SPPC
128 Hurricane, Venice
Venice Auxiliary Pumping Plant (VAPP)

Public Officials,

I live on Ocean Front Walk on the Marina Del Rey Peninsula. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more.

This project expands the pumping of sewage down to Dockweiler and is located in the middle of our residential neighborhood as well as in the middle of Environmentally Sensitive Habit Area (ESHA). It is an unacceptable land use for this area and yet it is critical infrastructure and we understand it must move forward. However, the lack of concern shown regarding finding reasonable mitigations for the impacts on our residential neighborhood and the lack of protection and mitigations for the ESHA is appalling and unacceptable.

The construction plans as designed will have a painful, material impact on this community and surrounding ESHA for decades.

Our primary concerns are:

- **Mitigation measures in order to conform as closely as possible with the certified Venice LUP, the state policy guidance for determining conformance with the Coastal Act.**
  - Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas.
  - Policy I.C.1 states that the scale and design of industrial facilities must be compatible with adjacent and neighboring uses.
  - Policy 1.A.5 seeks to preserve and protect stable multifamily neighborhoods.
  - Policy 1.D.1 states the only permitted development adjacent to the Grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.
- **Elimination of the proposed parking lot at 128 Hurricane St.** for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city.
- **Modification of the project design** so that it is visually compatible with the residentially zoned neighborhood.

Given that this location is grossly incompatible with this location and never should have been allowed to happen, the City's Bureau of Engineering should be bending over backwards to keep the impacts on the residential neighborhood and surrounding ESHA to a bare minimum.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through reasonable and respectful negotiations in order to minimize impacts on the surrounding ESHA and residential neighborhoods.

PLEASE support this request for fairness. Please work with us to make reasonable changes to the project in order to protect our residential neighborhood and the ESHA.

Thank you.

For the Love of Los Angeles
and our precious Coast,
Robin Rudisill
(310) 721-2343

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Ira Brown <ira.brown@lacity.org>

Fwd: Serious Concerns re VAPP Project on Hurricane St (MDR)

1 message

Steve Bradbury <steve@mycyberstuff.com> Mon, May 5, 2025 at 9:08 AM
To: Ira Brown <ira.brown@lacity.org>
Cc: Juliet Oh <juliet.oh@lacity.org>, Lisa Webber <lisa.webber@lacity.org>, Kevin Keller <kevin.keller@lacity.org>, Robin Rudisill <wildrudi@icloud.com>, Sean Silva <sean.silva@lacity.org>, Juan Fregoso <juan.fregoso@lacity.org>

Ira:

This email is regarding this morning's VAPP re-zoning hearing at 10:30a, I have attached the community's Term Sheet defining specific issues and proposed solutions. in addition, please find an updated compendium of neighborhood emails expressing concerns with this project as well as the previously provided Venice Neighborhood Council motion opposing the re-zoning approval until a specific condition is met, all to be entered into the public record.

For the public comment portion of today's hearing, I'm requesting additional time (5:00 minutes total please) as the primary spokesperson for the community. In addition, it would be greatly appreciated if you would allow Kenya Lee, who lives directly adjacent to the proposed VAPP, additional speaking time. Other community members will also be speaking with their allotted time.

With appreciation,

Steve Bradbury
109 Hurricane St.

~~~~~~~~~~~~~~~~~~~~
Steve Bradbury
310-428-5904
steve@mycyberstuff.com

Begin forwarded message:

From: Steve Bradbury <steve@mycyberstuff.com>
Subject: Re: Serious Concerns re VAPP Project on Hurricane St (MDR)
Date: November 7, 2024 at 4:48:31 PM PST
To: Ira Brown <ira.brown@lacity.org>
Cc: Juliet Oh <juliet.oh@lacity.org>, lisa.webber@lacity.org, Robin Rudisill <wildrudi@icloud.com>

Ira, please add me to your list of interested parties for advance notification with regard to any hearing and/or CPC commission meeting regarding this matter. My email is steve@mycyberstuff.com and mailing address is 109 Hurricane St, MDR, CA 90292.

Separate but related, please include in the public record the recent VNC motion passed in Sept as well as an overview of pertinent community issues and a compendium of neighborhood emails written over the past several years, all attached.

Finally, please be aware we continue to seek engagement with someone in LA Public Works who is legitimately empowered to make decisions (not lip service as has been the case to date) AND genuinely seeks a win-win for Public Works & the community. Our mission is not to stop this important infrastructure project nor are we are looking to be unreasonable. We simply seek solutions to real, impactful issues.

With appreciation,

Steve

~~~~~~~~~~~~~~~~~~~~
Steve Bradbury
310-428-5904
steve@mycyberstuff.com

On Nov 7, 2024, at 4:17 PM, Robin Rudisill <wildrudi@icloud.com> wrote:

CPC-2024-2010-GPA-ZC-CU2-SPPC
128 Hurricane, Venice
Venice Auxiliary Pumping Plant (VAPP)

Public Officials,

I live on Ocean Front Walk on the Marina Del Rey Peninsula. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more.

This project expands the pumping of sewage down to Dockweiler and is located in the middle of our residential neighborhood as well as in the middle of Environmentally Sensitive Habit Area (ESHA). It is an unacceptable land use for this area and yet it is critical infrastructure and we understand it must move forward. However, the lack of concern shown regarding finding reasonable mitigations for the impacts on our residential neighborhood and the lack of protection and mitigations for the ESHA is appalling and unacceptable.

The construction plans as designed will have a painful, material impact on this community and surrounding ESHA for decades.

Our primary concerns are:

- **Mitigation measures in order to conform as closely as possible with the certified Venice LUP, the state policy guidance for determining conformance with the Coastal Act.**
  - Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas.
  - Policy I.C.1 states that the scale and design of industrial facilities must be compatible with adjacent and neighboring uses.
  - Policy 1.A.5 seeks to preserve and protect stable multifamily neighborhoods.
  - Policy 1.D.1 states the only permitted development adjacent to the Grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.
- **Elimination of the proposed parking lot at 128 Hurricane St.** for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city.
- **Modification of the project design** so that it is visually compatible with the residentially zoned neighborhood.

Given that this location is grossly incompatible with this location and never should have been allowed to happen, the City's Bureau of Engineering should be bending over backwards to keep the impacts on the residential neighborhood and surrounding ESHA to a bare minimum.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through reasonable and respectful negotiations in order to minimize impacts on the surrounding ESHA and residential neighborhoods.

PLEASE support this request for fairness. Please work with us to make reasonable changes to the project in order to protect our residential neighborhood and the ESHA.

Thank you.

For the Love of Los Angeles
and our precious Coast,
Robin Rudisill
(310) 721-2343

4 attachments

LASAN Term Sheet_FINAL.pdf
476K

Hurricane Pumps Neighbor Letters.pdf
878K

VNC VAPP Motion.pdf
76K

VAPP Background.pdf
59K

Venice Neighborhood Council

PO Box 550, Venice, CA 90294
venicenc.org

MOTION BACKGROUND: Los Angeles Public Works (LAPW) has proposed the Venice Auxiliary Pumping Plant (VAPP) at 128 Hurricane St and an associated parking lot for employees and limited public use at 133 Hurricane St, MDR. The residents acknowledge the VAPP is considered critical infrastructure. From 2017 through and including the final city approval process, LAPW never meaningfully and materially addressed issues raised by the community. In fact, the City Planning Commission instructed LAPW to meet with the community. Nothing changed because of those meetings despite a multitude of suggestions and proposals offered to LAPW. The issues include, but are not limited to:

1. Conformance with the certified Venice LUP (Policies I.A.5, I.C.1, I.C.6, and I.D.1);
2. Meeting established Public Benefit standards including a 10' landscaped, irrigated buffer along all property lines. The performance standards applied to this project are applicable to those on a major or secondary highway, not a residential street;
3. Adherence to court-mandated ESHA protections in the Ballona Lagoon/Grand Canal area including no dredging and/or use of heavy equipment both of which are part of the project plan;
4. Mitigation of EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas release. The community has put forth a plan to address some of these issues;
5. Mitigation of "significant and unavoidable" construction-related issues including ground-borne vibration which could result in residential building damage, and, construction noise that exceeds LA CEQA Thresholds guidelines;
6. Improvement of inadequate emergency access during construction activities;
7. Change to five day/week construction and more restricted hours in lieu of six days/week;
8. Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city;
9. Modification of the project design so that it is compatible with the residentially zoned neighborhood;
10. Actionable protection of residential properties from dirt, dust and other construction impacts;
11. Upgrade of a deficient maintenance plan for both the new and existing facility.

The intention of this motion is not to stop a necessary infrastructure project. It is to seek a meaningful, results-oriented dialogue with Public Works to identify reasonable solutions for these issues.

Venice Neighborhood Council

PO Box 550, Venice, CA 90294
venicenc.org

(sent via email)
Traci Park, LA City Council Person CD-11 - Councilmember.Park@lacity.org
Sean Silva, Venice Field Deputy, CD-11 - Sean.Silva@lacity.org
Juan Fregoso, District Director, CD-11 - Juan.Fregoso@lacity.org
Marqueece Harris-Dawson, LA City Council President - Marqueece.Harris-Dawson@lacity.org
Hydee Feldstein Soto, City Attorney - Hydee.FeldsteinSoto@lacity.org
Mike Davis, President Pro Tempore, LA Public Works Board of Commissioners - Mike.Davis@lacity.org
Teresa Villegas, Vice President, LA Public Works Board of Commissioners - Teresa.Villegas@lacity.org
Vahid Khorsand, Commissioner, LA Public Works Board of Commissioners - Vahid.Khorsand@lacity.org
Susana Reyes, Commissioner, LA Public Works Board of Commissioners - Susana.Reyes@lacity.org
Ted Allen, City Engineer, Bureau of Engineering - Ted.Allen@lacity.org
Chloe Seifert, Coastal Program Analyst, California Coastal Commission - Chloe.Seifert@coastal.ca.gov

On Sept 17 2024, the Venice Neighborhood Council Board of Officers passed the following motion by a vote of 13-4-0.

MOTION: The Venice Neighborhood Council opposes CPC-2024-2010-GPA-ZC-CU2-SPPC-- allowing the City of Los Angeles to obtain a General Plan Amendment (GPA) and Zone Change (ZC) from RW2-1 to Public Facilities at 133 Hurricane St., a Project Review (SPPC), and a Conditional Use for the construction, use, and maintenance of a public parking area in a residential zone (CU2) for the empty lots located at 128 Hurricane St/3913 Esplanade -- unless LA Public Works (LAPW) materially and in good faith addresses the community's serious issues with this project.

Sincerely,

Brian Averill
President
Venice Neighborhood Council

VAPP Community Proposed Conditions
(May 5, 2025)

Overview: When the original VPP was built in the late 1950's, the Marina Peninsula was primarily comprised of oil derricks and marshland. The first residential properties on and around Hurricane St were constructed in the mid-1960's so design and other impactful attributes of the VPP were not material considerations.

Construction of the VAPP (the "Project") will have a significant, negative impact on our densely populated community and the surrounding environment including the Grand Canal and Ballona Lagoon, both recognized as ESHAs. Nonetheless, the community acknowledges the critical nature of this infrastructure project. Our goal has been and continues to seek modifications that will mitigate its impact on our quality of life.

Importantly, the Project does not conform to the Venice Land Use Plan (LUP) as follows:

- Policy I.C.1 states that the scale and design of industrial facilities must be compatible with adjacent and neighboring uses. The design does not meet this criterion.
- Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas. While the community does not claim to be experts on the chemicals and operations to be used at the plant, the operation is industrial in nature and some operations of the plant could reasonably constitute a hazardous use for nearby residents due to the potential for activities such as (but not limited to) transformer explosions, equipment fumes, sewage overflows etc.
- The Project conflicts with Policy 1.A.5 that seeks to preserve and protect stable multifamily neighborhoods.
- The Project conflicts with Policy 1.D.1 that states that only permitted development adjacent to the Grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.

Therefore, the community requests the following Project issues be addressed through the placement of conditions as detailed below:

1. The Project Does Not Meet Public Benefit Performance Standards

The Project does not meet the performance standards as required by LAMC 14.00.A.6 and 14.00.B.5. Public Works is not eligible for alternative compliance due to 1) lack of landscaped buffers to the north and west; 2) lack of full setbacks to the north; and 3) the majority of frontage is located on small local streets and alleys, rather than a major or secondary highway. These performance standards are designed to ensure that large industrial facilities such as this are kept to areas with adequate traffic infrastructure and contain adequate buffers and landscaping in keeping with the neighborhood. These goals are not met. Conditions requested:

a. A ten-foot landscaped buffer which will be maintained and equipped with an automatic irrigation system as well as a 6-foot solid block wall on the north property line next to 3811 Esplanade.

b. Shield entire structure with unobtrusive fencing as well as landscaping of a height adequate to screen the transformers and power poles.
c. The existing VPP shall be upgraded with landscaping, a new sidewalk, and all facilities, existing and new, shall be regularly cleaned, maintained, and patrolled for security.

2. Potential Release of Methane Gas and Other Chemical Hazards

The VAPP Mitigation Plan acknowledges "a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous chemicals into the environment." This includes encroachment or seepage of methane into the VAPP structure whose impact is considered potentially significant. Conditions requested:

a. A sufficient # of detection devices around the community shall be installed to provide ongoing accurate measurements.
b. The mitigation plan should proactively address the same exposure concerns for the community as defined for workers on the Project.
c. Should any analysis under the Mitigation Plan identify this issue, the entire Project must be shut down immediately until a realistic plan can be put in place to mitigate both short and long-term impacts.

3. Need for Appropriate Off-Site Workspace

Given the many "significant and unavoidable" issues identified on this Project, work from home conditions will be adversely impacted. Condition requested:

a. The city shall guarantee in writing the provision of suitable, local workspace, reasonably approved by the community, for all impacted home-based workers located within 500' of the Project for the duration of all construction activities.
b. The city will survey the community every six months during the term of construction to determine how much workspace is needed.

4. Ongoing Noise, Air & Dust Release

The Mitigation plan states "Project construction noise will exceed construction noise criteria provided by the LA CEQA Thresholds Guide. However, Section MM-NOI-3 of the same Mitigation plan, states noise control features will "reduce overall operational noise levels from all Project related sources to within 5 dB of existing ambient noise levels in the surrounding community (53-57 dB)." These two statements are in conflict. Conditions requested:

a. The city shall retain an independent 3rd party, reasonably approved by the community, to review and recommend changes to the mitigation plans.
b. The city shall provide independent (3rd party) noise and air quality monitoring whose results shall be available to the community in real time. If necessary, the city shall distribute or reimburse the cost of high-quality air purifiers to impacted households (up to $500/unit).
c. The city shall comply with residential noise thresholds including the provision of all sound barriers necessary to comply with municipal code requirements and CEQA thresholds.
d. Each construction day, the city shall erect temporary barriers of sufficient height to mitigate dust and dirt from impacting residential property. Barriers shall be removed at the end of each construction day to allow for street parking.

5. Lack of Adequate Emergency Access & Preparedness

The Project will exacerbate ongoing issues of emergency egress and ingress, by expanding density, blocking routes (even temporarily), and adding equipment & workers into the potential hazard zone. Evacuation plans have been generally ad hoc and done in the heat of the emergency. This approach has not been highly successful as recent problems with the Palisades Fire have demonstrated. Hazards facing the community include tsunami, tropical storm flooding, hazardous materials incidents and targeted violence, which will be complicated by the construction Project. Conditions requested:

a. LASAN shall, as the responsible party for the Project, initiate a Working Group including representatives from the Los Angeles Police Department (LAPD), Los Angeles Fire Department (LAFD), Los Angeles Department of Transportation (LADOT), Los Angeles Emergency Management Department (LAEMD) and the LA Department of Sanitation as the responsible party for the contract work, as well as a minimum of three representatives selected by the community.
b. Essential elements of the plan shall be as hazard specific as possible and include, but not be limited to:
    i. Identification of evacuation routes and emergency ingress routes.
    ii. Estimated evacuation times and numbers evacuated.
    iii. Mitigate blocking of evacuation routes/cooperate with the evacuation process.
    iv. Effective alternatives to evacuation such as shelter in place.
    v. Alert and warning procedures.
    vi. Addressing and including the needs of Persons with Disabilities and Access and Functional Needs (PDAFN).
    vii. Public education and practice.
c. The city shall install a walk bridge across the Grand Canal at Driftwood St as detailed in the previously approved Grand Canal Restoration Plan. The details of this plan can be found here: https://engineering.lacity.gov/grand-canal-restoration-project.

6. Lack of Street Parking on Hurricane St.

The VAPP plan proposes that all parking on Hurricane St will be removed during construction hours. This will displace 20-25 cars that park on the street during times of low demand, non-summer, non-holiday days, Monday-Saturday. Further, after construction, the city proposes using 128 Hurricane for employee parking and a public parking lot. This would be the only lot of its kind on the entire Marina Peninsula. There is no community support for a public parking lot. It will materially increase traffic on a residential street, will become an easily accessible haven for homeless, is not secure and LAPD does not have the resources to provide appropriate response when issues arise. Conditions requested:

a. During construction, the city shall securely enclose 128 Hurricane as a temporary permit-only lot at no cost to displaced residents in lieu of a construction staging site. Alternately, a similar number of spaces shall be made available on the South end of the Venice Pier parking lot at no charge to residents.
b. After construction is completed, the city shall implement the community-proposed red-zone parking solution for employee parking - see Exhibit A.

c. The city shall support the community by actively seeking an exception to the public parking requirement for a public utility.
d. Remove existing weekly no parking restrictions from Hurricane St to provide enhanced public parking.
e. At the completion of construction, the 128 Hurricane lot, which was purchased by the city for $2.7M, shall be sold to a private owner, the proceeds of which will be used to fund community benefits related to this Project as well as other needs as directed by CD-11 Councilmember Traci Park.

7. Excessive Construction Hours

The city plans for six day/week construction, 8a-5p. An internal city report produced seven months after the EIR was certified proposed a five-day construction work week as well as limitations on pile drivers, graders and jackhammers & haul trucks identical to these requested conditions:

a. Work shall be permitted Monday-Saturday November-March. Work shall be permitted Monday-Friday, April-October.
b. Equipment operation hours: 8a-5p
c. Pile driver, grader, jackhammer: 9a-3p - No pile driver, grader or jackhammer work shall be conducted on Saturdays any time during the year.
d. Haul trucks to access local neighborhood streets: 9a-4p

8. Lack of Binding Written, Recorded Conditions of Approval Between the City & Construction Company

It is unclear how the contractual conditions between the city and construction company will be enforced. How will resident complaints be addressed in real time? Current plans indicate a process where complaints are filed with an on-site city representative and addressed in an undetermined future time frame. Conditions requested:

a. Adopt written, recorded conditions of approval that clearly spell out all obligations with meaningful penalties for non-performance so they can be monitored by the community and enforced by the city, including each requirement of the approvals and the MMRP as well as mitigations during construction years.
b. Actively monitor and enforce all Project obligations including MMRP
c. Commit a city representative to be on-site every day from start to end of Project work who is empowered to satisfactorily address issues in real time or immediately shut the Project down pending resolution.

9. Lack of a Clear VPP/VAPP Maintenance Plan

The current VPP is not maintained in any meaningful way. The issues go far beyond graffiti and painting. There are environmental and safety issues. Garbage is strewn along the Grand Canal and Ballona Lagoon sides of the structure which can readily fall into the water (ESHA protection). The sidewalk around the structure is in a constant state of disrepair to the point of being dangerous. And as referenced in the Coastal Staff presentation made in February, the VPP was, back in 2012, landscaped to (at least partially) help blend into the neighborhood – see Exhibit B.

Since then, the VPP has been left in a state of disrepair. There was and is no maintenance plan. How will the VAPP be different? And what will become of the VPP as it is transitioned out of use?

What will eventually become of that structure and lot? Nobody within Public Works has ever provided a clear response. Conditions requested:

a. The city shall develop, in a timely manner, a meaningful maintenance plan for both the VPP and VAPP.
b. The city shall install safety railings around the VPP on the two sides facing the Lagoon
c. The city shall repair and maintain sidewalks surrounding the VPP.
d. The city shall plant and maintain environmentally appropriate plants & landscaping surrounding both the VPP and VAPP
e. The city shall communicate its short and long-term plans for the VPP after VAPP construction is completed.

# # #

Additionally, we seek appropriate, reasonable solutions to the following issues:

1. Significant & Unavoidable Residential Property Damage

The VAPP Mitigation Plan acknowledges "significant and unavoidable impact to surrounding land uses" including "ground-borne vibration levels that are distinctly perceptible at a receiving residential use or could potentially result in building damage." Section MM-NOI-2 of the mitigation plans does not adequately protect property from potential damage. In addition, Construction GEO-1 of the mitigation plan states the Project will "Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking and/or seismically related ground failure, including liquefaction**."** The plan to address residential impact uses terms such as "may include," "if considered appropriate," and "as feasible and practical." The discretion is left entirely to a Project assigned engineer. The city has strong motivation to look past issues that may arise as a path to completing the Project faster, especially with the Olympics on the horizon.

There must be an enforceable plan to cure defects to any adjacent or neighboring residential property caused by the Project. There is also no timely mechanism to address root causes in the event damage is done. The "process," as we have been told, will not mitigate additional damage before the cause is investigated and modified. Conditions requested:

a. An independent inspector, approved by the community and paid for by the city, shall be contracted to inspect all properties within 500' of the Project prior to construction to determine baseline conditions. Additional inspections shall take place no less than semi-annually or upon resident request for the duration of the Project.
b. Per Section 8 above, the on-site city representative shall be empowered to satisfactorily address these issues in real time or shut the Project down pending resolution.

2. Expected Reduction in Property Value

The anticipated severity of construction-related disruptions, including high-decibel noise, vibration, airborne debris, traffic blockage, and the potential release of subsurface gases such as methane will materially impact property values. Conditions requested:

a. We request the city collaborate with LA County to secure reduced property valuations/lower property taxes for all properties within 500' for the duration of the Project.

3. Anticipated Lost Income for Landlords

Given the circumstances described above, it is likely some tenants will be forced to leave their current residences. This may impact the landlord's ability to find new tenants and/or maintain current rental income, which can be a vital revenue stream. How will landlords be compensated for this loss of income?

4. Compensation for Displaced Residents

Residents living with 500' of the Project may be adversely impacted to the extent they can no longer remain in their current residence on either a temporary or permanent basis. How will they be compensated? Note: While many residences will be impacted, the greatest impact will be to 3811 Esplanade. This should be treated as a discreet case.

# # #

Exhibit A

6. Lack of Street Parking on Hurricane St.

The community proposes the following red-zone solution for staff parking (identified in orange below). At the existing VPP, one employee is present at any given time. There is one on-site parking space to satisfy this requirement. Even if the VAPP requires multiple employees (in addition to the VPP employee, whose necessity is not clear), this plan will provide sufficient parking for employees and city officials while obviating the need for employee parking at 128 Hurricane.

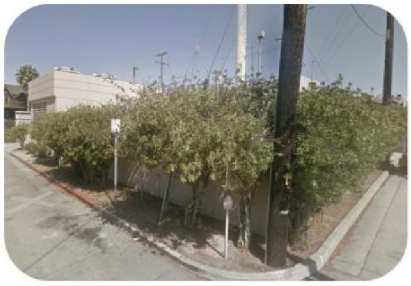
Employee Parking



Exhibit B

9. Lack of a Clear VPP/VAPP Maintenance Plan

Public Works Maintenance Report Card



2012



2022



2024

VPP Maintenance - 2024

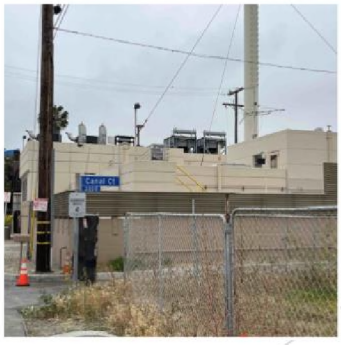












Hurricane Pumps Neighbor Letters

(Last updated: 12/2/24)

Re: Venice Auxiliary Pump Plant (VAPP), 128 and 133 Hurricane;
DIR-2017-4167; ZA-2017-3950 (plant); DIR-2017-4173; ZA-2017-3953 (parking lot)

The following members of our community have expressed their POV on this issue to date. We anticipate additional written responses as this process continues.

2024 Neighbor Letters

MIKE BORASSI & GENEVIEVE MORRILL-BORASSI – (FORMERLY) 3811 ESPLANADE. (ORIGINAL APPELLANTS) 5

KENYA LEE & JOEY JACKSON – 3811 ESPLANADE 6

HARVEY PLOTNICK – 125 & 127 HURRICANE ST (PROPERTY OWNER) 7

LESLIE & MICHAEL ADLER – 3601 ESPLANADE 9

MICHAEL HOFFS – 110 HURRICANE ST 10

MICHAEL HOLT – 127 HURRICANE 11

BETHANY GORFINE – 3950 VIA DOLCE (OWNER AND CONDO BOARD PRESIDENT) 12

ELIANE GANS – 3933 ESPLANADE (PROPERTY OWNER) 13

ROBIN RUDISILL – 3003 OCEAN FRONT WALK 14

TING CHANG – 28 MAST 15

TOM DRUCKER & MARCIA SELIGSON DRUCKER – 4 LIGHTHOUSE 16

JENESA KURLAND – 4300 VIA DOLCE (CONDO OWNER) 17

ROBERT DIBIASE – 115 ½ HURRICANE ST (OWNER) 18

TRACI GAY – 310 WASHINGTON BLVD. 19

GARY STROMBERG – 125 HURRICANE ST 20

TING CHANG – 28 MAST 21

JENESA KURLAND – 4300 VIA DOLCE (CONDO OWNER)....22

PERRY ROD – 3818 PACIFIC AVE....23

MARY-DOROTHY LINE – 125 PRIVATEER MALL....24

MICHAEL HOFFS – 110 HURRICANE ST....25

2022-23 Neighbor Letters

MARY LAING – 115 HURRICANE ST....27

STEVE & KAREN BRADBURY – 109 HURRICANE ST (OWNERS)....28

ADAM GOLDBERG – 110 HURRICANE ST....29

ROBERT DIBIASE – 115 ½ HURRICANE ST (OWNER)....30

MURIEL BLAKE & JOHN LARKIN – 110 HURRICANE ST.....31

GARY STROMBERG – 125 HURRICANE....33

MIKE BORASSI & GENEVIEVE MORRILL-BORASSI – 3801 ESPLANADE....34

KRISTY CANON - 3809 ESPLANADE (BUILDING OWNER)....36

ROBERT & LUCIA WILLIAMS – 3805 ESPLANADE....37

ELIANE GANS – 3933 ESPLANADE (PROPERTY OWNER)....38

TANYA SPERO – 113 ½ HURRICANE ST....40

LARRY LESSER, MD & CLAUDE LESSER – 3609 ESPLANADE (OWNER)....41

JEFF LEE – 3701 ESPLANADE (OWNER)....42

CLARE BRONOWSKI – 3701 ESPLANADE (OWNER)....43

LESLIE & MICHAEL ADLER – 3601 ESPLANADE....44

JENNIFER KELTON – 3615 ESPLANADE....45

MELLY LIBURD – 120 ½ GALLEON (OWNER)....46

ANDREW FREEDMAN – 20 IRONSIDES 47

MARILYN MIKOS – 115 EASTWIND ST (OWNER) 50

ARIANNE FLEMMING & JUSTIN WASSER – 3812 PACIFIC 51

SUSAN AFRIAT & STEVE HYMAN – 4000 PACIFIC 52

BETHANY GORFINE – 3950 VIA DOLCE (OWNER AND CONDO BOARD PRESIDENT) 53

JONATHAN TILLMAN – 3719 VIA DOLCE 54

ROBIN RUDISILL 56

ADAM ROSE – 12 BUCCANEER ST. 57

ROBERT NAU – 4250 VIA DOLCE 58

FELICIA GLADE & MIKE PELLETIER – 116 GALLEON ST. 59

ELIANE GANS – 3933 ESPLANADE (OWNER) 60

JENESA KURLAND – 4300 VIA DOLCE (CONDO OWNER) 61

2024 Neighbor Letters

Mike Borassi & Genevieve Morrill-Borassi – (formerly) 3811 Esplanade. (original appellants)

Dear Chair and members of the Venice Neighborhood Council Land Use & Planning Committee,

My name is Genevieve Morrill, and my husband and I filed the appeals to both City of Los Angeles Planning Commission, and more recently the California Coastal Commission. This project has been ill-conceived from the beginning and too large for the space. Understanding that it is an essential utility we need in our region, we were simply asking them to consider making it more compatible for the neighborhood and less intrusive on the community. At the time we filed the PC appeal, the city has not met or reached out to the community since 2016.

We are a casualty of this pending project, as our building is situated on the canal directly next to the vacant lot where the VAPP will be built. We have been renters for 28 years on the Canal and due to the pending construction, the owner sold the building, and the buyer decided to live there which therefore meant we had to move and find a new place to live at a considerable increase in market-based rate rents.

In my day job, I am the CEO of a Chamber of Commerce and therefore understand planning, zoning, and development. I attest that a developer would never be allowed to get away with such egregious disruption to a residential neighborhood. To have transformers and electrical equipment next to someone's bedroom window when the design can be flipped so that these electrical boxes would be on a vacated side of the street with no residents. They claim this impossible and frankly its only because they have already designed the project. A developer would be made, no matter what the expense to redesign.

This project is not compatible to the neighborhood aesthetics; it is too large for the location; it has negative impact to our community members; mitigation measures are not sufficient; has negative impact on the environment and a protected canal; and creates areas for more unhoused to encamp. Additionally, our understanding is that this project is an industrial use in a residential zone and no zoning was amended for its purpose.

Please oppose this project and help support the community members.

Thank you,

Genevieve Morrill
Formerly 3801 Esplanade/Grand Corso

Kenya Lee & Joey Jackson – 3811 Esplanade

I am writing to express my deep concerns regarding the ongoing plans for the Venice Auxiliary Pumping Plant (VAPP) project near my home at 3809-3811 Esplanade St in Marina del Rey. For over seven years, our community has diligently attempted to engage with Public Works to address critical concerns related to this project. Unfortunately, our efforts have largely been met with inadequate responses, leaving us feeling overlooked and unsupported.

While I recognize the importance of the VAPP as a critical infrastructure initiative, I am deeply troubled by the substantial and long-term negative impacts the current construction plans will have on my family and our community. Specifically, my primary concerns include:

Exposure to Toxins: The project involves significant excavation directly next to my home, raising serious concerns about potential exposure to hazardous substances that could endanger the health of residents, particularly children.

Structural Vibrations: Intense vibrations from construction activities could compromise the structural integrity of nearby homes, including my own, potentially leading to costly and irreversible damage.

Extreme Noise Levels: Construction noise will significantly affect my household's quality of life, particularly for my young child, whose well-being and development depend on a quiet and stable living environment. I also work from home and need a conducive environment to conduct my business.

Improvement of inadequate emergency access during construction activities.
Having a family residing next to this project concerns us to have an adequate emergency plan,a well thought out plan for emergency services during the time of construction.

Our community has never sought to halt this essential project. Instead, we have consistently requested an open and meaningful dialogue with project stakeholders to ensure fairness and adequate mitigation of these impacts. However, to date, we have seen little action or acknowledgment of our concerns.

The health, safety, and quality of life of our residents must be prioritized as this project moves forward. We are not opposed to progress; we simply seek fairness and the opportunity to live without unnecessary ha.rm or disruption

Thank you for your attention to this matter. I look forward to your prompt response and to working collaboratively toward a solution that benefits both the community and the project's success.

Sincerely,
Kenya Lee
3811 Esplanade, 90292
313-999-0264

Harvey Plotnick – 125 & 127 Hurricane St (property owner)

I own a property on Hurricane Street in Marina del Rey. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP Project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on lives for multiple years. My primary concern are:

* Conformance with the certified Venice LUP Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas. Policy 1.C.1 states that the sale and design of industrial facilities must be compatible with adjacent and neighboring uses. Policy 1.A.5 that seeks to preserve and protect stable multifamily neighborhoods. Policy 1.D.1 states the only permit development adjacent to the grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.

*Meeting established public Benefit standards including a 10' landscaped irrigated buffer along all property lines. The performance stands applied to this project are applicable to those on a major or secondary highway, not a residential street.

* Adherence to court-mandated ESHA protections in the Ballona Lagoon/Grand Canal area including no dredging and/or use of heavy equipment both of which are parr of the project plan *The community that introduced elements of the Grand Canal Restoration Plan (Phase 2) to address some of these issues. It is not an all or nothing

*Mitigation of other EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas releases. The community has put forth concepts to address some of these issues including the grand Canal Restoration Plan

* Mitigation of "significant and unavoidable" construction-related issues including ground borne vibration which could result in residential building damage, and construction noise that exceeds LA CEQA Thresholds guidelines. Section MM-NOI-2 of the mitigation plans does not adequately protect property from potential damage. The current plan is for more reactive than proactive using terms such as "may include." "If considered appropriate," and "as feasible and practical." Also, there is no timely mechanism for issues to be addressed/project to be halted in the event damage is done. Section MM-NO-3 of the mitigation plan is also inadequate. It strains credibility to believe noise control features will "reduce overall operational noise levels from all Project related sources to within 5db of existing ambient noise levels in the surrounding community (53-57db)."

* Change to five day/week construction and more restricted hours in lieu of six days/week.

* Alternative parking for up to 25 cars, most owned by residents, that park on Hurricane St daily during non-summer days and weekends year round. Hurricane St parking will cease to exist during construction hours. Where do these cars park?

* Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted Street parking around the current Venice Pumping Plant (VPP), at

a savings of at least $3.5 million to the city. The community has proposed a viable alternative that does not require this lot.

* Modification of the project design so that it is compatible with the residentially zoned neighborhood. There was very little, if any, community input during the design process,

*Actionable protection of residential properties from dirt, dust and other construction impacts. The community has offered viable suggestions.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through respectful negotiations. PLEASE support this request for fairness,

Thank you,
Harvey Plotnick

Leslie & Michael Adler – 3601 Esplanade

I live along Esplanade Canal on Eastwind.

We have a few concerns:

1. Adherence to court-mandated ESHA protections in the surrounding lagoon area;

2. Mitigation of EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas release;

3. Mitigation of "significant and unavoidable" issues including ground-borne vibration, which could result in residential building damage, and construction noise that exceeds LA CEQA Thresholds guidelines;

4. Change to five day/week construction instead of proposed six days/week;

5. Modification of project design so that it is compatible with its residentially zoned neighborhood;

6. Protection of residential properties from dirt, dust and other construction impacts;

7. Upgrade of deficient maintenance plan for both the new and existing facility.

Thank you
Leslie & Mike Adler
3601 Esplanade

Michael Hoffs – 110 Hurricane St.

As a 20+ resident of 110 Hurricane Street, I am in strong support of the motion. This is a classic case of the city not listening to the boots on the ground describing why the installation of the parking lot is not only not needed but strongly opposed for security reasons. For VAPP personnel, alternative parking on Hurricane has been found in other areas within a half block or less of VAPP. Homeless encampments, drunken disorderly conduct and contempt for Hurricane residents, constant traffic to find parking in the lot, mounting trash and lack of city funds to police the area have not been addressed and frankly will not be before construction.

Please ask yourself, would you want this parking lot built on your street? If you would support installing the parking lot on your street, would you be concerned if the aforementioned was not thoroughly embedded in the parking plan before construction?

Thank you for listening, your time to think about Hurricane Street's resident thoughts and frankly the chance to use the funds suggested for the parking lot on something else that will benefit the area in greater need.

Sincerely,

Michael Hoffs
110 Hurricane St

Michael Holt – 127 Hurricane

Greetings,

I live on Hurricane St in Marina Del Rey.

For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on our lives for multiple years. My primary concerns are

- Mitigation of "significant and unavoidable" construction-related issues including ground-borne vibration which could result in residential building damage, and, construction noise that exceeds LA CEQA Thresholds guidelines.
- Change to five day/week construction and more restricted hours in lieu of six days/week.
- Off-site workspaces for home-based workers
    - The city says it will be managed by the construction company but there have not been any guarantees of location or suitability.
- Actionable protection of residential properties from dirt, dust and other construction impacts.
    - The community has offered viable suggestions.
- Alternative parking for up to 25 cars, most owned by residents, that park on Hurricane St daily during non-summer days and weekends year round
    - Hurricane St parking will cease to exist during construction hours. Where do these cars park?
- Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through respectful negotiations.

PLEASE support this request for fairness.

Thank you,

Michael Holt
127 Hurricane Street

Bethany Gorfine – 3950 Via Dolce (owner and condo board president)

As an association that lives across the lagoon from Hurricane, and an association that lived through the dual main project for five years, with drilling immediately outside our 7 buildings between Marquesas and Tahiti on Via Dolce and via Marina, we are still feeling the effects of the project. I will elaborate.

I would like to say a few things regarding the care of the Ballona Lagoon, and Grand Canal - parking issues, vibrations, care, concern and communication for and of neighbors, repairs, plumbing, mental health, 6 days of noise, chaos, construction, personnel are all issues. Day in. Day out.

Bethany Gorfine
President, Marina Strand Colony 1.
145 units

Eliane Gans – 3933 Esplanade (property owner)

To the Chairman of LUPC
To LUPC
To Traci Park

I have lived in my building on Esplanade & Hurricane (just 1/2 block from this proposed VAAP). for 35 years. **I love my neighborhood and my neighbors. I love the serenity and residential environment.**

1. **REGARDING VIBRATION:** This will disturb all residents and as a landlord I do not want any tenant moving as a result of vibration and constriction noise. This will impact my quality of life and my ability to support myself financially.

2. **INADEQUATE EMERGENCY ACCESS DURING CONSTRUCTION**: Children and animals, and elderly residents, **will be in danger** of obstruction in an emergency

4. **PARKING LOT:** The city has already eliminated 6 parking spaces on Hurricane—which was not necessary, and parking is a HUGE issue for residents and their families when visiting. Eliminating another parking lot is NOT A RESPONSIBLE ACTION.
WE MOVED TO THIS NEIGHBORHOOD FOR A REASON—AND THIS ENTIRE PROJECT WILL NEGATIVELY IMPACT THE QUALITY OF OUR LIVES.
The city should use the $2.5 million for a more advantageous purpose to actually enhance this community—so that the City could actually get more taxes if our properties were not devalued as a result of this VAAP project.

CLARIFYING #4. PARKING LOT: WE DO NOT WANT OR NEED A PARKING LOT. AND ESPECIALLY FOR NON-RESIDENTS.

5. PROJECT DESIGN: This is designed to look like a dungeon. Or a jail block. There is nothing that resembles a structure that one would consider to be compatible with the Beach and lagoon environment. The project design is not compatible with the residentially zoned neighborhood. Again, detracting anyone from wanting to live near this ugly eye sore. We need more beauty and aesthetics in our world, not a building that appears like a “block” house jail.

Sorry for being so blunt… but I wanted you to get the idea of our feelings.

Sincerely,

Robin Rudisill – 3003 Ocean Front Walk

Public Officials,

I live on Ocean Front Walk on the Marina Del Rey Peninsula. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more.

This project expands the pumping of sewage down to Dockweiler and is located in the middle of our residential neighborhood as well as in the middle of Environmentally Sensitive Habit Area (ESHA). It is an unacceptable land use for this area and yet it is critical infrastructure, and we understand it must move forward. However, the lack of concern shown regarding finding reasonable mitigations for the impacts on our residential neighborhood and the lack of protection and mitigations for the ESHA is appalling and unacceptable.

The construction plans as designed will have a painful, material impact on this community and surrounding ESHA for decades.

Our primary concerns are:

- **Mitigation measures in order to conform as closely as possible with the certified Venice LUP, the state policy guidance for determining conformance with the Coastal Act.**
    - Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas.
    - Policy I.C.1 states that the scale and design of industrial facilities must be compatible with adjacent and neighboring uses.
    - Policy 1.A.5 seeks to preserve and protect stable multifamily neighborhoods.
    - Policy 1.D.1 states the only permitted development adjacent to the Grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.
- **Elimination of the proposed parking lot at 128 Hurricane St.** for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city.
- **Modification of the project design** so that it is visually compatible with the residentially zoned neighborhood.

Given that this location is grossly incompatible with this location and never should have been allowed to happen, the City's Bureau of Engineering should be bending over backwards to keep the impacts on the residential neighborhood and surrounding ESHA to a bare minimum.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through reasonable and respectful negotiations in order to minimize impacts on the surrounding ESHA and residential neighborhoods.

PLEASE support this request for fairness. Please work with us to make reasonable changes to the project in order to protect our residential neighborhood and the ESHA.

Ting Chang – 28 Mast

To whom it may concern,

As a resident of the Marina Peninsula, I am writing to express my strong support for the Venice Neighborhood Council's (VNC) motion opposing the Venice Auxiliary Pumping Plant (VAPP) project as currently proposed under CPC-2024-2010-GPA-ZC-CU2-SPPC.

While I understand the necessity of infrastructure improvements, the current plan presents serious concerns that have not been adequately addressed by Los Angeles Public Works (LAPW). The project's non-conformance with the Venice Local Coastal Program (LUP) policies, particularly those aimed at protecting stable residential neighborhoods and preserving environmentally sensitive areas like the Grand Canal and Ballona Lagoon, is deeply troubling.

Moreover, the Environmental Impact Report (EIR) for the project has failed to address key issues, including the risk of habitat destruction, groundwater contamination, and methane gas release. The proposed six-day workweek for construction will significantly disrupt the lives of local residents, with excessive noise, vibration, and dust over an extended period. The plan's inadequate provision for emergency access during construction is another critical concern.

The addition of a parking lot at 128 Hurricane Street, which was not part of the original project, will only exacerbate traffic and safety issues in our community. The VNC's motion rightly calls for the elimination of this parking lot, proposing more suitable alternatives that would save the city millions of dollars while addressing community concerns.

I fully support the VNC's call for LAPW to engage in a meaningful, results-oriented dialogue with our community to address these issues. It is crucial that any development in our neighborhood is done thoughtfully, with full consideration of its impact on residents and the environment.

Thank you for your attention to this matter.

Sincerely,

Ting Chang
3933 Esplanade W.
Marina del Rey, CA 90292
(310) 339-4056

Tom Drucker & Marcia Seligson Drucker – 4 Lighthouse

As long-time Marina residents, we are opposed to this zoning change until Public Works addresses some of the issues below:

- Mitigation of "significant and unavoidable" issues including ground-borne vibration, which could result in residential building damage.
- Mitigation of construction noise that will exceed LA CEQA Thresholds guidelines.
- Potentially significant methane gas release (read the community feedback to the EIR Mitigation Plans via the website link below - starts on page 44).
- Inadequate emergency access during construction activities.
- Change to five day/week construction instead of proposed six days/week.
- 25 parking spaces that will be eliminated on Hurricane every day of construction. Where will these people park?
- Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), a savings of at least $2.5 million to the city.
- Conformance to the certified Venice LUP (Policies I.A.5, I.C.1, I.C.6, and I.D.1).
- Adherence to court-mandated ESHA protections in the surrounding Ballona Lagoon and Grand Canal.
- Mitigation of EIR issues related to loss of species and habitat, groundwater impact.
- Modification of project design so that it is compatible with its residentially zoned neighborhood.
- Protection of residential properties from dirt, dust and other construction impacts.
- Upgrade of deficient maintenance plan for both the new and existing facility.
- Compensation for lost property value - During construction, tenants may very well seek reduced rents or move out. Units may have to be re-rented at lower rates, if at all. As a result, property owners may have to sell at reduced valuations. This is not hypothetical. It has already occurred.
- Resident physical/mental issues due to construction.
- Real-time community recourse to on-site construction issues. Without teeth, there can be no enforcement.

Please include this email as part of the public record.

Sincerely,

Tom Drucker and Marcia Seligson Drucker

Jenesa Kurland – 4300 Via Dolce (condo owner)

Hello VNC Board -

The Venice Auxiliary Pumping Plant (Project) as designed should not occur within a Residential Zone; and regardless of Zone nomenclature, Project must avoid drilling/vibrating foundations. No home/building owner should be forced to have their foundations and structure compromised due to poor planning and poor execution by City of Los Angeles (City). A 'mere' cosmetic crack through drywall stems from a crack in building structure which stems from a foundation crack. In earthquake country, one cannot afford - literally - to have compromised foundations & structure. City Department of Public Works (LADPW) has well proved that they cannot be trusted to comply with EIR requirements nor fair guidelines. I still seethe with distain towards the Community Outreach folks' blatant lies during their Venice Dual Force Main (VDFM) project by simply writing to you now. Photographed pre-construction inspection survey by a third party contracted by City as a baseline and photographed post-construction inspection survey by City employees admitting to seeing cracks afterwards is meaningless.

If anyone pretends to think that Project's parking lot will become anything but a trash dump and under-housed tent camp, you know they are neither trustworthy nor grounded in reality; and therefore, should not be decision-maker.

Also, Project design detracts from the community. Given Project is within a beachside residential community, why cannot the building appear more contextually-friendly? I do not understand the difunctional brown slat awnings here & there which do not provide shade to anything. A small item, but indicative of City not paying attention to detail and nor Project's impact on community of taxpayers.

If absolutely nothing else, City needs to disallow work on Saturdays. City (work) projects drag on (& on), so there is no 'time is of the essence' condition which warrants six workdays.

City allows drilling, vibrating, pounding starting at 7:00AM. City allows spilling of groundwater mixed with the oil fields below us to spill out onto streets 24-7. Thus, enforceable penalties for non-compliance with the EIR need to be in writing and should be available to all on VNC website.

Thank you,
J. Kurland
Via Dolce

Robert DiBiase – 115 ½ Hurricane St (owner)

Oct 10, 2024

To: Los Angeles Planning Commission

Subject: Proposed Pumping Station Addition,128 Hurricane St & 3813 South Esplanade

Dear Commissioners:

I have lived on Hurricane St since 1977 and witnessed the new construction of the present Pumping Station and it was a vast improvement to the old pumping station. This proposed additional pumping station construction has made many of our local residents angry, because you are not letting us give you our opinions on what we feel are legitimate objections.

1. Why is the project needed anyway. It appears that the present pumping station is doing the job just fine right now.

2. This area is an environmentally protected area. Court mandated ESHA protections in the Ballona Lagoon/Grand Canal area INCLUDE NO DREDGING AND /OR USE OF HEAVY EQUIPMENT -- BOTH OF WHICH ARE PART OF THE PROJECT PLAN. THIS IS NOT ACCEPATABLE.
3. Conversations with my neighbors are telling me that traffic on the street and car parking loss due to construction equipment will be a major problem. The noise and the impact on the canal itself could be devastating.

4. Are the transformers in the new station generating Electromagnetic fields which are known to cause Cancer?

5. Is this project absolutely NECESSARY?

6. Our neighborhood residents demand to have input into this planning process and to negotiate a possible site farther down the coast. This is a residential neighborhood, and the pumping station does not even belong here.

Respectfully submitted
Robert DeBiase
115 ½ Hurricane St

Traci Gay – 310 Washington Blvd.

I strongly oppose Venice Auxiliary pumping plant going forward! I am a resident at 310 Washington Blvd., #604, marina Del Rey 90292

Gary Stromberg – 125 Hurricane St

I live on Hurricane St in Marina Del Rey. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on our lives for multiple years.

My primary concerns are safety and mitigation of "significant and unavoidable" construction-related issues. Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone. PLEASE support this request for fairness. Thank you.

Gary Stromberg
125 Hurricane St.
MDR

Ting Chang – 28 Mast

Hello,

My husband and I are residents of Mast Street in Marina Del Rey. For over seven years, our community has tried to work with Public Works to address significant concerns about the proposed VAPP project. Despite our persistent efforts, we've been met with empty promises and no real action.

This lack of consideration for our community's well-being is deeply disappointing. While I recognize the importance of this infrastructure project, the current construction plans, as proposed, will significantly and adversely impact our lives for years to come.

My main concerns are conformance with the certified Venice LUP (as homeowners we are held to the LUP and it is only fair that city projects are as well) and the upgrade of a deficient maintenance plan for both the new and existing facility (currently garbage is all over the canal and it looks like there has not been any efforts to maintain the sidewalk area).

We are not asking to halt the project but rather to engage in a meaningful dialogue with someone who has the authority and willingness to address these concerns through respectful and fair negotiations. Your support in ensuring this request for fairness is honored would be greatly appreciated.

Thank you for your attention.

Regards,

Ting Chang

Jenesa Kurland – 4300 Via Dolce (condo owner)

Dear City Representatives -

For over seven years our community has been **trying** to **collaborate** with Public Works to address critical concerns about the planned VAPP project. Though our efforts fall on deaf ears. We receive lip service and nothing more. This total lack of concern for our community is unacceptable.

Our community acknowledges this is a critical infrastructure project even if is a hazardous industrial facility located within our residential area. However, the construction plans as designed will have a painful, material impact on our lives for multiple years.

+ Change to five day/week construction and more restricted hours in lieu of six days/week.

+ Mitigation of other EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas release.

- The community has put forth concepts to address some of these issues including the Grand Canal Restoration Plan.

+ Mitigation of "significant and unavoidable" construction-related issues including ground-borne vibration which could result in residential building damage, and, construction noise that exceeds LA CEQA Thresholds guidelines

- Section MM-NOI-2 of the mitigation plans does not adequately protect property from potential damage. The current plan is far more reactive than proactive using terms such as "may include," "if considered appropriate," and "as feasible and practical." Also, there is no timely mechanism for issues to be addressed/project to be halted in the event damage is done.

Section MM-NOI-3 of the mitigation plan is also inadequate. It strains credibility to believe noise control features will "reduce overall operational noise levels from all Project related sources to within 5 dB of existing ambient noise levels in the surrounding community (53-57 db)."

+ Modification of the project design so that it is compatible with the residentially zoned neighborhood.

+ Upgrade of a deficient maintenance plan for both the new and existing facility.

- The existing VPP is ***not*** maintained in any meaningful way. There are environmental and safety issues. Garbage is strewn along the Grand Canal side of the structure which can readily fall into this ESHA. The sidewalk around the structure is in a constant state of disrepair to the point of being dangerous.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with AHJ and motivation to address these issues through respectful negotiations. PLEASE support this request for fairness. *Imagine* ***how you would feel in a similar situation****!?*

Thank you,
J. Kurland
Via Dolce, Marina del Rey

Perry Rod – 3818 Pacific Ave

To Whom It May Concern,

My 3-unit residential building is at 3818 Pacific Avenue in Marina Del Rey. We have been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. Although the industrial project is for critical infrastructure, the construction plans as designed require much more compatibility and dialogue with the immediately surrounding residentially zoned neighborhood. There was very little, if any, community input during the design process and this must change.

Thank you,

Perry Rod
Chief Investment Officer
Rod Capital Management

Mary-Dorothy Line – 125 Privateer Mall

I live on Privateer Mall in Marina Del Rey. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project.

All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on our lives for multiple years.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through respectful negotiations. PLEASE support this request for fairness.

Thank you.

Michael Hoffs – 110 Hurricane St.

As a 20+ resident of 110 Hurricane Street, I'm pleading with you to take a closer look at how the VAPP Project on Hurricane Street will affect the local neighborhood if our concerns are not faithfully considered. I am not alone on feeling the city is not listening to the boots on the ground describing why the installation of the parking lot is not only not needed but strongly opposed for security reasons. For VAPP personnel, alternative parking on Hurricane has been found in other areas within a half block or less of VAPP. Homeless encampments, drunken disorderly conduct and contempt for Hurricane residents, constant traffic to find parking in the lot, mounting trash and lack of city funds to police the area have not been addressed and frankly will not be before construction.

Please ask yourself, would you want this parking lot built on your street? If you would support installing the parking lot on your street, would you be concerned if the aforementioned was not thoroughly embedded in the parking plan before construction?

Thank you for listening, your time to think about Hurricane Street's resident thoughts and frankly the chance to use the funds suggested for the parking lot on something else that will benefit the area in greater need.

Sincerely,

Michael Hoffs

2022-23 Neighbor Letters

Mary Laing – 115 Hurricane St

ML **Mary Laing <mblaing1@aol.com>**
Hurricane Street Auxiliary Pumping Plant Project
To: Steve Bradbury <steve@mycyberstuff.com>

VNC Parking & Transport March 13, 2022 at 2:31 PM

Steve,

I would like to go on record that I oppose the current auxiliary pump plant project and parking lot that is being proposed at 133 Hurricane and the adjacent lot at 3813 South Esplanade.

I am a resident at 115 Hurricane for 20 years. Myself and my neighbors were forced to endure the disastrous nightmare construction of the existing pumping station constructed a few years ago. There was little to no community engagement or communication from the Public Works Department. Most importantly, the unkept promises from Public Works after the years of construction.

I understand that the current project is essential for the area, however I wane on trust due to past performance from Public Works. This is an industrial facility in a residential neighborhood and more care must be taken to buffer the use from existing homes and resources.

We as neighbors are also concerned that the parking lot will create an unsafe environment near our homes. What is the design? How will it be secured at night? We oppose moving forward with the project until these concerns are addressed.

I would like to voice my support for the VNC motion to rescind it's support of the project as it is currently configured.

Best,

Mary Laing
115 Hurricane St
MDR 90292

Steve & Karen Bradbury – 109 Hurricane St (owners)

July 27, 2022

My wife and I own 109 Hurricane St. We have lived here since 2007. During that time, we have experienced several city-led construction projects. None have effectively managed the impact on the community without our voices rising to generate awareness. The city's track record is dismal at best.

Now the city intends to build an auxiliary pumping station at the end of Hurricane St. While we understand the critical nature of this project, the fact there has been no meaningful community engagement since preliminary plans were shared in 2016 is abhorrent. It appears the project design has changed over that time including the addition of a sewage command and control center for entire city of Los Angeles. We thought this was simply an auxiliary pumping station to support the aging current plant.

The city cannot simply ramrod an industrial project down the throats of a neighborhood without incorporating our input. City employees work for the residents, not the other way around.

We understand one element of the plan is to create a public parking lot at 128 Hurricane. Why???? There are no other public lots on any MDR residential street. If there is truly a need for that much employee parking (which has never been adequately justified), it should be a 100% secure lot only accessible by pumping station workers. **No** public car spaces, **no** bike racks, **no** art installation, **no** use by beachgoers, **no** opportunity for homeless to camp out.

There have been recent suggestions the parking lot was incorporated into the plan to satisfy the coastal commission. Did the city ever convey this information to residents during the process? Did the city take a position that this would impact residents and push back? Does the city even care? We do.

We attended both community meetings (Zoom and in-person) conducted by Public Works. These were little more than sham, window-dressing efforts. The city representatives showed NO willingness to modify ANY aspect of the project to align with the interests of the community. This arrogance is unacceptable behavior by people whose job is to serve the community.

Our neighbors have spoken about many other issues with this project. We support them and request you reconsider all approvals for this project until the community has been given a meaningful opportunity to engage. We can work together. There's no reason to antagonize the community.

Thank you,

Steve & Karen Bradbury
109 Hurricane St., MDR

Adam Goldberg – 110 Hurricane St.

To Whom It May Concern/VNC:

I have lived on the Marina Peninsula since 2005 and on Hurricane St since 2013. Since 2013, the amount of construction and noise on Hurricane has increased with each year. And now, with the plans of building a parking lot along with a new pump station, it behooves us all to keep this to a minimum.

While I understand that the pump station is necessary, the parking lot is not. There is already plenty of parking for workers, so to add a space where the public can park, is completely unnecessary. This will not only cause more car and foot traffic on our small, little street, but it will also bring in an unwanted element. There is no doubt that the homeless population will find this parking lot and make it a place to loiter, make unwanted noise, and use drugs. I have a small child who does not need to see this, and there are plenty of other families who are in the same situation.

I am asking that you vote to make it so there is NOT a parking lot at the end of our street. We have endured enough over the last 5 years or so with street closures, construction that rattles our homes, and an increase in the homeless population in our neighborhood. Flatly, there is no reason/need for this parking lot and it will make life exponentially worse for those of us that live here.

Thank you for your time and assistance with this matter.

Best,
Adam M Goldberg
110 Hurricane St

Robert DiBiase – 115 ½ Hurricane St (owner)

HELLO STEVE: MY OPINION IS THAT THE PARKING LOT BE USED EXCLUSIVELY FOR THE PUMPING STATION EMPLOYEES AND THE HURRICANE ST RESIDENTS. IF THE LOT IS OPEN TO PEOPLE GOING TO THE BEACH THAT WOULD BE A NO-NO FOR ME, SINCE THEY ARE ALREADY PARKING ON THE STREET WHERE RESIDENTS USUALLY PARK.

BEST REGARDS

BOB DEBIASE

115 ½ HURRICANE ST

MARINA DEL REY, CA 90292

Muriel Blake & John Larkin – 110 Hurricane St.

RE: 128 Hurricane & 3813So. Esplanade, ZA 2017-3950-ZAA-1A;DIR-2017-4173-CDP-SPP-1A DIR-2017-4167-PUD-CDP-SPP; ZA 2017-3953-CU2
Sent

Muriel Blake murielblake@wealthbuildersinc.com

To: cpc@lacity.org, elizabeth.gallard@lacity.org

Cc: mike.bonin@lacity.org

Fri, Mar 4 at 5:30 PM

Dear Commissioners,

Please address and reply to the following important concerns of your constituents

No 1. I have been living at 110 Hurricane for 42 years. Our residence is located 1 building away from the proposed Pumping Plant construction. As you overwhelmingly know this is strictly an upscale residential neighborhood which was not intended to be used for Industrial purposes let alone a "Pumping Plant"; there must be many other locations which would be more suitable for a Pumping Plant...perhaps all of your neighborhoods. The last time this proposed new plant project was presented to our community was 5 years ago - in 2017. It's not clear from the "notice provided" five years ago, that there was any written response to our community's concerns regarding the impact on our residential street of a Pumping Plant.

a) So at this late date (2022) after five years, what are the architectural design and landscape design of your proposed industrial plant to fit in with the design of our residential neighborhood? What design steps have you taken to insure that this "plant" will it blend in with this residential design without it being a complete "eyesore" in this sought-after residential Marina Del Rey beach area. As well, our beautiful beach is exceedingly popular with those who live in the inner city and who look forward to spending the day in our neighboring beautiful beach. Of courses, it would be extremely negligent to not to note that this area is notably popularity with its shops and restaurants which bring revenue to your city.
b) b) What buffers will you provide between this proposed "Plant" and our dwellings?? Likewise, this block abuts sensitive wetlands so what buffers will be taken to protect this area?

No. 2.) I am extremely concerned about the proposed "Parking Lot" How many employees do you plan to have working at the "Plant" that it would necessitate of a Parking Lot??? And what about the residents on Hurricane St. that of the block? will there be a full time Guard?? How will it be secured at night? As you are alll well there is a large homeless population in our neighboring Venice. H ere there are vagrants who roam our street and, if not guarded at night they very well may seek refuge in the lot. It may well become a haven for car thefts or car parts theft. It brings an unsafe environment to those near homes and to the street parkers who come home after dark.. What measures will be taken to provide safety to the residents who live

next to this lot?

a) those of us on Hurricane Street recently lived through 3 years of construction in the same "plant area". The street was torn up, blocked with huge equipment, construction cranes, diggers etc. all emitting constant banging, dirt and dust; the workers parked their trucks up and down the entire street, leaving no space for the residents to park. this cannot go on once again with construction of your "Plant"

No. 3) Transformers proposed at this new location, generate electromagnetic field (EMF) known to cause cancer and we all believe to be a risk to our health and the community at large.

I, for one, oppose your moving forward with the proposed project until the above concerns are addressed, in writing, and sent to all those who reside near the proposed Industrial Plant.

Sincerely,
Muriel Blake
John Larkin
110 Hurricane St.
Marina del Rey, CA 90292

Muriel A. Blake, CFP®
WEALTHBUILDERS, INC.
11600 Washington Place #116D
Los Angeles, CA 90066
(310) 391-3921- phone
(310) 398-9859- fax

Gary Stromberg – 125 Hurricane

I'm writing to request that the equipment you are using to build this new facility, including transformers, HVAC and electrical panels be moved away from our residences and towards the existing pump plant on Hurricane, and that you shield the entire project with solid fencing. You have no idea how disruptive your project is to our little community.

Regards,

Gary Stromberg
125 Hurricane St.
(203) 984-4836

Mike Borassi & Genevieve Morrill-Borassi – 3801 Esplanade

(Note: On 2/28/22, Gen and Mike filed an appeal with the LA City Planning Commission. The following material has been taken from that appeal)

The goal of this appeal is to require Public Works to work with the community on a better design for this project which will fit within our community and will provide protection for adjoining residential neighbors from the impacts of this industrial-style facility on privacy, safety, noise and aesthetics.

- Public Works last presented this project to the community in 2017. The case has been on hold for almost 5 years. No additional information or contacts with the community were held during this time despite prior promises to work on design and mitigation. We have repeatedly asked for a new presentation of the project since changes were clearly made since the last City public hearings in 2017.
- The EIR for the project and prior presentations misrepresented the location of the project, which is in fact 10 -15 feet closer to the nearest residential structure than previously represented.
- The project is poorly designed to fit within its residentially zoned neighborhood. Noisy and dangerous equipment is located very close to two neighboring residential areas. However, on the other side, the project site is adjacent to a dead-end street and the exiting pump plant, and all noisy and dangerous equipment should be located nearer to this facility and away from residents.
- The project aesthetic design, proposed landscaping and “public art” has never been presented to the community and the simple elevation of the structure presented does not adequately show how this will fit into a 100% residential neighborhood.
- Public Works has a history at this location of poor maintenance of the existing facility and landscaping, as well as noisy and intrusive construction for years during the recent Dual Force Main project at this location. The community simply does not trust Public Works to fulfill its promises to keep this facility and the parking lot safe and attractive.
- The facility is adjacent to a sensitive wetland area and no effort is made to mitigate impacts or improve existing conditions.
- The proposed parking lot will be an attractive nuisance in this residential area and will not be secured or patrolled. City parking should continue to be on the street and the additional lot should be used for open space to buffer the facilities.
- The project approval and conditions do not properly include all required mitigation measures so that the community knows what must be done and enforced. The EIR, Addendum and MMRP plan are only found on an obscure Bureau of Engineering link and were not available to the neighbors.

The Venice Pump Plant has existed in this area for a long time. It is not well maintained. It has no landscaping or attractive fencing. It is never upgraded, cleaned, and graffiti is often left for months before painting. The existing plant is stark, abuts directly onto a sensitive waterway, is littered with trash and graffiti, with weeds poking through the scant gravel setbacks. Over the last five years, the site has been used as a staging area for the Hyperion Dual Force Main project, so the neighbors have endured constant construction traffic, noise, dust and equipment.

In order to build a safe and beneficial project here, Public Works must be required to include the following measures in the project:

- The project needs to mitigate its impact on the sensitive canal and lagoon. The existing pump plant has no vegetation whatsoever and the canal banks are not appropriately landscaped with native materials. Additional landscaping should be added to the existing facility including vines to cover walls which are frequently graffitied.
- Upgrades should be required to the aesthetics of the existing plant including painting, consideration of a mural, and additional planting in currently empty and trash filled planters and side yards.
- The new facility must be designed and landscaped in keeping with the residential area and sensitive lagoon.
- Provide a buffer of landscaping and walls between the new facilities and the directly adjacent residential buildings, including a minimum 6-foot block wall and 10 feet of landscaping between both the parking lot and the new facility and the nearest adjoining residential property to the north and west.
- Include an on-going obligation to clean and maintain the existing and new facilities when they are complete.

Adopt binding conditions of approval that clearly spell out all obligations in the future so that neighbors can monitor and enforce, including each requirement of the approvals and the MMRP.

For all of the above reasons, this project should not be approved, but should be sent back to the drawing board so that Public Works can design a compatible facility. To place this facility in a residential neighborhood in a sensitive wetland location requires careful consideration and strict conditions.

Kristy Canon - 3809 Esplanade (building owner)

From: **Cannon Enterprises, Inc.** <cannonenterprisesinc@gmail.com>
Date: Thu, Apr 14, 2022 at 8:16 AM
Subject: Auxiliary Pumping Plant in Venice
To: <cpc@lacity.org>, Elizabeth Gallardo <elizabeth.gallardo@lacity.org>, <mike.bonin@lacity.org>

To Whom it may concern,
I am the property owner directly north of the new pumping station location. This project is going to affect my income that is generated from my income property located at 3809 Esplanade. My current tenants may leave because of the project and the proximity of the industrial equipment to their bedrooms/ living space. It will be significantly harder to get market rent if some of the following concerns are not taken into account:

- The design is incompatible with the neighborhood
- No buffer from the project and residential homes
- We have health concerns of having transformers and electromagnetic fields near residential homes
- Equipment noise and construction impacts

I understand that this is a vital piece of infrastructure that the community needs, but my property being so close to the project and having owned this property for over 30 years, I feel my concerns are not being heard or given any value.

Thank you,
Kristy Cannon
--
Cannon Enterprises
8405 Pershing Dr. #500
Playa Del Rey, CA 90293
Phone: (310) 823-2082
Fax: (310) 823-2085

Robert & Lucia Williams – 3805 Esplanade

From: Lucia Williams <luciaw2012@gmail.com>
To: cpc@lacity.org, elizabeth.gallardo@lacity.org
Cc: mike.bonin@lacity.org

Mon. Feb 28. 2022 at 1:35 PM

Dear Commissioners:

We along with our neighbors are writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to community concerns as we were never shown a final architectural design or landscape plan. This is an industrial facility in a residential neighborhood abutting a sensitive wetland area--more care should be taken to buffer the use from existing homes and resources.

The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping and aesthetics.

Additionally, the transformers proposed within the new location generate electromagnetic field (EMF) known to cause cancer and we believe it to be a risk to our health and the community at large.

We are concerned that the parking lot will create an unsafe environment near homes and additionally will provide only two spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night? We understand that the project is essential for the area, however we wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication.

We oppose moving forward with the project until these concerns are addressed.

Sincerely,
Robert and Lucia Williams
3805 Esplanade
Marina del Rey, CA 90292

Eliane Gans – 3933 Esplanade (property owner)

From: Eliane Gans <elianegans@gmail.com>
Subject: Venice Axilliary Pumping Plant
Date: April 8, 2022 at 11:22:56 AM PDT
To: cpc@lacity.org, elizabeth.gallard@lacity.org, mike.bonin@lacity.org

To All of you, and to whom it may concern:

I have been a resident of my property at 3933 South Esplanade W. For over 35 years. I have endured cracked streets and lack parking for many years. And the pumping plant that reduces the value of my property.

I am writing to you today to voice my concerns and to object to the proposed Auxiliary Pumping Plant at the end of my street. At 133 East Hurricane and the adjacent lot at 3813 South Esplanade w. My property/residence will be impacted by this construction, and it will affect the future value or all of our properties.

- There has not been adequate community or resident communication
- The design has not been approved or reviewed by the residents or is not in keeping with the current neighborhood.
- The design should have a residential look and materials to blend with the residences and environment of the Lagoon.
- Residents should be given a chance veto review the design and comment and request any changes that are deemed necessary
- The proposed Pumping plant buttes right up against residential property—this is NOT OK.
- There are environmental and health concerns about the electronics, transformers and electromagnetic fields that will impact the residents
- Noise and equipment will destroy our wetland peace and quiet,,,,, and create parking and vehicle access problems. and in general create more congestion in an already contested neighborhood
- The unsecured parking lot will invite homeless people and will not create any additional parking and will even block any parking that might be accessible.
- There should be buffers between the parking and the residences.
- How will the parking lot be managed. And WHY are there only 2 public spaces, when parking is an issue already in this area
- There are no studies that I have seen, that address any environmental impact on our sensitive lagoon—which is why we all live here!!!
- Previous construction of this Public Works with the existing facility has had a bad track record for noise, debris, obstructions of the street and other problems.
- Past Public Works projects in our neighborhood have caused a barrage of constructions. Issues over 7 weeks causing discomfort to all neighbors and a lack or peace!

Lastly, what are the benefits to us, the residents? YOU do not live here, and have no knowledge about the very special residential area that this is, and why we have chosen to live here.

I AM STRONGLY OPPOSED TO THIS PROJECT—YOU HAVE NO RIGHT TO IMPACT OUR HOMES AND THE VALUES OF THIS NEIGHBORHOOD, AND OUR SAFETY AND HEALTH.

Thank you for reading this letter…. I hope that you will consider my concerns and dither concerns of all my neighbors—and or the entire Marina Peninsula!

Sincerely,

Eliane Gans
Owner
3933 Esplanade W.,
Marina Del Rey, CA 90292
(310) 339-4056

WE ARE ALL TENANTS OF 3933 South Esplanade W. and STRONGLY OPPOSE THIS PROJECT, AND WE DO NOT WISH TO MOVE AWAY AS A RESULT OF THIS PROJECT.
Hans Brofeldt
Wil Mavronicolas
Shawn Groshans
Kate Stone

ARTfully,
Eliane Gans
LONNY GANS & ASSOCIATES
Fine Art

Tanya Spero – 113 ½ Hurricane St

TS **Tanya Spero <tanya1040@aol.com>** VNC Parking & Transport March 12, 2022 at 2:35 PM

Re: Hurricane St Auxiliary Pumping Plant Project - It's A Mess

To: Rick <chucksteak897@yahoo.com>, Steve Bradbury <steve@mycyberstuff.com>

Hi Steve

I was forwarded the emails and I definitely would appreciate your representation. I allow you to represent me for this issue regarding the employee parking lot. I agree that the parking lot should not be built. It will bring more traffic and we have enough as it is on the weekends.
Thanks so much,
Tanya Spero

Sent from my iPhone

Larry Lesser, MD & Claude Lesser – 3609 Esplanade (owner)

From: Lawrence Lesser lessermd@mac.com

Date: Wed, Feb 23, 2022 at 5:03 PM

Subject: 128 Hurricane & So. Esplanade

To: <cpc@lacity.org>, <elizabeth.gallard@lacity.org>
Cc: mike.bonin@lacity.org

Dear commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plan project proposed at East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to the community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from existing homes and resources.The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics.

We are concerned that the parking lot will create an unsafe environment near homes, and additionally providing only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night. We understand that project is essential for the area, however we wane on trust due to past promised form Public Works and constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement of communication.

We oppose moving forward with the project until these concerns are addressed

We have been living in the area for 20 years, and never saw any attempt to fix the unpaved road abutting the proposed project. It is very unsafe to walk and a real eyesore.

Sincerely

Larry Lesser, MD, and Claude Lesser
Homeowner 3609 Esplanade. Marina del Rey 90292

Jeff Lee – 3701 Esplanade (owner)

From: Jeff Lee ilee@laurbanhomes.com

Date: Sun, Feb 27, 2022 at 12:11 PM

Subject: Venice Auxiliary Pump plant, March 10 hearing, Case ZA 2017-3950-ZAA-1A and related cases

To: <elizabeth.gallardo@lacity.org>
CC: cpc@lacity.org

Dear Planning Commission:

I have lived on Esplanade, two blocks from the proposed pump station, for twenty years raising my family. I am writing to oppose the current plans for the pump plant and parking lot.

I have been a real estate developer in the City of Los Angeles for over 40 years building over 40 projects through the City including hundreds of homes in CD 11.

The process followed by Public Works to design and permit the pump station would never be allowed for any private developer. For the past 40 years on every one of our developments we have had extensive community meetings, neighborhood council presentations, and meetings with the council office. We have been responsive to the community
and the council office.

In this case Public Works has been allowed to ignore the neighborhood keeping this case on hold for over four years. In 2016 we had a community meeting with representatives of the council office and the Department of Public Works. I was personally assured that my concerns of the community would be addressed and additional community meetings to
review design would be held. We asked many times when the City would respond which never happened. Had we treated the community this way in our business, our projects would never move forward. If we stonewalled the community for four years, our case would have been terminated.

I am not against the development of the pump station as the City needs to continually upgrade its infrastructure. The pump station is surrounded by 20' alleys and the ecologically sensitive Grand Canal. The community concerns need to be addressed including landscaping, design, construction, mitigation to enhance the area around the pump station, and continual maintenance. We lived through the construction work at this site for the Dual Force Main project, which was a disaster. We live on a daily basis with the eyesore of the existing pump station and lack of maintenance or pride in the neighborhood exhibited by Public Works.

I hope you will grant these appeals and require Public Works to live up to its promises.

Sincerely

Jeff Lee
3701 Esplanade

Clare Bronowski – 3701 Esplanade (owner)

CB **Clare Bronowski <clareb1050@gmail.com>** VNC Parking & Transport March 12, 2022 at 4:39 PM

Hurricane Pump Plant and Parking lot

To: Robert Thibodeau <robert.thibodeau@venicenc.org>, Jonathan Deer <virtualjonny@gmail.com>, Cc: Steve Bradbury <steve@mycyberstuff.com> Details

We live two blocks from the Venice Pump Plant, and we write to support the VNC Transportation Committee motion opposing the current plan for the Auxiliary pump plant and parking lot.
We are concerned that the current plan does not protect the nearby residences from noise, privacy and industrial type activities. Public Works needs to rethink the plan and include buffers, privacy walls, landscaping, security measures and long term maintenance to protect the neighborhood and the sensitive canal and lagoon area. The parking lot must be locked and secured when not in use by Public Works employees. The entire area must be well maintained, not allowed to be full of weeds, trash and graffiti as it currently is.

Thank you.
Clare Bronowski and Jeff Lee

Leslie & Michael Adler – 3601 Esplanade

April 24, 2022

To: Los Angeles Planning Commission

Re: 128 Hurricane & 3813 So. Esplanade
ZA2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A | DIR-2017-4167-PUB-CDP-SPP; ZA2017-3953-
CU

Email: cpc@lacity.org; elizabeth.gallardo@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from existing homes and resources.

The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics. Additionally, the transformers proposed within the new location generate an electromagnetic field (EMF) known to cause cancer and we believe to be a risk to our health and the community at large. We are concerned that the parking lot will create an unsafe environment near homes, and additionally provide only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night?

We understand that the project is essential for the area, however we wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication.

We oppose moving forward with the project until these concerns are addressed.

Sincerely,

Leslie and Michael Adler
Neighbor
3601 Esplanade MDR-Home Owner

Jennifer Kelton – 3615 Esplanade

On Mon, Apr 25, 2022 at 8:43 AM Nomad1800 <nomad1800@aol.com> wrote:

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade.

Please note that one of my main concerns is the public parking lot. I am not sure why it is needed? And it will only create problems - as you also are very aware of, and also based on the current state of homeless and transients in our area.

Jennifer Kelton
3615 Esplanade
MDR, CA 90292

Melly Liburd – 120 ½ Galleon (owner)

Wed, Apr 13, 2022 at 3:04 PM
Melly Liburd mellyliburd@yahoo.com

April 8, 2022

To: Los Angeles Planning Commission
Re: 128 Hurricane & 3813 So. Esplanade
ZA2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP.1A | DIR-2017-4167-PUB-CDP-SPP: ZA2017-3953-CU

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this proiect was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or If there was any response to community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to butter the use from existing nomes and resources

The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics. Additionally, the transformers proposed within the new location, generate electromagnetic field (EMF) known to cause cancer and we believe to be a risk to our health and the community at large.

We are concerned that the parking lot will create an unsafe environment near homes, and additionally providing only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night?

We understand that project is essential for the area, however vie wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication.

We oppose moving forward with the project until these concerns are addressed

Sincerely,
Melanie Liburd
120 1/2 Galleon Street, Marina Del Rey, CA 90292
Homeowner

Andrew Freedman – 20 Ironsides

April 13, 2022

To: Los Angeles Planning Commission
Re: Proposed Venice Auxiliary Pumping Plant (VAPP) 3813 S. Esplanade, 3817 S. Esplanade and 3913 S. Esplanade W. (128 E. Hurricane Street)
ZA 2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A; DIR-2017-4167-PUB-CDP-SPP; ZA 2017-3953-CU

Via Email: cpc@lacity.org; elizabeth.gallardo@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

In addition to the very astute comments made by Genevieve Morrill and other neighbors, I would like to share my concerns.

General
The Contract Documents for this project were submitted and cleared by Los Angeles Department of Building and Safety in 2017 without any public notice or review. Approval by two agencies (LA City Planning Department and California Coastal Commission) which both require public notification and public review, is only now being sought. Typically, Planning and Coastal clearances are the first to be addressed, not the last. The Public review of this project has been severely lacking, and City officials have both a legal and moral obligation to make sure the citizens of Los Angeles are heard.

This project spans two existing lots (which both front the Grand Canal) without an approved lot-tie agreement. All lot-tie agreements must go through a Public Hearing and review process. This has not been done, and all further consideration of this project should be suspended until the proper Public Hearing process has been completed and the lot-tie agreement approved.

The front yards of the two City lots of the proposed VAPP both face the Esplanade (Grand Canal). The rear yards of these two City lots face Canal Court. Hurricane Street is located along the side yard of only one of the parcels. The use of 133 and 139 Hurricane Street as the project address is both inaccurate and misleading. All references to 133 and 139 Hurricane Street for this project should be changed to 3813 and 3817 South Esplanade, respectively.

Design Issues
The recent Joint Determination letter from the LA City Director of Planning and Zoning Administrator states the following: "*As proposed, the project is visually compatible with the character of the area and will enhance the visual quality of the existing neighborhood.*" I couldn't disagree more.

The existing VPP is a one-story building surrounded by a sound wall, painted in neutral colors. It is quiet and odorless, and its low massing minimizes its effect on neighboring residences. In contrast, the proposed VAPP has a large concrete-walled Electrical Building that is oriented in a north-south direction – 90 degrees from the adjacent residences – which would form a 32-foot-high solid wall, not only blocking views to the Grand Canal, but creating shadows (between 10 am and 3 pm) directly onto all adjacent residences located to the north and west.

A recent change to the flood zone map in the Venice area was made effective by FEMA on April 21, 2021. As a participant to the National Flood Insurance Program (NFIP), the City of Los Angeles is required to enforce the flood clearance requirement for new construction and substantial improvement projects.

The two lots where the future VAPP is to be located were affected by this flood zone map update. The new Base Flood Elevation (BFE) is 8 feet above sea level and all new buildings require that the Lowest Finished Floor Elevation (LFFE) be at 9 feet (8 feet + 1 foot of free board) per LA City Ordinance 186952.

The current design for the VAPP has the Lowest Finished Floor Elevation (LFFE) at 7.67 feet – 16 inches below the minimum required level per the new FEMA requirements. Note, the building generator, all switchgear electrical equipment for the pump motors, and all exterior transformers will be underwater during a flood. This will lead to the complete failure of the pumps and a catastrophic environmental disaster. **The entire VAPP must be redesigned accordingly.**

The 32-foot Electrical Building height is excessive and unnecessary. It is twice the height of the existing VPP. The BFE issue noted above will only make this tall building even taller. Further, the current two-story design has no elevator to accommodate disabled employees, with the only restroom and office located on the second floor. **The Electrical Building should be changed to a one-story structure and reoriented in an east-west direction along Hurricane Street.**

These design changes would allow for a large open buffer area for the residences located directly to the north, eliminate shadows, reduce the project's visual impact, be more compatible with the existing VPP, accommodate disabled employees, and better comply with the Venice Coastal Zone Specific Plan.

The three large transformers (each 6.5' to 7' tall) located within the required setback are unacceptable. They are located outside the decorative fencing and surrounded by 19 steel bollards along the entire Canal Court property line. These transformers would be an eyesore. Additionally, they will generate noise. They must be repositioned out of sight and away from any adjacent residences. If a one-story VAPP were U-shaped facing the existing Venice Pumping Plant, the transformers could be placed within the recessed U-shape with direct access to Hurricane Street, but out of sight from adjacent residences.

The HVAC equipment for the Electrical Building is located outside near the north property line and in direct view from adjacent residences. This equipment will generate noise and heat, and should be relocated away from residences (perhaps on the roof) and screened from view.

Parking Lot/Green Space

The proposed public artwork located in the green space south of the proposed parking has <u>not</u> been designed or specifically defined. The design and massing of this proposed artwork should be clearly presented as part of the formal public review process prior to any project approval. In addition, the City must provide written assurances as part of the Conditions of Approval for this project that no artificial lighting, sound or kinetic movement will be associated with the public art. Landscaping shown in the same area as the public art should be revised accordingly prior to further public review.

The accessible aisle for the van parking space shown at 3913 S. Esplanade W. (128 E. Hurricane Street) should be located on the passenger side. The current configuration does not meet either Federal or State Accessibility Code requirements, and should be redesigned.

I oppose any further action on this project, including an indefinite postponement of the April 28, 2022 Public Hearing, until these issues are addressed and corrected.

Sincerely,

Andrew Freedman
20 Ironsides #18, Venice, CA 90292

Steve Freedman
732 Howard St., Venice, CA 90292

Marilyn Mikos – 115 Eastwind St (owner)

To Whom It May Concern:

I stand OPPOSED to the way in which the above referenced Pumping Plant is being constructed. Although I understand the sewage plant is a necessary evil, there are many issues that have not been taken into consideration with the construction design of the project.

I have lived in the same building (which I own) for 33 years. There has been literally zero attention paid to upgrading the infrastructure of this residential area by the City. The "roads" are in dire need of repair, including "Speedway" (which will be adjacent to the Plant) which floods every time it rains. The potholes are ridiculous and no amount of calls to have them repaired gets any attention at all. Yet, you seem to have a burning desire to build an industrial structure right smack dab in the middle of a lovely residential community.

This Plant is being constructed in the MIDDLE OF A BEAUTIFUL RESIDENTIAL AREA...People literally live inches away from where transformers will be housed, which could conceivably cause grave health concerns @ electromagnetic fields. The actual construction of the Plant will disrupt the entire neighborhood with noise, dust, etc. The last time Public Works did construction in this area, several people became ill from the particulate matter in the air and were forced to move. Add to this, the beautiful Lagoon and the indiginous flora and fauna that reside there (and have for decades) - all of which will be disrupted.

There has literally been no communication with the immediate community about what the plans are. From what we "understand", the design is incompatible with the community; further, you have offered no benefit to the community, not only aesthetically (no buffer between the Plant and the community), but also concerning the health and well being (including safety) of the people who live here. Why would you build an industrial project in the middle of a residential zone? It is beyond my comprehension.

I am in dire opposition to moving forward with this project until these (and other) concerns are addressed. I sincerely hope you will, for once, consider the concerns of those of us who live in the community. We pay taxes...and we vote.

Sincerely,

Marilyn Mikos (owner)
115 Eastwind
MdR 90292
marilyn.mikos@gmail.com

Arianne Flemming & Justin Wasser – 3812 Pacific

To Whom it May Concern,

We are residents of 3812 Pacific Ave, located at the corner of Pacific and Hurricane. We have heard the news that the City of Los Angeles plans to construct a large sewage plant at the two vacant lots at the end of Hurricane.

We are writing to express our great concern with this plan for a number of reasons.

First, and most importantly to us, we understand the building for the plant will house transformers, emitting electromagnetic fields. EMFs have been known to cause cancer and as residents we are seriously concerns about how this plant will put our health and the health of the neighborhood at risk.

Further, we love the ecological reserve and lagoon near our house, this plant could have significant impact on the ecological health and well-being of this sensitive lagoon.

Finally, we are concerned that the parking lot proposed near the plant will create an unsafe environment on our street. We are concerned about how the lot will be managed and controlled and secured and the potential safety risks it poses to the community.

We oppose moving forward with the project until these concerns are addressed.

Sincerely,

Arianne Flemming and Justin Wasser

3812 Pacific Ave Marina Del Rey 90292

Susan Afriat & Steve Hyman – 4000 Pacific

Susan Afriatafriats@gmail.com

To: elizabeth.gallardo@lacity.org

Dear Commissioner:

Thu, Mar 3, 2022 at 8:49 AM

We are neighbors writing to share our concerns regarding the Venice Pumping Plant projected proposed at the above addresses. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017. It is impossible to determine from the notice provided what the final design is or if there was
any response to community concerns - we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from existing homes and resources.

We have many concerns: the parking lot will create an unsafe environment near homes; buffers are needed between industrial and parking uses and the adjoining homes, etc.

We understand the project is essential for the area; however, past experience has led us to not trust the promises and assurances that will be made. We oppose moving forward until these concerns are addressed

Thank you for listening to our concerns.

Susan Afriat and Steve Hyman
4000 Pacific Avenue
310-893-4616

Bethany Gorfine – 3950 Via Dolce (owner and condo board president)

On Mar 15, 2022, at 8:53 PM, Bethany Gorfine <Bethany@federalhill.tv> wrote:

Sent from Bethany's iPhone

I live at 3950 Via Dolce, Our 145 unit condo complex (of which I'm HOA president) faces the lagoon and pumping plant site.

I don't appreciate when a design and proposal has been approved and then changed without notifications to the community including the VNC.

SIze does matter, construction matters especially to homeowners on via Dolce as well as surrounding Hurricane.

It was hard enough to to live through the past 5 years of construction and now more years across from us where sound really travels over the lagoon.

We just lived through 4 apartment complexes 2 hotels, and the sewer project.
It's relentless.

We understand the need for an additional plant for the community but keep it simple, small, and no public parking which will turn it into a hangout- luring outsiders into the community.

Adding bicycle racks? An art exhibit? We don't want folks congregating on Hurricane - especially on weekends. It's a huge liability to our community on the Strand that is already experiencing massive intrusions and thefts.

Thank you.

Jonathan Tillman – 3719 Via Dolce

April 13, 2022

To: Los Angeles Planning Commission
Re: 128 Hurricane & 3813 So. Esplanade
ZA 2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A | DIR-2017-4167-PUB-CDP-SPP; ZA 2017-3953- CU

cpc@lacity.org; elizabeth.gallardo@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from exisXng homes and resources. The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics. **Moreover, a licensed architect should be hired to design the structure's exterior and its landscaping.**

Additionally, the transformers proposed within the new location, generate electromagnetic field (EMF) known to cause cancer and we believe to be a risk to our health and the community at large.

We are concerned that the parking lot will create an unsafe environment near homes, and additionally providing only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night?

We understand that project is essential for the area, however we wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication. **One such promise was to repair Via Dolce and Marquesas Way to the extent they were damaged due to construction activity. The applicant, however, left portions of those roads with deep ruts and broken pavement until the community complained to their local representatives. Therefore, continuing community oversight is essential to make sure there is compliance with applicant's obligations in this project.**

We oppose moving forward with the project until these concerns are addressed. Sincerely,

Jonathan Tillman
3719 Via Dolce
Marina del Rey, CA 90292

P.S. If the location of the power boxes endanger the residents of the adjoining property, the city may be liable for inverse condemnation.

Robin Rudisill

April 27, 2022

Los Angeles Planning Commission

Re: 128 Hurricane & 3813 So. Esplanade
ZA2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A
DIR-2017-4167-PUB-CDP-SPP; ZA2017-3953-CU

Honorable City Planning Commissioners:

I live in the area surrounding this project. The last time this project was presented to the community was in 2017, five years ago, and I participated in the hearing down at the Corinth hearing room at that time, expressing numerous concerns. I am deeply concerned that as an "interested party" (I filled out a speaker card and signed a list to be emailed all determinations, as I do at every hearing I attend) I was not notified of any hearings or determinations since that time. I only found out about this hearing because someone asked me how I felt about it. I do not understand why so much time has passed. This should be explained to the community.

This is a sensitive wetland area, surrounded by ESHA, in the Dual Permit Jurisdiction Coastal Zone. I cannot think of a more sensitive area in the Los Angeles Coastal Zone. See attached certified Venice Land Use Plan map. Aesthetics in such a sensitive area should be paramount, and the project must be designed to be compatible with the surrounding residential neighborhood.

This is an industrial facility in a residential neighborhood and as such buffers must be provided between the industrial and parking uses and the adjoining homes. The surrounding community must be given an opportunity to review the architectural design or landscape plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics.

I am also concerned that the parking lot will create an unsafe environment near homes and that only two spaces would be provided to the public. Please inform us re. the design, how the lot will be managed and controlled, and how will it be secured at night. Please put the project on hold until all of these concerns are addressed.

Sincerely,

For the Love of Los Angeles
and our precious Coast,
Robin Rudisill
(310) 721-2343

Adam Rose – 12 Buccaneer St.

I live at 12 Buccaneer, so I'm a few blocks away. That's why I opened my questions/comments by noting that precedence with concerns should go to closer residents (who will deal with this around-the-clock). That said, my girlfriend and I walk a loop around Grand Canal (at least to Lighthouse Bridge) almost daily, so we must pass this site on foot at least 300 times per year. We also help out with local cat rescues, and over the years there have been a number who've lived and/or been caught along the canal. We're night owls and tend to walk around midnight, so we also try to keep an eye out for issues at odd hours (hence why I got them to adjust the new lights on the old plant a few months ago).

From what you just sent me, it seems there are a lot of issues they need to address. I'm a bit fatalistic about this project in the sense that it's reasonable they'll eventually need more capacity (the alternative seems terrible!) It's a big question about how they get there, so I support your pushback on multiple fronts because it needs to be reasonable for those closest. In terms of more ancillary things that my girlfriend and I were thinking about:

- We're still wary of the new plant's noise and vibrations under normal operation (i.e., after construction is done). I was relieved they said the motors will be underground and with more modern technology. However, I'd love to see some sort of engineering report that confirms the noise/vibration projections.

- If this project is going to happen, they should ensure it adds to the community in other ways, including aesthetics. Instead of the harsh floodlights like the older building, maybe decorative street lamps or sconces with proper shading so they don't shine on other people's property or glare across the canal (possibly interrupting wildlife). Some greenery on the walls would be nice (bougainvillea, jasmine or some kind of ivy so it grows up the walls). Alternately, I like the idea of the art project or at least some fun but not garish colors. I think our most "controversial" suggestion may be benches, as I can imagine some folks are wary of them attracting long-term homeless to stay. These could be smaller size, or maybe a series of chair-width seats. With this being such a popular walking area, it never ceases to amaze me that the only benches on the whole peninsula seem to be in the kids park on Via Dolce.

- I worry that EIRs only focus on certain types of wildlife and may not be accommodating for "common" waterfowl like ducks. Those fledglings bring a lot of joy to the community each spring! Unless the noise/vibrations are in issue, it might be nice if that flat area over the "pool" could have some bushes as a protective habitat for mothers and their young. I'd love to make sure the design considers potential places they might fall and get trapped, too, and holes big enough to get in and out of (but not so big people can get through, as the mentioned a security concern).

Robert Nau – 4250 Via Dolce

I am a concerned resident and a condo owner at 4250 Via Dolce. Thank you!

Felicia Glade & Mike Pelletier – 116 Galleon St.

Hi, as a resident living close to the hurricane pumps, I am very concerned about this project.

Please eliminate the parking lot, and instead use parking on the pump plant property or street. Having an unsecured lot will invite security issues that will affect our children who play outside around there and who we take walks with along the canals. Please have security Patrol planned for this residential area as this lot will attract unhoused people to a peaceful quiet and currently safe neighborhood.

Please adopt written recorded conditions of approval that clearly spell out all obligations in the future so that neighbors can monitor and enforce, including each requirement of the approvals and the MMRP, and mitigations during construction years.

Thank you for reading. I hope you protect nearby residents and our children.

Felicia

Eliane Gans – 3933 Esplanade (owner)

Aug 10, 2022

To President Millman and Honorable Commissioners
City Planning Commission

I am a resident on Pacific Court/ South Esplanade West- 1/2 block from the pumping station.

I have been a resident and own the three Unit property, where I reside, for the past 38 years. I feel that the residents of this community- especially the residents who live on the Canal, are being invaded, disrespected and disregarded.

We have moved to this community and this special area for reasons that the City Planning Commission may not understand. It is a peaceful, and non-commercial area with beautiful residences, lovely landscaping, water and peace.

Now we are being invaded with a design of the pumping station that is horrible, not in keeping with any structures in the neighborhood and will be an eye sore to any adjacent residences. The design, the noise from the transformers and other equipment will impact any neighboring homes and even visitors. The equipment may also be dangerous to the environment and to those of us who live here.

The City Planning Commission DOES NOT LIVE HERE. And We do! This is a matter of our well-being and our daily lives!

The parking lot is not necessary, and in addition -WHY HAVE YOU REMOVED 4 PARKING SPACES necessary to the residents on Hurricane?? This area already has limited parking! This is not necessary, and another invasion and destruction of our quality of life in our neighborhood.

Lastly, and importantly, all of our property values will be diminished. Who would want to live near a Pumping station that makes noise, spews chemicals into the air and looks ugly, and an eye sore to the neighborhood...

I respectfully request that you re-design the new facility and review the recommendations that you have received. I also request that you landscape the entire area. And, of course, protect the neighboring residences.

With a plea of hope for your consideration and revisions, as requested by all of us who are residents; and the requests made by Genevieve and Mile Morrill-Borassi. And Kristy Swanson.

These requests are truly from all of us in the neighborhood, and I respectfully ask for your assistance and re-consideration of the current plan.

Sincerely,

Eliane Gans
Property owner: 3933 Esplanade West, Marina del Rey, CA 90292

Jenesa Kurland – 4300 Via Dolce (condo owner)

Whatever City says they're going to do to mitigate or their useless report says regarding noise, vibration, home damage, etc. is all BS rhetoric: City takes no responsibility and homeowner is helpless. Their preconstruction survey of one's home carries as much weight as blank pieces of paper.

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Ira Brown <ira.brown@lacity.org>

Re: Serious Concerns re VAPP Project on Hurricane St (MDR)

1 message

Steve Bradbury <steve@mycyberstuff.com> Fri, May 16, 2025 at 8:17 AM
To: Ira Brown <ira.brown@lacity.org>
Cc: Juliet Oh <juliet.oh@lacity.org>, Lisa Webber <lisa.webber@lacity.org>, Kevin Keller <kevin.keller@lacity.org>

2 of 2 emails.

Ira:

Here are some additional files relevant to the VAPP re-zoning motion. I'm happy to provide additional color as to why any/all of these documents have been submitted. Please include them in the public record.

With appreciation,

Steve

~~~~~~~~~~~~~~~~~~~~
Steve Bradbury
310-428-5904
steve@mycyberstuff.com

On May 5, 2025, at 9:08 AM, Steve Bradbury <steve@mycyberstuff.com> wrote:

Ira:

This email is regarding this morning's VAPP re-zoning hearing at 10:30a, I have attached the community's Term Sheet defining specific issues and proposed solutions. in addition, please find an updated compendium of neighborhood emails expressing concerns with this project as well as the previously provided Venice Neighborhood Council motion opposing the re-zoning approval until a specific condition is met, all to be entered into the public record.

For the public comment portion of today's hearing, I'm requesting additional time (5:00 minutes total please) as the primary spokesperson for the community. In addition, it would be greatly appreciated if you would allow Kenya Lee, who lives directly adjacent to the proposed VAPP, additional speaking time. Other community members will also be speaking with their allotted time.

With appreciation,

Steve Bradbury
109 Hurricane St.

~~~~~~~~~~~~~~~~~~~~
Steve Bradbury
310-428-5904
steve@mycyberstuff.com

Begin forwarded message:

From: Steve Bradbury <steve@mycyberstuff.com>
Subject: Re: Serious Concerns re VAPP Project on Hurricane St (MDR)
Date: November 7, 2024 at 4:48:31 PM PST
To: Ira Brown <ira.brown@lacity.org>
Cc: Juliet Oh <juliet.oh@lacity.org>, lisa.webber@lacity.org, Robin Rudisill <wildrudi@icloud.com>

Ira, please add me to your list of interested parties for advance notification with regard to any hearing and/or CPC commission meeting regarding this matter. My email is steve@mycyberstuff.com and mailing address is 109 Hurricane St, MDR, CA 90292.

Separate but related, please include in the public record the recent VNC motion passed in Sept as well as an overview of pertinent community issues and a compendium of neighborhood emails written over the past several years, all attached.

Finally, please be aware we continue to seek engagement with someone in LA Public Works who is legitimately empowered to make decisions (not lip service as has been the case to date) AND genuinely seeks a win-win for Public Works & the community. Our mission is not to stop this important infrastructure project nor are we are looking to be unreasonable. We simply seek solutions to real, impactful issues.

With appreciation,

Steve

~~~~~~~~~~~~~~~~~~~~
Steve Bradbury
310-428-5904
steve@mycyberstuff.com

On Nov 7, 2024, at 4:17 PM, Robin Rudisill <wildrudi@icloud.com> wrote:

CPC-2024-2010-GPA-ZC-CU2-SPPC
128 Hurricane, Venice
Venice Auxiliary Pumping Plant (VAPP)

Public Officials,

I live on Ocean Front Walk on the Marina Del Rey Peninsula. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more.

This project expands the pumping of sewage down to Dockweiler and is located in the middle of our residential neighborhood as well as in the middle of Environmentally Sensitive Habit Area (ESHA). It is an unacceptable land use for this area and yet it is critical infrastructure and we understand it must move forward. However, the lack of concern shown regarding finding reasonable mitigations for the impacts on our residential neighborhood and the lack of protection and mitigations for the ESHA is appalling and unacceptable.

The construction plans as designed will have a painful, material impact on this community and surrounding ESHA for decades.

Our primary concerns are:

- **Mitigation measures in order to conform as closely as possible with the certified Venice LUP, the state policy guidance for determining conformance with the Coastal Act.**
    - Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas.
    - Policy I.C.1 states that the scale and design of industrial facilities must be compatible with adjacent and neighboring uses.
    - Policy 1.A.5 seeks to preserve and protect stable multifamily neighborhoods.
    - Policy 1.D.1 states the only permitted development adjacent to the Grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.
~~~~~~~~~~~~~~~~~~~~

- **Elimination of the proposed parking lot at 128 Hurricane St.** for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city.
- **Modification of the project design** so that it is visually compatible with the residentially zoned neighborhood.

Given that this location is grossly incompatible with this location and never should have been allowed to happen, the City's Bureau of Engineering should be bending over backwards to keep the impacts on the residential neighborhood and surrounding ESHA to a bare minimum.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through reasonable and respectful negotiations in order to minimize impacts on the surrounding ESHA and residential neighborhoods.

PLEASE support this request for fairness. Please work with us to make reasonable changes to the project in order to protect our residential neighborhood and the ESHA.

Thank you.

For the Love of Los Angeles
and our precious Coast,
Robin Rudisill
(310) 721-2343

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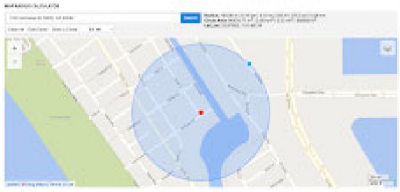
12 attachments



500' Radius of 133 Hurricane St .png
367K

Sierra Club Comment Letter re VAPP 12 02 2024.pdf
1885K

Pre_Designe_Concept_Report_final_11-13-07.pdf
299K

Venice Auxiliary Pump Plant (VAPP) appeal 022822.pdf
2072K

6.18.22 VAPP community Quesstions.pdf
191K

Marina Evacuation Planning re VAPP.pdf
91K

VAPP Community Feedback 08.01.22.pdf
127K

VAPP Parking 08.03.22.pdf
778K

LASAN Term Sheet_FINAL.pdf
476K

Hurricane Pumps Neighbor Letters.pdf
878K

VNC VAPP Motion.pdf
76K

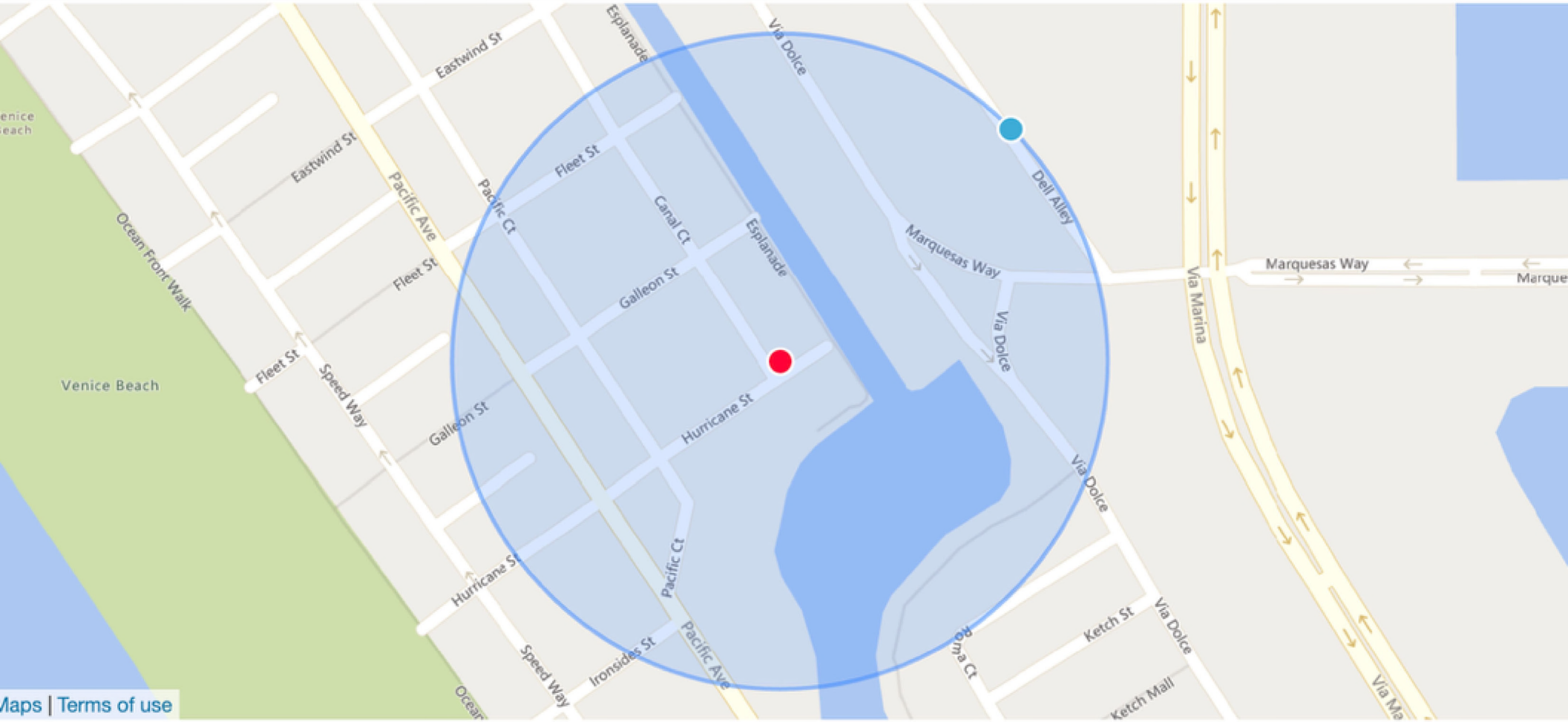
VAPP Background.pdf
59K

LCULATOR

St, MDR, CA 90292 Search

Circle Draw a Circle 0.1 mi

Radius: 160.00 m | 0.16 km | 0.10 mi | 525 ft | 175.0 yd | 0.09 nm
Circle Area: 80424.77 m^2 | 0.08 km^2 | 0.03 mi^2 | 865685 ft^2
Lat,Lon: 33.97602,-118.46134



Venice Neighborhood Council

PO Box 550, Venice, CA 90294
venicenc.org

MOTION BACKGROUND: Los Angeles Public Works (LAPW) has proposed the Venice Auxiliary Pumping Plant (VAPP) at 128 Hurricane St and an associated parking lot for employees and limited public use at 133 Hurricane St, MDR. The residents acknowledge the VAPP is considered critical infrastructure. From 2017 through and including the final city approval process, LAPW never meaningfully and materially addressed issues raised by the community. In fact, the City Planning Commission instructed LAPW to meet with the community. Nothing changed because of those meetings despite a multitude of suggestions and proposals offered to LAPW. The issues include, but are not limited to:

1. Conformance with the certified Venice LUP (Policies I.A.5, I.C.1, I.C.6, and I.D.1);
2. Meeting established Public Benefit standards including a 10' landscaped, irrigated buffer along all property lines. The performance standards applied to this project are applicable to those on a major or secondary highway, not a residential street;
3. Adherence to court-mandated ESHA protections in the Ballona Lagoon/Grand Canal area including no dredging and/or use of heavy equipment both of which are part of the project plan;
4. Mitigation of EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas release. The community has put forth a plan to address some of these issues;
5. Mitigation of "significant and unavoidable" construction-related issues including ground-borne vibration which could result in residential building damage, and, construction noise that exceeds LA CEQA Thresholds guidelines;
6. Improvement of inadequate emergency access during construction activities;
7. Change to five day/week construction and more restricted hours in lieu of six days/week;
8. Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city;
9. Modification of the project design so that it is compatible with the residentially zoned neighborhood;
10. Actionable protection of residential properties from dirt, dust and other construction impacts;
11. Upgrade of a deficient maintenance plan for both the new and existing facility.

The intention of this motion is not to stop a necessary infrastructure project. It is to seek a meaningful, results-oriented dialogue with Public Works to identify reasonable solutions for these issues.

Venice Neighborhood Council

PO Box 550, Venice, CA 90294
venicenc.org

(sent via email)
Traci Park, LA City Council Person CD-11 - Councilmember.Park@lacity.org
Sean Silva, Venice Field Deputy, CD-11 - Sean.Silva@lacity.org
Juan Fregoso, District Director, CD-11 - Juan.Fregoso@lacity.org
Marqueece Harris-Dawson, LA City Council President - Marqueece.Harris-Dawson@lacity.org
Hydee Feldstein Soto, City Attorney - Hydee.FeldsteinSoto@lacity.org
Mike Davis, President Pro Tempore, LA Public Works Board of Commissioners - Mike.Davis@lacity.org
Teresa Villegas, Vice President, LA Public Works Board of Commissioners - Teresa.Villegas@lacity.org
Vahid Khorsand, Commissioner, LA Public Works Board of Commissioners - Vahid.Khorsand@lacity.org
Susana Reyes, Commissioner, LA Public Works Board of Commissioners - Susana.Reyes@lacity.org
Ted Allen, City Engineer, Bureau of Engineering - Ted.Allen@lacity.org
Chloe Seifert, Coastal Program Analyst, California Coastal Commission - Chloe.Seifert@coastal.ca.gov

On Sept 17 2024, the Venice Neighborhood Council Board of Officers passed the following motion by a vote of 13-4-0.

MOTION: The Venice Neighborhood Council opposes CPC-2024-2010-GPA-ZC-CU2-SPPC-- allowing the City of Los Angeles to obtain a General Plan Amendment (GPA) and Zone Change (ZC) from RW2-1 to Public Facilities at 133 Hurricane St., a Project Review (SPPC), and a Conditional Use for the construction, use, and maintenance of a public parking area in a residential zone (CU2) for the empty lots located at 128 Hurricane St/3913 Esplanade -- unless LA Public Works (LAPW) materially and in good faith addresses the community's serious issues with this project.

Sincerely,

Brian Averill
President
Venice Neighborhood Council

Hurricane Pumps Neighbor Letters

(Last updated: 12/2/24)

Re: Venice Auxiliary Pump Plant (VAPP), 128 and 133 Hurricane;
DIR-2017-4167; ZA-2017-3950 (plant); DIR-2017-4173; ZA-2017-3953 (parking lot)

The following members of our community have expressed their POV on this issue to date. We anticipate additional written responses as this process continues.

2024 Neighbor Letters

MIKE BORASSI & GENEVIEVE MORRILL-BORASSI – (FORMERLY) 3811 ESPLANADE. (ORIGINAL APPELLANTS) 5

KENYA LEE & JOEY JACKSON – 3811 ESPLANADE 6

HARVEY PLOTNICK – 125 & 127 HURRICANE ST (PROPERTY OWNER) 7

LESLIE & MICHAEL ADLER – 3601 ESPLANADE 9

MICHAEL HOFFS – 110 HURRICANE ST 10

MICHAEL HOLT – 127 HURRICANE 11

BETHANY GORFINE – 3950 VIA DOLCE (OWNER AND CONDO BOARD PRESIDENT) 12

ELIANE GANS – 3933 ESPLANADE (PROPERTY OWNER) 13

ROBIN RUDISILL – 3003 OCEAN FRONT WALK 14

TING CHANG – 28 MAST 15

TOM DRUCKER & MARCIA SELIGSON DRUCKER – 4 LIGHTHOUSE 16

JENESA KURLAND – 4300 VIA DOLCE (CONDO OWNER) 17

ROBERT DIBIASE – 115 ½ HURRICANE ST (OWNER) 18

TRACI GAY – 310 WASHINGTON BLVD. 19

GARY STROMBERG – 125 HURRICANE ST 20

TING CHANG – 28 MAST 21

JENESA KURLAND – 4300 VIA DOLCE (CONDO OWNER)....22

PERRY ROD – 3818 PACIFIC AVE....23

MARY-DOROTHY LINE – 125 PRIVATEER MALL....24

MICHAEL HOFFS – 110 HURRICANE ST....25

2022-23 Neighbor Letters

MARY LAING – 115 HURRICANE ST....27

STEVE & KAREN BRADBURY – 109 HURRICANE ST (OWNERS)....28

ADAM GOLDBERG – 110 HURRICANE ST....29

ROBERT DIBIASE – 115 ½ HURRICANE ST (OWNER)....30

MURIEL BLAKE & JOHN LARKIN – 110 HURRICANE ST.....31

GARY STROMBERG – 125 HURRICANE....33

MIKE BORASSI & GENEVIEVE MORRILL-BORASSI – 3801 ESPLANADE....34

KRISTY CANON - 3809 ESPLANADE (BUILDING OWNER)....36

ROBERT & LUCIA WILLIAMS – 3805 ESPLANADE....37

ELIANE GANS – 3933 ESPLANADE (PROPERTY OWNER)....38

TANYA SPERO – 113 ½ HURRICANE ST....40

LARRY LESSER, MD & CLAUDE LESSER – 3609 ESPLANADE (OWNER)....41

JEFF LEE – 3701 ESPLANADE (OWNER)....42

CLARE BRONOWSKI – 3701 ESPLANADE (OWNER)....43

LESLIE & MICHAEL ADLER – 3601 ESPLANADE....44

JENNIFER KELTON – 3615 ESPLANADE....45

MELLY LIBURD – 120 ½ GALLEON (OWNER)....46

ANDREW FREEDMAN – 20 IRONSIDES 47

MARILYN MIKOS – 115 EASTWIND ST (OWNER) 50

ARIANNE FLEMMING & JUSTIN WASSER – 3812 PACIFIC 51

SUSAN AFRIAT & STEVE HYMAN – 4000 PACIFIC 52

BETHANY GORFINE – 3950 VIA DOLCE (OWNER AND CONDO BOARD PRESIDENT) 53

JONATHAN TILLMAN – 3719 VIA DOLCE 54

ROBIN RUDISILL 56

ADAM ROSE – 12 BUCCANEER ST. 57

ROBERT NAU – 4250 VIA DOLCE 58

FELICIA GLADE & MIKE PELLETIER – 116 GALLEON ST. 59

ELIANE GANS – 3933 ESPLANADE (OWNER) 60

JENESA KURLAND – 4300 VIA DOLCE (CONDO OWNER) 61

2024 Neighbor Letters

Mike Borassi & Genevieve Morrill-Borassi – (formerly) 3811 Esplanade. (original appellants)

Dear Chair and members of the Venice Neighborhood Council Land Use & Planning Committee,

My name is Genevieve Morrill, and my husband and I filed the appeals to both City of Los Angeles Planning Commission, and more recently the California Coastal Commission. This project has been ill-conceived from the beginning and too large for the space. Understanding that it is an essential utility we need in our region, we were simply asking them to consider making it more compatible for the neighborhood and less intrusive on the community. At the time we filed the PC appeal, the city has not met or reached out to the community since 2016.

We are a casualty of this pending project, as our building is situated on the canal directly next to the vacant lot where the VAPP will be built. We have been renters for 28 years on the Canal and due to the pending construction, the owner sold the building, and the buyer decided to live there which therefore meant we had to move and find a new place to live at a considerable increase in market-based rate rents.

In my day job, I am the CEO of a Chamber of Commerce and therefore understand planning, zoning, and development. I attest that a developer would never be allowed to get away with such egregious disruption to a residential neighborhood. To have transformers and electrical equipment next to someone's bedroom window when the design can be flipped so that these electrical boxes would be on a vacated side of the street with no residents. They claim this impossible and frankly its only because they have already designed the project. A developer would be made, no matter what the expense to redesign.

This project is not compatible to the neighborhood aesthetics; it is too large for the location; it has negative impact to our community members; mitigation measures are not sufficient; has negative impact on the environment and a protected canal; and creates areas for more unhoused to encamp. Additionally, our understanding is that this project is an industrial use in a residential zone and no zoning was amended for its purpose.

Please oppose this project and help support the community members.

Thank you,

Genevieve Morrill
Formerly 3801 Esplanade/Grand Corso

Kenya Lee & Joey Jackson – 3811 Esplanade

I am writing to express my deep concerns regarding the ongoing plans for the Venice Auxiliary Pumping Plant (VAPP) project near my home at 3809-3811 Esplanade St in Marina del Rey. For over seven years, our community has diligently attempted to engage with Public Works to address critical concerns related to this project. Unfortunately, our efforts have largely been met with inadequate responses, leaving us feeling overlooked and unsupported.

While I recognize the importance of the VAPP as a critical infrastructure initiative, I am deeply troubled by the substantial and long-term negative impacts the current construction plans will have on my family and our community. Specifically, my primary concerns include:

Exposure to Toxins: The project involves significant excavation directly next to my home, raising serious concerns about potential exposure to hazardous substances that could endanger the health of residents, particularly children.

Structural Vibrations: Intense vibrations from construction activities could compromise the structural integrity of nearby homes, including my own, potentially leading to costly and irreversible damage.

Extreme Noise Levels: Construction noise will significantly affect my household's quality of life, particularly for my young child, whose well-being and development depend on a quiet and stable living environment. I also work from home and need a conducive environment to conduct my business.

Improvement of inadequate emergency access during construction activities.
Having a family residing next to this project concerns us to have an adequate emergency plan,a well thought out plan for emergency services during the time of construction.

Our community has never sought to halt this essential project. Instead, we have consistently requested an open and meaningful dialogue with project stakeholders to ensure fairness and adequate mitigation of these impacts. However, to date, we have seen little action or acknowledgment of our concerns.

The health, safety, and quality of life of our residents must be prioritized as this project moves forward. We are not opposed to progress; we simply seek fairness and the opportunity to live without unnecessary ha.rm or disruption

Thank you for your attention to this matter. I look forward to your prompt response and to working collaboratively toward a solution that benefits both the community and the project's success.

Sincerely,
Kenya Lee
3811 Esplanade, 90292
313-999-0264

Harvey Plotnick – 125 & 127 Hurricane St (property owner)

I own a property on Hurricane Street in Marina del Rey. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP Project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on lives for multiple years. My primary concern are:

* Conformance with the certified Venice LUP Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas. Policy 1.C.1 states that the sale and design of industrial facilities must be compatible with adjacent and neighboring uses. Policy 1.A.5 that seeks to preserve and protect stable multifamily neighborhoods. Policy 1.D.1 states the only permit development adjacent to the grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.

*Meeting established public Benefit standards including a 10' landscaped irrigated buffer along all property lines. The performance stands applied to this project are applicable to those on a major or secondary highway, not a residential street.

* Adherence to court-mandated ESHA protections in the Ballona Lagoon/Grand Canal area including no dredging and/or use of heavy equipment both of which are parr of the project plan *The community that introduced elements of the Grand Canal Restoration Plan (Phase 2) to address some of these issues. It is not an all or nothing

*Mitigation of other EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas releases. The community has put forth concepts to address some of these issues including the grand Canal Restoration Plan

* Mitigation of "significant and unavoidable" construction-related issues including ground borne vibration which could result in residential building damage, and construction noise that exceeds LA CEQA Thresholds guidelines. Section MM-NOI-2 of the mitigation plans does not adequately protect property from potential damage. The current plan is for more reactive than proactive using terms such as "may include." "If considered appropriate," and "as feasible and practical." Also, there is no timely mechanism for issues to be addressed/project to be halted in the event damage is done. Section MM-NO-3 of the mitigation plan is also inadequate. It strains credibility to believe noise control features will "reduce overall operational noise levels from all Project related sources to within 5db of existing ambient noise levels in the surrounding community (53-57db)."

* Change to five day/week construction and more restricted hours in lieu of six days/week.

* Alternative parking for up to 25 cars, most owned by residents, that park on Hurricane St daily during non-summer days and weekends year round. Hurricane St parking will cease to exist during construction hours. Where do these cars park?

* Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted Street parking around the current Venice Pumping Plant (VPP), at

a savings of at least $3.5 million to the city. The community has proposed a viable alternative that does not require this lot.

* Modification of the project design so that it is compatible with the residentially zoned neighborhood. There was very little, if any, community input during the design process,

*Actionable protection of residential properties from dirt, dust and other construction impacts. The community has offered viable suggestions.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through respectful negotiations. PLEASE support this request for fairness,

Thank you,
Harvey Plotnick

Leslie & Michael Adler – 3601 Esplanade

I live along Esplanade Canal on Eastwind.

We have a few concerns:

1. Adherence to court-mandated ESHA protections in the surrounding lagoon area;

2. Mitigation of EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas release;

3. Mitigation of "significant and unavoidable" issues including ground-borne vibration, which could result in residential building damage, and construction noise that exceeds LA CEQA Thresholds guidelines;

4. Change to five day/week construction instead of proposed six days/week;

5. Modification of project design so that it is compatible with its residentially zoned neighborhood;

6. Protection of residential properties from dirt, dust and other construction impacts;

7. Upgrade of deficient maintenance plan for both the new and existing facility.

Thank you
Leslie & Mike Adler
3601 Esplanade

Michael Hoffs – 110 Hurricane St.

As a 20+ resident of 110 Hurricane Street, I am in strong support of the motion. This is a classic case of the city not listening to the boots on the ground describing why the installation of the parking lot is not only not needed but strongly opposed for security reasons. For VAPP personnel, alternative parking on Hurricane has been found in other areas within a half block or less of VAPP. Homeless encampments, drunken disorderly conduct and contempt for Hurricane residents, constant traffic to find parking in the lot, mounting trash and lack of city funds to police the area have not been addressed and frankly will not be before construction.

Please ask yourself, would you want this parking lot built on your street? If you would support installing the parking lot on your street, would you be concerned if the aforementioned was not thoroughly embedded in the parking plan before construction?

Thank you for listening, your time to think about Hurricane Street's resident thoughts and frankly the chance to use the funds suggested for the parking lot on something else that will benefit the area in greater need.

Sincerely,

Michael Hoffs
110 Hurricane St

Michael Holt – 127 Hurricane

Greetings,

I live on Hurricane St in Marina Del Rey.

For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on our lives for multiple years. My primary concerns are

- Mitigation of "significant and unavoidable" construction-related issues including ground-borne vibration which could result in residential building damage, and, construction noise that exceeds LA CEQA Thresholds guidelines.
- Change to five day/week construction and more restricted hours in lieu of six days/week.
- Off-site workspaces for home-based workers
    - The city says it will be managed by the construction company but there have not been any guarantees of location or suitability.
- Actionable protection of residential properties from dirt, dust and other construction impacts.
    - The community has offered viable suggestions.
- Alternative parking for up to 25 cars, most owned by residents, that park on Hurricane St daily during non-summer days and weekends year round
    - Hurricane St parking will cease to exist during construction hours. Where do these cars park?
- Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through respectful negotiations.

PLEASE support this request for fairness.

Thank you,

Michael Holt
127 Hurricane Street

Bethany Gorfine – 3950 Via Dolce (owner and condo board president)

As an association that lives across the lagoon from Hurricane, and an association that lived through the dual main project for five years, with drilling immediately outside our 7 buildings between Marquesas and Tahiti on Via Dolce and via Marina, we are still feeling the effects of the project. I will elaborate.

I would like to say a few things regarding the care of the Ballona Lagoon, and Grand Canal - parking issues, vibrations, care, concern and communication for and of neighbors, repairs, plumbing, mental health, 6 days of noise, chaos, construction, personnel are all issues. Day in. Day out.

Bethany Gorfine
President, Marina Strand Colony 1.
145 units

Eliane Gans – 3933 Esplanade (property owner)

To the Chairman of LUPC
To LUPC
To Traci Park

I have lived in my building on Esplanade & Hurricane (just 1/2 block from this proposed VAAP). for 35 years. **I love my neighborhood and my neighbors. I love the serenity and residential environment.**

1. **REGARDING VIBRATION:** This will disturb all residents and as a landlord I do not want any tenant moving as a result of vibration and constriction noise. This will impact my quality of life and my ability to support myself financially.

2. **INADEQUATE EMERGENCY ACCESS DURING CONSTRUCTION**: Children and animals, and elderly residents, **will be in danger** of obstruction in an emergency

4. **PARKING LOT:** The city has already eliminated 6 parking spaces on Hurricane—which was not necessary, and parking is a HUGE issue for residents and their families when visiting. Eliminating another parking lot is NOT A RESPONSIBLE ACTION.
WE MOVED TO THIS NEIGHBORHOOD FOR A REASON—AND THIS ENTIRE PROJECT WILL NEGATIVELY IMPACT THE QUALITY OF OUR LIVES.
The city should use the $2.5 million for a more advantageous purpose to actually enhance this community—so that the City could actually get more taxes if our properties were not devalued as a result of this VAAP project.

CLARIFYING #4. PARKING LOT: WE DO NOT WANT OR NEED A PARKING LOT. AND ESPECIALLY FOR NON-RESIDENTS.

5. PROJECT DESIGN: This is designed to look like a dungeon. Or a jail block. There is nothing that resembles a structure that one would consider to be compatible with the Beach and lagoon environment. The project design is not compatible with the residentially zoned neighborhood. Again, detracting anyone from wanting to live near this ugly eye sore. We need more beauty and aesthetics in our world, not a building that appears like a “block” house jail.

Sorry for being so blunt… but I wanted you to get the idea of our feelings.

Sincerely,

Robin Rudisill – 3003 Ocean Front Walk

Public Officials,

I live on Ocean Front Walk on the Marina Del Rey Peninsula. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more.

This project expands the pumping of sewage down to Dockweiler and is located in the middle of our residential neighborhood as well as in the middle of Environmentally Sensitive Habit Area (ESHA). It is an unacceptable land use for this area and yet it is critical infrastructure, and we understand it must move forward. However, the lack of concern shown regarding finding reasonable mitigations for the impacts on our residential neighborhood and the lack of protection and mitigations for the ESHA is appalling and unacceptable.

The construction plans as designed will have a painful, material impact on this community and surrounding ESHA for decades.

Our primary concerns are:

- **Mitigation measures in order to conform as closely as possible with the certified Venice LUP, the state policy guidance for determining conformance with the Coastal Act.**
    - Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas.
    - Policy I.C.1 states that the scale and design of industrial facilities must be compatible with adjacent and neighboring uses.
    - Policy 1.A.5 seeks to preserve and protect stable multifamily neighborhoods.
    - Policy 1.D.1 states the only permitted development adjacent to the Grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.
- **Elimination of the proposed parking lot at 128 Hurricane St.** for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city.
- **Modification of the project design** so that it is visually compatible with the residentially zoned neighborhood.

Given that this location is grossly incompatible with this location and never should have been allowed to happen, the City's Bureau of Engineering should be bending over backwards to keep the impacts on the residential neighborhood and surrounding ESHA to a bare minimum.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through reasonable and respectful negotiations in order to minimize impacts on the surrounding ESHA and residential neighborhoods.

PLEASE support this request for fairness. Please work with us to make reasonable changes to the project in order to protect our residential neighborhood and the ESHA.

Ting Chang – 28 Mast

To whom it may concern,

As a resident of the Marina Peninsula, I am writing to express my strong support for the Venice Neighborhood Council's (VNC) motion opposing the Venice Auxiliary Pumping Plant (VAPP) project as currently proposed under CPC-2024-2010-GPA-ZC-CU2-SPPC.

While I understand the necessity of infrastructure improvements, the current plan presents serious concerns that have not been adequately addressed by Los Angeles Public Works (LAPW). The project's non-conformance with the Venice Local Coastal Program (LUP) policies, particularly those aimed at protecting stable residential neighborhoods and preserving environmentally sensitive areas like the Grand Canal and Ballona Lagoon, is deeply troubling.

Moreover, the Environmental Impact Report (EIR) for the project has failed to address key issues, including the risk of habitat destruction, groundwater contamination, and methane gas release. The proposed six-day workweek for construction will significantly disrupt the lives of local residents, with excessive noise, vibration, and dust over an extended period. The plan's inadequate provision for emergency access during construction is another critical concern.

The addition of a parking lot at 128 Hurricane Street, which was not part of the original project, will only exacerbate traffic and safety issues in our community. The VNC's motion rightly calls for the elimination of this parking lot, proposing more suitable alternatives that would save the city millions of dollars while addressing community concerns.

I fully support the VNC's call for LAPW to engage in a meaningful, results-oriented dialogue with our community to address these issues. It is crucial that any development in our neighborhood is done thoughtfully, with full consideration of its impact on residents and the environment.

Thank you for your attention to this matter.

Sincerely,

Ting Chang
3933 Esplanade W.
Marina del Rey, CA 90292
(310) 339-4056

Tom Drucker & Marcia Seligson Drucker – 4 Lighthouse

As long-time Marina residents, we are opposed to this zoning change until Public Works addresses some of the issues below:

- Mitigation of "significant and unavoidable" issues including ground-borne vibration, which could result in residential building damage.
- Mitigation of construction noise that will exceed LA CEQA Thresholds guidelines.
- Potentially significant methane gas release (read the community feedback to the EIR Mitigation Plans via the website link below - starts on page 44).
- Inadequate emergency access during construction activities.
- Change to five day/week construction instead of proposed six days/week.
- 25 parking spaces that will be eliminated on Hurricane every day of construction. Where will these people park?
- Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), a savings of at least $2.5 million to the city.
- Conformance to the certified Venice LUP (Policies I.A.5, I.C.1, I.C.6, and I.D.1).
- Adherence to court-mandated ESHA protections in the surrounding Ballona Lagoon and Grand Canal.
- Mitigation of EIR issues related to loss of species and habitat, groundwater impact.
- Modification of project design so that it is compatible with its residentially zoned neighborhood.
- Protection of residential properties from dirt, dust and other construction impacts.
- Upgrade of deficient maintenance plan for both the new and existing facility.
- Compensation for lost property value - During construction, tenants may very well seek reduced rents or move out. Units may have to be re-rented at lower rates, if at all. As a result, property owners may have to sell at reduced valuations. This is not hypothetical. It has already occurred.
- Resident physical/mental issues due to construction.
- Real-time community recourse to on-site construction issues. Without teeth, there can be no enforcement.

Please include this email as part of the public record.

Sincerely,

Tom Drucker and Marcia Seligson Drucker

Jenesa Kurland – 4300 Via Dolce (condo owner)

Hello VNC Board -

The Venice Auxiliary Pumping Plant (Project) as designed should not occur within a Residential Zone; and regardless of Zone nomenclature, Project must avoid drilling/vibrating foundations. No home/building owner should be forced to have their foundations and structure compromised due to poor planning and poor execution by City of Los Angeles (City). A 'mere' cosmetic crack through drywall stems from a crack in building structure which stems from a foundation crack. In earthquake country, one cannot afford - literally - to have compromised foundations & structure. City Department of Public Works (LADPW) has well proved that they cannot be trusted to comply with EIR requirements nor fair guidelines. I still seethe with distain towards the Community Outreach folks' blatant lies during their Venice Dual Force Main (VDFM) project by simply writing to you now. Photographed pre-construction inspection survey by a third party contracted by City as a baseline and photographed post-construction inspection survey by City employees admitting to seeing cracks afterwards is meaningless.

If anyone pretends to think that Project's parking lot will become anything but a trash dump and under-housed tent camp, you know they are neither trustworthy nor grounded in reality; and therefore, should not be decision-maker.

Also, Project design detracts from the community. Given Project is within a beachside residential community, why cannot the building appear more contextually-friendly? I do not understand the difunctional brown slat awnings here & there which do not provide shade to anything. A small item, but indicative of City not paying attention to detail and nor Project's impact on community of taxpayers.

If absolutely nothing else, City needs to disallow work on Saturdays. City (work) projects drag on (& on), so there is no 'time is of the essence' condition which warrants six workdays.

City allows drilling, vibrating, pounding starting at 7:00AM. City allows spilling of groundwater mixed with the oil fields below us to spill out onto streets 24-7. Thus, enforceable penalties for non-compliance with the EIR need to be in writing and should be available to all on VNC website.

Thank you,
J. Kurland
Via Dolce

Robert DiBiase – 115 ½ Hurricane St (owner)

Oct 10, 2024

To: Los Angeles Planning Commission

Subject: Proposed Pumping Station Addition,128 Hurricane St & 3813 South Esplanade

Dear Commissioners:

I have lived on Hurricane St since 1977 and witnessed the new construction of the present Pumping Station and it was a vast improvement to the old pumping station. This proposed additional pumping station construction has made many of our local residents angry, because you are not letting us give you our opinions on what we feel are legitimate objections.

1. Why is the project needed anyway. It appears that the present pumping station is doing the job just fine right now.

2. This area is an environmentally protected area. Court mandated ESHA protections in the Ballona Lagoon/Grand Canal area INCLUDE NO DREDGING AND /OR USE OF HEAVY EQUIPMENT -- BOTH OF WHICH ARE PART OF THE PROJECT PLAN. THIS IS NOT ACCEPATABLE.
3. Conversations with my neighbors are telling me that traffic on the street and car parking loss due to construction equipment will be a major problem. The noise and the impact on the canal itself could be devastating.

4. Are the transformers in the new station generating Electromagnetic fields which are known to cause Cancer?

5. Is this project absolutely NECESSARY?

6. Our neighborhood residents demand to have input into this planning process and to negotiate a possible site farther down the coast. This is a residential neighborhood, and the pumping station does not even belong here.

Respectfully submitted
Robert DeBiase
115 ½ Hurricane St

Traci Gay – 310 Washington Blvd.

I strongly oppose Venice Auxiliary pumping plant going forward! I am a resident at 310 Washington Blvd., #604, marina Del Rey 90292

Gary Stromberg – 125 Hurricane St

I live on Hurricane St in Marina Del Rey. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on our lives for multiple years.

My primary concerns are safety and mitigation of "significant and unavoidable" construction-related issues. Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone. PLEASE support this request for fairness. Thank you.

Gary Stromberg
125 Hurricane St.
MDR

Ting Chang – 28 Mast

Hello,

My husband and I are residents of Mast Street in Marina Del Rey. For over seven years, our community has tried to work with Public Works to address significant concerns about the proposed VAPP project. Despite our persistent efforts, we've been met with empty promises and no real action.

This lack of consideration for our community's well-being is deeply disappointing. While I recognize the importance of this infrastructure project, the current construction plans, as proposed, will significantly and adversely impact our lives for years to come.

My main concerns are conformance with the certified Venice LUP (as homeowners we are held to the LUP and it is only fair that city projects are as well) and the upgrade of a deficient maintenance plan for both the new and existing facility (currently garbage is all over the canal and it looks like there has not been any efforts to maintain the sidewalk area).

We are not asking to halt the project but rather to engage in a meaningful dialogue with someone who has the authority and willingness to address these concerns through respectful and fair negotiations. Your support in ensuring this request for fairness is honored would be greatly appreciated.

Thank you for your attention.

Regards,

Ting Chang

Jenesa Kurland – 4300 Via Dolce (condo owner)

Dear City Representatives -

For over seven years our community has been **trying** to **collaborate** with Public Works to address critical concerns about the planned VAPP project. Though our efforts fall on deaf ears. We receive lip service and nothing more. This total lack of concern for our community is unacceptable.

Our community acknowledges this is a critical infrastructure project even if is a hazardous industrial facility located within our residential area. However, the construction plans as designed will have a painful, material impact on our lives for multiple years.

+ Change to five day/week construction and more restricted hours in lieu of six days/week.

+ Mitigation of other EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas release.

- The community has put forth concepts to address some of these issues including the Grand Canal Restoration Plan.

+ Mitigation of "significant and unavoidable" construction-related issues including ground-borne vibration which could result in residential building damage, and, construction noise that exceeds LA CEQA Thresholds guidelines

- Section MM-NOI-2 of the mitigation plans does not adequately protect property from potential damage. The current plan is far more reactive than proactive using terms such as "may include," "if considered appropriate," and "as feasible and practical." Also, there is no timely mechanism for issues to be addressed/project to be halted in the event damage is done.

Section MM-NOI-3 of the mitigation plan is also inadequate. It strains credibility to believe noise control features will "reduce overall operational noise levels from all Project related sources to within 5 dB of existing ambient noise levels in the surrounding community (53-57 db)."

+ Modification of the project design so that it is compatible with the residentially zoned neighborhood.

+ Upgrade of a deficient maintenance plan for both the new and existing facility.

- The existing VPP is ***not*** maintained in any meaningful way. There are environmental and safety issues. Garbage is strewn along the Grand Canal side of the structure which can readily fall into this ESHA. The sidewalk around the structure is in a constant state of disrepair to the point of being dangerous.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with AHJ and motivation to address these issues through respectful negotiations. PLEASE support this request for fairness. *Imagine* ***how you would feel in a similar situation****!?*

Thank you,
J. Kurland
Via Dolce, Marina del Rey

Perry Rod – 3818 Pacific Ave

To Whom It May Concern,

My 3-unit residential building is at 3818 Pacific Avenue in Marina Del Rey. We have been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. Although the industrial project is for critical infrastructure, the construction plans as designed require much more compatibility and dialogue with the immediately surrounding residentially zoned neighborhood. There was very little, if any, community input during the design process and this must change.

Thank you,

Perry Rod
Chief Investment Officer
Rod Capital Management

Mary-Dorothy Line – 125 Privateer Mall

I live on Privateer Mall in Marina Del Rey. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project.

All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on our lives for multiple years.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through respectful negotiations. PLEASE support this request for fairness.

Thank you.

Michael Hoffs – 110 Hurricane St.

As a 20+ resident of 110 Hurricane Street, I'm pleading with you to take a closer look at how the VAPP Project on Hurricane Street will affect the local neighborhood if our concerns are not faithfully considered. I am not alone on feeling the city is not listening to the boots on the ground describing why the installation of the parking lot is not only not needed but strongly opposed for security reasons. For VAPP personnel, alternative parking on Hurricane has been found in other areas within a half block or less of VAPP. Homeless encampments, drunken disorderly conduct and contempt for Hurricane residents, constant traffic to find parking in the lot, mounting trash and lack of city funds to police the area have not been addressed and frankly will not be before construction.

Please ask yourself, would you want this parking lot built on your street? If you would support installing the parking lot on your street, would you be concerned if the aforementioned was not thoroughly embedded in the parking plan before construction?

Thank you for listening, your time to think about Hurricane Street's resident thoughts and frankly the chance to use the funds suggested for the parking lot on something else that will benefit the area in greater need.

Sincerely,

Michael Hoffs

2022-23 Neighbor Letters

Mary Laing – 115 Hurricane St

ML **Mary Laing <mblaing1@aol.com>**
Hurricane Street Auxiliary Pumping Plant Project
To: Steve Bradbury <steve@mycyberstuff.com>

VNC Parking & Transport March 13, 2022 at 2:31 PM

Steve,

I would like to go on record that I oppose the current auxiliary pump plant project and parking lot that is being proposed at 133 Hurricane and the adjacent lot at 3813 South Esplanade.

I am a resident at 115 Hurricane for 20 years. Myself and my neighbors were forced to endure the disastrous nightmare construction of the existing pumping station constructed a few years ago. There was little to no community engagement or communication from the Public Works Department. Most importantly, the unkept promises from Public Works after the years of construction.

I understand that the current project is essential for the area, however I wane on trust due to past performance from Public Works. This is an industrial facility in a residential neighborhood and more care must be taken to buffer the use from existing homes and resources.

We as neighbors are also concerned that the parking lot will create an unsafe environment near our homes. What is the design? How will it be secured at night? We oppose moving forward with the project until these concerns are addressed.

I would like to voice my support for the VNC motion to rescind it's support of the project as it is currently configured.

Best,

Mary Laing
115 Hurricane St
MDR 90292

Steve & Karen Bradbury – 109 Hurricane St (owners)

July 27, 2022

My wife and I own 109 Hurricane St. We have lived here since 2007. During that time, we have experienced several city-led construction projects. None have effectively managed the impact on the community without our voices rising to generate awareness. The city's track record is dismal at best.

Now the city intends to build an auxiliary pumping station at the end of Hurricane St. While we understand the critical nature of this project, the fact there has been no meaningful community engagement since preliminary plans were shared in 2016 is abhorrent. It appears the project design has changed over that time including the addition of a sewage command and control center for entire city of Los Angeles. We thought this was simply an auxiliary pumping station to support the aging current plant.

The city cannot simply ramrod an industrial project down the throats of a neighborhood without incorporating our input. City employees work for the residents, not the other way around.

We understand one element of the plan is to create a public parking lot at 128 Hurricane. Why???? There are no other public lots on any MDR residential street. If there is truly a need for that much employee parking (which has never been adequately justified), it should be a 100% secure lot only accessible by pumping station workers. **No** public car spaces, **no** bike racks, **no** art installation, **no** use by beachgoers, **no** opportunity for homeless to camp out.

There have been recent suggestions the parking lot was incorporated into the plan to satisfy the coastal commission. Did the city ever convey this information to residents during the process? Did the city take a position that this would impact residents and push back? Does the city even care? We do.

We attended both community meetings (Zoom and in-person) conducted by Public Works. These were little more than sham, window-dressing efforts. The city representatives showed NO willingness to modify ANY aspect of the project to align with the interests of the community. This arrogance is unacceptable behavior by people whose job is to serve the community.

Our neighbors have spoken about many other issues with this project. We support them and request you reconsider all approvals for this project until the community has been given a meaningful opportunity to engage. We can work together. There's no reason to antagonize the community.

Thank you,

Steve & Karen Bradbury
109 Hurricane St., MDR

Adam Goldberg – 110 Hurricane St.

To Whom It May Concern/VNC:

I have lived on the Marina Peninsula since 2005 and on Hurricane St since 2013. Since 2013, the amount of construction and noise on Hurricane has increased with each year. And now, with the plans of building a parking lot along with a new pump station, it behooves us all to keep this to a minimum.

While I understand that the pump station is necessary, the parking lot is not. There is already plenty of parking for workers, so to add a space where the public can park, is completely unnecessary. This will not only cause more car and foot traffic on our small, little street, but it will also bring in an unwanted element. There is no doubt that the homeless population will find this parking lot and make it a place to loiter, make unwanted noise, and use drugs. I have a small child who does not need to see this, and there are plenty of other families who are in the same situation.

I am asking that you vote to make it so there is NOT a parking lot at the end of our street. We have endured enough over the last 5 years or so with street closures, construction that rattles our homes, and an increase in the homeless population in our neighborhood. Flatly, there is no reason/need for this parking lot and it will make life exponentially worse for those of us that live here.

Thank you for your time and assistance with this matter.

Best,
Adam M Goldberg
110 Hurricane St

Robert DiBiase – 115 ½ Hurricane St (owner)

HELLO STEVE: MY OPINION IS THAT THE PARKING LOT BE USED EXCLUSIVELY FOR THE PUMPING STATION EMPLOYEES AND THE HURRICANE ST RESIDENTS. IF THE LOT IS OPEN TO PEOPLE GOING TO THE BEACH THAT WOULD BE A NO-NO FOR ME, SINCE THEY ARE ALREADY PARKING ON THE STREET WHERE RESIDENTS USUALLY PARK.

BEST REGARDS

BOB DEBIASE

115 ½ HURRICANE ST

MARINA DEL REY, CA 90292

Muriel Blake & John Larkin – 110 Hurricane St.

RE: 128 Hurricane & 3813So. Esplanade, ZA 2017-3950-ZAA-1A;DIR-2017-4173-CDP-SPP-1A DIR-2017-4167-PUD-CDP-SPP; ZA 2017-3953-CU2
Sent

Muriel Blake murielblake@wealthbuildersinc.com

To: cpc@lacity.org, elizabeth.gallard@lacity.org

Cc: mike.bonin@lacity.org

Fri, Mar 4 at 5:30 PM

Dear Commissioners,

Please address and reply to the following important concerns of your constituents

No 1. I have been living at 110 Hurricane for 42 years. Our residence is located 1 building away from the proposed Pumping Plant construction. As you overwhelmingly know this is strictly an upscale residential neighborhood which was not intended to be used for Industrial purposes let alone a "Pumping Plant"; there must be many other locations which would be more suitable for a Pumping Plant...perhaps all of your neighborhoods. The last time this proposed new plant project was presented to our community was 5 years ago - in 2017. It's not clear from the "notice provided" five years ago, that there was any written response to our community's concerns regarding the impact on our residential street of a Pumping Plant.

a) So at this late date (2022) after five years, what are the architectural design and landscape design of your proposed industrial plant to fit in with the design of our residential neighborhood? What design steps have you taken to insure that this "plant" will it blend in with this residential design without it being a complete "eyesore" in this sought-after residential Marina Del Rey beach area. As well, our beautiful beach is exceedingly popular with those who live in the inner city and who look forward to spending the day in our neighboring beautiful beach. Of courses, it would be extremely negligent to not to note that this area is notably popularity with its shops and restaurants which bring revenue to your city.
b) b) What buffers will you provide between this proposed "Plant" and our dwellings?? Likewise, this block abuts sensitive wetlands so what buffers will be taken to protect this area?

No. 2.) I am extremely concerned about the proposed "Parking Lot" How many employees do you plan to have working at the "Plant" that it would necessitate of a Parking Lot??? And what about the residents on Hurricane St. that of the block? will there be a full time Guard?? How will it be secured at night? As you are alll well there is a large homeless population in our neighboring Venice. H ere there are vagrants who roam our street and, if not guarded at night they very well may seek refuge in the lot. It may well become a haven for car thefts or car parts theft. It brings an unsafe environment to those near homes and to the street parkers who come home after dark.. What measures will be taken to provide safety to the residents who live

next to this lot?

a) those of us on Hurricane Street recently lived through 3 years of construction in the same "plant area". The street was torn up, blocked with huge equipment, construction cranes, diggers etc. all emitting constant banging, dirt and dust; the workers parked their trucks up and down the entire street, leaving no space for the residents to park. this cannot go on once again with construction of your "Plant"

No. 3) Transformers proposed at this new location, generate electromagnetic field (EMF) known to cause cancer and we all believe to be a risk to our health and the community at large.

I, for one, oppose your moving forward with the proposed project until the above concerns are addressed, in writing, and sent to all those who reside near the proposed Industrial Plant.

Sincerely,
Muriel Blake
John Larkin
110 Hurricane St.
Marina del Rey, CA 90292

Muriel A. Blake, CFP®
WEALTHBUILDERS, INC.
11600 Washington Place #116D
Los Angeles, CA 90066
(310) 391-3921- phone
(310) 398-9859- fax

Gary Stromberg – 125 Hurricane

I'm writing to request that the equipment you are using to build this new facility, including transformers, HVAC and electrical panels be moved away from our residences and towards the existing pump plant on Hurricane, and that you shield the entire project with solid fencing. You have no idea how disruptive your project is to our little community.

Regards,

Gary Stromberg
125 Hurricane St.
(203) 984-4836

Mike Borassi & Genevieve Morrill-Borassi – 3801 Esplanade

(Note: On 2/28/22, Gen and Mike filed an appeal with the LA City Planning Commission. The following material has been taken from that appeal)

The goal of this appeal is to require Public Works to work with the community on a better design for this project which will fit within our community and will provide protection for adjoining residential neighbors from the impacts of this industrial-style facility on privacy, safety, noise and aesthetics.

- Public Works last presented this project to the community in 2017. The case has been on hold for almost 5 years. No additional information or contacts with the community were held during this time despite prior promises to work on design and mitigation. We have repeatedly asked for a new presentation of the project since changes were clearly made since the last City public hearings in 2017.
- The EIR for the project and prior presentations misrepresented the location of the project, which is in fact 10 -15 feet closer to the nearest residential structure than previously represented.
- The project is poorly designed to fit within its residentially zoned neighborhood. Noisy and dangerous equipment is located very close to two neighboring residential areas. However, on the other side, the project site is adjacent to a dead-end street and the exiting pump plant, and all noisy and dangerous equipment should be located nearer to this facility and away from residents.
- The project aesthetic design, proposed landscaping and “public art” has never been presented to the community and the simple elevation of the structure presented does not adequately show how this will fit into a 100% residential neighborhood.
- Public Works has a history at this location of poor maintenance of the existing facility and landscaping, as well as noisy and intrusive construction for years during the recent Dual Force Main project at this location. The community simply does not trust Public Works to fulfill its promises to keep this facility and the parking lot safe and attractive.
- The facility is adjacent to a sensitive wetland area and no effort is made to mitigate impacts or improve existing conditions.
- The proposed parking lot will be an attractive nuisance in this residential area and will not be secured or patrolled. City parking should continue to be on the street and the additional lot should be used for open space to buffer the facilities.
- The project approval and conditions do not properly include all required mitigation measures so that the community knows what must be done and enforced. The EIR, Addendum and MMRP plan are only found on an obscure Bureau of Engineering link and were not available to the neighbors.

The Venice Pump Plant has existed in this area for a long time. It is not well maintained. It has no landscaping or attractive fencing. It is never upgraded, cleaned, and graffiti is often left for months before painting. The existing plant is stark, abuts directly onto a sensitive waterway, is littered with trash and graffiti, with weeds poking through the scant gravel setbacks. Over the last five years, the site has been used as a staging area for the Hyperion Dual Force Main project, so the neighbors have endured constant construction traffic, noise, dust and equipment.

In order to build a safe and beneficial project here, Public Works must be required to include the following measures in the project:

- The project needs to mitigate its impact on the sensitive canal and lagoon. The existing pump plant has no vegetation whatsoever and the canal banks are not appropriately landscaped with native materials. Additional landscaping should be added to the existing facility including vines to cover walls which are frequently graffitied.
- Upgrades should be required to the aesthetics of the existing plant including painting, consideration of a mural, and additional planting in currently empty and trash filled planters and side yards.
- The new facility must be designed and landscaped in keeping with the residential area and sensitive lagoon.
- Provide a buffer of landscaping and walls between the new facilities and the directly adjacent residential buildings, including a minimum 6-foot block wall and 10 feet of landscaping between both the parking lot and the new facility and the nearest adjoining residential property to the north and west.
- Include an on-going obligation to clean and maintain the existing and new facilities when they are complete.

Adopt binding conditions of approval that clearly spell out all obligations in the future so that neighbors can monitor and enforce, including each requirement of the approvals and the MMRP.

For all of the above reasons, this project should not be approved, but should be sent back to the drawing board so that Public Works can design a compatible facility. To place this facility in a residential neighborhood in a sensitive wetland location requires careful consideration and strict conditions.

Kristy Canon - 3809 Esplanade (building owner)

From: **Cannon Enterprises, Inc.** <cannonenterprisesinc@gmail.com>
Date: Thu, Apr 14, 2022 at 8:16 AM
Subject: Auxiliary Pumping Plant in Venice
To: <cpc@lacity.org>, Elizabeth Gallardo <elizabeth.gallardo@lacity.org>, <mike.bonin@lacity.org>

To Whom it may concern,
I am the property owner directly north of the new pumping station location. This project is going to affect my income that is generated from my income property located at 3809 Esplanade. My current tenants may leave because of the project and the proximity of the industrial equipment to their bedrooms/ living space. It will be significantly harder to get market rent if some of the following concerns are not taken into account:

- The design is incompatible with the neighborhood
- No buffer from the project and residential homes
- We have health concerns of having transformers and electromagnetic fields near residential homes
- Equipment noise and construction impacts

I understand that this is a vital piece of infrastructure that the community needs, but my property being so close to the project and having owned this property for over 30 years, I feel my concerns are not being heard or given any value.

Thank you,
Kristy Cannon
--
Cannon Enterprises
8405 Pershing Dr. #500
Playa Del Rey, CA 90293
Phone: (310) 823-2082
Fax: (310) 823-2085

Robert & Lucia Williams – 3805 Esplanade

From: Lucia Williams <luciaw2012@gmail.com>
To: cpc@lacity.org, elizabeth.gallardo@lacity.org
Cc: mike.bonin@lacity.org

Mon. Feb 28. 2022 at 1:35 PM

Dear Commissioners:

We along with our neighbors are writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to community concerns as we were never shown a final architectural design or landscape plan. This is an industrial facility in a residential neighborhood abutting a sensitive wetland area--more care should be taken to buffer the use from existing homes and resources.

The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping and aesthetics.

Additionally, the transformers proposed within the new location generate electromagnetic field (EMF) known to cause cancer and we believe it to be a risk to our health and the community at large.

We are concerned that the parking lot will create an unsafe environment near homes and additionally will provide only two spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night? We understand that the project is essential for the area, however we wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication.

We oppose moving forward with the project until these concerns are addressed.

Sincerely,
Robert and Lucia Williams
3805 Esplanade
Marina del Rey, CA 90292

Eliane Gans – 3933 Esplanade (property owner)

From: Eliane Gans <elianegans@gmail.com>
Subject: Venice Axilliary Pumping Plant
Date: April 8, 2022 at 11:22:56 AM PDT
To: cpc@lacity.org, elizabeth.gallard@lacity.org, mike.bonin@lacity.org

To All of you, and to whom it may concern:

I have been a resident of my property at 3933 South Esplanade W. For over 35 years. I have endured cracked streets and lack parking for many years. And the pumping plant that reduces the value of my property.

I am writing to you today to voice my concerns and to object to the proposed Auxiliary Pumping Plant at the end of my street. At 133 East Hurricane and the adjacent lot at 3813 South Esplanade w. My property/residence will be impacted by this construction, and it will affect the future value or all of our properties.

- There has not been adequate community or resident communication
- The design has not been approved or reviewed by the residents or is not in keeping with the current neighborhood.
- The design should have a residential look and materials to blend with the residences and environment of the Lagoon.
- Residents should be given a chance veto review the design and comment and request any changes that are deemed necessary
- The proposed Pumping plant buttes right up against residential property—this is NOT OK.
- There are environmental and health concerns about the electronics, transformers and electromagnetic fields that will impact the residents
- Noise and equipment will destroy our wetland peace and quiet,,,,, and create parking and vehicle access problems. and in general create more congestion in an already contested neighborhood
- The unsecured parking lot will invite homeless people and will not create any additional parking and will even block any parking that might be accessible.
- There should be buffers between the parking and the residences.
- How will the parking lot be managed. And WHY are there only 2 public spaces, when parking is an issue already in this area
- There are no studies that I have seen, that address any environmental impact on our sensitive lagoon—which is why we all live here!!!
- Previous construction of this Public Works with the existing facility has had a bad track record for noise, debris, obstructions of the street and other problems.
- Past Public Works projects in our neighborhood have caused a barrage of constructions. Issues over 7 weeks causing discomfort to all neighbors and a lack or peace!

Lastly, what are the benefits to us, the residents? YOU do not live here, and have no knowledge about the very special residential area that this is, and why we have chosen to live here.

I AM STRONGLY OPPOSED TO THIS PROJECT—YOU HAVE NO RIGHT TO IMPACT OUR HOMES AND THE VALUES OF THIS NEIGHBORHOOD, AND OUR SAFETY AND HEALTH.

Thank you for reading this letter…. I hope that you will consider my concerns and dither concerns of all my neighbors—and or the entire Marina Peninsula!

Sincerely,

Eliane Gans
Owner
3933 Esplanade W.,
Marina Del Rey, CA 90292
(310) 339-4056

WE ARE ALL TENANTS OF 3933 South Esplanade W. and STRONGLY OPPOSE THIS PROJECT, AND WE DO NOT WISH TO MOVE AWAY AS A RESULT OF THIS PROJECT.
Hans Brofeldt
Wil Mavronicolas
Shawn Groshans
Kate Stone

ARTfully,
Eliane Gans
LONNY GANS & ASSOCIATES
Fine Art

Tanya Spero – 113 ½ Hurricane St

TS **Tanya Spero <tanya1040@aol.com>** VNC Parking & Transport March 12, 2022 at 2:35 PM

Re: Hurricane St Auxiliary Pumping Plant Project - It's A Mess

To: Rick <chucksteak897@yahoo.com>, Steve Bradbury <steve@mycyberstuff.com>

Hi Steve

I was forwarded the emails and I definitely would appreciate your representation. I allow you to represent me for this issue regarding the employee parking lot. I agree that the parking lot should not be built. It will bring more traffic and we have enough as it is on the weekends.
Thanks so much,
Tanya Spero

Sent from my iPhone

Larry Lesser, MD & Claude Lesser – 3609 Esplanade (owner)

From: Lawrence Lesser lessermd@mac.com

Date: Wed, Feb 23, 2022 at 5:03 PM

Subject: 128 Hurricane & So. Esplanade

To: <cpc@lacity.org>, <elizabeth.gallard@lacity.org>
Cc: mike.bonin@lacity.org

Dear commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plan project proposed at East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to the community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from existing homes and resources.The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics.

We are concerned that the parking lot will create an unsafe environment near homes, and additionally providing only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night. We understand that project is essential for the area, however we wane on trust due to past promised form Public Works and constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement of communication.

We oppose moving forward with the project until these concerns are addressed

We have been living in the area for 20 years, and never saw any attempt to fix the unpaved road abutting the proposed project. It is very unsafe to walk and a real eyesore.

Sincerely

Larry Lesser, MD, and Claude Lesser
Homeowner 3609 Esplanade. Marina del Rey 90292

Jeff Lee – 3701 Esplanade (owner)

From: Jeff Lee ilee@laurbanhomes.com

Date: Sun, Feb 27, 2022 at 12:11 PM

Subject: Venice Auxiliary Pump plant, March 10 hearing, Case ZA 2017-3950-ZAA-1A and related cases

To: <elizabeth.gallardo@lacity.org>
CC: cpc@lacity.org

Dear Planning Commission:

I have lived on Esplanade, two blocks from the proposed pump station, for twenty years raising my family. I am writing to oppose the current plans for the pump plant and parking lot.

I have been a real estate developer in the City of Los Angeles for over 40 years building over 40 projects through the City including hundreds of homes in CD 11.

The process followed by Public Works to design and permit the pump station would never be allowed for any private developer. For the past 40 years on every one of our developments we have had extensive community meetings, neighborhood council presentations, and meetings with the council office. We have been responsive to the community
and the council office.

In this case Public Works has been allowed to ignore the neighborhood keeping this case on hold for over four years. In 2016 we had a community meeting with representatives of the council office and the Department of Public Works. I was personally assured that my concerns of the community would be addressed and additional community meetings to
review design would be held. We asked many times when the City would respond which never happened. Had we treated the community this way in our business, our projects would never move forward. If we stonewalled the community for four years, our case would have been terminated.

I am not against the development of the pump station as the City needs to continually upgrade its infrastructure. The pump station is surrounded by 20' alleys and the ecologically sensitive Grand Canal. The community concerns need to be addressed including landscaping, design, construction, mitigation to enhance the area around the pump station, and continual maintenance. We lived through the construction work at this site for the Dual Force Main project, which was a disaster. We live on a daily basis with the eyesore of the existing pump station and lack of maintenance or pride in the neighborhood exhibited by Public Works.

I hope you will grant these appeals and require Public Works to live up to its promises.

Sincerely

Jeff Lee
3701 Esplanade

Clare Bronowski – 3701 Esplanade (owner)

CB **Clare Bronowski <clareb1050@gmail.com>** VNC Parking & Transport March 12, 2022 at 4:39 PM

Hurricane Pump Plant and Parking lot

To: Robert Thibodeau <robert.thibodeau@venicenc.org>, Jonathan Deer <virtualjonny@gmail.com>, Cc: Steve Bradbury <steve@mycyberstuff.com> Details

We live two blocks from the Venice Pump Plant, and we write to support the VNC Transportation Committee motion opposing the current plan for the Auxiliary pump plant and parking lot.
We are concerned that the current plan does not protect the nearby residences from noise, privacy and industrial type activities. Public Works needs to rethink the plan and include buffers, privacy walls, landscaping, security measures and long term maintenance to protect the neighborhood and the sensitive canal and lagoon area. The parking lot must be locked and secured when not in use by Public Works employees. The entire area must be well maintained, not allowed to be full of weeds, trash and graffiti as it currently is.

Thank you.
Clare Bronowski and Jeff Lee

Leslie & Michael Adler – 3601 Esplanade

April 24, 2022

To: Los Angeles Planning Commission

Re: 128 Hurricane & 3813 So. Esplanade
ZA2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A | DIR-2017-4167-PUB-CDP-SPP; ZA2017-3953-
CU

Email: cpc@lacity.org; elizabeth.gallardo@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from existing homes and resources.

The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics. Additionally, the transformers proposed within the new location generate an electromagnetic field (EMF) known to cause cancer and we believe to be a risk to our health and the community at large. We are concerned that the parking lot will create an unsafe environment near homes, and additionally provide only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night?

We understand that the project is essential for the area, however we wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication.

We oppose moving forward with the project until these concerns are addressed.

Sincerely,

Leslie and Michael Adler
Neighbor
3601 Esplanade MDR-Home Owner

Jennifer Kelton – 3615 Esplanade

On Mon, Apr 25, 2022 at 8:43 AM Nomad1800 <nomad1800@aol.com> wrote:

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade.

Please note that one of my main concerns is the public parking lot. I am not sure why it is needed? And it will only create problems - as you also are very aware of, and also based on the current state of homeless and transients in our area.

Jennifer Kelton
3615 Esplanade
MDR, CA 90292

Melly Liburd – 120 ½ Galleon (owner)

Wed, Apr 13, 2022 at 3:04 PM
Melly Liburd mellyliburd@yahoo.com

April 8, 2022

To: Los Angeles Planning Commission
Re: 128 Hurricane & 3813 So. Esplanade
ZA2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP.1A | DIR-2017-4167-PUB-CDP-SPP: ZA2017-3953-CU

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this proiect was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or If there was any response to community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to butter the use from existing nomes and resources

The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics. Additionally, the transformers proposed within the new location, generate electromagnetic field (EMF) known to cause cancer and we believe to be a risk to our health and the community at large.

We are concerned that the parking lot will create an unsafe environment near homes, and additionally providing only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night?

We understand that project is essential for the area, however vie wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication.

We oppose moving forward with the project until these concerns are addressed

Sincerely,
Melanie Liburd
120 1/2 Galleon Street, Marina Del Rey, CA 90292
Homeowner

Andrew Freedman – 20 Ironsides

April 13, 2022

To: Los Angeles Planning Commission
Re: Proposed Venice Auxiliary Pumping Plant (VAPP) 3813 S. Esplanade, 3817 S. Esplanade and 3913 S. Esplanade W. (128 E. Hurricane Street)
ZA 2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A; DIR-2017-4167-PUB-CDP-SPP; ZA 2017-3953-CU

Via Email: cpc@lacity.org; elizabeth.gallardo@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

In addition to the very astute comments made by Genevieve Morrill and other neighbors, I would like to share my concerns.

General
The Contract Documents for this project were submitted and cleared by Los Angeles Department of Building and Safety in 2017 without any public notice or review. Approval by two agencies (LA City Planning Department and California Coastal Commission) which both require public notification and public review, is only now being sought. Typically, Planning and Coastal clearances are the first to be addressed, not the last. The Public review of this project has been severely lacking, and City officials have both a legal and moral obligation to make sure the citizens of Los Angeles are heard.

This project spans two existing lots (which both front the Grand Canal) without an approved lot-tie agreement. All lot-tie agreements must go through a Public Hearing and review process. This has not been done, and all further consideration of this project should be suspended until the proper Public Hearing process has been completed and the lot-tie agreement approved.

The front yards of the two City lots of the proposed VAPP both face the Esplanade (Grand Canal). The rear yards of these two City lots face Canal Court. Hurricane Street is located along the side yard of only one of the parcels. The use of 133 and 139 Hurricane Street as the project address is both inaccurate and misleading. All references to 133 and 139 Hurricane Street for this project should be changed to 3813 and 3817 South Esplanade, respectively.

Design Issues
The recent Joint Determination letter from the LA City Director of Planning and Zoning Administrator states the following: "*As proposed, the project is visually compatible with the character of the area and will enhance the visual quality of the existing neighborhood.*" I couldn't disagree more.

The existing VPP is a one-story building surrounded by a sound wall, painted in neutral colors. It is quiet and odorless, and its low massing minimizes its effect on neighboring residences. In contrast, the proposed VAPP has a large concrete-walled Electrical Building that is oriented in a north-south direction – 90 degrees from the adjacent residences – which would form a 32-foot-high solid wall, not only blocking views to the Grand Canal, but creating shadows (between 10 am and 3 pm) directly onto all adjacent residences located to the north and west.

A recent change to the flood zone map in the Venice area was made effective by FEMA on April 21, 2021. As a participant to the National Flood Insurance Program (NFIP), the City of Los Angeles is required to enforce the flood clearance requirement for new construction and substantial improvement projects.

The two lots where the future VAPP is to be located were affected by this flood zone map update. The new Base Flood Elevation (BFE) is 8 feet above sea level and all new buildings require that the Lowest Finished Floor Elevation (LFFE) be at 9 feet (8 feet + 1 foot of free board) per LA City Ordinance 186952.

The current design for the VAPP has the Lowest Finished Floor Elevation (LFFE) at 7.67 feet – 16 inches below the minimum required level per the new FEMA requirements. Note, the building generator, all switchgear electrical equipment for the pump motors, and all exterior transformers will be underwater during a flood. This will lead to the complete failure of the pumps and a catastrophic environmental disaster. **The entire VAPP must be redesigned accordingly.**

The 32-foot Electrical Building height is excessive and unnecessary. It is twice the height of the existing VPP. The BFE issue noted above will only make this tall building even taller. Further, the current two-story design has no elevator to accommodate disabled employees, with the only restroom and office located on the second floor. **The Electrical Building should be changed to a one-story structure and reoriented in an east-west direction along Hurricane Street.**

These design changes would allow for a large open buffer area for the residences located directly to the north, eliminate shadows, reduce the project's visual impact, be more compatible with the existing VPP, accommodate disabled employees, and better comply with the Venice Coastal Zone Specific Plan.

The three large transformers (each 6.5' to 7' tall) located within the required setback are unacceptable. They are located outside the decorative fencing and surrounded by 19 steel bollards along the entire Canal Court property line. These transformers would be an eyesore. Additionally, they will generate noise. They must be repositioned out of sight and away from any adjacent residences. If a one-story VAPP were U-shaped facing the existing Venice Pumping Plant, the transformers could be placed within the recessed U-shape with direct access to Hurricane Street, but out of sight from adjacent residences.

The HVAC equipment for the Electrical Building is located outside near the north property line and in direct view from adjacent residences. This equipment will generate noise and heat, and should be relocated away from residences (perhaps on the roof) and screened from view.

Parking Lot/Green Space

The proposed public artwork located in the green space south of the proposed parking has <u>not</u> been designed or specifically defined. The design and massing of this proposed artwork should be clearly presented as part of the formal public review process prior to any project approval. In addition, the City must provide written assurances as part of the Conditions of Approval for this project that no artificial lighting, sound or kinetic movement will be associated with the public art. Landscaping shown in the same area as the public art should be revised accordingly prior to further public review.

The accessible aisle for the van parking space shown at 3913 S. Esplanade W. (128 E. Hurricane Street) should be located on the passenger side. The current configuration does not meet either Federal or State Accessibility Code requirements, and should be redesigned.

I oppose any further action on this project, including an indefinite postponement of the April 28, 2022 Public Hearing, until these issues are addressed and corrected.

Sincerely,

Andrew Freedman
20 Ironsides #18, Venice, CA 90292

Steve Freedman
732 Howard St., Venice, CA 90292

Marilyn Mikos – 115 Eastwind St (owner)

To Whom It May Concern:

I stand OPPOSED to the way in which the above referenced Pumping Plant is being constructed. Although I understand the sewage plant is a necessary evil, there are many issues that have not been taken into consideration with the construction design of the project.

I have lived in the same building (which I own) for 33 years. There has been literally zero attention paid to upgrading the infrastructure of this residential area by the City. The "roads" are in dire need of repair, including "Speedway" (which will be adjacent to the Plant) which floods every time it rains. The potholes are ridiculous and no amount of calls to have them repaired gets any attention at all. Yet, you seem to have a burning desire to build an industrial structure right smack dab in the middle of a lovely residential community.

This Plant is being constructed in the MIDDLE OF A BEAUTIFUL RESIDENTIAL AREA...People literally live inches away from where transformers will be housed, which could conceivably cause grave health concerns @ electromagnetic fields. The actual construction of the Plant will disrupt the entire neighborhood with noise, dust, etc. The last time Public Works did construction in this area, several people became ill from the particulate matter in the air and were forced to move. Add to this, the beautiful Lagoon and the indiginous flora and fauna that reside there (and have for decades) - all of which will be disrupted.

There has literally been no communication with the immediate community about what the plans are. From what we "understand", the design is incompatible with the community; further, you have offered no benefit to the community, not only aesthetically (no buffer between the Plant and the community), but also concerning the health and well being (including safety) of the people who live here. Why would you build an industrial project in the middle of a residential zone? It is beyond my comprehension.

I am in dire opposition to moving forward with this project until these (and other) concerns are addressed. I sincerely hope you will, for once, consider the concerns of those of us who live in the community. We pay taxes...and we vote.

Sincerely,

Marilyn Mikos (owner)
115 Eastwind
MdR 90292
marilyn.mikos@gmail.com

Arianne Flemming & Justin Wasser – 3812 Pacific

To Whom it May Concern,

We are residents of 3812 Pacific Ave, located at the corner of Pacific and Hurricane. We have heard the news that the City of Los Angeles plans to construct a large sewage plant at the two vacant lots at the end of Hurricane.

We are writing to express our great concern with this plan for a number of reasons.

First, and most importantly to us, we understand the building for the plant will house transformers, emitting electromagnetic fields. EMFs have been known to cause cancer and as residents we are seriously concerns about how this plant will put our health and the health of the neighborhood at risk.

Further, we love the ecological reserve and lagoon near our house, this plant could have significant impact on the ecological health and well-being of this sensitive lagoon.

Finally, we are concerned that the parking lot proposed near the plant will create an unsafe environment on our street. We are concerned about how the lot will be managed and controlled and secured and the potential safety risks it poses to the community.

We oppose moving forward with the project until these concerns are addressed.

Sincerely,

Arianne Flemming and Justin Wasser

3812 Pacific Ave Marina Del Rey 90292

Susan Afriat & Steve Hyman – 4000 Pacific

Susan Afriatafriats@gmail.com

To: elizabeth.gallardo@lacity.org

Dear Commissioner:

Thu, Mar 3, 2022 at 8:49 AM

We are neighbors writing to share our concerns regarding the Venice Pumping Plant projected proposed at the above addresses. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017. It is impossible to determine from the notice provided what the final design is or if there was
any response to community concerns - we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from existing homes and resources.

We have many concerns: the parking lot will create an unsafe environment near homes; buffers are needed between industrial and parking uses and the adjoining homes, etc.

We understand the project is essential for the area; however, past experience has led us to not trust the promises and assurances that will be made. We oppose moving forward until these concerns are addressed

Thank you for listening to our concerns.

Susan Afriat and Steve Hyman
4000 Pacific Avenue
310-893-4616

Bethany Gorfine – 3950 Via Dolce (owner and condo board president)

On Mar 15, 2022, at 8:53 PM, Bethany Gorfine <Bethany@federalhill.tv> wrote:

Sent from Bethany's iPhone

I live at 3950 Via Dolce, Our 145 unit condo complex (of which I'm HOA president) faces the lagoon and pumping plant site.

I don't appreciate when a design and proposal has been approved and then changed without notifications to the community including the VNC.

SIze does matter, construction matters especially to homeowners on via Dolce as well as surrounding Hurricane.

It was hard enough to to live through the past 5 years of construction and now more years across from us where sound really travels over the lagoon.

We just lived through 4 apartment complexes 2 hotels, and the sewer project.
It's relentless.

We understand the need for an additional plant for the community but keep it simple, small, and no public parking which will turn it into a hangout- luring outsiders into the community.

Adding bicycle racks? An art exhibit? We don't want folks congregating on Hurricane - especially on weekends. It's a huge liability to our community on the Strand that is already experiencing massive intrusions and thefts.

Thank you.

Jonathan Tillman – 3719 Via Dolce

April 13, 2022

To: Los Angeles Planning Commission
Re: 128 Hurricane & 3813 So. Esplanade
ZA 2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A | DIR-2017-4167-PUB-CDP-SPP; ZA 2017-3953- CU

cpc@lacity.org; elizabeth.gallardo@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from exisXng homes and resources. The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics. **Moreover, a licensed architect should be hired to design the structure's exterior and its landscaping.**

Additionally, the transformers proposed within the new location, generate electromagnetic field (EMF) known to cause cancer and we believe to be a risk to our health and the community at large.

We are concerned that the parking lot will create an unsafe environment near homes, and additionally providing only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night?

We understand that project is essential for the area, however we wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication. **One such promise was to repair Via Dolce and Marquesas Way to the extent they were damaged due to construction activity. The applicant, however, left portions of those roads with deep ruts and broken pavement until the community complained to their local representatives. Therefore, continuing community oversight is essential to make sure there is compliance with applicant's obligations in this project.**

We oppose moving forward with the project until these concerns are addressed. Sincerely,

Jonathan Tillman
3719 Via Dolce
Marina del Rey, CA 90292

P.S. If the location of the power boxes endanger the residents of the adjoining property, the city may be liable for inverse condemnation.

Robin Rudisill

April 27, 2022

Los Angeles Planning Commission

Re: 128 Hurricane & 3813 So. Esplanade
ZA2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A
DIR-2017-4167-PUB-CDP-SPP; ZA2017-3953-CU

Honorable City Planning Commissioners:

I live in the area surrounding this project. The last time this project was presented to the community was in 2017, five years ago, and I participated in the hearing down at the Corinth hearing room at that time, expressing numerous concerns. I am deeply concerned that as an "interested party" (I filled out a speaker card and signed a list to be emailed all determinations, as I do at every hearing I attend) I was not notified of any hearings or determinations since that time. I only found out about this hearing because someone asked me how I felt about it. I do not understand why so much time has passed. This should be explained to the community.

This is a sensitive wetland area, surrounded by ESHA, in the Dual Permit Jurisdiction Coastal Zone. I cannot think of a more sensitive area in the Los Angeles Coastal Zone. See attached certified Venice Land Use Plan map. Aesthetics in such a sensitive area should be paramount, and the project must be designed to be compatible with the surrounding residential neighborhood.

This is an industrial facility in a residential neighborhood and as such buffers must be provided between the industrial and parking uses and the adjoining homes. The surrounding community must be given an opportunity to review the architectural design or landscape plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics.

I am also concerned that the parking lot will create an unsafe environment near homes and that only two spaces would be provided to the public. Please inform us re. the design, how the lot will be managed and controlled, and how will it be secured at night. Please put the project on hold until all of these concerns are addressed.

Sincerely,

For the Love of Los Angeles
and our precious Coast,
Robin Rudisill
(310) 721-2343

Adam Rose – 12 Buccaneer St.

I live at 12 Buccaneer, so I'm a few blocks away. That's why I opened my questions/comments by noting that precedence with concerns should go to closer residents (who will deal with this around-the-clock). That said, my girlfriend and I walk a loop around Grand Canal (at least to Lighthouse Bridge) almost daily, so we must pass this site on foot at least 300 times per year. We also help out with local cat rescues, and over the years there have been a number who've lived and/or been caught along the canal. We're night owls and tend to walk around midnight, so we also try to keep an eye out for issues at odd hours (hence why I got them to adjust the new lights on the old plant a few months ago).

From what you just sent me, it seems there are a lot of issues they need to address. I'm a bit fatalistic about this project in the sense that it's reasonable they'll eventually need more capacity (the alternative seems terrible!) It's a big question about how they get there, so I support your pushback on multiple fronts because it needs to be reasonable for those closest. In terms of more ancillary things that my girlfriend and I were thinking about:

- We're still wary of the new plant's noise and vibrations under normal operation (i.e., after construction is done). I was relieved they said the motors will be underground and with more modern technology. However, I'd love to see some sort of engineering report that confirms the noise/vibration projections.

- If this project is going to happen, they should ensure it adds to the community in other ways, including aesthetics. Instead of the harsh floodlights like the older building, maybe decorative street lamps or sconces with proper shading so they don't shine on other people's property or glare across the canal (possibly interrupting wildlife). Some greenery on the walls would be nice (bougainvillea, jasmine or some kind of ivy so it grows up the walls). Alternately, I like the idea of the art project or at least some fun but not garish colors. I think our most "controversial" suggestion may be benches, as I can imagine some folks are wary of them attracting long-term homeless to stay. These could be smaller size, or maybe a series of chair-width seats. With this being such a popular walking area, it never ceases to amaze me that the only benches on the whole peninsula seem to be in the kids park on Via Dolce.

- I worry that EIRs only focus on certain types of wildlife and may not be accommodating for "common" waterfowl like ducks. Those fledglings bring a lot of joy to the community each spring! Unless the noise/vibrations are in issue, it might be nice if that flat area over the "pool" could have some bushes as a protective habitat for mothers and their young. I'd love to make sure the design considers potential places they might fall and get trapped, too, and holes big enough to get in and out of (but not so big people can get through, as the mentioned a security concern).

Robert Nau – 4250 Via Dolce

I am a concerned resident and a condo owner at 4250 Via Dolce. Thank you!

Felicia Glade & Mike Pelletier – 116 Galleon St.

Hi, as a resident living close to the hurricane pumps, I am very concerned about this project.

Please eliminate the parking lot, and instead use parking on the pump plant property or street. Having an unsecured lot will invite security issues that will affect our children who play outside around there and who we take walks with along the canals. Please have security Patrol planned for this residential area as this lot will attract unhoused people to a peaceful quiet and currently safe neighborhood.

Please adopt written recorded conditions of approval that clearly spell out all obligations in the future so that neighbors can monitor and enforce, including each requirement of the approvals and the MMRP, and mitigations during construction years.

Thank you for reading. I hope you protect nearby residents and our children.

Felicia

Eliane Gans – 3933 Esplanade (owner)

Aug 10, 2022

To President Millman and Honorable Commissioners
City Planning Commission

I am a resident on Pacific Court/ South Esplanade West- 1/2 block from the pumping station.

I have been a resident and own the three Unit property, where I reside, for the past 38 years. I feel that the residents of this community- especially the residents who live on the Canal, are being invaded, disrespected and disregarded.

We have moved to this community and this special area for reasons that the City Planning Commission may not understand. It is a peaceful, and non-commercial area with beautiful residences, lovely landscaping, water and peace.

Now we are being invaded with a design of the pumping station that is horrible, not in keeping with any structures in the neighborhood and will be an eye sore to any adjacent residences. The design, the noise from the transformers and other equipment will impact any neighboring homes and even visitors. The equipment may also be dangerous to the environment and to those of us who live here.

The City Planning Commission DOES NOT LIVE HERE. And We do! This is a matter of our well-being and our daily lives!

The parking lot is not necessary, and in addition -WHY HAVE YOU REMOVED 4 PARKING SPACES necessary to the residents on Hurricane?? This area already has limited parking! This is not necessary, and another invasion and destruction of our quality of life in our neighborhood.

Lastly, and importantly, all of our property values will be diminished. Who would want to live near a Pumping station that makes noise, spews chemicals into the air and looks ugly, and an eye sore to the neighborhood...

I respectfully request that you re-design the new facility and review the recommendations that you have received. I also request that you landscape the entire area. And, of course, protect the neighboring residences.

With a plea of hope for your consideration and revisions, as requested by all of us who are residents; and the requests made by Genevieve and Mile Morrill-Borassi. And Kristy Swanson.

These requests are truly from all of us in the neighborhood, and I respectfully ask for your assistance and re-consideration of the current plan.

Sincerely,

Eliane Gans
Property owner: 3933 Esplanade West, Marina del Rey, CA 90292

Jenesa Kurland – 4300 Via Dolce (condo owner)

Whatever City says they're going to do to mitigate or their useless report says regarding noise, vibration, home damage, etc. is all BS rhetoric: City takes no responsibility and homeowner is helpless. Their preconstruction survey of one's home carries as much weight as blank pieces of paper.

VAPP Community Proposed Conditions
(May 5, 2025)

Overview: When the original VPP was built in the late 1950's, the Marina Peninsula was primarily comprised of oil derricks and marshland. The first residential properties on and around Hurricane St were constructed in the mid-1960's so design and other impactful attributes of the VPP were not material considerations.

Construction of the VAPP (the "Project") will have a significant, negative impact on our densely populated community and the surrounding environment including the Grand Canal and Ballona Lagoon, both recognized as ESHAs. Nonetheless, the community acknowledges the critical nature of this infrastructure project. Our goal has been and continues to seek modifications that will mitigate its impact on our quality of life.

Importantly, the Project does not conform to the Venice Land Use Plan (LUP) as follows:

- Policy I.C.1 states that the scale and design of industrial facilities must be compatible with adjacent and neighboring uses. The design does not meet this criterion.
- Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas. While the community does not claim to be experts on the chemicals and operations to be used at the plant, the operation is industrial in nature and some operations of the plant could reasonably constitute a hazardous use for nearby residents due to the potential for activities such as (but not limited to) transformer explosions, equipment fumes, sewage overflows etc.
- The Project conflicts with Policy 1.A.5 that seeks to preserve and protect stable multifamily neighborhoods.
- The Project conflicts with Policy 1.D.1 that states that only permitted development adjacent to the Grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.

Therefore, the community requests the following Project issues be addressed through the placement of conditions as detailed below:

1. The Project Does Not Meet Public Benefit Performance Standards

The Project does not meet the performance standards as required by LAMC 14.00.A.6 and 14.00.B.5. Public Works is not eligible for alternative compliance due to 1) lack of landscaped buffers to the north and west; 2) lack of full setbacks to the north; and 3) the majority of frontage is located on small local streets and alleys, rather than a major or secondary highway. These performance standards are designed to ensure that large industrial facilities such as this are kept to areas with adequate traffic infrastructure and contain adequate buffers and landscaping in keeping with the neighborhood. These goals are not met. Conditions requested:

a. A ten-foot landscaped buffer which will be maintained and equipped with an automatic irrigation system as well as a 6-foot solid block wall on the north property line next to 3811 Esplanade.

b. Shield entire structure with unobtrusive fencing as well as landscaping of a height adequate to screen the transformers and power poles.
c. The existing VPP shall be upgraded with landscaping, a new sidewalk, and all facilities, existing and new, shall be regularly cleaned, maintained, and patrolled for security.

2. Potential Release of Methane Gas and Other Chemical Hazards

The VAPP Mitigation Plan acknowledges "a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous chemicals into the environment." This includes encroachment or seepage of methane into the VAPP structure whose impact is considered potentially significant. Conditions requested:

a. A sufficient # of detection devices around the community shall be installed to provide ongoing accurate measurements.
b. The mitigation plan should proactively address the same exposure concerns for the community as defined for workers on the Project.
c. Should any analysis under the Mitigation Plan identify this issue, the entire Project must be shut down immediately until a realistic plan can be put in place to mitigate both short and long-term impacts.

3. Need for Appropriate Off-Site Workspace

Given the many "significant and unavoidable" issues identified on this Project, work from home conditions will be adversely impacted. Condition requested:

a. The city shall guarantee in writing the provision of suitable, local workspace, reasonably approved by the community, for all impacted home-based workers located within 500' of the Project for the duration of all construction activities.
b. The city will survey the community every six months during the term of construction to determine how much workspace is needed.

4. Ongoing Noise, Air & Dust Release

The Mitigation plan states "Project construction noise will exceed construction noise criteria provided by the LA CEQA Thresholds Guide. However, Section MM-NOI-3 of the same Mitigation plan, states noise control features will "reduce overall operational noise levels from all Project related sources to within 5 dB of existing ambient noise levels in the surrounding community (53-57 dB)." These two statements are in conflict. Conditions requested:

a. The city shall retain an independent 3rd party, reasonably approved by the community, to review and recommend changes to the mitigation plans.
b. The city shall provide independent (3rd party) noise and air quality monitoring whose results shall be available to the community in real time. If necessary, the city shall distribute or reimburse the cost of high-quality air purifiers to impacted households (up to $500/unit).
c. The city shall comply with residential noise thresholds including the provision of all sound barriers necessary to comply with municipal code requirements and CEQA thresholds.
d. Each construction day, the city shall erect temporary barriers of sufficient height to mitigate dust and dirt from impacting residential property. Barriers shall be removed at the end of each construction day to allow for street parking.

5. Lack of Adequate Emergency Access & Preparedness

The Project will exacerbate ongoing issues of emergency egress and ingress, by expanding density, blocking routes (even temporarily), and adding equipment & workers into the potential hazard zone. Evacuation plans have been generally ad hoc and done in the heat of the emergency. This approach has not been highly successful as recent problems with the Palisades Fire have demonstrated. Hazards facing the community include tsunami, tropical storm flooding, hazardous materials incidents and targeted violence, which will be complicated by the construction Project. Conditions requested:

a. LASAN shall, as the responsible party for the Project, initiate a Working Group including representatives from the Los Angeles Police Department (LAPD), Los Angeles Fire Department (LAFD), Los Angeles Department of Transportation (LADOT), Los Angeles Emergency Management Department (LAEMD) and the LA Department of Sanitation as the responsible party for the contract work, as well as a minimum of three representatives selected by the community.
b. Essential elements of the plan shall be as hazard specific as possible and include, but not be limited to:
    i. Identification of evacuation routes and emergency ingress routes.
    ii. Estimated evacuation times and numbers evacuated.
    iii. Mitigate blocking of evacuation routes/cooperate with the evacuation process.
    iv. Effective alternatives to evacuation such as shelter in place.
    v. Alert and warning procedures.
    vi. Addressing and including the needs of Persons with Disabilities and Access and Functional Needs (PDAFN).
    vii. Public education and practice.
c. The city shall install a walk bridge across the Grand Canal at Driftwood St as detailed in the previously approved Grand Canal Restoration Plan. The details of this plan can be found here: https://engineering.lacity.gov/grand-canal-restoration-project.

6. Lack of Street Parking on Hurricane St.

The VAPP plan proposes that all parking on Hurricane St will be removed during construction hours. This will displace 20-25 cars that park on the street during times of low demand, non-summer, non-holiday days, Monday-Saturday. Further, after construction, the city proposes using 128 Hurricane for employee parking and a public parking lot. This would be the only lot of its kind on the entire Marina Peninsula. There is no community support for a public parking lot. It will materially increase traffic on a residential street, will become an easily accessible haven for homeless, is not secure and LAPD does not have the resources to provide appropriate response when issues arise. Conditions requested:

a. During construction, the city shall securely enclose 128 Hurricane as a temporary permit-only lot at no cost to displaced residents in lieu of a construction staging site. Alternately, a similar number of spaces shall be made available on the South end of the Venice Pier parking lot at no charge to residents.
b. After construction is completed, the city shall implement the community-proposed red-zone parking solution for employee parking - see Exhibit A.

c. The city shall support the community by actively seeking an exception to the public parking requirement for a public utility.
d. Remove existing weekly no parking restrictions from Hurricane St to provide enhanced public parking.
e. At the completion of construction, the 128 Hurricane lot, which was purchased by the city for $2.7M, shall be sold to a private owner, the proceeds of which will be used to fund community benefits related to this Project as well as other needs as directed by CD-11 Councilmember Traci Park.

7. Excessive Construction Hours

The city plans for six day/week construction, 8a-5p. An internal city report produced seven months after the EIR was certified proposed a five-day construction work week as well as limitations on pile drivers, graders and jackhammers & haul trucks identical to these requested conditions:

a. Work shall be permitted Monday-Saturday November-March. Work shall be permitted Monday-Friday, April-October.
b. Equipment operation hours: 8a-5p
c. Pile driver, grader, jackhammer: 9a-3p - No pile driver, grader or jackhammer work shall be conducted on Saturdays any time during the year.
d. Haul trucks to access local neighborhood streets: 9a-4p

8. Lack of Binding Written, Recorded Conditions of Approval Between the City & Construction Company

It is unclear how the contractual conditions between the city and construction company will be enforced. How will resident complaints be addressed in real time? Current plans indicate a process where complaints are filed with an on-site city representative and addressed in an undetermined future time frame. Conditions requested:

a. Adopt written, recorded conditions of approval that clearly spell out all obligations with meaningful penalties for non-performance so they can be monitored by the community and enforced by the city, including each requirement of the approvals and the MMRP as well as mitigations during construction years.
b. Actively monitor and enforce all Project obligations including MMRP
c. Commit a city representative to be on-site every day from start to end of Project work who is empowered to satisfactorily address issues in real time or immediately shut the Project down pending resolution.

9. Lack of a Clear VPP/VAPP Maintenance Plan

The current VPP is not maintained in any meaningful way. The issues go far beyond graffiti and painting. There are environmental and safety issues. Garbage is strewn along the Grand Canal and Ballona Lagoon sides of the structure which can readily fall into the water (ESHA protection). The sidewalk around the structure is in a constant state of disrepair to the point of being dangerous. And as referenced in the Coastal Staff presentation made in February, the VPP was, back in 2012, landscaped to (at least partially) help blend into the neighborhood – see Exhibit B.

Since then, the VPP has been left in a state of disrepair. There was and is no maintenance plan. How will the VAPP be different? And what will become of the VPP as it is transitioned out of use?

What will eventually become of that structure and lot? Nobody within Public Works has ever provided a clear response. Conditions requested:

a. The city shall develop, in a timely manner, a meaningful maintenance plan for both the VPP and VAPP.
b. The city shall install safety railings around the VPP on the two sides facing the Lagoon
c. The city shall repair and maintain sidewalks surrounding the VPP.
d. The city shall plant and maintain environmentally appropriate plants & landscaping surrounding both the VPP and VAPP
e. The city shall communicate its short and long-term plans for the VPP after VAPP construction is completed.

# # #

Additionally, we seek appropriate, reasonable solutions to the following issues:

1. Significant & Unavoidable Residential Property Damage

The VAPP Mitigation Plan acknowledges "significant and unavoidable impact to surrounding land uses" including "ground-borne vibration levels that are distinctly perceptible at a receiving residential use or could potentially result in building damage." Section MM-NOI-2 of the mitigation plans does not adequately protect property from potential damage. In addition, Construction GEO-1 of the mitigation plan states the Project will "Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking and/or seismically related ground failure, including liquefaction**."** The plan to address residential impact uses terms such as "may include," "if considered appropriate," and "as feasible and practical." The discretion is left entirely to a Project assigned engineer. The city has strong motivation to look past issues that may arise as a path to completing the Project faster, especially with the Olympics on the horizon.

There must be an enforceable plan to cure defects to any adjacent or neighboring residential property caused by the Project. There is also no timely mechanism to address root causes in the event damage is done. The "process," as we have been told, will not mitigate additional damage before the cause is investigated and modified. Conditions requested:

a. An independent inspector, approved by the community and paid for by the city, shall be contracted to inspect all properties within 500' of the Project prior to construction to determine baseline conditions. Additional inspections shall take place no less than semi-annually or upon resident request for the duration of the Project.
b. Per Section 8 above, the on-site city representative shall be empowered to satisfactorily address these issues in real time or shut the Project down pending resolution.

2. Expected Reduction in Property Value

The anticipated severity of construction-related disruptions, including high-decibel noise, vibration, airborne debris, traffic blockage, and the potential release of subsurface gases such as methane will materially impact property values. Conditions requested:

a. We request the city collaborate with LA County to secure reduced property valuations/lower property taxes for all properties within 500' for the duration of the Project.

3. Anticipated Lost Income for Landlords

Given the circumstances described above, it is likely some tenants will be forced to leave their current residences. This may impact the landlord's ability to find new tenants and/or maintain current rental income, which can be a vital revenue stream. How will landlords be compensated for this loss of income?

4. Compensation for Displaced Residents

Residents living with 500' of the Project may be adversely impacted to the extent they can no longer remain in their current residence on either a temporary or permanent basis. How will they be compensated? Note: While many residences will be impacted, the greatest impact will be to 3811 Esplanade. This should be treated as a discreet case.

# # #

Exhibit A

6. Lack of Street Parking on Hurricane St.

The community proposes the following red-zone solution for staff parking (identified in orange below). At the existing VPP, one employee is present at any given time. There is one on-site parking space to satisfy this requirement. Even if the VAPP requires multiple employees (in addition to the VPP employee, whose necessity is not clear), this plan will provide sufficient parking for employees and city officials while obviating the need for employee parking at 128 Hurricane.

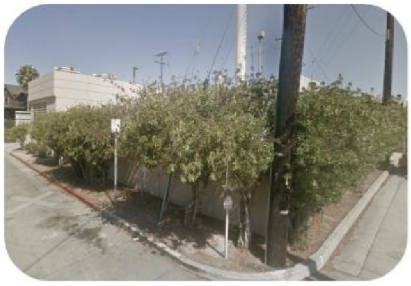
Employee Parking



Exhibit B

9. Lack of a Clear VPP/VAPP Maintenance Plan

Public Works Maintenance Report Card



2012



2022



2024

VPP Maintenance - 2024

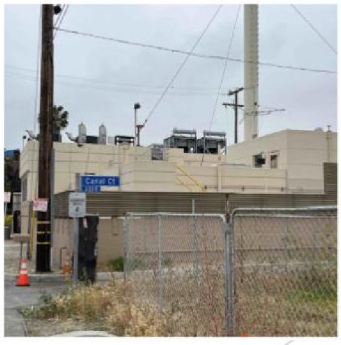












Hurricane Pumps

Our MDR Community in Action

August 3, 2022

To: LA City Planning Commission ("LACPC")

Re: VAPP Proposed Parking Lot @ 128 Hurricane St

Re: Venice Auxiliary Pump Plant (VAPP), 128 and 133 Hurricane;
DIR-2017-4167; ZA-2017-3950 (plant); DIR-2017-4173; ZA-2017-3953 (parking lot)

This comment is submitted in reference to the proposed parking lot at 128 Hurricane St. LADPW has previously indicated a need for additional parking above and beyond supporting the 1-2 plant operators, which can easily be accommodated without the need for an additional lot. Their rationale is that inspectors, on occasion, need to visit the plant(s). Their rationale is that limited parking on Hurricane St. makes these visits more challenging.

Within the past couple of days, new "no stopping" signs have been posted on the south side of Hurricane St between Pacific Ave and Pacific Court eliminating legal street parking for 3-4 cars. Please see photos below. You will note that parking is still permitted on the north side of Hurricane with the exception of the spot closest to Pacific Avenue (a new sign was posted there as well).

What is the rationale for eliminating this street parking? What specific problem is it designed to resolve? Who made this decision? Was anyone in the community consulted? FYI, there has been no notice to the community. The signs were simply posted.

One could speculate that this action was taken to intentionally create more scarcity and support the rationale for additional parking at 128 Hurricane. We don't want to believe the city would do something so nefarious. However, based on the timing of this change and LADPW's actions to date, this seems like a logical explanation.

As part of your evaluation of the parking issue contained within this broader appeal, please consider when, how and why this decision was made.

Thank you,

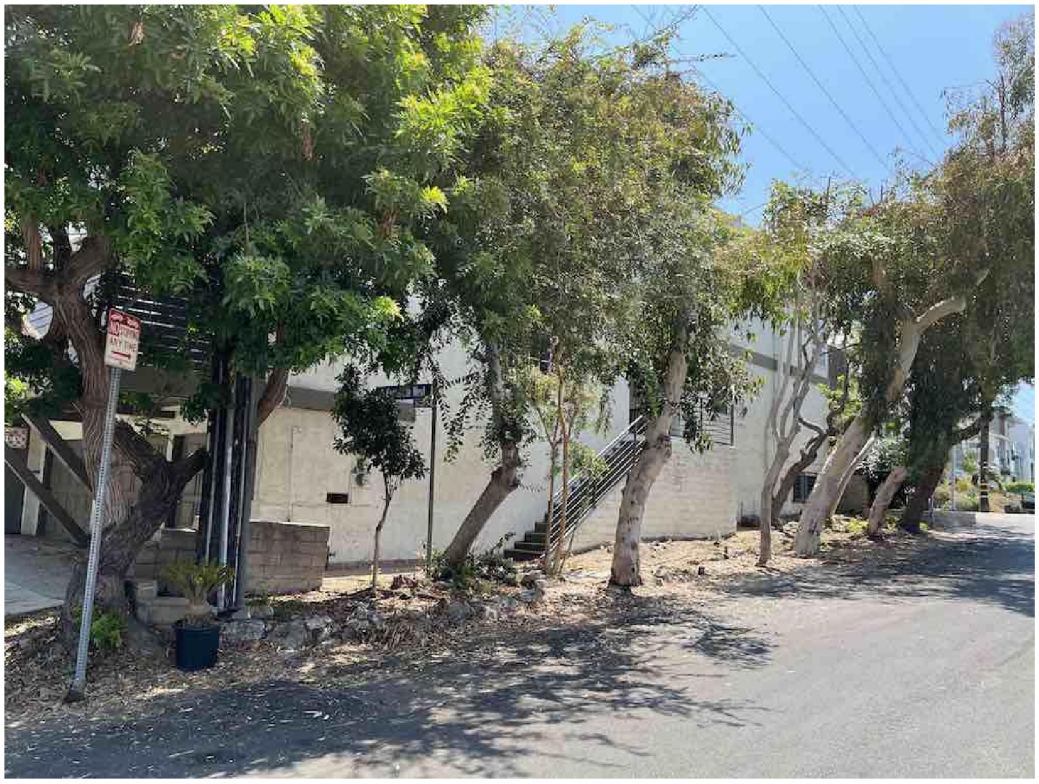
Genevieve Morrill-Borassi
Mike Borassi
Steve Bradbury

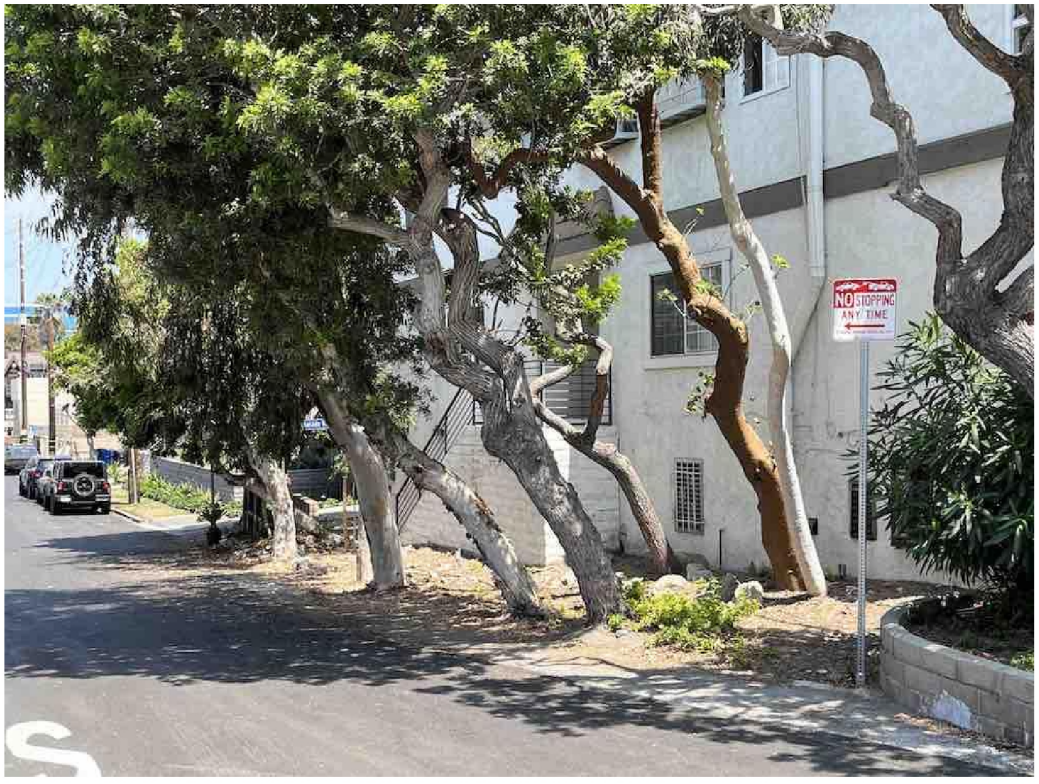
on behalf of the Hurricane Pumps community

P.S. We have sent an email to LADOT seeking a response.

Hurricane Pumps

Our MDR Community in Action





Hurricane Pumps

Our MDR Community in Action



HURRICANE PUMPS

Our MDR Community in Action

August 1, 2022

To: LA City Planning Commission ("LACPC")

cc: LA Dept of Sanitation, LA Dept of Engineering (collectively, "LADPW"), Venice Neighborhood Council ("VNC"), Ballona Institute, Friends of Ballona Creek

Re: VAPP June 2022 Community Meetings – Community Feedback

Re: Venice Auxiliary Pump Plant (VAPP), 128 and 133 Hurricane;
DIR-2017-4167; ZA-2017-3950 (plant); DIR-2017-4173; ZA-2017-3953 (parking lot)

Continued April 28 hearing to August 11, 2022

On April 28, 2022, LACPC heard the appeal filed by Michael and Genevieve Morrill-Borassi on behalf of the impacted community to discuss the VAPP project at Hurricane St. in Marina Del Rey (the "Appeal"). At that meeting, LACPC continued the Appeal to August 11th. In the interim, LADPW was directed to engage with and listen to the community. This action was readily apparent to the commission such that there was no need for community feedback portion of the hearing.

Since then, there have been two meetings – one via Zoom and one in person. At both meetings, LADPW has attempted to explain and rationalize their decisions while indicating there is no opportunity to modify the scope of the project no matter how much it does not align with the community's point-of-view. We strongly disagree with this position. In fact, the entire basis of this Appeal and this ongoing community action is to engage in a meaningful dialogue with LADPW resulting in an agreement that serves all interests.

To be clear, the community acknowledges there is a material need for a VAPP project (although not as large as is currently scoped) much as there was a compelling need for the dual force main project that preceded it. However, we are equally adamant that the community's collective point-of-view be part of the final design as well as the project's construction plan especially given (1) the city's inability to maintain the existing VPP, (2) the extremely disturbing experiences that were part of the dual force main construction project and (3) the fact that all decisions to date have been made without public input since the preliminary presentation in 2016.

During the two recent community meetings LADPW has laid claim to having solicited community input throughout this process starting with a scoping meeting in 2016 and presentation to the VNC in 2017, continuing to the present time. At the time, LADPW stated the primary purpose of the 2016 meeting was to address the dual force main project. VAPP plans were identified as preliminary with further meetings planned. Today, the community is baffled to identify the source of purported ongoing input that, we have been told, has been integrated into the plan. Certain decisions, outlined below, run counter intuitive to what anyone in the community would want. In fact, the VNC has recently withdrawn its support of the parking lot element of this project given the current scope is not consistent with the plan as presented to them in 2017.

Further, LADPW has stated the design of the project has not changed from the scoping hearing until the present. This is materially untrue. The original presentation referenced a 10-foot space between the VAPP and all residences. Upon learning the city owned additional property adjacent to 3809 Esplanade, the project was re-designed such that it is now is within two feet of that residence. It strains credulity to believe this change did not result in additional modifications. Therefore, any claim the project plan has never changed from 2016 is wrong. It is disingenuous to state otherwise.

We are requesting LADPW meet with representatives of the community to discuss and negotiate, in good faith, modifications to the project scope and construction plans. The key topics are summarized below. For clarity, we take the position that simply providing a written response to our concerns without material changes to the plan is unacceptable and not within the direction nor spirit of LACPC's order to listen to the community.

VAPP Design

- **Move the building away from the existing residences on Esplanade and create a hard buffer**. The project is materially closer than initially represented. The hard buffer should include, at minimum, a 6-foot block wall and additional landscaping to ten feet along all boundaries Note there is existing landscaping present, installed by the residents, which can function as one element of the buffer.
- **Move all equipment to the center and/or opposite side of the building (on Hurricane).** There should not be any mechanical equipment within 10 feet of a residence. This includes the transformers, HVAC and electrical panels. There are significant health concerns associated with this equipment. It has been suggested that the entire building could be turned 180°. This would address several key issues.
- **Mitigate noise and light levels from the VPP and the VAPP**. The VPP has had a material impact for many residents living closest to or in the sightline of the structure. We are concerned about the impact of the VAPP in conjunction with the VPP, assuming the latter remains operational.
- **Re-design the architecture to fit more appropriately within the residential style of the neighborhood**. The proposed aesthetic has never been discussed with the residents. As an example, there has never been ANY community interest in a low metal fence along Esplanade identical to the fencing used on Washington Blvd. LADPW claims of material community input are dishonest. There has never been, nor will there be, any desire for residents to see the entire building (VAPP and VPP).
- **Include the community in your collaboration with the Coastal Commission and other government agencies.** It appears the city has been working with the Coastal Commission and other agencies throughout the entire design process. Yet, the community has not had ONE opportunity to participate in this process. As such, decisions have been made without concern for residents. This must change ASAP.

Project Scope

- **The scope of this project is entirely too large for this residential location and not appropriate for a tsunami flood zone**. Why does the master control for all LA City pump stations (continue to) have to be placed in this specific location? What might have made sense in the 1950's when there were far fewer residences makes no sense in the present day. Additionally, why would the LADPW choose this location for so much critical infrastructure

including the master control? Does this not put the entire system at undue risk? Given these and other circumstances, we question the criteria for granting a public benefit waiver.

- **The VAPP building height.** As the scope is reduced, the building height can be reduced to be more consistent with other buildings in the community.
- **Who is in charge of this project?** The community has been seeking to communicate with someone who has decision-making authority. No person has been identified so all concerns become a "pass the buck" response.
- **The value of nearby private properties**. Property owners are rightfully concerned that the value of their properties will decrease specifically due to this additional construction. How will the city compensate property owners? Does this mean property owners will have to sue the city under inverse condemnation?

Parking Lot @ 128 Hurricane St

- **Why is this parking lot needed?** The VPP requires one full-time operator. The VAPP will require one full-time operator who may be able to also manage the VPP. At most, this means two people. There is already one parking space in the existing plant. The rationale we have been given is a need for additional parking when inspectors visit the plants. This does not necessitate the need for a separate "just in case" lot.' Why could the project design not be modified to include one or more parking spots adjacent to the VAPP, thereby providing more than enough parking for the stated need? Alternately, could a couple of parking spaces not be created along the West side of the VPP? Employee visitors currently park in those spaces and there is plenty of room for people to walk past the plant.
- **No public parking and no public access**. If we agree this lot is deemed necessary for city employees, there should not be ANY public parking. Employee access should be key card secure with no public access by vehicle or on foot. It should not be accessible by beachgoers who decide to hangout or tailgate in this lot. Even more critical, we are extremely concerned it will be accessed by homeless who look for any opportunity to plant down with their belongings. No viable, realistic action plan to address this issue has ever been provided. LADPW has said the community should rely on LAPD. This is not a realistic solution given they are vastly under resourced.
- **Parking lot design**. There is no material community demand for benches, art installations or other elements that would attract people to this location. There are no other similar public parking lots on the Marina Peninsula. This is not acceptable.
- **VNC withdraws support.** As noted above, the VNC has recently withdrawn its support of the parking lot element of this project given the current scope is not consistent with what was presented to them in 2017.

Construction Impact/Operations

- **The Dual Force Main construction project was a disaster for the entire community.** Noise, property dirt, street dirt, worker parking on the street, not respecting stated work hours…the list goes on. Why will this project be any different? Further, all construction should be limited to Monday- Friday starting no earlier than 8a with a hard stop at 5p. NO weekend work hours.
- **Construction noise.** This is a particular issue for residents on both sides of the lagoon. During the recent community events, LADPW admitted there will be loud noise for extended periods of time without offering any solutions. How will this be mitigated?

- **Alternative work location for residents**. Many residents, more than ever, work from home. A construction project of this magnitude will be overtly disruptive. Appropriate arrangements must be made, in advance and at no expense, for residents to access local, convenient, off-site locations as needed for the entirety of the project.
- **Project mitigation measures.** What is the full list of mitigation measures for this project? The community has never been told nor given the opportunity to comment on them. We have no idea what is required and how they will be enforced.

Ongoing Site Maintenance

- **LADPW ongoing maintenance of the VAPP and VPP.** LADPW has continually demonstrated its inability to maintain the VPP. Until the community complained this Spring, the current structure had not been painted in many years. Additionally, there is NO landscaping nor design elements. The sidewalks along the lagoon wall need repair, there are no safety railings, and the entire property (including the future site of the new VAPP project) is strewn with litter, graffiti, and homeless items. This should all be done in collaboration with the community.
- **LADPW written, binding maintenance obligations.** What is LADPW's obligation to clean and maintain both the VPP and VAPP during and post-construction? Who will enforce it? What is the enforcement mechanism? What penalties are in place when not enforced? What is the plan for immediate response to graffiti, loitering, camping, etc.?

Environmental Issues

- **The city has not made appropriate efforts to mitigate environmental issues**. There have been myriad issues brought to the city's attention for many years regarding this site. They should ALL be addressed at this time.
- **Parking lot environmental issues.** IF the parking lot site is to be utilized, there is contaminated soil in the ground and the oil well needs to be re-abandoned. It is not acceptable that LADPW approved its own environmental report and attached it to the project as a 44-page addendum.

Please note we have identified 50+ concerned neighbors who live throughout our community. This group is growing larger as more people become aware of the City's behavior.

For all of these reasons as well as the more in-depth rationale provided in the original Appeal, we respectfully request that LACPC direct LADPW to meet with and negotiate with the community so these issues can be resolved in a cooperative, congenial manner.

Thank you,

Genevieve Morrill-Borassi
Mike Borassi
Steve Bradbury

on behalf of the Hurricane Pumps community.

MDR Peninsula Resiliency Concerns re: VAPP Project

Written by Keith Harrison
April 2025

(Keith Harrison has had a lengthy, highly respected career in emergency management. For 24 years he was Deputy Regional Administrator for the CA Governor's Office of Emergency Services, then became the Assistant Administrator and later Acting Administrator for the LA County Office of Emergency Management. His knowledge and experience overseeing emergency /disaster response, recovery operations as well as training, planning and preparedness prcjects is without peer and includes his contributions to the original California Emergency Manager's Mutual Aid Plan as well as a new County Operational Area Multi-Hazard Emergency Operations Plan and an update of the County All Hazard Mitigation Plan.)

The current construction project exacerbates ongoing issues of emergency egress and ingress, by expanding density, blocking routes albeit temporarily, and adding equipment and workers into the potential hazard zone. Evacuation plans have been generally ad hoc and done in the heat of the emergency. This approach has not been highly successful as recent problems with the Pacific Palisades Fire demonstrated.

Given the hazards facing the community, such as tsunami, tropical storm flooding, hazardous materials incidents and targeted violence, which are complicated by the construction project impacts on egress and ingress, a formal evacuation plan is recommended.

The evacuation planning group must include government and community representatives. At a minimum, the planning group should have representatives from the Los Angeles Police Department (LAPD), Los Angeles Fire Department (LAFD), Los Angeles Department of Transportation (LADOT), Los Angeles Emergency Management Department (LAEMD) and the LA Department of Sanitation as the responsible party for the contract work, as well at least two representatives selected by the community.

Essential elements of the evacuation plan should be as hazard specific as possible and include, but not be limited to:

- Identification of evacuation routes and emergency ingress routes.
- Estimated evacuation times and numbers evacuated.
- How will contractor and workers mitigate the blocking of evacuation routes and cooperate with the evacuation process.
- Effective alternatives to evacuation such as shelter in place.
- Alert and warning procedures.
- Addressing and including the needs of Persons with Disabilities and Access and Functional Needs (PDAFN).
- Public education and practice.

# # #

Venice Auxiliary Pumping Plant (VAPP)
June 18, 2022 Community Briefing
Summary of Questions & Comments from the Community

TOPIC	QUESTION/COMMENT
Process/Opportunities for input	
Changes to design/plan	Request for update on any changes made to plan/design since planning commission advised project team to meet with the community
Status and process	Questions regarding status and process, is there still an opportunity for input or are the designs and other elements of the project already finalized
California Coastal Commission	Request for community to be informed when project goes before Coastal Commission so that they can attend and/or submit comments
Potential changes	Assertions that it is not true that it is "too late", that changes can still be made
Additional comments included	"It's useless", "Why are we even here", "This is a waste of our time", "Seems like there isn't much reason for doing this (the meeting), it's all decided and can't be changed but I'm here", "We don't feel informed", "We have questions and aren't getting any answers", "dictatorship" comments
Comment regarding appeal	Appeal was made in December 2021, it is now June 2022, and there are still no answers for the community
Comments regarding having a decision maker present	Comments for "someone in charge" who can make decisions or share information, assertions that the team present at the meeting are unable to answer questions and thus wasting constituents' time, why weren't the appropriate people brought to the meeting who can provide answers and make decisions
VAPP design elements	
Renderings	Comments that the renderings are not the same as what had been presented to the community in the past, that elements have been changed Request for "accurate depictions" of the buildings surrounding the plant, "In other words, change the brown condo to its true color of white"
Fence design	Request for it to be a solid fence or wall rather than open fencing Requests for it to be a solid block wall with landscaping, that if this is not possible the project should not move forward What is the height of the fence?
Distance between project and the building adjacent to the north	Comments that originally there was a 10 ft. buffer between, and now there is only a two ft. buffer; that this element was changed, and that the original is available online, supporting that it was changed and that staff is lying when saying no changes have been made Assertion that community hasn't been given a clear answer to this question
Location of transformers/equipment next to residential side of building	Why they weren't placed on the side of the building facing the VPP, can they be moved, can they be buried?

Height and square footage of building	Inquiry on how tall the VAPP will be and what the total square footage will be Why does the VAPP need to be so tall? Why is the VAPP taller than the VPP?
Separate elements to different locations	Can pump station be located here, but electronics or some other part of operations be located elsewhere, in order to minimize the footprint?
Landscaping	Can plants be amended/changed from current plan? Can plants that support local butterfly populations be included? Can landscaping be added along the perimeter of the proposed VAPP (for example, greenscreen/vining plants/planters that obscure the building)?
Sea level rise, impacts of climate change	Were these incorporated, and if so, how?
VPP design elements	
Paint	Can VPP be painted to match or coordinate with the VAPP?
Landscaping	Can landscaping be added to the VPP (for example greenscreen/vining plants/planters that obscure the building)?
Height	How tall is the VPP?
Surface parking lot	
Unhoused individuals	Concerns related to unhoused individuals and the potential for encampments – how will this be managed?
Safety	Concerns regarding security of lot and impact to safety of neighborhood – can lot be secured in any way?
Enforcement	Needed for parking lot and parking spaces
Canal	
	Request for pedestrian bridge over canal/channel
	Question asking if anything will be going in under the canal
Walking path and sidewalk	
Design of walking path and railing	Comment that walking path as it travels around and behind the VPP is not the same as the rest of the path – not landscaped or maintained the same, and lacks a railing that the rest of the path has; request for improvement on this area of the path for the community
Sidewalk along VAPP	Will sidewalk be in line with existing sidewalk on Hurricane Street?
Current detour of walking path	Inquiry regarding closure of walking path and will it be reopened (VDFM related)
Project need	
"Near misses"	Inquiry about what was meant by this term in regard to need for VAPP and increased capacity
Wet-weather events	Comments that we are in a drought and VAPP will not be needed
Flooding at this location	Observation that this seems like the location most likely to flood, why site the VAPP at a potential flooding location, wouldn't this put the system at risk?
Mitigation and impacts	
Noise	What will the noise level be from the VAPP (during construction as well as during operation of the completed VAPP) Comments regarding concerns about noise level and impact to quality of life Comment that current noise level outside of VPP is 74 decibels

	Concerns about noise from equipment and trucks (during construction as well as during operation of completed VAPP) Will construction noise travel down the lagoon?
Access	Concerns about trucks blocking access to driveways and parking (during construction as well as during operation of completed VAPP)
Graffiti	How will graffiti be prevented with the open design?
Unhoused individuals, potential encampments	How will this be addressed?
Off-site workspace	Request for additional details, including: • How will it be implemented? • Are local locations being identified? • What will the process be to apply/get more information?
Maintenance	
Areas of concern	Concerns regarding maintenance for example: • Exterior of building • Paint • Landscaping • Trash, etc., • Comments that current VPP is not well-maintained in these areas
Opposing view of VPP maintenance	• Opposing comments that VPP has in fact been well-maintained, including: • Recent upgrades that improved operations • Noise mitigation • "Smoke" mitigation, etc.
Comments regarding neighborhood	
Property values	Many comments regarding impacts to property values
Loss of views	Comments that the VAPP will block residential views
Additional comments included:	• "This is not East L.A. or Hollywood" • "These are multi-million-dollar homes" • "This is a nice neighborhood", "We live in a good area" • "We pay a lot of money to live here" • "We live here for a reason; this will change our neighborhood and make it undesirable like other parts of the City"
Misc.	
VPP exterior lights	Why are the lights on 24/7
VDFM equipment	Inquiry about what the equipment currently on Hurricane is for
Impacts to health of humans and animals	Concern regarding electricity, power lines, and transformers, negative impacts to health
Schedule	When will project begin?
Paving	Coordination with BSS and other construction projects
Presentation materials	Request for recording of Zoom presentation, PowerPoint presentation used for Zoom presentation, list of questions asked

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GlaserWeil

10250 Constellation Blvd.
19th Floor
Los Angeles, CA 90067
310.553.3000 TEL
310.556.2920 FAX

Clare Bronowski

Direct Dial
310.282.6254
Direct Fax
310.785.3554
Email
cbronowski@glaserweil.com

February 28, 2022

BY E-MAIL

President Millman and Honorable
Commissioners
City Planning Commission
200 North Spring Street
Los Angeles, California 90012

Email: cpc@lacity.org

Re: Venice Auxiliary Pump Plant (VAPP), 128 and 133 Hurricane;
DIR-2017-4167; ZA-2017-3950 (plant); DIR-2017-4173; ZA-2017-3953 (parking lot)

Dear President Millman and Commissioners:

This letter is submitted on behalf of the appellants, Michael and Genevieve Morrill-Borassi, as well as other neighbors who will be impacted by the proposed Public Works project at 128 and 133 Hurricane on the Marina Peninsula.

The goal of this appeal is to require Public Works to work with the community on a better design for this project which will fit within our community and will provide protection for adjoining residential neighbors from the impacts of this industrial-style facility on privacy, safety, noise and aesthetics.

The background and issues with this facility are summarized as follows:

- Public Works last presented this project to the community in 2017. The case has been on hold for almost 5 years. No additional information or contacts with the community were held during this time despite prior promises to work on design and mitigation. We have repeatedly asked for a new presentation of the project since changes were clearly made since the last City public hearings in 2017.

- The EIR for the project and prior presentations misrepresented the location of the project, which is in fact 10 -15 feet closer to the nearest residential structure than previously represented.

- The project is poorly designed to fit within its residentially zoned neighborhood. Noisy and dangerous equipment is located very close to two neighboring residential areas. However, on the other side, the project site is adjacent to a dead-end street and the exiting pump plant, and all noisy and dangerous equipment should be located nearer to this facility and away from residents.

- The project aesthetic design, proposed landscaping and "public art" has never been presented to the community and the simple elevation of the structure presented does not adequately show how this will fit into a 100% residential neighborhood.

- Public Works has a history at this location of poor maintenance of the existing facility and landscaping, as well as noisy and intrusive construction for years during the recent Dual Force Main project at this location. The community simply does not trust Public Works to fulfill its promises to keep this facility and the parking lot safe and attractive. (See attached photographs of trash, graffiti, lack of landscaping, and lack of maintenance of existing facility.)

- The facility is adjacent to a sensitive wetland area and no effort is made to mitigate impacts or improve existing conditions.

- The proposed parking lot will be an attractive nuisance in this residential area and will not be secured or patrolled. City parking should continue to be on the street and the additional lot should be used for open space to buffer the facilities.

- The project approval and conditions do not properly include all required mitigation measures so that the community knows what must be done and enforced. The EIR, Addendum and MMRP plan are only found on an obscure Bureau of Engineering link and were not available to the neighbors.

    - <u>Introduction and Background</u>

The project site is in a unique residential neighborhood in the Venice/Marina Peninsula area where apartments, condominiums, duplexes and single family homes

support a thriving and unique residential community enjoying their surroundings between the Pacific Ocean and the Ballona Lagoon/Grand Canal waterway.

The Venice Pump Plant has existed in this area for a long time. It is not well maintained. It has no landscaping or attractive fencing. It is never upgraded, cleaned, and graffiti is often left for months before painting. The existing plant is stark, abuts directly onto a sensitive waterway, is littered with trash and graffiti, with weeds poking through the scant gravel setbacks. Over the last five years, the site has been used as a staging area for the Hyperion Dual Force Main project, so the neighbors have endured constant construction traffic, noise, dust and equipment.

The only saving grace in the current layout is that there are two large empty properties on either side of the existing plant, and this open space has mitigated the impact of the plant on the neighborhood. Now Public Works wants to build on both of these lots, and their new improvements will directly abut existing residences. In order to build a safe and beneficial project here, Public Works must be required to include the following measures in the project:

- The project needs to mitigate its impact on the sensitive canal and lagoon. The existing pump plant has no vegetation whatsoever and the canal banks are not appropriately landscaped with native materials. Additional landscaping should be added to the existing facility including vines to cover walls which are frequently graffitied.

- Upgrades should be required to the aesthetics of the existing plant including painting, consideration of a mural, and additional planting in currently empty and trash filled planters and side yards.

- The new facility must be designed and landscaped in keeping with the residential area and sensitive lagoon.

- Provide a buffer of landscaping and walls between the new facilities and the directly adjacent residential buildings, including a minimum 6-foot block wall and 10 feet of landscaping between both the parking lot and the new facility and the nearest adjoining residential property to the north and west.

- Include an on-going obligation to clean and maintain the existing and new facilities when they are complete.

- Adopt binding conditions of approval that clearly spell out all obligations in the future so that neighbors can monitor and enforce, including each requirement of the approvals and the MMRP.

- The Errors in the Current Approvals

In the cases before you, Public Works has been granted a series of special adjustments and "alternative" compliance measures that don't make sense in this case. While most of the project site adjoins open space, a City facility and streets, the equipment for this facility has been jammed up against the nearest residential uses, with transformers less than four feet from bedroom windows. A more thoughtful design that really fits into this location needs to be proposed.

This project does not meet the performance standards for a Public Benefit Project. A zone change and general plan amendment are required for this project. Per Code, an eligible Public Benefit Project must be improved with a 10 foot landscaped, irrigated buffer along all property lines.

In addition, this project does not meet the standards required for a Conditional Use to allow a parking lot in a residential zone. The finding cannot be made that this use is compatible with adjacent properties and the surrounding neighborhood. The project is not consistent with the general plan as this property is designated for Low Medium Residential use only. A zone change and general plan amendment are required.

The parking lot will be an attractive nuisance in this small residential area unless security, fencing and nightly locked gates are required. The entire parking lot needs to be enclosed with attractive fencing with a residential look and materials to help blend in with the area.

- The Project Does Not Comply with CEQA

The CEQA compliance for the project is inadequate. Public Works certified its own EIR in 2017 and then an Addendum in 2021. There was no public outreach whatsoever for the Addendum, but the community was notified by the State Dept. of Toxic Substance Control that remediation was needed at the project site.

City Planning has not properly reviewed the CEQA compliance nor included the mitigation measures as conditions as required by law. Each requirement of the MMRP should be included in these public and recorded conditions, so the community knows what is required and can monitor the implementation. Instead, the MMRP can only be found on an obscure Public Works weblink.

Further, the EIR included false and misleading project plans which showed the project footprint further from the closest neighboring residence than it actually is. Even at the on-site meeting, Public Works falsely represented the distance between the nearest residence and the project equipment. The EIR is vague and does not specify the project design, distance between equipment, the type of equipment to be used, and what the neighborhood would be exposed to during and after construction.

- Errors in the Decision

The following errors are made in the findings for Public Benefit Project:

Finding 7 h. An eligible Public Benefit Project must be improved with a 10 foot landscaped, irrigated buffer along the periphery. This is very important to the community and cannot be met.

Finding 7 i. The finding refers to "Condition 4" stating that the project shall include landscaped parking per LAMC 12.21-A 6. There is no such condition and it does not appear that the parking area is sufficiently landscaped.

Finding 7 o. The cited performance standards apply to projects on a major or secondary highway, which this site is not. Therefore, the Public Benefits exception is not available and the project must seek a zone change.

The following errors are found in the Pump Plant and Parking Lot conditions:

Pump Plant Condition # 5 Setback. The notice for this case in 2017 stated that a ZA Adjustment was sought for the northerly side yard. However, the decision grants an adjustment for the westerly rear yard, allowing equipment along Canal Court. There has been no explanation to the community whether in fact the design has changed or what the distance is between the facility, equipment and the nearest residential property directly to the north. The project needs an ample buffer between the residential property to the north and the facility, including a minimum 6 foot block wall and 10 feet of landscaping. The project needs to be designed with a residential look and materials to help blend in with the area.

Parking Lot Condition # 5 requiring "signage" with the parking lot hours will not be sufficient to prevent overnight parking, camping, etc. The parking lot should be gated and supervised with gates locked at sunset. A parking lot in a residential area is an attractive nuisance that must be secured and patrolled.

Parking Lot Condition #4 regarding setbacks is insufficient. There should be a 6 foot block wall and 10 feet of landscaping on the west side of the property to buffer the next door residential uses. The findings mention a 6 foot "decorative fence" and landscaping. These requirements should be spelled out in the conditions so that they cannot be altered, and the fencing should be a block wall where it abuts the residence.

Both Conditions #13. Each requirement of the MMRP should be included in these public and recorded conditions, so the community knows what is required and can monitor the implementation. The Public Works link to the project plans, EIR and Addendum currently does not work, and there is nothing including the MMRP in the case file referenced in Condition 13. We have received notice from the Depart. of Toxic Substances Control that there is active remediation plan at the site. Compliance with these plans should be spelled out in the conditions and recorded covenant.

Both Conditions #15 Final Plans. The community should be given an opportunity to review final plans showing how the facility will be compatible with the adjoining neighborhood in terms of scale, privacy, landscaping and aesthetics.

- Conclusion

For all of the above reasons, this project should not be approved, but should be sent back to the drawing board so that Public Works can design a compatible facility. To place this facility in a residential neighborhood in a sensitive wetland location requires careful consideration and strict conditions.

Sincerely,

Clare Bronowski

CLARE BRONOWSKI
of GLASER WEIL FINK HOWARD AVCHEN & SHAPIRO LLP

CB:cb
Attachments

cc: Elizabeth Gallardo
Juliet Oh
Councilmember Mike Bonin

Venice Auxiliary Pump Plan

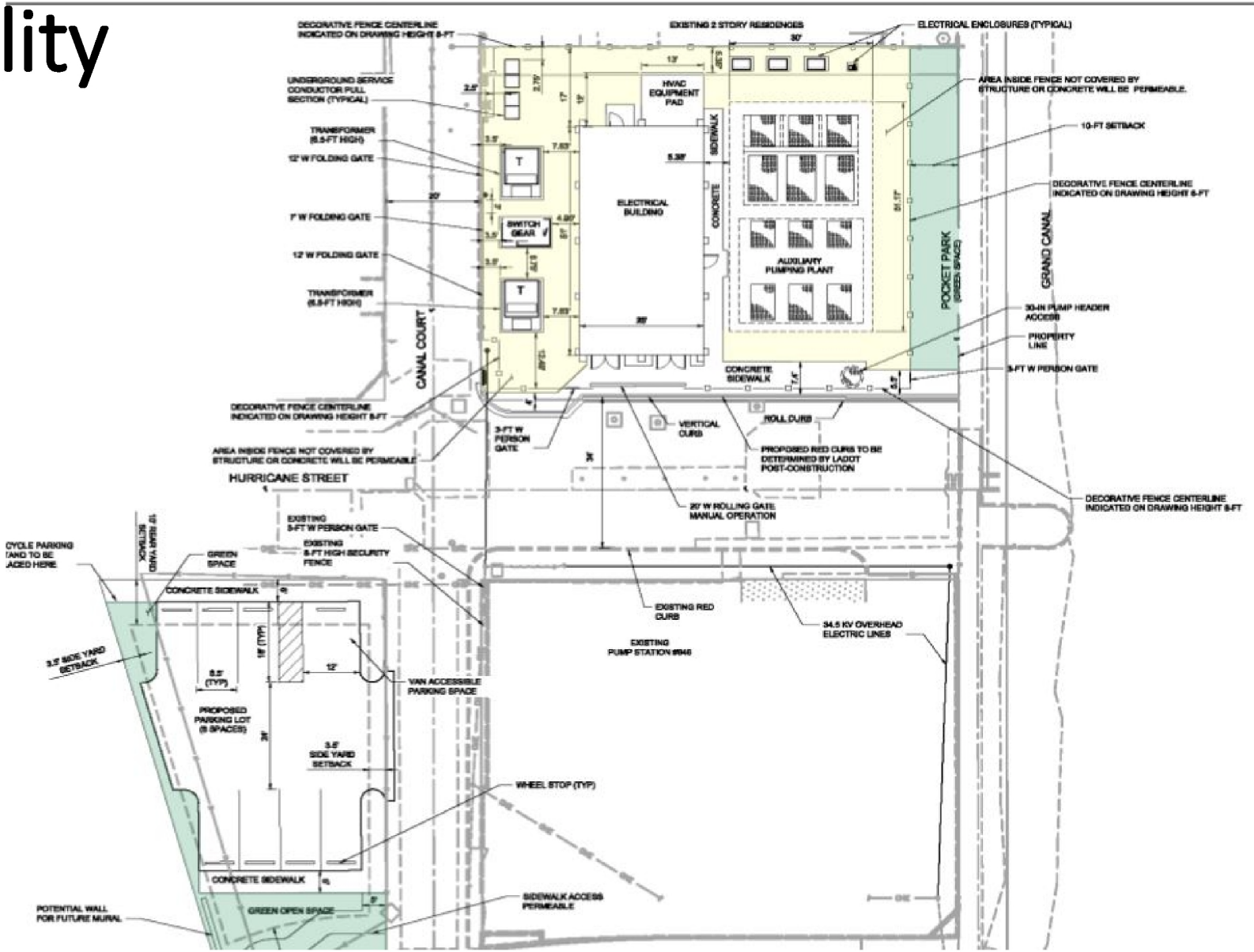
Project Site



Project Site



Proposed Facility layout



Existing Facility: No landscaping





Existing facility: lagoon side, disrepair





Existing graffiti





More graffiti





More graffiti, disrepair





Trash, disrepair





PRE-DESIGN CONCEPT REPORT
GRAND CANAL RESTORATION

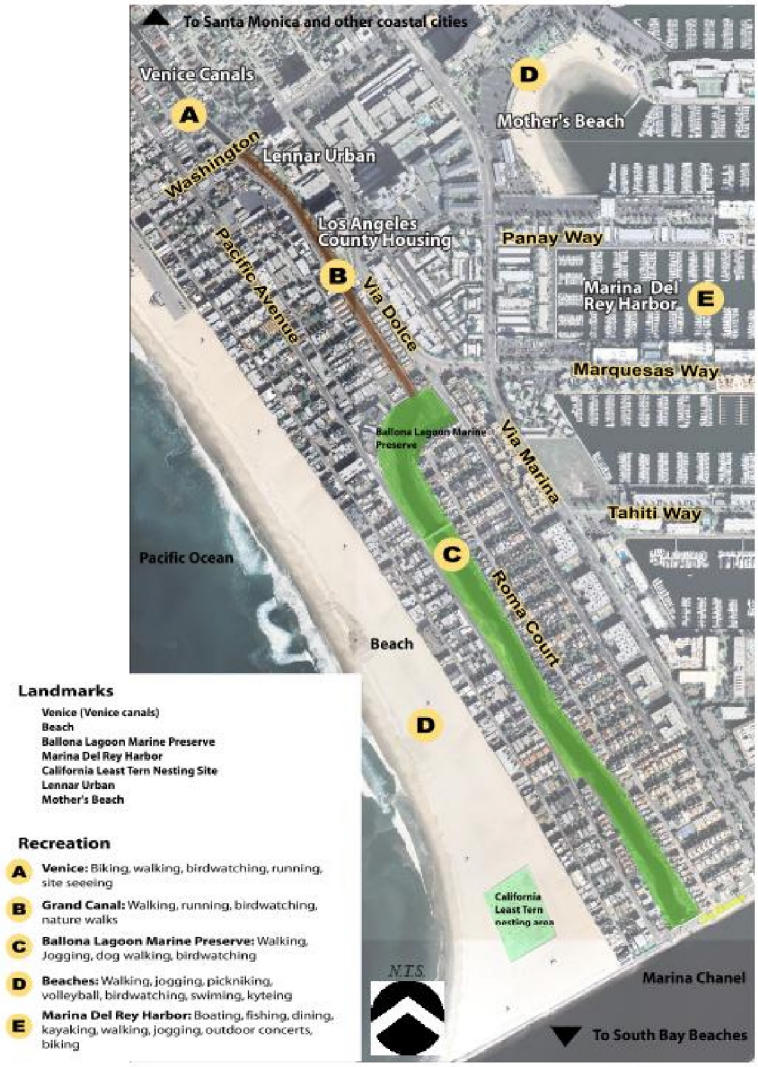
November 19, 2007

Executive Summary

Project Background

The Grand Canal is an important tidal waterway in the Venice community of Los Angeles, California, that connects the canal system of Venice to the Ballona Lagoon, Marina Del Rey Channel, and the Pacific Ocean.

Figure 1
Grand Canal Vicinity Map



The Canal, its banks and adjacent lands have been impacted over the years from many sources and are in need of restoration. The goal of the City of Los Angeles is to improve the natural habitat value of the channel and banks of the Grand Canal while maintaining, and improving where feasible, flood protection, tidal flushing, stormwater quality, and public access.

With these goals in mind, the City contracted with Psomas and its team of specialists to characterize the existing physical and biological conditions within the study area, identify potential restoration alternatives and estimate their costs; and recommend which alternative actions should be implemented and how they should be phased. Efforts were coordinated with a public involvement process orchestrated by the City. Reports dealing with each area of expertise are found in the appendix, this report summarizes and integrates the key recommendations.

Existing Conditions

Grand Canal extends approximately 2,000 feet (0.37 miles) and averages approximately 50 to 75 feet wide. The Grand Canal is located immediately to the north of the Ballona Lagoon Marine Preserve (BLMP) and is connected via tidal waters, which enter the BLMP through a tide gate at the Marina del Rey boating entrance. The 405 and 90 freeways are the two nearby freeways located to the east of Grand Canal. The region is home to a landscape of unique ecological, social and cultural diversity.

Existing conditions were analyzed in four areas: 1) hydrology, 2) access, 3) biology, and 4) storm water quality/erosion.

The **hydrological** existing condition examined was not the actual current condition because plans are underway for the proposed Marina del Rey Tide Gates Rehabilitation. As requested by the City, the modeling of the existing condition is based on design drawings of the County of Los Angeles Gate Rehabilitation design (LADPW 2007) provided by the City. Since the Grand Canal is exposed to oceanic tides via tide gates at the mouth of Ballona Lagoon that connect to Marina del Rey and Santa Monica Bay, the configuration of the Marina del Rey tide gates is the primary determinant of the water levels in the Grand Canal. Under existing conditions, the average tide range in Grand Canal varies between -1.3 ft MSL and 1.9 ft MSL from mid-April to mid-October (Dry mode) and between -1.3 ft MSL and 0.3 ft MSL from mid-October to mid-April (Wet-mode). The maximum water level is determined by the Marina del Rey tide gates' operational settings which is described in the County design. The planned rehabilitation of the Marina del Rey tide gates has sufficient conveyance capacity that water levels in the Grand Canal closely follow oceanic tides, except when limited by bed elevation or tide gate closures.

Public access was analyzed principally in terms of pedestrian and vehicular access. Two areas of particular interest are Strongs Dr. from Washington Blvd. to

Driftwood, and pedestrian access on the east side of the canal from house 3511 to 3621, and from there to 3815. Public access is restricted in the first stretch and below the tideline in the second.

The west side of Strongs Dr. currently accommodates twelve non-metered parking places and seven metered spaces. On the east side of Strongs Dr. there are six metered parking spaces and 35 non-metered spaces. However there is no sidewalk or designated trail along this stretch. As a result, the banks of the canal have become the de facto trail and habitat has suffered. The following other issues were also identified:

- Lack of disability access
- Lack of pedestrian connection between east and west side of Canal
- Lack of park space defining entrance to Grand Canal
- Lack of demonstration areas for interpretive learning
- Lack of gathering areas
- Lack of recreation amenities and signage
- Lack of connections to landmarks within the regional scale

Biological resources were analyzed in terms of the presence of specific native and non-native biological species. A wetlands delineation was also performed. A total of 15 native plant species were observed; Pickleweed dominated the salt marsh vegetation. Some wetlands plants were observed in the east-side trail as it is sometimes below the tidal water level. Observed special status species include Wooly Sea-Blite, Brackish-water Snail, Snowy Egret, and Great Egret. Special interest species include, for example, Fiddler Crab and California Sea Lavender. Existing conditions of the various study areas include degraded upper banks, some of which has been trampled and some are covered with exotic plants; erosion from stormwater flows; debris scattered on the canal bottom; and weedy undeveloped parcels.

Existing **stormwater** conditions were analyzed in terms of drainage areas, land uses and their pollutants of concern, and flows/volumes during a .75 inch and 10-year 24-hour storm event. Land uses in the watershed are mainly high density single family and multi-family with commercial and retail uses adjacent to Washington Blvd. Pollutants from these land uses are varied however, trash and bacteria are particular pollutants of concern. According to the Bureau of Engineering Drainage Map (July 2007), stormwater on the west side of the canal generally runs overland from Pacific Ave. down the streets directly into the Grand Canal. Several west-side streets also have drains, usually small, which discharge directly to the Canal. Both overflows and drain inlets to the Canal have eroded the banks. One major drain enters the Grand Canal from the east at Via Dolce at the city-owned property adjacent to the County residential facility across from Driftwood. Runoff is not treated except for Stormceptors installed at Washington and Strongs (2400 gallon) and at Via Dolce across from Driftwood (7200 gallon). These remove oil and grease and sediment.

Alternatives Evaluation Summary

Two alternatives for physical changes to the Grand Canal area have been developed and examined. The objectives of these approaches are to establish a balance of ecological habitat types, address endangered species and exotic species concerns, increase stability of the banks, improve water quality through improved stormwater management, and balance public access, flood protection and protection of wildlife. Both alternatives are based on the recommended hydrological structure and operational regime and provide somewhat different mixes and benefits of public access, stormwater management and biological restoration.

Hydrology – The recommended hydrology approach is to maintain the structural changes of the tide gate rehabilitation under way, but to modify it operationally in order to maximize the winter period tidal regime to allow for the most inundation of wetlands plant species. Also by reducing the duration of restricted tidal range and residence time, this operational approach would reduce the duration of freshwater inundation following flood events.

Key recommendations as to operation of the gates are:

- The Marina del Rey tide gates should be operated so that the Wet Mode is only implemented in response to storm forecasts. An analysis of 13 years of daily rainfall in Santa Monica provided a hindcast estimate of the annual frequency at which the gates would be operated in Wet Mode. If the Wet Mode was implemented for two days on either side of any rainfall 0.25 inches or greater, the gates would have been set to Wet Mode for an average of 13% of the 13-year precipitation record. For the driest (2002) and wettest (2005) water years of this record, Wet Mode would have been in effect 7% and 20% of the time, respectively.
- The Washington St tide gates should not be opened for extended periods of time. When the culverts were open, high tide water levels decrease and low tide water levels increase by a similar magnitude of 0.3 to 0.6 feet. Even if the culverts were opened for a maximum of three 6-hour periods per week (10% of the time), the impacts on the integrated water level statistics (MHHW, MLLW, annual inundation frequency, etc.) should be small.
- An OM plan should be developed along the lines outlines in the Hydrology Appendix.

Because public access treatment provides the most distinguishing differences between the alternatives, the alternatives are presented with access discussed first.

Alternative 1

Pedestrian Circulation -- In alternative one, the **west side** of the Canal bank along Strongs Drive will have a defined six-foot pedestrian trail adjacent to a three-foot high fence that will provide shelter to proposed biological restoration and will be installed adjacent to all walking paths along the Canal in order to avoid trampling of vegetation. The new trail will connect with the existing concrete pathway running from Strongs Drive and Driftwood Street to Hurricane St. connecting eventually with the not yet restored west bank of the Ballona Lagoon Marine Preserve. A pedestrian bridge will be located at the intersection of Strongs Dr. and Driftwood St., providing pedestrians the ability to cross over to the east side of Grand Canal. The bridge will lead visitors to and from one of the three proposed gateway parks and also to currently underutilized parking along Via Dolce. On the **east side** a new path will be installed from Washington to the new entrance park with a continuation path to the **sidewalk adjacent to Via Dolce**, which will lead pedestrians, through signage, to the entrance of the sand dune park, the second east-side park, or beyond to the entrance to Ballona Lagoon Marine Preserve.

Parking and Vehicle Circulation on Strongs Dr. -- A distinguishing factor of this alternative is that, with the addition of a walking path and landscape division from the road from Washington to Driftwood along Strongs Dr., traffic on Strongs becomes one way only and parking is eliminated. Fire Department code can be met with this approach.

Habitat Restoration -- Along Strongs Dr., habitat will be restored up to the current curb. Along the east side across from Strongs Dr., non-natives will be removed and native habitat will be planted. Along the houses on the eastern side, the existing concrete path along the canal will be broken and cobble will be added to provide tidal habitat. The area from house #3511 to #3621 along the canal will be restored to habitat. The recommended approach to bank restoration is to enhance the bank in its current profile other than where areas have been damaged by erosion. The compacted and degraded topsoil could either be replaced or disked and improved. Existing wetlands vegetation would be retained and would be enriched with additional native wetland species representative of similar habitats elsewhere in the Ballona Wetlands Ecosystem.

Stormwater Management -- The landscaped separation between the path and the street along Strongs Dr., in this alternative, is principally dedicated to a bioswale/bioretention area that treats runoff along the length of Strongs Dr. minimizing flows reaching Driftwood and managing flows from Anchorage as well. Rain Gardens combined with pervious pavement and Filterra units will be installed to treat stormwater from west side streets dead-ending at the Canal (Galleon St., Fleet St., and Eastwind St.) And Hurricane St. drainage area runoff will be managed in a low flow bioswale – the centerpiece of Hurricane Park. The Washington Drain overflows will be directed to the bioswale. Low flows from the Via Dolce drainage area will be treated with a bioswale system also.

Alternative 1 is shown in Figure 2, below.

Figure 2
Alternative 1



Alternative 2

In alternative two, the west side (Strongs Drive) of the Canal bank will have a defined six-foot pedestrian trail which will be installed partly where the top of the bank and informal walking area is now located. There will not be a landscape separation between the path and the road. The same three foot high fence described in Alternative 1 will be used in this alternative. The trail will also connect with the existing concrete pathway beginning at Strongs Dr. and Driftwood St., leading to the end of Grand Canal. A pedestrian bridge will also be located at the intersection of Strongs Drive and Driftwood. While a pathway will also lead to the sidewalk adjacent to Via Dolce, in this alternative **pedestrians will also have access to the east side of the bank through a walkway from house 3511 to the end of Grand Canal.**

Parking on Strongs Dr.—by moving the trail partly on to the bank where the informal trail is now located and by eliminating the landscape buffer, parking can be retained along the eastern side of Strongs with the street running one way only. This alternative also meets fire access code.

Habitat Restoration – Less of the bank is restored along Strongs Dr. in this alternative. Also less habitat is created on the east side as the access adjacent to the canal, where habitat is restored in Alternative 1, is used for pedestrian access.

Stormwater Management – because the landscape buffer is not part of Alternative 2, the bioswale along Strongs Dr. is not included. It is replaced, however with a series of Filterra units. Other stormwater elements remain the same.

Figure 3 shows the main elements of the second alternative.

Figure 3
Alternative 2



Recommended Alternative and Phasing

EVALUATION

Alternative1

Strengths

• Meets city's low impact access recommendations
• Preserves and enhances natural character of Grand Canal
• Increases wildlife watching opportunities
• Enhances pedestrian use of Via Dolce
• Enhances ability to use under utilized parking on Via Dolce
• Maximizes use of existing city lots for public use
• Assists with better fire access on Strongs Drive
• Protects to the greatest extent possible the ecological integrity of an important coastal resource designated as ESHA (Environmentally Sensitive Habitat Area) by the California Coastal Commission Has this already been designated?

Constraints

• Residents may not respect boundaries on east side of Canal where habitat is restored.
• Parking directly on Strongs Dr. is reduced and must be made up via the walking bridge to parking on Via Dolce
• Cost of removal of structures and non-natives may be elevated
• Coastal Commission permitting may be more complex.
• Possible dispute among home owners
• Cost of park installation may be elevated

Alternative2

Strengths

• Enhanced access
• Enhanced water views for pedestrians adjacent to east side of Canal
• Protects existing access
• Coastal Commission permitting may be less complex.

Constraints

• Possible opposition from some residents

• High cost associated with installation of proper walking path above high tide levels
• Decreased opportunities for wildlife gathering areas
• Decreased protection of ESHA (Environmentally Sensitive Habitat Area) as designated by the California Coastal Commission
• Decreased opportunities for wildlife watching
• Does not meet city's low impact access recommendations

Alternative 1 is the recommended alternative.

Phasing --- Projects have been grouped in areas for phasing of implementation. It is recommended that the projects be implemented in the following groupings and possibly in the following order:

1) Stormwater management measures and adjacent bank restoration and trail disability access on end streets with least complex issues. These can be completed most quickly and serve as a model for the others. These are at Galleon, Fleet, and East Wind.
2) East bank from Washington to city property – trail and restoration planting of banks.
3) West Bank from Washington to Driftwood – revise traffic in one direction and restore bank, construct trail and fence and install Strongs Dr. stormwater treatment measures.
4) City property entrance park at Via Dolce, pedestrian bridge, vegetation and habitat restoration and stormwater treatment measures at Park and at Driftwood. Signage for project components to date.

(Number 3 and 4 should be implemented as part one and two of the same project.)

5) Hurricane stormwater treatment park, observation platform, eastside concrete path broken- up into habitat area. Revisions to remainder of east side bank restoration from new entrance park to _____. Completion of educational signage.
6) Complete additional fencing.
7) Sand Dune Park.

Project Cost Estimate

SIERRA CLUB

Airport Marina Group

December 2, 2024

Los Angeles City Councilmember Traci Park
200 N. Spring St. #410
Los Angeles, CA 90012
councilmember.Park@lacity.org

Director and General Manager Barbara Romero
Los Angeles City Bureau of Sanitation and Environment
1149 South Broadway, Suite 900
Los Angeles, CA 90015
barbara.romero@lacity.org

Re: Proposed Venice Auxiliary Pumping Plant (VAPP)

Dear Councilmember Park and Director Romero:

While we are very supportive of making certain that there is sufficient capacity and adequate working order of the wastewater treatment mechanisms in Los Angeles, we have serious concerns about the potential impact of the proposed Venice Auxiliary Pumping Plant (VAPP) and wish to make sure that this biologically important area of the Los Angeles coast is well-protected. We note too that the Venice Neighborhood Council shares our concerns, motion attached.

To be clear, we do not oppose an environmentally sensitive overhaul and expansion of the Venice Pumping Plant, but we urge you to use the power and authority of your offices to ensure that adequate mitigation efforts are fully considered and addressed before this proposed project is presented to the Coastal Commission.

After hearing from our own members in the community, as well as other environmental advocates, we do not think this proposed project has adequate mitigations for the environmental harm it may cause. We urge you to meet with representatives of Sierra Club, Venice Neighborhood Council, and other environmental leaders.

This area is of continuing importance to the Sierra Club. Sierra Club was involved in litigation against the Coastal Commission (and the City as real party in interest) approximately 20 years ago for a project that included this same area - the Ballona Wetlands Grand Canal Lagoon area. We prevailed (with the assistance of a Judge) in helping the City choose an environmentally superior project than they had originally proposed. The City (with leadership from Councilmember Rosendahl and Mayor Villaraigosa) then worked with the community to bring back important biodiversity to the area, while beautifying a walk path for residents and visitors. Phase Two of this effort was left uncompleted due to lack of funding from the City, even though there was state grant funding offered for it. The Phase Two plans were well-considered by the community and are still on the City of Los Angeles' Bureau of Engineering's website. Please review them, and Recommended Alternative #1, at https://engineering.lacity.gov/grand-canal-restoration-project

Specifically, the work now proposed would cause harm to the ESHA (Environmentally Sensitive Habitat Area) of both Grand Canal Lagoon and Ballona Lagoon Marine Preserve, which is unacceptable unless there is sufficient mitigation to make up for the damage. Leaders in the community have suggested that the Phase Two plans for the Ballona Wetlands Grand Canal Lagoon restoration be undertaken by the community and funded by the City's Sanitation and Environment Department – as mitigation for the environmental damage that is anticipated by the pumping plant overhaul and expansion. This might also include installing one or two walk bridges over the lagoon – which would help to make up for public access issues this project would impact.

Please contact me to set up a meeting so these important environmental issues can be resolved. Thank you.

Sincerely,

Susanne Cumming

Susanne L. Cumming, Esq.
CA State Bar #137426
Conservation Chair, Airport Marina Group
Sierra Club
cumming@earthlink.net
310-962-3341

Copies:
Los Angeles County Supervisor Holly Mitchell (HollyJMitchell@bos.lacounty.gov)
Venice Neighborhood Council President Brian Averill (brian.averill@venicenc.org)
Venice Field Deputy Sean Silva (sean.silva@lacity.org)
Venice Council Member Steve Bradbury (steve@mycyberstuff.com)

Attachments:
Venice Neighborhood Council Motion and Motion Background

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Ira Brown <ira.brown@lacity.org>

Re: Serious Concerns re VAPP Project on Hurricane St (MDR)

1 message

Steve Bradbury <steve@mycyberstuff.com> Fri, May 16, 2025 at 8:14 AM
To: Ira Brown <ira.brown@lacity.org>
Cc: Juliet Oh <juliet.oh@lacity.org>, Lisa Webber <lisa.webber@lacity.org>, Kevin Keller <kevin.keller@lacity.org>

Ira:

Here are some additional files relevant to the VAPP re-zoning motion. I'm happy to provide additional color as to why any/all of these documents have been submitted. Please include them in the public record. **1 of 2 emails.**

With appreciation,

Steve

~~~~~~~~~~~~~~~~~~~~
Steve Bradbury
310-428-5904
steve@mycyberstuff.com

On May 5, 2025, at 9:08 AM, Steve Bradbury <steve@mycyberstuff.com> wrote:

Ira:

This email is regarding this morning's VAPP re-zoning hearing at 10:30a, I have attached the community's Term Sheet defining specific issues and proposed solutions. in addition, please find an updated compendium of neighborhood emails expressing concerns with this project as well as the previously provided Venice Neighborhood Council motion opposing the re-zoning approval until a specific condition is met, all to be entered into the public record.

For the public comment portion of today's hearing, I'm requesting additional time (5:00 minutes total please) as the primary spokesperson for the community. In addition, it would be greatly appreciated if you would allow Kenya Lee, who lives directly adjacent to the proposed VAPP, additional speaking time. Other community members will also be speaking with their allotted time.

With appreciation,

Steve Bradbury
109 Hurricane St.

~~~~~~~~~~~~~~~~~~~~
Steve Bradbury
310-428-5904
steve@mycyberstuff.com

Begin forwarded message:

From: Steve Bradbury <steve@mycyberstuff.com>
Subject: Re: Serious Concerns re VAPP Project on Hurricane St (MDR)
Date: November 7, 2024 at 4:48:31 PM PST
To: Ira Brown <ira.brown@lacity.org>
Cc: Juliet Oh <juliet.oh@lacity.org>, lisa.webber@lacity.org, Robin Rudisill <wildrudi@icloud.com>

Ira, please add me to your list of interested parties for advance notification with regard to any hearing and/or CPC commission meeting regarding this matter. My email is steve@mycyberstuff.com and mailing address is 109 Hurricane St, MDR, CA 90292.

Separate but related, please include in the public record the recent VNC motion passed in Sept as well as an overview of pertinent community issues and a compendium of neighborhood emails written over the past several years, all attached.

Finally, please be aware we continue to seek engagement with someone in LA Public Works who is legitimately empowered to make decisions (not lip service as has been the case to date) AND genuinely seeks a win-win for Public Works & the community. Our mission is not to stop this important infrastructure project nor are we are looking to be unreasonable. We simply seek solutions to real, impactful issues.

With appreciation,

Steve

~~~~~~~~~~~~~~~~~~~~~
Steve Bradbury
310-428-5904
steve@mycyberstuff.com

On Nov 7, 2024, at 4:17 PM, Robin Rudisill <wildrudi@icloud.com> wrote:

CPC-2024-2010-GPA-ZC-CU2-SPPC
128 Hurricane, Venice
Venice Auxiliary Pumping Plant (VAPP)

Public Officials,

I live on Ocean Front Walk on the Marina Del Rey Peninsula. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more.

This project expands the pumping of sewage down to Dockweiler and is located in the middle of our residential neighborhood as well as in the middle of Environmentally Sensitive Habit Area (ESHA). It is an unacceptable land use for this area and yet it is critical infrastructure and we understand it must move forward. However, the lack of concern shown regarding finding reasonable mitigations for the impacts on our residential neighborhood and the lack of protection and mitigations for the ESHA is appalling and unacceptable.

The construction plans as designed will have a painful, material impact on this community and surrounding ESHA for decades.

Our primary concerns are:

- **Mitigation measures in order to conform as closely as possible with the certified Venice LUP, the state policy guidance for determining conformance with the Coastal Act.**
  - Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas.
  - Policy I.C.1 states that the scale and design of industrial facilities must be compatible with adjacent and neighboring uses.
  - Policy 1.A.5 seeks to preserve and protect stable multifamily neighborhoods.
  - Policy 1.D.1 states the only permitted development adjacent to the Grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.
- **Elimination of the proposed parking lot at 128 Hurricane St.** for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city.
- **Modification of the project design** so that it is visually compatible with the residentially zoned neighborhood.
~~~~~~~~~~~~~~~~~~~~~

Given that this location is grossly incompatible with this location and never should have been allowed to happen, the City's Bureau of Engineering should be bending over backwards to keep the impacts on the residential neighborhood and surrounding ESHA to a bare minimum.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through reasonable and respectful negotiations in order to minimize impacts on the surrounding ESHA and residential neighborhoods.

PLEASE support this request for fairness. Please work with us to make reasonable changes to the project in order to protect our residential neighborhood and the ESHA.

Thank you.

For the Love of Los Angeles
and our precious Coast,
Robin Rudisill
(310) 721-2343

---

9 attachments

- **FINAL Venice Pumping Plant Ballona Institute 4_27_22.pdf**
  185K
- **Grand Canal Restoration_Phase 2_summary.pdf**
  750K
- **Pump House Letter August 1.pdf**
  2871K
- **Coastal Staff PPT 02.24 - For Coastal.pdf**
  1949K
- **ANSWER TO PETITION FOR WRIT OF MANDATE: PROHIBITION: CERTIFICATION FILED BY OTHER CITY OF LOS ANGELES A MUNICIPAL CORPORATION (REAL PARTY IN INTEREST).pdf**
  523K
- **LASAN Term Sheet_FINAL.pdf**
  476K
- **Hurricane Pumps Neighbor Letters.pdf**
  878K
- **VNC VAPP Motion.pdf**
  76K
- **VAPP Background.pdf**
  59K

Venice Neighborhood Council

PO Box 550, Venice, CA 90294
venicenc.org

MOTION BACKGROUND: Los Angeles Public Works (LAPW) has proposed the Venice Auxiliary Pumping Plant (VAPP) at 128 Hurricane St and an associated parking lot for employees and limited public use at 133 Hurricane St, MDR. The residents acknowledge the VAPP is considered critical infrastructure. From 2017 through and including the final city approval process, LAPW never meaningfully and materially addressed issues raised by the community. In fact, the City Planning Commission instructed LAPW to meet with the community. Nothing changed because of those meetings despite a multitude of suggestions and proposals offered to LAPW. The issues include, but are not limited to:

1. Conformance with the certified Venice LUP (Policies I.A.5, I.C.1, I.C.6, and I.D.1);
2. Meeting established Public Benefit standards including a 10' landscaped, irrigated buffer along all property lines. The performance standards applied to this project are applicable to those on a major or secondary highway, not a residential street;
3. Adherence to court-mandated ESHA protections in the Ballona Lagoon/Grand Canal area including no dredging and/or use of heavy equipment both of which are part of the project plan;
4. Mitigation of EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas release. The community has put forth a plan to address some of these issues;
5. Mitigation of "significant and unavoidable" construction-related issues including ground-borne vibration which could result in residential building damage, and, construction noise that exceeds LA CEQA Thresholds guidelines;
6. Improvement of inadequate emergency access during construction activities;
7. Change to five day/week construction and more restricted hours in lieu of six days/week;
8. Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city;
9. Modification of the project design so that it is compatible with the residentially zoned neighborhood;
10. Actionable protection of residential properties from dirt, dust and other construction impacts;
11. Upgrade of a deficient maintenance plan for both the new and existing facility.

The intention of this motion is not to stop a necessary infrastructure project. It is to seek a meaningful, results-oriented dialogue with Public Works to identify reasonable solutions for these issues.

Venice Neighborhood Council

PO Box 550, Venice, CA 90294
venicenc.org

(sent via email)
Traci Park, LA City Council Person CD-11 - Councilmember.Park@lacity.org
Sean Silva, Venice Field Deputy, CD-11 - Sean.Silva@lacity.org
Juan Fregoso, District Director, CD-11 - Juan.Fregoso@lacity.org
Marqueece Harris-Dawson, LA City Council President - Marqueece.Harris-Dawson@lacity.org
Hydee Feldstein Soto, City Attorney - Hydee.FeldsteinSoto@lacity.org
Mike Davis, President Pro Tempore, LA Public Works Board of Commissioners - Mike.Davis@lacity.org
Teresa Villegas, Vice President, LA Public Works Board of Commissioners - Teresa.Villegas@lacity.org
Vahid Khorsand, Commissioner, LA Public Works Board of Commissioners - Vahid.Khorsand@lacity.org
Susana Reyes, Commissioner, LA Public Works Board of Commissioners - Susana.Reyes@lacity.org
Ted Allen, City Engineer, Bureau of Engineering - Ted.Allen@lacity.org
Chloe Seifert, Coastal Program Analyst, California Coastal Commission - Chloe.Seifert@coastal.ca.gov

On Sept 17 2024, the Venice Neighborhood Council Board of Officers passed the following motion by a vote of 13-4-0.

MOTION: The Venice Neighborhood Council opposes CPC-2024-2010-GPA-ZC-CU2-SPPC-- allowing the City of Los Angeles to obtain a General Plan Amendment (GPA) and Zone Change (ZC) from RW2-1 to Public Facilities at 133 Hurricane St., a Project Review (SPPC), and a Conditional Use for the construction, use, and maintenance of a public parking area in a residential zone (CU2) for the empty lots located at 128 Hurricane St/3913 Esplanade -- unless LA Public Works (LAPW) materially and in good faith addresses the community's serious issues with this project.

Sincerely,

Brian Averill
President
Venice Neighborhood Council

Hurricane Pumps Neighbor Letters

(Last updated: 12/2/24)

Re: Venice Auxiliary Pump Plant (VAPP), 128 and 133 Hurricane;
DIR-2017-4167; ZA-2017-3950 (plant); DIR-2017-4173; ZA-2017-3953 (parking lot)

The following members of our community have expressed their POV on this issue to date. We anticipate additional written responses as this process continues.

2024 Neighbor Letters

MIKE BORASSI & GENEVIEVE MORRILL-BORASSI – (FORMERLY) 3811 ESPLANADE. (ORIGINAL APPELLANTS) 5

KENYA LEE & JOEY JACKSON – 3811 ESPLANADE 6

HARVEY PLOTNICK – 125 & 127 HURRICANE ST (PROPERTY OWNER) 7

LESLIE & MICHAEL ADLER – 3601 ESPLANADE 9

MICHAEL HOFFS – 110 HURRICANE ST 10

MICHAEL HOLT – 127 HURRICANE 11

BETHANY GORFINE – 3950 VIA DOLCE (OWNER AND CONDO BOARD PRESIDENT) 12

ELIANE GANS – 3933 ESPLANADE (PROPERTY OWNER) 13

ROBIN RUDISILL – 3003 OCEAN FRONT WALK 14

TING CHANG – 28 MAST 15

TOM DRUCKER & MARCIA SELIGSON DRUCKER – 4 LIGHTHOUSE 16

JENESA KURLAND – 4300 VIA DOLCE (CONDO OWNER) 17

ROBERT DIBIASE – 115 ½ HURRICANE ST (OWNER) 18

TRACI GAY – 310 WASHINGTON BLVD. 19

GARY STROMBERG – 125 HURRICANE ST 20

TING CHANG – 28 MAST 21

JENESA KURLAND – 4300 VIA DOLCE (CONDO OWNER)....22

PERRY ROD – 3818 PACIFIC AVE....23

MARY-DOROTHY LINE – 125 PRIVATEER MALL....24

MICHAEL HOFFS – 110 HURRICANE ST....25

2022-23 Neighbor Letters

MARY LAING – 115 HURRICANE ST....27

STEVE & KAREN BRADBURY – 109 HURRICANE ST (OWNERS)....28

ADAM GOLDBERG – 110 HURRICANE ST....29

ROBERT DIBIASE – 115 ½ HURRICANE ST (OWNER)....30

MURIEL BLAKE & JOHN LARKIN – 110 HURRICANE ST.....31

GARY STROMBERG – 125 HURRICANE....33

MIKE BORASSI & GENEVIEVE MORRILL-BORASSI – 3801 ESPLANADE....34

KRISTY CANON - 3809 ESPLANADE (BUILDING OWNER)....36

ROBERT & LUCIA WILLIAMS – 3805 ESPLANADE....37

ELIANE GANS – 3933 ESPLANADE (PROPERTY OWNER)....38

TANYA SPERO – 113 ½ HURRICANE ST....40

LARRY LESSER, MD & CLAUDE LESSER – 3609 ESPLANADE (OWNER)....41

JEFF LEE – 3701 ESPLANADE (OWNER)....42

CLARE BRONOWSKI – 3701 ESPLANADE (OWNER)....43

LESLIE & MICHAEL ADLER – 3601 ESPLANADE....44

JENNIFER KELTON – 3615 ESPLANADE....45

MELLY LIBURD – 120 ½ GALLEON (OWNER)....46

ANDREW FREEDMAN – 20 IRONSIDES 47

MARILYN MIKOS – 115 EASTWIND ST (OWNER) 50

ARIANNE FLEMMING & JUSTIN WASSER – 3812 PACIFIC 51

SUSAN AFRIAT & STEVE HYMAN – 4000 PACIFIC 52

BETHANY GORFINE – 3950 VIA DOLCE (OWNER AND CONDO BOARD PRESIDENT) 53

JONATHAN TILLMAN – 3719 VIA DOLCE 54

ROBIN RUDISILL 56

ADAM ROSE – 12 BUCCANEER ST. 57

ROBERT NAU – 4250 VIA DOLCE 58

FELICIA GLADE & MIKE PELLETIER – 116 GALLEON ST. 59

ELIANE GANS – 3933 ESPLANADE (OWNER) 60

JENESA KURLAND – 4300 VIA DOLCE (CONDO OWNER) 61

2024 Neighbor Letters

Mike Borassi & Genevieve Morrill-Borassi – (formerly) 3811 Esplanade. (original appellants)

Dear Chair and members of the Venice Neighborhood Council Land Use & Planning Committee,

My name is Genevieve Morrill, and my husband and I filed the appeals to both City of Los Angeles Planning Commission, and more recently the California Coastal Commission. This project has been ill-conceived from the beginning and too large for the space. Understanding that it is an essential utility we need in our region, we were simply asking them to consider making it more compatible for the neighborhood and less intrusive on the community. At the time we filed the PC appeal, the city has not met or reached out to the community since 2016.

We are a casualty of this pending project, as our building is situated on the canal directly next to the vacant lot where the VAPP will be built. We have been renters for 28 years on the Canal and due to the pending construction, the owner sold the building, and the buyer decided to live there which therefore meant we had to move and find a new place to live at a considerable increase in market-based rate rents.

In my day job, I am the CEO of a Chamber of Commerce and therefore understand planning, zoning, and development. I attest that a developer would never be allowed to get away with such egregious disruption to a residential neighborhood. To have transformers and electrical equipment next to someone's bedroom window when the design can be flipped so that these electrical boxes would be on a vacated side of the street with no residents. They claim this impossible and frankly its only because they have already designed the project. A developer would be made, no matter what the expense to redesign.

This project is not compatible to the neighborhood aesthetics; it is too large for the location; it has negative impact to our community members; mitigation measures are not sufficient; has negative impact on the environment and a protected canal; and creates areas for more unhoused to encamp. Additionally, our understanding is that this project is an industrial use in a residential zone and no zoning was amended for its purpose.

Please oppose this project and help support the community members.

Thank you,

Genevieve Morrill
Formerly 3801 Esplanade/Grand Corso

Kenya Lee & Joey Jackson – 3811 Esplanade

I am writing to express my deep concerns regarding the ongoing plans for the Venice Auxiliary Pumping Plant (VAPP) project near my home at 3809-3811 Esplanade St in Marina del Rey. For over seven years, our community has diligently attempted to engage with Public Works to address critical concerns related to this project. Unfortunately, our efforts have largely been met with inadequate responses, leaving us feeling overlooked and unsupported.

While I recognize the importance of the VAPP as a critical infrastructure initiative, I am deeply troubled by the substantial and long-term negative impacts the current construction plans will have on my family and our community. Specifically, my primary concerns include:

Exposure to Toxins: The project involves significant excavation directly next to my home, raising serious concerns about potential exposure to hazardous substances that could endanger the health of residents, particularly children.

Structural Vibrations: Intense vibrations from construction activities could compromise the structural integrity of nearby homes, including my own, potentially leading to costly and irreversible damage.

Extreme Noise Levels: Construction noise will significantly affect my household's quality of life, particularly for my young child, whose well-being and development depend on a quiet and stable living environment. I also work from home and need a conducive environment to conduct my business.

Improvement of inadequate emergency access during construction activities.
Having a family residing next to this project concerns us to have an adequate emergency plan,a well thought out plan for emergency services during the time of construction.

Our community has never sought to halt this essential project. Instead, we have consistently requested an open and meaningful dialogue with project stakeholders to ensure fairness and adequate mitigation of these impacts. However, to date, we have seen little action or acknowledgment of our concerns.

The health, safety, and quality of life of our residents must be prioritized as this project moves forward. We are not opposed to progress; we simply seek fairness and the opportunity to live without unnecessary ha.rm or disruption

Thank you for your attention to this matter. I look forward to your prompt response and to working collaboratively toward a solution that benefits both the community and the project's success.

Sincerely,
Kenya Lee
3811 Esplanade, 90292
313-999-0264

Harvey Plotnick – 125 & 127 Hurricane St (property owner)

I own a property on Hurricane Street in Marina del Rey. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP Project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on lives for multiple years. My primary concern are:

* Conformance with the certified Venice LUP Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas. Policy 1.C.1 states that the sale and design of industrial facilities must be compatible with adjacent and neighboring uses. Policy 1.A.5 that seeks to preserve and protect stable multifamily neighborhoods. Policy 1.D.1 states the only permit development adjacent to the grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.

*Meeting established public Benefit standards including a 10' landscaped irrigated buffer along all property lines. The performance stands applied to this project are applicable to those on a major or secondary highway, not a residential street.

* Adherence to court-mandated ESHA protections in the Ballona Lagoon/Grand Canal area including no dredging and/or use of heavy equipment both of which are parr of the project plan *The community that introduced elements of the Grand Canal Restoration Plan (Phase 2) to address some of these issues. It is not an all or nothing

*Mitigation of other EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas releases. The community has put forth concepts to address some of these issues including the grand Canal Restoration Plan

* Mitigation of "significant and unavoidable" construction-related issues including ground borne vibration which could result in residential building damage, and construction noise that exceeds LA CEQA Thresholds guidelines. Section MM-NOI-2 of the mitigation plans does not adequately protect property from potential damage. The current plan is for more reactive than proactive using terms such as "may include." "If considered appropriate," and "as feasible and practical." Also, there is no timely mechanism for issues to be addressed/project to be halted in the event damage is done. Section MM-NO-3 of the mitigation plan is also inadequate. It strains credibility to believe noise control features will "reduce overall operational noise levels from all Project related sources to within 5db of existing ambient noise levels in the surrounding community (53-57db)."

* Change to five day/week construction and more restricted hours in lieu of six days/week.

* Alternative parking for up to 25 cars, most owned by residents, that park on Hurricane St daily during non-summer days and weekends year round. Hurricane St parking will cease to exist during construction hours. Where do these cars park?

* Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted Street parking around the current Venice Pumping Plant (VPP), at

a savings of at least $3.5 million to the city. The community has proposed a viable alternative that does not require this lot.

* Modification of the project design so that it is compatible with the residentially zoned neighborhood. There was very little, if any, community input during the design process,

*Actionable protection of residential properties from dirt, dust and other construction impacts. The community has offered viable suggestions.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through respectful negotiations. PLEASE support this request for fairness,

Thank you,
Harvey Plotnick

Leslie & Michael Adler – 3601 Esplanade

I live along Esplanade Canal on Eastwind.

We have a few concerns:

1. Adherence to court-mandated ESHA protections in the surrounding lagoon area;

2. Mitigation of EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas release;

3. Mitigation of "significant and unavoidable" issues including ground-borne vibration, which could result in residential building damage, and construction noise that exceeds LA CEQA Thresholds guidelines;

4. Change to five day/week construction instead of proposed six days/week;

5. Modification of project design so that it is compatible with its residentially zoned neighborhood;

6. Protection of residential properties from dirt, dust and other construction impacts;

7. Upgrade of deficient maintenance plan for both the new and existing facility.

Thank you
Leslie & Mike Adler
3601 Esplanade

Michael Hoffs – 110 Hurricane St.

As a 20+ resident of 110 Hurricane Street, I am in strong support of the motion. This is a classic case of the city not listening to the boots on the ground describing why the installation of the parking lot is not only not needed but strongly opposed for security reasons. For VAPP personnel, alternative parking on Hurricane has been found in other areas within a half block or less of VAPP. Homeless encampments, drunken disorderly conduct and contempt for Hurricane residents, constant traffic to find parking in the lot, mounting trash and lack of city funds to police the area have not been addressed and frankly will not be before construction.

Please ask yourself, would you want this parking lot built on your street? If you would support installing the parking lot on your street, would you be concerned if the aforementioned was not thoroughly embedded in the parking plan before construction?

Thank you for listening, your time to think about Hurricane Street's resident thoughts and frankly the chance to use the funds suggested for the parking lot on something else that will benefit the area in greater need.

Sincerely,

Michael Hoffs
110 Hurricane St

Michael Holt – 127 Hurricane

Greetings,

I live on Hurricane St in Marina Del Rey.

For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on our lives for multiple years. My primary concerns are

- Mitigation of "significant and unavoidable" construction-related issues including ground-borne vibration which could result in residential building damage, and, construction noise that exceeds LA CEQA Thresholds guidelines.
- Change to five day/week construction and more restricted hours in lieu of six days/week.
- Off-site workspaces for home-based workers
    - The city says it will be managed by the construction company but there have not been any guarantees of location or suitability.
- Actionable protection of residential properties from dirt, dust and other construction impacts.
    - The community has offered viable suggestions.
- Alternative parking for up to 25 cars, most owned by residents, that park on Hurricane St daily during non-summer days and weekends year round
    - Hurricane St parking will cease to exist during construction hours. Where do these cars park?
- Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through respectful negotiations.

PLEASE support this request for fairness.

Thank you,

Michael Holt
127 Hurricane Street

Bethany Gorfine – 3950 Via Dolce (owner and condo board president)

As an association that lives across the lagoon from Hurricane, and an association that lived through the dual main project for five years, with drilling immediately outside our 7 buildings between Marquesas and Tahiti on Via Dolce and via Marina, we are still feeling the effects of the project. I will elaborate.

I would like to say a few things regarding the care of the Ballona Lagoon, and Grand Canal - parking issues, vibrations, care, concern and communication for and of neighbors, repairs, plumbing, mental health, 6 days of noise, chaos, construction, personnel are all issues. Day in. Day out.

Bethany Gorfine
President, Marina Strand Colony 1.
145 units

Eliane Gans – 3933 Esplanade (property owner)

To the Chairman of LUPC
To LUPC
To Traci Park

I have lived in my building on Esplanade & Hurricane (just 1/2 block from this proposed VAAP). for 35 years. **I love my neighborhood and my neighbors. I love the serenity and residential environment.**

1. **REGARDING VIBRATION:** This will disturb all residents and as a landlord I do not want any tenant moving as a result of vibration and constriction noise. This will impact my quality of life and my ability to support myself financially.

2. **INADEQUATE EMERGENCY ACCESS DURING CONSTRUCTION**: Children and animals, and elderly residents, **will be in danger** of obstruction in an emergency

4. **PARKING LOT:** The city has already eliminated 6 parking spaces on Hurricane—which was not necessary, and parking is a HUGE issue for residents and their families when visiting. Eliminating another parking lot is NOT A RESPONSIBLE ACTION.
WE MOVED TO THIS NEIGHBORHOOD FOR A REASON—AND THIS ENTIRE PROJECT WILL NEGATIVELY IMPACT THE QUALITY OF OUR LIVES.
The city should use the $2.5 million for a more advantageous purpose to actually enhance this community—so that the City could actually get more taxes if our properties were not devalued as a result of this VAAP project.

CLARIFYING #4. PARKING LOT: WE DO NOT WANT OR NEED A PARKING LOT. AND ESPECIALLY FOR NON-RESIDENTS.

5. PROJECT DESIGN: This is designed to look like a dungeon. Or a jail block. There is nothing that resembles a structure that one would consider to be compatible with the Beach and lagoon environment. The project design is not compatible with the residentially zoned neighborhood. Again, detracting anyone from wanting to live near this ugly eye sore. We need more beauty and aesthetics in our world, not a building that appears like a “block” house jail.

Sorry for being so blunt… but I wanted you to get the idea of our feelings.

Sincerely,

Robin Rudisill – 3003 Ocean Front Walk

Public Officials,

I live on Ocean Front Walk on the Marina Del Rey Peninsula. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more.

This project expands the pumping of sewage down to Dockweiler and is located in the middle of our residential neighborhood as well as in the middle of Environmentally Sensitive Habit Area (ESHA). It is an unacceptable land use for this area and yet it is critical infrastructure, and we understand it must move forward. However, the lack of concern shown regarding finding reasonable mitigations for the impacts on our residential neighborhood and the lack of protection and mitigations for the ESHA is appalling and unacceptable.

The construction plans as designed will have a painful, material impact on this community and surrounding ESHA for decades.

Our primary concerns are:

- **Mitigation measures in order to conform as closely as possible with the certified Venice LUP, the state policy guidance for determining conformance with the Coastal Act.**
    - Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas.
    - Policy I.C.1 states that the scale and design of industrial facilities must be compatible with adjacent and neighboring uses.
    - Policy 1.A.5 seeks to preserve and protect stable multifamily neighborhoods.
    - Policy 1.D.1 states the only permitted development adjacent to the Grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.
- **Elimination of the proposed parking lot at 128 Hurricane St.** for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city.
- **Modification of the project design** so that it is visually compatible with the residentially zoned neighborhood.

Given that this location is grossly incompatible with this location and never should have been allowed to happen, the City's Bureau of Engineering should be bending over backwards to keep the impacts on the residential neighborhood and surrounding ESHA to a bare minimum.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through reasonable and respectful negotiations in order to minimize impacts on the surrounding ESHA and residential neighborhoods.

PLEASE support this request for fairness. Please work with us to make reasonable changes to the project in order to protect our residential neighborhood and the ESHA.

Ting Chang – 28 Mast

To whom it may concern,

As a resident of the Marina Peninsula, I am writing to express my strong support for the Venice Neighborhood Council's (VNC) motion opposing the Venice Auxiliary Pumping Plant (VAPP) project as currently proposed under CPC-2024-2010-GPA-ZC-CU2-SPPC.

While I understand the necessity of infrastructure improvements, the current plan presents serious concerns that have not been adequately addressed by Los Angeles Public Works (LAPW). The project's non-conformance with the Venice Local Coastal Program (LUP) policies, particularly those aimed at protecting stable residential neighborhoods and preserving environmentally sensitive areas like the Grand Canal and Ballona Lagoon, is deeply troubling.

Moreover, the Environmental Impact Report (EIR) for the project has failed to address key issues, including the risk of habitat destruction, groundwater contamination, and methane gas release. The proposed six-day workweek for construction will significantly disrupt the lives of local residents, with excessive noise, vibration, and dust over an extended period. The plan's inadequate provision for emergency access during construction is another critical concern.

The addition of a parking lot at 128 Hurricane Street, which was not part of the original project, will only exacerbate traffic and safety issues in our community. The VNC's motion rightly calls for the elimination of this parking lot, proposing more suitable alternatives that would save the city millions of dollars while addressing community concerns.

I fully support the VNC's call for LAPW to engage in a meaningful, results-oriented dialogue with our community to address these issues. It is crucial that any development in our neighborhood is done thoughtfully, with full consideration of its impact on residents and the environment.

Thank you for your attention to this matter.

Sincerely,

Ting Chang
3933 Esplanade W.
Marina del Rey, CA 90292
(310) 339-4056

Tom Drucker & Marcia Seligson Drucker – 4 Lighthouse

As long-time Marina residents, we are opposed to this zoning change until Public Works addresses some of the issues below:

- Mitigation of "significant and unavoidable" issues including ground-borne vibration, which could result in residential building damage.
- Mitigation of construction noise that will exceed LA CEQA Thresholds guidelines.
- Potentially significant methane gas release (read the community feedback to the EIR Mitigation Plans via the website link below - starts on page 44).
- Inadequate emergency access during construction activities.
- Change to five day/week construction instead of proposed six days/week.
- 25 parking spaces that will be eliminated on Hurricane every day of construction. Where will these people park?
- Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), a savings of at least $2.5 million to the city.
- Conformance to the certified Venice LUP (Policies I.A.5, I.C.1, I.C.6, and I.D.1).
- Adherence to court-mandated ESHA protections in the surrounding Ballona Lagoon and Grand Canal.
- Mitigation of EIR issues related to loss of species and habitat, groundwater impact.
- Modification of project design so that it is compatible with its residentially zoned neighborhood.
- Protection of residential properties from dirt, dust and other construction impacts.
- Upgrade of deficient maintenance plan for both the new and existing facility.
- Compensation for lost property value - During construction, tenants may very well seek reduced rents or move out. Units may have to be re-rented at lower rates, if at all. As a result, property owners may have to sell at reduced valuations. This is not hypothetical. It has already occurred.
- Resident physical/mental issues due to construction.
- Real-time community recourse to on-site construction issues. Without teeth, there can be no enforcement.

Please include this email as part of the public record.

Sincerely,

Tom Drucker and Marcia Seligson Drucker

Jenesa Kurland – 4300 Via Dolce (condo owner)

Hello VNC Board -

The Venice Auxiliary Pumping Plant (Project) as designed should not occur within a Residential Zone; and regardless of Zone nomenclature, Project must avoid drilling/vibrating foundations. No home/building owner should be forced to have their foundations and structure compromised due to poor planning and poor execution by City of Los Angeles (City). A 'mere' cosmetic crack through drywall stems from a crack in building structure which stems from a foundation crack. In earthquake country, one cannot afford - literally - to have compromised foundations & structure. City Department of Public Works (LADPW) has well proved that they cannot be trusted to comply with EIR requirements nor fair guidelines. I still seethe with distain towards the Community Outreach folks' blatant lies during their Venice Dual Force Main (VDFM) project by simply writing to you now. Photographed pre-construction inspection survey by a third party contracted by City as a baseline and photographed post-construction inspection survey by City employees admitting to seeing cracks afterwards is meaningless.

If anyone pretends to think that Project's parking lot will become anything but a trash dump and under-housed tent camp, you know they are neither trustworthy nor grounded in reality; and therefore, should not be decision-maker.

Also, Project design detracts from the community. Given Project is within a beachside residential community, why cannot the building appear more contextually-friendly? I do not understand the difunctional brown slat awnings here & there which do not provide shade to anything. A small item, but indicative of City not paying attention to detail and nor Project's impact on community of taxpayers.

If absolutely nothing else, City needs to disallow work on Saturdays. City (work) projects drag on (& on), so there is no 'time is of the essence' condition which warrants six workdays.

City allows drilling, vibrating, pounding starting at 7:00AM. City allows spilling of groundwater mixed with the oil fields below us to spill out onto streets 24-7. Thus, enforceable penalties for non-compliance with the EIR need to be in writing and should be available to all on VNC website.

Thank you,
J. Kurland
Via Dolce

Robert DiBiase – 115 ½ Hurricane St (owner)

Oct 10, 2024

To: Los Angeles Planning Commission

Subject: Proposed Pumping Station Addition,128 Hurricane St & 3813 South Esplanade

Dear Commissioners:

I have lived on Hurricane St since 1977 and witnessed the new construction of the present Pumping Station and it was a vast improvement to the old pumping station. This proposed additional pumping station construction has made many of our local residents angry, because you are not letting us give you our opinions on what we feel are legitimate objections.

1. Why is the project needed anyway. It appears that the present pumping station is doing the job just fine right now.

2. This area is an environmentally protected area. Court mandated ESHA protections in the Ballona Lagoon/Grand Canal area INCLUDE NO DREDGING AND /OR USE OF HEAVY EQUIPMENT -- BOTH OF WHICH ARE PART OF THE PROJECT PLAN. THIS IS NOT ACCEPATABLE.
3. Conversations with my neighbors are telling me that traffic on the street and car parking loss due to construction equipment will be a major problem. The noise and the impact on the canal itself could be devastating.

4. Are the transformers in the new station generating Electromagnetic fields which are known to cause Cancer?

5. Is this project absolutely NECESSARY?

6. Our neighborhood residents demand to have input into this planning process and to negotiate a possible site farther down the coast. This is a residential neighborhood, and the pumping station does not even belong here.

Respectfully submitted
Robert DeBiase
115 ½ Hurricane St

Traci Gay – 310 Washington Blvd.

I strongly oppose Venice Auxiliary pumping plant going forward! I am a resident at 310 Washington Blvd., #604, marina Del Rey 90292

Gary Stromberg – 125 Hurricane St

I live on Hurricane St in Marina Del Rey. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on our lives for multiple years.

My primary concerns are safety and mitigation of "significant and unavoidable" construction-related issues. Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone. PLEASE support this request for fairness. Thank you.

Gary Stromberg
125 Hurricane St.
MDR

Ting Chang – 28 Mast

Hello,

My husband and I are residents of Mast Street in Marina Del Rey. For over seven years, our community has tried to work with Public Works to address significant concerns about the proposed VAPP project. Despite our persistent efforts, we've been met with empty promises and no real action.

This lack of consideration for our community's well-being is deeply disappointing. While I recognize the importance of this infrastructure project, the current construction plans, as proposed, will significantly and adversely impact our lives for years to come.

My main concerns are conformance with the certified Venice LUP (as homeowners we are held to the LUP and it is only fair that city projects are as well) and the upgrade of a deficient maintenance plan for both the new and existing facility (currently garbage is all over the canal and it looks like there has not been any efforts to maintain the sidewalk area).

We are not asking to halt the project but rather to engage in a meaningful dialogue with someone who has the authority and willingness to address these concerns through respectful and fair negotiations. Your support in ensuring this request for fairness is honored would be greatly appreciated.

Thank you for your attention.

Regards,

Ting Chang

Jenesa Kurland – 4300 Via Dolce (condo owner)

Dear City Representatives -

For over seven years our community has been **trying** to **collaborate** with Public Works to address critical concerns about the planned VAPP project. Though our efforts fall on deaf ears. We receive lip service and nothing more. This total lack of concern for our community is unacceptable.

Our community acknowledges this is a critical infrastructure project even if is a hazardous industrial facility located within our residential area. However, the construction plans as designed will have a painful, material impact on our lives for multiple years.

+ Change to five day/week construction and more restricted hours in lieu of six days/week.

+ Mitigation of other EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas release.

- The community has put forth concepts to address some of these issues including the Grand Canal Restoration Plan.

+ Mitigation of "significant and unavoidable" construction-related issues including ground-borne vibration which could result in residential building damage, and, construction noise that exceeds LA CEQA Thresholds guidelines

- Section MM-NOI-2 of the mitigation plans does not adequately protect property from potential damage. The current plan is far more reactive than proactive using terms such as "may include," "if considered appropriate," and "as feasible and practical." Also, there is no timely mechanism for issues to be addressed/project to be halted in the event damage is done.

Section MM-NOI-3 of the mitigation plan is also inadequate. It strains credibility to believe noise control features will "reduce overall operational noise levels from all Project related sources to within 5 dB of existing ambient noise levels in the surrounding community (53-57 db)."

+ Modification of the project design so that it is compatible with the residentially zoned neighborhood.

+ Upgrade of a deficient maintenance plan for both the new and existing facility.

- The existing VPP is ***not*** maintained in any meaningful way. There are environmental and safety issues. Garbage is strewn along the Grand Canal side of the structure which can readily fall into this ESHA. The sidewalk around the structure is in a constant state of disrepair to the point of being dangerous.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with AHJ and motivation to address these issues through respectful negotiations. PLEASE support this request for fairness. *Imagine* ***how you would feel in a similar situation****!?*

Thank you,
J. Kurland
Via Dolce, Marina del Rey

Perry Rod – 3818 Pacific Ave

To Whom It May Concern,

My 3-unit residential building is at 3818 Pacific Avenue in Marina Del Rey. We have been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. Although the industrial project is for critical infrastructure, the construction plans as designed require much more compatibility and dialogue with the immediately surrounding residentially zoned neighborhood. There was very little, if any, community input during the design process and this must change.

Thank you,

Perry Rod
Chief Investment Officer
Rod Capital Management

Mary-Dorothy Line – 125 Privateer Mall

I live on Privateer Mall in Marina Del Rey. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project.

All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on our lives for multiple years.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through respectful negotiations. PLEASE support this request for fairness.

Thank you.

Michael Hoffs – 110 Hurricane St.

As a 20+ resident of 110 Hurricane Street, I'm pleading with you to take a closer look at how the VAPP Project on Hurricane Street will affect the local neighborhood if our concerns are not faithfully considered. I am not alone on feeling the city is not listening to the boots on the ground describing why the installation of the parking lot is not only not needed but strongly opposed for security reasons. For VAPP personnel, alternative parking on Hurricane has been found in other areas within a half block or less of VAPP. Homeless encampments, drunken disorderly conduct and contempt for Hurricane residents, constant traffic to find parking in the lot, mounting trash and lack of city funds to police the area have not been addressed and frankly will not be before construction.

Please ask yourself, would you want this parking lot built on your street? If you would support installing the parking lot on your street, would you be concerned if the aforementioned was not thoroughly embedded in the parking plan before construction?

Thank you for listening, your time to think about Hurricane Street's resident thoughts and frankly the chance to use the funds suggested for the parking lot on something else that will benefit the area in greater need.

Sincerely,

Michael Hoffs

2022-23 Neighbor Letters

Mary Laing – 115 Hurricane St

ML **Mary Laing <mblaing1@aol.com>**
Hurricane Street Auxiliary Pumping Plant Project
To: Steve Bradbury <steve@mycyberstuff.com>

VNC Parking & Transport March 13, 2022 at 2:31 PM

Steve,

I would like to go on record that I oppose the current auxiliary pump plant project and parking lot that is being proposed at 133 Hurricane and the adjacent lot at 3813 South Esplanade.

I am a resident at 115 Hurricane for 20 years. Myself and my neighbors were forced to endure the disastrous nightmare construction of the existing pumping station constructed a few years ago. There was little to no community engagement or communication from the Public Works Department. Most importantly, the unkept promises from Public Works after the years of construction.

I understand that the current project is essential for the area, however I wane on trust due to past performance from Public Works. This is an industrial facility in a residential neighborhood and more care must be taken to buffer the use from existing homes and resources.

We as neighbors are also concerned that the parking lot will create an unsafe environment near our homes. What is the design? How will it be secured at night? We oppose moving forward with the project until these concerns are addressed.

I would like to voice my support for the VNC motion to rescind it's support of the project as it is currently configured.

Best,

Mary Laing
115 Hurricane St
MDR 90292

Steve & Karen Bradbury – 109 Hurricane St (owners)

July 27, 2022

My wife and I own 109 Hurricane St. We have lived here since 2007. During that time, we have experienced several city-led construction projects. None have effectively managed the impact on the community without our voices rising to generate awareness. The city's track record is dismal at best.

Now the city intends to build an auxiliary pumping station at the end of Hurricane St. While we understand the critical nature of this project, the fact there has been no meaningful community engagement since preliminary plans were shared in 2016 is abhorrent. It appears the project design has changed over that time including the addition of a sewage command and control center for entire city of Los Angeles. We thought this was simply an auxiliary pumping station to support the aging current plant.

The city cannot simply ramrod an industrial project down the throats of a neighborhood without incorporating our input. City employees work for the residents, not the other way around.

We understand one element of the plan is to create a public parking lot at 128 Hurricane. Why???? There are no other public lots on any MDR residential street. If there is truly a need for that much employee parking (which has never been adequately justified), it should be a 100% secure lot only accessible by pumping station workers. **No** public car spaces, **no** bike racks, **no** art installation, **no** use by beachgoers, **no** opportunity for homeless to camp out.

There have been recent suggestions the parking lot was incorporated into the plan to satisfy the coastal commission. Did the city ever convey this information to residents during the process? Did the city take a position that this would impact residents and push back? Does the city even care? We do.

We attended both community meetings (Zoom and in-person) conducted by Public Works. These were little more than sham, window-dressing efforts. The city representatives showed NO willingness to modify ANY aspect of the project to align with the interests of the community. This arrogance is unacceptable behavior by people whose job is to serve the community.

Our neighbors have spoken about many other issues with this project. We support them and request you reconsider all approvals for this project until the community has been given a meaningful opportunity to engage. We can work together. There's no reason to antagonize the community.

Thank you,

Steve & Karen Bradbury
109 Hurricane St., MDR

Adam Goldberg – 110 Hurricane St.

To Whom It May Concern/VNC:

I have lived on the Marina Peninsula since 2005 and on Hurricane St since 2013. Since 2013, the amount of construction and noise on Hurricane has increased with each year. And now, with the plans of building a parking lot along with a new pump station, it behooves us all to keep this to a minimum.

While I understand that the pump station is necessary, the parking lot is not. There is already plenty of parking for workers, so to add a space where the public can park, is completely unnecessary. This will not only cause more car and foot traffic on our small, little street, but it will also bring in an unwanted element. There is no doubt that the homeless population will find this parking lot and make it a place to loiter, make unwanted noise, and use drugs. I have a small child who does not need to see this, and there are plenty of other families who are in the same situation.

I am asking that you vote to make it so there is NOT a parking lot at the end of our street. We have endured enough over the last 5 years or so with street closures, construction that rattles our homes, and an increase in the homeless population in our neighborhood. Flatly, there is no reason/need for this parking lot and it will make life exponentially worse for those of us that live here.

Thank you for your time and assistance with this matter.

Best,
Adam M Goldberg
110 Hurricane St

Robert DiBiase – 115 ½ Hurricane St (owner)

HELLO STEVE: MY OPINION IS THAT THE PARKING LOT BE USED EXCLUSIVELY FOR THE PUMPING STATION EMPLOYEES AND THE HURRICANE ST RESIDENTS. IF THE LOT IS OPEN TO PEOPLE GOING TO THE BEACH THAT WOULD BE A NO-NO FOR ME, SINCE THEY ARE ALREADY PARKING ON THE STREET WHERE RESIDENTS USUALLY PARK.

BEST REGARDS

BOB DEBIASE

115 ½ HURRICANE ST

MARINA DEL REY, CA 90292

Muriel Blake & John Larkin – 110 Hurricane St.

RE: 128 Hurricane & 3813So. Esplanade, ZA 2017-3950-ZAA-1A;DIR-2017-4173-CDP-SPP-1A DIR-2017-4167-PUD-CDP-SPP; ZA 2017-3953-CU2
Sent

Muriel Blake murielblake@wealthbuildersinc.com

To: cpc@lacity.org, elizabeth.gallard@lacity.org

Cc: mike.bonin@lacity.org

Fri, Mar 4 at 5:30 PM

Dear Commissioners,

Please address and reply to the following important concerns of your constituents

No 1. I have been living at 110 Hurricane for 42 years. Our residence is located 1 building away from the proposed Pumping Plant construction. As you overwhelmingly know this is strictly an upscale residential neighborhood which was not intended to be used for Industrial purposes let alone a "Pumping Plant"; there must be many other locations which would be more suitable for a Pumping Plant...perhaps all of your neighborhoods. The last time this proposed new plant project was presented to our community was 5 years ago - in 2017. It's not clear from the "notice provided" five years ago, that there was any written response to our community's concerns regarding the impact on our residential street of a Pumping Plant.

a) So at this late date (2022) after five years, what are the architectural design and landscape design of your proposed industrial plant to fit in with the design of our residential neighborhood? What design steps have you taken to insure that this "plant" will it blend in with this residential design without it being a complete "eyesore" in this sought-after residential Marina Del Rey beach area. As well, our beautiful beach is exceedingly popular with those who live in the inner city and who look forward to spending the day in our neighboring beautiful beach. Of courses, it would be extremely negligent to not to note that this area is notably popularity with its shops and restaurants which bring revenue to your city.
b) b) What buffers will you provide between this proposed "Plant" and our dwellings?? Likewise, this block abuts sensitive wetlands so what buffers will be taken to protect this area?

No. 2.) I am extremely concerned about the proposed "Parking Lot" How many employees do you plan to have working at the "Plant" that it would necessitate of a Parking Lot??? And what about the residents on Hurricane St. that of the block? will there be a full time Guard?? How will it be secured at night? As you are alll well there is a large homeless population in our neighboring Venice. H ere there are vagrants who roam our street and, if not guarded at night they very well may seek refuge in the lot. It may well become a haven for car thefts or car parts theft. It brings an unsafe environment to those near homes and to the street parkers who come home after dark.. What measures will be taken to provide safety to the residents who live

next to this lot?

a) those of us on Hurricane Street recently lived through 3 years of construction in the same "plant area". The street was torn up, blocked with huge equipment, construction cranes, diggers etc. all emitting constant banging, dirt and dust; the workers parked their trucks up and down the entire street, leaving no space for the residents to park. this cannot go on once again with construction of your "Plant"

No. 3) Transformers proposed at this new location, generate electromagnetic field (EMF) known to cause cancer and we all believe to be a risk to our health and the community at large.

I, for one, oppose your moving forward with the proposed project until the above concerns are addressed, in writing, and sent to all those who reside near the proposed Industrial Plant.

Sincerely,
Muriel Blake
John Larkin
110 Hurricane St.
Marina del Rey, CA 90292

Muriel A. Blake, CFP®
WEALTHBUILDERS, INC.
11600 Washington Place #116D
Los Angeles, CA 90066
(310) 391-3921- phone
(310) 398-9859- fax

Gary Stromberg – 125 Hurricane

I'm writing to request that the equipment you are using to build this new facility, including transformers, HVAC and electrical panels be moved away from our residences and towards the existing pump plant on Hurricane, and that you shield the entire project with solid fencing. You have no idea how disruptive your project is to our little community.

Regards,

Gary Stromberg
125 Hurricane St.
(203) 984-4836

Mike Borassi & Genevieve Morrill-Borassi – 3801 Esplanade

(Note: On 2/28/22, Gen and Mike filed an appeal with the LA City Planning Commission. The following material has been taken from that appeal)

The goal of this appeal is to require Public Works to work with the community on a better design for this project which will fit within our community and will provide protection for adjoining residential neighbors from the impacts of this industrial-style facility on privacy, safety, noise and aesthetics.

- Public Works last presented this project to the community in 2017. The case has been on hold for almost 5 years. No additional information or contacts with the community were held during this time despite prior promises to work on design and mitigation. We have repeatedly asked for a new presentation of the project since changes were clearly made since the last City public hearings in 2017.
- The EIR for the project and prior presentations misrepresented the location of the project, which is in fact 10 -15 feet closer to the nearest residential structure than previously represented.
- The project is poorly designed to fit within its residentially zoned neighborhood. Noisy and dangerous equipment is located very close to two neighboring residential areas. However, on the other side, the project site is adjacent to a dead-end street and the exiting pump plant, and all noisy and dangerous equipment should be located nearer to this facility and away from residents.
- The project aesthetic design, proposed landscaping and “public art” has never been presented to the community and the simple elevation of the structure presented does not adequately show how this will fit into a 100% residential neighborhood.
- Public Works has a history at this location of poor maintenance of the existing facility and landscaping, as well as noisy and intrusive construction for years during the recent Dual Force Main project at this location. The community simply does not trust Public Works to fulfill its promises to keep this facility and the parking lot safe and attractive.
- The facility is adjacent to a sensitive wetland area and no effort is made to mitigate impacts or improve existing conditions.
- The proposed parking lot will be an attractive nuisance in this residential area and will not be secured or patrolled. City parking should continue to be on the street and the additional lot should be used for open space to buffer the facilities.
- The project approval and conditions do not properly include all required mitigation measures so that the community knows what must be done and enforced. The EIR, Addendum and MMRP plan are only found on an obscure Bureau of Engineering link and were not available to the neighbors.

The Venice Pump Plant has existed in this area for a long time. It is not well maintained. It has no landscaping or attractive fencing. It is never upgraded, cleaned, and graffiti is often left for months before painting. The existing plant is stark, abuts directly onto a sensitive waterway, is littered with trash and graffiti, with weeds poking through the scant gravel setbacks. Over the last five years, the site has been used as a staging area for the Hyperion Dual Force Main project, so the neighbors have endured constant construction traffic, noise, dust and equipment.

In order to build a safe and beneficial project here, Public Works must be required to include the following measures in the project:

- The project needs to mitigate its impact on the sensitive canal and lagoon. The existing pump plant has no vegetation whatsoever and the canal banks are not appropriately landscaped with native materials. Additional landscaping should be added to the existing facility including vines to cover walls which are frequently graffitied.
- Upgrades should be required to the aesthetics of the existing plant including painting, consideration of a mural, and additional planting in currently empty and trash filled planters and side yards.
- The new facility must be designed and landscaped in keeping with the residential area and sensitive lagoon.
- Provide a buffer of landscaping and walls between the new facilities and the directly adjacent residential buildings, including a minimum 6-foot block wall and 10 feet of landscaping between both the parking lot and the new facility and the nearest adjoining residential property to the north and west.
- Include an on-going obligation to clean and maintain the existing and new facilities when they are complete.

Adopt binding conditions of approval that clearly spell out all obligations in the future so that neighbors can monitor and enforce, including each requirement of the approvals and the MMRP.

For all of the above reasons, this project should not be approved, but should be sent back to the drawing board so that Public Works can design a compatible facility. To place this facility in a residential neighborhood in a sensitive wetland location requires careful consideration and strict conditions.

Kristy Canon - 3809 Esplanade (building owner)

From: **Cannon Enterprises, Inc.** <cannonenterprisesinc@gmail.com>
Date: Thu, Apr 14, 2022 at 8:16 AM
Subject: Auxiliary Pumping Plant in Venice
To: <cpc@lacity.org>, Elizabeth Gallardo <elizabeth.gallardo@lacity.org>, <mike.bonin@lacity.org>

To Whom it may concern,
I am the property owner directly north of the new pumping station location. This project is going to affect my income that is generated from my income property located at 3809 Esplanade. My current tenants may leave because of the project and the proximity of the industrial equipment to their bedrooms/ living space. It will be significantly harder to get market rent if some of the following concerns are not taken into account:

- The design is incompatible with the neighborhood
- No buffer from the project and residential homes
- We have health concerns of having transformers and electromagnetic fields near residential homes
- Equipment noise and construction impacts

I understand that this is a vital piece of infrastructure that the community needs, but my property being so close to the project and having owned this property for over 30 years, I feel my concerns are not being heard or given any value.

Thank you,
Kristy Cannon
--
Cannon Enterprises
8405 Pershing Dr. #500
Playa Del Rey, CA 90293
Phone: (310) 823-2082
Fax: (310) 823-2085

Robert & Lucia Williams – 3805 Esplanade

From: Lucia Williams <luciaw2012@gmail.com>
To: cpc@lacity.org, elizabeth.gallardo@lacity.org
Cc: mike.bonin@lacity.org

Mon. Feb 28. 2022 at 1:35 PM

Dear Commissioners:

We along with our neighbors are writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to community concerns as we were never shown a final architectural design or landscape plan. This is an industrial facility in a residential neighborhood abutting a sensitive wetland area--more care should be taken to buffer the use from existing homes and resources.

The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping and aesthetics.

Additionally, the transformers proposed within the new location generate electromagnetic field (EMF) known to cause cancer and we believe it to be a risk to our health and the community at large.

We are concerned that the parking lot will create an unsafe environment near homes and additionally will provide only two spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night? We understand that the project is essential for the area, however we wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication.

We oppose moving forward with the project until these concerns are addressed.

Sincerely,
Robert and Lucia Williams
3805 Esplanade
Marina del Rey, CA 90292

Eliane Gans – 3933 Esplanade (property owner)

From: Eliane Gans <elianegans@gmail.com>
Subject: Venice Axilliary Pumping Plant
Date: April 8, 2022 at 11:22:56 AM PDT
To: cpc@lacity.org, elizabeth.gallard@lacity.org, mike.bonin@lacity.org

To All of you, and to whom it may concern:

I have been a resident of my property at 3933 South Esplanade W. For over 35 years. I have endured cracked streets and lack parking for many years. And the pumping plant that reduces the value of my property.

I am writing to you today to voice my concerns and to object to the proposed Auxiliary Pumping Plant at the end of my street. At 133 East Hurricane and the adjacent lot at 3813 South Esplanade w. My property/residence will be impacted by this construction, and it will affect the future value or all of our properties.

- There has not been adequate community or resident communication
- The design has not been approved or reviewed by the residents or is not in keeping with the current neighborhood.
- The design should have a residential look and materials to blend with the residences and environment of the Lagoon.
- Residents should be given a chance veto review the design and comment and request any changes that are deemed necessary
- The proposed Pumping plant buttes right up against residential property—this is NOT OK.
- There are environmental and health concerns about the electronics, transformers and electromagnetic fields that will impact the residents
- Noise and equipment will destroy our wetland peace and quiet,,,,, and create parking and vehicle access problems. and in general create more congestion in an already contested neighborhood
- The unsecured parking lot will invite homeless people and will not create any additional parking and will even block any parking that might be accessible.
- There should be buffers between the parking and the residences.
- How will the parking lot be managed. And WHY are there only 2 public spaces, when parking is an issue already in this area
- There are no studies that I have seen, that address any environmental impact on our sensitive lagoon—which is why we all live here!!!
- Previous construction of this Public Works with the existing facility has had a bad track record for noise, debris, obstructions of the street and other problems.
- Past Public Works projects in our neighborhood have caused a barrage of constructions. Issues over 7 weeks causing discomfort to all neighbors and a lack or peace!

Lastly, what are the benefits to us, the residents? YOU do not live here, and have no knowledge about the very special residential area that this is, and why we have chosen to live here.

I AM STRONGLY OPPOSED TO THIS PROJECT—YOU HAVE NO RIGHT TO IMPACT OUR HOMES AND THE VALUES OF THIS NEIGHBORHOOD, AND OUR SAFETY AND HEALTH.

Thank you for reading this letter…. I hope that you will consider my concerns and dither concerns of all my neighbors—and or the entire Marina Peninsula!

Sincerely,

Eliane Gans
Owner
3933 Esplanade W.,
Marina Del Rey, CA 90292
(310) 339-4056

WE ARE ALL TENANTS OF 3933 South Esplanade W. and STRONGLY OPPOSE THIS PROJECT, AND WE DO NOT WISH TO MOVE AWAY AS A RESULT OF THIS PROJECT.
Hans Brofeldt
Wil Mavronicolas
Shawn Groshans
Kate Stone

ARTfully,
Eliane Gans
LONNY GANS & ASSOCIATES
Fine Art

Tanya Spero – 113 ½ Hurricane St

TS **Tanya Spero <tanya1040@aol.com>** VNC Parking & Transport March 12, 2022 at 2:35 PM

Re: Hurricane St Auxiliary Pumping Plant Project - It's A Mess

To: Rick <chucksteak897@yahoo.com>, Steve Bradbury <steve@mycyberstuff.com>

Hi Steve

I was forwarded the emails and I definitely would appreciate your representation. I allow you to represent me for this issue regarding the employee parking lot. I agree that the parking lot should not be built. It will bring more traffic and we have enough as it is on the weekends.
Thanks so much,
Tanya Spero

Sent from my iPhone

Larry Lesser, MD & Claude Lesser – 3609 Esplanade (owner)

From: Lawrence Lesser lessermd@mac.com

Date: Wed, Feb 23, 2022 at 5:03 PM

Subject: 128 Hurricane & So. Esplanade

To: <cpc@lacity.org>, <elizabeth.gallard@lacity.org>
Cc: mike.bonin@lacity.org

Dear commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plan project proposed at East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to the community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from existing homes and resources.The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics.

We are concerned that the parking lot will create an unsafe environment near homes, and additionally providing only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night. We understand that project is essential for the area, however we wane on trust due to past promised form Public Works and constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement of communication.

We oppose moving forward with the project until these concerns are addressed

We have been living in the area for 20 years, and never saw any attempt to fix the unpaved road abutting the proposed project. It is very unsafe to walk and a real eyesore.

Sincerely

Larry Lesser, MD, and Claude Lesser
Homeowner 3609 Esplanade. Marina del Rey 90292

Jeff Lee – 3701 Esplanade (owner)

From: Jeff Lee ilee@laurbanhomes.com

Date: Sun, Feb 27, 2022 at 12:11 PM

Subject: Venice Auxiliary Pump plant, March 10 hearing, Case ZA 2017-3950-ZAA-1A and related cases

To: <elizabeth.gallardo@lacity.org>
CC: cpc@lacity.org

Dear Planning Commission:

I have lived on Esplanade, two blocks from the proposed pump station, for twenty years raising my family. I am writing to oppose the current plans for the pump plant and parking lot.

I have been a real estate developer in the City of Los Angeles for over 40 years building over 40 projects through the City including hundreds of homes in CD 11.

The process followed by Public Works to design and permit the pump station would never be allowed for any private developer. For the past 40 years on every one of our developments we have had extensive community meetings, neighborhood council presentations, and meetings with the council office. We have been responsive to the community
and the council office.

In this case Public Works has been allowed to ignore the neighborhood keeping this case on hold for over four years. In 2016 we had a community meeting with representatives of the council office and the Department of Public Works. I was personally assured that my concerns of the community would be addressed and additional community meetings to
review design would be held. We asked many times when the City would respond which never happened. Had we treated the community this way in our business, our projects would never move forward. If we stonewalled the community for four years, our case would have been terminated.

I am not against the development of the pump station as the City needs to continually upgrade its infrastructure. The pump station is surrounded by 20' alleys and the ecologically sensitive Grand Canal. The community concerns need to be addressed including landscaping, design, construction, mitigation to enhance the area around the pump station, and continual maintenance. We lived through the construction work at this site for the Dual Force Main project, which was a disaster. We live on a daily basis with the eyesore of the existing pump station and lack of maintenance or pride in the neighborhood exhibited by Public Works.

I hope you will grant these appeals and require Public Works to live up to its promises.

Sincerely

Jeff Lee
3701 Esplanade

Clare Bronowski – 3701 Esplanade (owner)

CB **Clare Bronowski <clareb1050@gmail.com>** VNC Parking & Transport March 12, 2022 at 4:39 PM

Hurricane Pump Plant and Parking lot

To: Robert Thibodeau <robert.thibodeau@venicenc.org>, Jonathan Deer <virtualjonny@gmail.com>, Cc: Steve Bradbury <steve@mycyberstuff.com> Details

We live two blocks from the Venice Pump Plant, and we write to support the VNC Transportation Committee motion opposing the current plan for the Auxiliary pump plant and parking lot.
We are concerned that the current plan does not protect the nearby residences from noise, privacy and industrial type activities. Public Works needs to rethink the plan and include buffers, privacy walls, landscaping, security measures and long term maintenance to protect the neighborhood and the sensitive canal and lagoon area. The parking lot must be locked and secured when not in use by Public Works employees. The entire area must be well maintained, not allowed to be full of weeds, trash and graffiti as it currently is.

Thank you.
Clare Bronowski and Jeff Lee

Leslie & Michael Adler – 3601 Esplanade

April 24, 2022

To: Los Angeles Planning Commission

Re: 128 Hurricane & 3813 So. Esplanade
ZA2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A | DIR-2017-4167-PUB-CDP-SPP; ZA2017-3953-
CU

Email: cpc@lacity.org; elizabeth.gallardo@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from existing homes and resources.

The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics. Additionally, the transformers proposed within the new location generate an electromagnetic field (EMF) known to cause cancer and we believe to be a risk to our health and the community at large. We are concerned that the parking lot will create an unsafe environment near homes, and additionally provide only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night?

We understand that the project is essential for the area, however we wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication.

We oppose moving forward with the project until these concerns are addressed.

Sincerely,

Leslie and Michael Adler
Neighbor
3601 Esplanade MDR-Home Owner

Jennifer Kelton – 3615 Esplanade

On Mon, Apr 25, 2022 at 8:43 AM Nomad1800 <nomad1800@aol.com> wrote:

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade.

Please note that one of my main concerns is the public parking lot. I am not sure why it is needed? And it will only create problems - as you also are very aware of, and also based on the current state of homeless and transients in our area.

Jennifer Kelton
3615 Esplanade
MDR, CA 90292

Melly Liburd – 120 ½ Galleon (owner)

Wed, Apr 13, 2022 at 3:04 PM
Melly Liburd mellyliburd@yahoo.com

April 8, 2022

To: Los Angeles Planning Commission
Re: 128 Hurricane & 3813 So. Esplanade
ZA2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP.1A | DIR-2017-4167-PUB-CDP-SPP: ZA2017-3953-CU

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this proiect was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or If there was any response to community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to butter the use from existing nomes and resources

The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics. Additionally, the transformers proposed within the new location, generate electromagnetic field (EMF) known to cause cancer and we believe to be a risk to our health and the community at large.

We are concerned that the parking lot will create an unsafe environment near homes, and additionally providing only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night?

We understand that project is essential for the area, however vie wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication.

We oppose moving forward with the project until these concerns are addressed

Sincerely,
Melanie Liburd
120 1/2 Galleon Street, Marina Del Rey, CA 90292
Homeowner

Andrew Freedman – 20 Ironsides

April 13, 2022

To: Los Angeles Planning Commission
Re: Proposed Venice Auxiliary Pumping Plant (VAPP) 3813 S. Esplanade, 3817 S. Esplanade and 3913 S. Esplanade W. (128 E. Hurricane Street)
ZA 2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A; DIR-2017-4167-PUB-CDP-SPP; ZA 2017-3953-CU

Via Email: cpc@lacity.org; elizabeth.gallardo@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

In addition to the very astute comments made by Genevieve Morrill and other neighbors, I would like to share my concerns.

General
The Contract Documents for this project were submitted and cleared by Los Angeles Department of Building and Safety in 2017 without any public notice or review. Approval by two agencies (LA City Planning Department and California Coastal Commission) which both require public notification and public review, is only now being sought. Typically, Planning and Coastal clearances are the first to be addressed, not the last. The Public review of this project has been severely lacking, and City officials have both a legal and moral obligation to make sure the citizens of Los Angeles are heard.

This project spans two existing lots (which both front the Grand Canal) without an approved lot-tie agreement. All lot-tie agreements must go through a Public Hearing and review process. This has not been done, and all further consideration of this project should be suspended until the proper Public Hearing process has been completed and the lot-tie agreement approved.

The front yards of the two City lots of the proposed VAPP both face the Esplanade (Grand Canal). The rear yards of these two City lots face Canal Court. Hurricane Street is located along the side yard of only one of the parcels. The use of 133 and 139 Hurricane Street as the project address is both inaccurate and misleading. All references to 133 and 139 Hurricane Street for this project should be changed to 3813 and 3817 South Esplanade, respectively.

Design Issues
The recent Joint Determination letter from the LA City Director of Planning and Zoning Administrator states the following: "*As proposed, the project is visually compatible with the character of the area and will enhance the visual quality of the existing neighborhood.*" I couldn't disagree more.

The existing VPP is a one-story building surrounded by a sound wall, painted in neutral colors. It is quiet and odorless, and its low massing minimizes its effect on neighboring residences. In contrast, the proposed VAPP has a large concrete-walled Electrical Building that is oriented in a north-south direction – 90 degrees from the adjacent residences – which would form a 32-foot-high solid wall, not only blocking views to the Grand Canal, but creating shadows (between 10 am and 3 pm) directly onto all adjacent residences located to the north and west.

A recent change to the flood zone map in the Venice area was made effective by FEMA on April 21, 2021. As a participant to the National Flood Insurance Program (NFIP), the City of Los Angeles is required to enforce the flood clearance requirement for new construction and substantial improvement projects.

The two lots where the future VAPP is to be located were affected by this flood zone map update. The new Base Flood Elevation (BFE) is 8 feet above sea level and all new buildings require that the Lowest Finished Floor Elevation (LFFE) be at 9 feet (8 feet + 1 foot of free board) per LA City Ordinance 186952.

The current design for the VAPP has the Lowest Finished Floor Elevation (LFFE) at 7.67 feet – 16 inches below the minimum required level per the new FEMA requirements. Note, the building generator, all switchgear electrical equipment for the pump motors, and all exterior transformers will be underwater during a flood. This will lead to the complete failure of the pumps and a catastrophic environmental disaster. **The entire VAPP must be redesigned accordingly.**

The 32-foot Electrical Building height is excessive and unnecessary. It is twice the height of the existing VPP. The BFE issue noted above will only make this tall building even taller. Further, the current two-story design has no elevator to accommodate disabled employees, with the only restroom and office located on the second floor. **The Electrical Building should be changed to a one-story structure and reoriented in an east-west direction along Hurricane Street.**

These design changes would allow for a large open buffer area for the residences located directly to the north, eliminate shadows, reduce the project's visual impact, be more compatible with the existing VPP, accommodate disabled employees, and better comply with the Venice Coastal Zone Specific Plan.

The three large transformers (each 6.5' to 7' tall) located within the required setback are unacceptable. They are located outside the decorative fencing and surrounded by 19 steel bollards along the entire Canal Court property line. These transformers would be an eyesore. Additionally, they will generate noise. They must be repositioned out of sight and away from any adjacent residences. If a one-story VAPP were U-shaped facing the existing Venice Pumping Plant, the transformers could be placed within the recessed U-shape with direct access to Hurricane Street, but out of sight from adjacent residences.

The HVAC equipment for the Electrical Building is located outside near the north property line and in direct view from adjacent residences. This equipment will generate noise and heat, and should be relocated away from residences (perhaps on the roof) and screened from view.

Parking Lot/Green Space

The proposed public artwork located in the green space south of the proposed parking has <u>not</u> been designed or specifically defined. The design and massing of this proposed artwork should be clearly presented as part of the formal public review process prior to any project approval. In addition, the City must provide written assurances as part of the Conditions of Approval for this project that no artificial lighting, sound or kinetic movement will be associated with the public art. Landscaping shown in the same area as the public art should be revised accordingly prior to further public review.

The accessible aisle for the van parking space shown at 3913 S. Esplanade W. (128 E. Hurricane Street) should be located on the passenger side. The current configuration does not meet either Federal or State Accessibility Code requirements, and should be redesigned.

I oppose any further action on this project, including an indefinite postponement of the April 28, 2022 Public Hearing, until these issues are addressed and corrected.

Sincerely,

Andrew Freedman
20 Ironsides #18, Venice, CA 90292

Steve Freedman
732 Howard St., Venice, CA 90292

Marilyn Mikos – 115 Eastwind St (owner)

To Whom It May Concern:

I stand OPPOSED to the way in which the above referenced Pumping Plant is being constructed. Although I understand the sewage plant is a necessary evil, there are many issues that have not been taken into consideration with the construction design of the project.

I have lived in the same building (which I own) for 33 years. There has been literally zero attention paid to upgrading the infrastructure of this residential area by the City. The "roads" are in dire need of repair, including "Speedway" (which will be adjacent to the Plant) which floods every time it rains. The potholes are ridiculous and no amount of calls to have them repaired gets any attention at all. Yet, you seem to have a burning desire to build an industrial structure right smack dab in the middle of a lovely residential community.

This Plant is being constructed in the MIDDLE OF A BEAUTIFUL RESIDENTIAL AREA...People literally live inches away from where transformers will be housed, which could conceivably cause grave health concerns @ electromagnetic fields. The actual construction of the Plant will disrupt the entire neighborhood with noise, dust, etc. The last time Public Works did construction in this area, several people became ill from the particulate matter in the air and were forced to move. Add to this, the beautiful Lagoon and the indiginous flora and fauna that reside there (and have for decades) - all of which will be disrupted.

There has literally been no communication with the immediate community about what the plans are. From what we "understand", the design is incompatible with the community; further, you have offered no benefit to the community, not only aesthetically (no buffer between the Plant and the community), but also concerning the health and well being (including safety) of the people who live here. Why would you build an industrial project in the middle of a residential zone? It is beyond my comprehension.

I am in dire opposition to moving forward with this project until these (and other) concerns are addressed. I sincerely hope you will, for once, consider the concerns of those of us who live in the community. We pay taxes...and we vote.

Sincerely,

Marilyn Mikos (owner)
115 Eastwind
MdR 90292
marilyn.mikos@gmail.com

Arianne Flemming & Justin Wasser – 3812 Pacific

To Whom it May Concern,

We are residents of 3812 Pacific Ave, located at the corner of Pacific and Hurricane. We have heard the news that the City of Los Angeles plans to construct a large sewage plant at the two vacant lots at the end of Hurricane.

We are writing to express our great concern with this plan for a number of reasons.

First, and most importantly to us, we understand the building for the plant will house transformers, emitting electromagnetic fields. EMFs have been known to cause cancer and as residents we are seriously concerns about how this plant will put our health and the health of the neighborhood at risk.

Further, we love the ecological reserve and lagoon near our house, this plant could have significant impact on the ecological health and well-being of this sensitive lagoon.

Finally, we are concerned that the parking lot proposed near the plant will create an unsafe environment on our street. We are concerned about how the lot will be managed and controlled and secured and the potential safety risks it poses to the community.

We oppose moving forward with the project until these concerns are addressed.

Sincerely,

Arianne Flemming and Justin Wasser

3812 Pacific Ave Marina Del Rey 90292

Susan Afriat & Steve Hyman – 4000 Pacific

Susan Afriatafriats@gmail.com

To: elizabeth.gallardo@lacity.org

Dear Commissioner:

Thu, Mar 3, 2022 at 8:49 AM

We are neighbors writing to share our concerns regarding the Venice Pumping Plant projected proposed at the above addresses. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017. It is impossible to determine from the notice provided what the final design is or if there was
any response to community concerns - we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from existing homes and resources.

We have many concerns: the parking lot will create an unsafe environment near homes; buffers are needed between industrial and parking uses and the adjoining homes, etc.

We understand the project is essential for the area; however, past experience has led us to not trust the promises and assurances that will be made. We oppose moving forward until these concerns are addressed

Thank you for listening to our concerns.

Susan Afriat and Steve Hyman
4000 Pacific Avenue
310-893-4616

Bethany Gorfine – 3950 Via Dolce (owner and condo board president)

On Mar 15, 2022, at 8:53 PM, Bethany Gorfine <Bethany@federalhill.tv> wrote:

Sent from Bethany's iPhone

I live at 3950 Via Dolce, Our 145 unit condo complex (of which I'm HOA president) faces the lagoon and pumping plant site.

I don't appreciate when a design and proposal has been approved and then changed without notifications to the community including the VNC.

SIze does matter, construction matters especially to homeowners on via Dolce as well as surrounding Hurricane.

It was hard enough to to live through the past 5 years of construction and now more years across from us where sound really travels over the lagoon.

We just lived through 4 apartment complexes 2 hotels, and the sewer project.
It's relentless.

We understand the need for an additional plant for the community but keep it simple, small, and no public parking which will turn it into a hangout- luring outsiders into the community.

Adding bicycle racks? An art exhibit? We don't want folks congregating on Hurricane - especially on weekends. It's a huge liability to our community on the Strand that is already experiencing massive intrusions and thefts.

Thank you.

Jonathan Tillman – 3719 Via Dolce

April 13, 2022

To: Los Angeles Planning Commission
Re: 128 Hurricane & 3813 So. Esplanade
ZA 2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A | DIR-2017-4167-PUB-CDP-SPP; ZA 2017-3953- CU

cpc@lacity.org; elizabeth.gallardo@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from exisXng homes and resources. The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics. **Moreover, a licensed architect should be hired to design the structure's exterior and its landscaping.**

Additionally, the transformers proposed within the new location, generate electromagnetic field (EMF) known to cause cancer and we believe to be a risk to our health and the community at large.

We are concerned that the parking lot will create an unsafe environment near homes, and additionally providing only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night?

We understand that project is essential for the area, however we wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication. **One such promise was to repair Via Dolce and Marquesas Way to the extent they were damaged due to construction activity. The applicant, however, left portions of those roads with deep ruts and broken pavement until the community complained to their local representatives. Therefore, continuing community oversight is essential to make sure there is compliance with applicant's obligations in this project.**

We oppose moving forward with the project until these concerns are addressed. Sincerely,

Jonathan Tillman
3719 Via Dolce
Marina del Rey, CA 90292

P.S. If the location of the power boxes endanger the residents of the adjoining property, the city may be liable for inverse condemnation.

Robin Rudisill

April 27, 2022

Los Angeles Planning Commission

Re: 128 Hurricane & 3813 So. Esplanade
ZA2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A
DIR-2017-4167-PUB-CDP-SPP; ZA2017-3953-CU

Honorable City Planning Commissioners:

I live in the area surrounding this project. The last time this project was presented to the community was in 2017, five years ago, and I participated in the hearing down at the Corinth hearing room at that time, expressing numerous concerns. I am deeply concerned that as an "interested party" (I filled out a speaker card and signed a list to be emailed all determinations, as I do at every hearing I attend) I was not notified of any hearings or determinations since that time. I only found out about this hearing because someone asked me how I felt about it. I do not understand why so much time has passed. This should be explained to the community.

This is a sensitive wetland area, surrounded by ESHA, in the Dual Permit Jurisdiction Coastal Zone. I cannot think of a more sensitive area in the Los Angeles Coastal Zone. See attached certified Venice Land Use Plan map. Aesthetics in such a sensitive area should be paramount, and the project must be designed to be compatible with the surrounding residential neighborhood.

This is an industrial facility in a residential neighborhood and as such buffers must be provided between the industrial and parking uses and the adjoining homes. The surrounding community must be given an opportunity to review the architectural design or landscape plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics.

I am also concerned that the parking lot will create an unsafe environment near homes and that only two spaces would be provided to the public. Please inform us re. the design, how the lot will be managed and controlled, and how will it be secured at night. Please put the project on hold until all of these concerns are addressed.

Sincerely,

For the Love of Los Angeles
and our precious Coast,
Robin Rudisill
(310) 721-2343

Adam Rose – 12 Buccaneer St.

I live at 12 Buccaneer, so I'm a few blocks away. That's why I opened my questions/comments by noting that precedence with concerns should go to closer residents (who will deal with this around-the-clock). That said, my girlfriend and I walk a loop around Grand Canal (at least to Lighthouse Bridge) almost daily, so we must pass this site on foot at least 300 times per year. We also help out with local cat rescues, and over the years there have been a number who've lived and/or been caught along the canal. We're night owls and tend to walk around midnight, so we also try to keep an eye out for issues at odd hours (hence why I got them to adjust the new lights on the old plant a few months ago).

From what you just sent me, it seems there are a lot of issues they need to address. I'm a bit fatalistic about this project in the sense that it's reasonable they'll eventually need more capacity (the alternative seems terrible!) It's a big question about how they get there, so I support your pushback on multiple fronts because it needs to be reasonable for those closest. In terms of more ancillary things that my girlfriend and I were thinking about:

- We're still wary of the new plant's noise and vibrations under normal operation (i.e., after construction is done). I was relieved they said the motors will be underground and with more modern technology. However, I'd love to see some sort of engineering report that confirms the noise/vibration projections.

- If this project is going to happen, they should ensure it adds to the community in other ways, including aesthetics. Instead of the harsh floodlights like the older building, maybe decorative street lamps or sconces with proper shading so they don't shine on other people's property or glare across the canal (possibly interrupting wildlife). Some greenery on the walls would be nice (bougainvillea, jasmine or some kind of ivy so it grows up the walls). Alternately, I like the idea of the art project or at least some fun but not garish colors. I think our most "controversial" suggestion may be benches, as I can imagine some folks are wary of them attracting long-term homeless to stay. These could be smaller size, or maybe a series of chair-width seats. With this being such a popular walking area, it never ceases to amaze me that the only benches on the whole peninsula seem to be in the kids park on Via Dolce.

- I worry that EIRs only focus on certain types of wildlife and may not be accommodating for "common" waterfowl like ducks. Those fledglings bring a lot of joy to the community each spring! Unless the noise/vibrations are in issue, it might be nice if that flat area over the "pool" could have some bushes as a protective habitat for mothers and their young. I'd love to make sure the design considers potential places they might fall and get trapped, too, and holes big enough to get in and out of (but not so big people can get through, as the mentioned a security concern).

Robert Nau – 4250 Via Dolce

I am a concerned resident and a condo owner at 4250 Via Dolce. Thank you!

Felicia Glade & Mike Pelletier – 116 Galleon St.

Hi, as a resident living close to the hurricane pumps, I am very concerned about this project.

Please eliminate the parking lot, and instead use parking on the pump plant property or street. Having an unsecured lot will invite security issues that will affect our children who play outside around there and who we take walks with along the canals. Please have security Patrol planned for this residential area as this lot will attract unhoused people to a peaceful quiet and currently safe neighborhood.

Please adopt written recorded conditions of approval that clearly spell out all obligations in the future so that neighbors can monitor and enforce, including each requirement of the approvals and the MMRP, and mitigations during construction years.

Thank you for reading. I hope you protect nearby residents and our children.

Felicia

Eliane Gans – 3933 Esplanade (owner)

Aug 10, 2022

To President Millman and Honorable Commissioners
City Planning Commission

I am a resident on Pacific Court/ South Esplanade West- 1/2 block from the pumping station.

I have been a resident and own the three Unit property, where I reside, for the past 38 years. I feel that the residents of this community- especially the residents who live on the Canal, are being invaded, disrespected and disregarded.

We have moved to this community and this special area for reasons that the City Planning Commission may not understand. It is a peaceful, and non-commercial area with beautiful residences, lovely landscaping, water and peace.

Now we are being invaded with a design of the pumping station that is horrible, not in keeping with any structures in the neighborhood and will be an eye sore to any adjacent residences. The design, the noise from the transformers and other equipment will impact any neighboring homes and even visitors. The equipment may also be dangerous to the environment and to those of us who live here.

The City Planning Commission DOES NOT LIVE HERE. And We do! This is a matter of our well-being and our daily lives!

The parking lot is not necessary, and in addition -WHY HAVE YOU REMOVED 4 PARKING SPACES necessary to the residents on Hurricane?? This area already has limited parking! This is not necessary, and another invasion and destruction of our quality of life in our neighborhood.

Lastly, and importantly, all of our property values will be diminished. Who would want to live near a Pumping station that makes noise, spews chemicals into the air and looks ugly, and an eye sore to the neighborhood...

I respectfully request that you re-design the new facility and review the recommendations that you have received. I also request that you landscape the entire area. And, of course, protect the neighboring residences.

With a plea of hope for your consideration and revisions, as requested by all of us who are residents; and the requests made by Genevieve and Mile Morrill-Borassi. And Kristy Swanson.

These requests are truly from all of us in the neighborhood, and I respectfully ask for your assistance and re-consideration of the current plan.

Sincerely,

Eliane Gans
Property owner: 3933 Esplanade West, Marina del Rey, CA 90292

Jenesa Kurland – 4300 Via Dolce (condo owner)

Whatever City says they're going to do to mitigate or their useless report says regarding noise, vibration, home damage, etc. is all BS rhetoric: City takes no responsibility and homeowner is helpless. Their preconstruction survey of one's home carries as much weight as blank pieces of paper.

VAPP Community Proposed Conditions
(May 5, 2025)

Overview: When the original VPP was built in the late 1950's, the Marina Peninsula was primarily comprised of oil derricks and marshland. The first residential properties on and around Hurricane St were constructed in the mid-1960's so design and other impactful attributes of the VPP were not material considerations.

Construction of the VAPP (the "Project") will have a significant, negative impact on our densely populated community and the surrounding environment including the Grand Canal and Ballona Lagoon, both recognized as ESHAs. Nonetheless, the community acknowledges the critical nature of this infrastructure project. Our goal has been and continues to seek modifications that will mitigate its impact on our quality of life.

Importantly, the Project does not conform to the Venice Land Use Plan (LUP) as follows:

- Policy I.C.1 states that the scale and design of industrial facilities must be compatible with adjacent and neighboring uses. The design does not meet this criterion.
- Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas. While the community does not claim to be experts on the chemicals and operations to be used at the plant, the operation is industrial in nature and some operations of the plant could reasonably constitute a hazardous use for nearby residents due to the potential for activities such as (but not limited to) transformer explosions, equipment fumes, sewage overflows etc.
- The Project conflicts with Policy 1.A.5 that seeks to preserve and protect stable multifamily neighborhoods.
- The Project conflicts with Policy 1.D.1 that states that only permitted development adjacent to the Grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.

Therefore, the community requests the following Project issues be addressed through the placement of conditions as detailed below:

1. The Project Does Not Meet Public Benefit Performance Standards

The Project does not meet the performance standards as required by LAMC 14.00.A.6 and 14.00.B.5. Public Works is not eligible for alternative compliance due to 1) lack of landscaped buffers to the north and west; 2) lack of full setbacks to the north; and 3) the majority of frontage is located on small local streets and alleys, rather than a major or secondary highway. These performance standards are designed to ensure that large industrial facilities such as this are kept to areas with adequate traffic infrastructure and contain adequate buffers and landscaping in keeping with the neighborhood. These goals are not met. Conditions requested:

a. A ten-foot landscaped buffer which will be maintained and equipped with an automatic irrigation system as well as a 6-foot solid block wall on the north property line next to 3811 Esplanade.

b. Shield entire structure with unobtrusive fencing as well as landscaping of a height adequate to screen the transformers and power poles.
c. The existing VPP shall be upgraded with landscaping, a new sidewalk, and all facilities, existing and new, shall be regularly cleaned, maintained, and patrolled for security.

2. Potential Release of Methane Gas and Other Chemical Hazards

The VAPP Mitigation Plan acknowledges "a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous chemicals into the environment." This includes encroachment or seepage of methane into the VAPP structure whose impact is considered potentially significant. Conditions requested:

a. A sufficient # of detection devices around the community shall be installed to provide ongoing accurate measurements.
b. The mitigation plan should proactively address the same exposure concerns for the community as defined for workers on the Project.
c. Should any analysis under the Mitigation Plan identify this issue, the entire Project must be shut down immediately until a realistic plan can be put in place to mitigate both short and long-term impacts.

3. Need for Appropriate Off-Site Workspace

Given the many "significant and unavoidable" issues identified on this Project, work from home conditions will be adversely impacted. Condition requested:

a. The city shall guarantee in writing the provision of suitable, local workspace, reasonably approved by the community, for all impacted home-based workers located within 500' of the Project for the duration of all construction activities.
b. The city will survey the community every six months during the term of construction to determine how much workspace is needed.

4. Ongoing Noise, Air & Dust Release

The Mitigation plan states "Project construction noise will exceed construction noise criteria provided by the LA CEQA Thresholds Guide. However, Section MM-NOI-3 of the same Mitigation plan, states noise control features will "reduce overall operational noise levels from all Project related sources to within 5 dB of existing ambient noise levels in the surrounding community (53-57 dB)." These two statements are in conflict. Conditions requested:

a. The city shall retain an independent 3rd party, reasonably approved by the community, to review and recommend changes to the mitigation plans.
b. The city shall provide independent (3rd party) noise and air quality monitoring whose results shall be available to the community in real time. If necessary, the city shall distribute or reimburse the cost of high-quality air purifiers to impacted households (up to $500/unit).
c. The city shall comply with residential noise thresholds including the provision of all sound barriers necessary to comply with municipal code requirements and CEQA thresholds.
d. Each construction day, the city shall erect temporary barriers of sufficient height to mitigate dust and dirt from impacting residential property. Barriers shall be removed at the end of each construction day to allow for street parking.

5. Lack of Adequate Emergency Access & Preparedness

The Project will exacerbate ongoing issues of emergency egress and ingress, by expanding density, blocking routes (even temporarily), and adding equipment & workers into the potential hazard zone. Evacuation plans have been generally ad hoc and done in the heat of the emergency. This approach has not been highly successful as recent problems with the Palisades Fire have demonstrated. Hazards facing the community include tsunami, tropical storm flooding, hazardous materials incidents and targeted violence, which will be complicated by the construction Project. Conditions requested:

a. LASAN shall, as the responsible party for the Project, initiate a Working Group including representatives from the Los Angeles Police Department (LAPD), Los Angeles Fire Department (LAFD), Los Angeles Department of Transportation (LADOT), Los Angeles Emergency Management Department (LAEMD) and the LA Department of Sanitation as the responsible party for the contract work, as well as a minimum of three representatives selected by the community.
b. Essential elements of the plan shall be as hazard specific as possible and include, but not be limited to:
    i. Identification of evacuation routes and emergency ingress routes.
    ii. Estimated evacuation times and numbers evacuated.
    iii. Mitigate blocking of evacuation routes/cooperate with the evacuation process.
    iv. Effective alternatives to evacuation such as shelter in place.
    v. Alert and warning procedures.
    vi. Addressing and including the needs of Persons with Disabilities and Access and Functional Needs (PDAFN).
    vii. Public education and practice.
c. The city shall install a walk bridge across the Grand Canal at Driftwood St as detailed in the previously approved Grand Canal Restoration Plan. The details of this plan can be found here: https://engineering.lacity.gov/grand-canal-restoration-project.

6. Lack of Street Parking on Hurricane St.

The VAPP plan proposes that all parking on Hurricane St will be removed during construction hours. This will displace 20-25 cars that park on the street during times of low demand, non-summer, non-holiday days, Monday-Saturday. Further, after construction, the city proposes using 128 Hurricane for employee parking and a public parking lot. This would be the only lot of its kind on the entire Marina Peninsula. There is no community support for a public parking lot. It will materially increase traffic on a residential street, will become an easily accessible haven for homeless, is not secure and LAPD does not have the resources to provide appropriate response when issues arise. Conditions requested:

a. During construction, the city shall securely enclose 128 Hurricane as a temporary permit-only lot at no cost to displaced residents in lieu of a construction staging site. Alternately, a similar number of spaces shall be made available on the South end of the Venice Pier parking lot at no charge to residents.
b. After construction is completed, the city shall implement the community-proposed red-zone parking solution for employee parking - see Exhibit A.

c. The city shall support the community by actively seeking an exception to the public parking requirement for a public utility.
d. Remove existing weekly no parking restrictions from Hurricane St to provide enhanced public parking.
e. At the completion of construction, the 128 Hurricane lot, which was purchased by the city for $2.7M, shall be sold to a private owner, the proceeds of which will be used to fund community benefits related to this Project as well as other needs as directed by CD-11 Councilmember Traci Park.

7. Excessive Construction Hours

The city plans for six day/week construction, 8a-5p. An internal city report produced seven months after the EIR was certified proposed a five-day construction work week as well as limitations on pile drivers, graders and jackhammers & haul trucks identical to these requested conditions:

a. Work shall be permitted Monday-Saturday November-March. Work shall be permitted Monday-Friday, April-October.
b. Equipment operation hours: 8a-5p
c. Pile driver, grader, jackhammer: 9a-3p - No pile driver, grader or jackhammer work shall be conducted on Saturdays any time during the year.
d. Haul trucks to access local neighborhood streets: 9a-4p

8. Lack of Binding Written, Recorded Conditions of Approval Between the City & Construction Company

It is unclear how the contractual conditions between the city and construction company will be enforced. How will resident complaints be addressed in real time? Current plans indicate a process where complaints are filed with an on-site city representative and addressed in an undetermined future time frame. Conditions requested:

a. Adopt written, recorded conditions of approval that clearly spell out all obligations with meaningful penalties for non-performance so they can be monitored by the community and enforced by the city, including each requirement of the approvals and the MMRP as well as mitigations during construction years.
b. Actively monitor and enforce all Project obligations including MMRP
c. Commit a city representative to be on-site every day from start to end of Project work who is empowered to satisfactorily address issues in real time or immediately shut the Project down pending resolution.

9. Lack of a Clear VPP/VAPP Maintenance Plan

The current VPP is not maintained in any meaningful way. The issues go far beyond graffiti and painting. There are environmental and safety issues. Garbage is strewn along the Grand Canal and Ballona Lagoon sides of the structure which can readily fall into the water (ESHA protection). The sidewalk around the structure is in a constant state of disrepair to the point of being dangerous. And as referenced in the Coastal Staff presentation made in February, the VPP was, back in 2012, landscaped to (at least partially) help blend into the neighborhood – see Exhibit B.

Since then, the VPP has been left in a state of disrepair. There was and is no maintenance plan. How will the VAPP be different? And what will become of the VPP as it is transitioned out of use?

What will eventually become of that structure and lot? Nobody within Public Works has ever provided a clear response. Conditions requested:

a. The city shall develop, in a timely manner, a meaningful maintenance plan for both the VPP and VAPP.
b. The city shall install safety railings around the VPP on the two sides facing the Lagoon
c. The city shall repair and maintain sidewalks surrounding the VPP.
d. The city shall plant and maintain environmentally appropriate plants & landscaping surrounding both the VPP and VAPP
e. The city shall communicate its short and long-term plans for the VPP after VAPP construction is completed.

# # #

Additionally, we seek appropriate, reasonable solutions to the following issues:

1. Significant & Unavoidable Residential Property Damage

The VAPP Mitigation Plan acknowledges "significant and unavoidable impact to surrounding land uses" including "ground-borne vibration levels that are distinctly perceptible at a receiving residential use or could potentially result in building damage." Section MM-NOI-2 of the mitigation plans does not adequately protect property from potential damage. In addition, Construction GEO-1 of the mitigation plan states the Project will "Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking and/or seismically related ground failure, including liquefaction**."** The plan to address residential impact uses terms such as "may include," "if considered appropriate," and "as feasible and practical." The discretion is left entirely to a Project assigned engineer. The city has strong motivation to look past issues that may arise as a path to completing the Project faster, especially with the Olympics on the horizon.

There must be an enforceable plan to cure defects to any adjacent or neighboring residential property caused by the Project. There is also no timely mechanism to address root causes in the event damage is done. The "process," as we have been told, will not mitigate additional damage before the cause is investigated and modified. Conditions requested:

a. An independent inspector, approved by the community and paid for by the city, shall be contracted to inspect all properties within 500' of the Project prior to construction to determine baseline conditions. Additional inspections shall take place no less than semi-annually or upon resident request for the duration of the Project.
b. Per Section 8 above, the on-site city representative shall be empowered to satisfactorily address these issues in real time or shut the Project down pending resolution.

2. Expected Reduction in Property Value

The anticipated severity of construction-related disruptions, including high-decibel noise, vibration, airborne debris, traffic blockage, and the potential release of subsurface gases such as methane will materially impact property values. Conditions requested:

a. We request the city collaborate with LA County to secure reduced property valuations/lower property taxes for all properties within 500' for the duration of the Project.

3. Anticipated Lost Income for Landlords

Given the circumstances described above, it is likely some tenants will be forced to leave their current residences. This may impact the landlord's ability to find new tenants and/or maintain current rental income, which can be a vital revenue stream. How will landlords be compensated for this loss of income?

4. Compensation for Displaced Residents

Residents living with 500' of the Project may be adversely impacted to the extent they can no longer remain in their current residence on either a temporary or permanent basis. How will they be compensated? Note: While many residences will be impacted, the greatest impact will be to 3811 Esplanade. This should be treated as a discreet case.

# # #

Exhibit A

6. Lack of Street Parking on Hurricane St.

The community proposes the following red-zone solution for staff parking (identified in orange below). At the existing VPP, one employee is present at any given time. There is one on-site parking space to satisfy this requirement. Even if the VAPP requires multiple employees (in addition to the VPP employee, whose necessity is not clear), this plan will provide sufficient parking for employees and city officials while obviating the need for employee parking at 128 Hurricane.

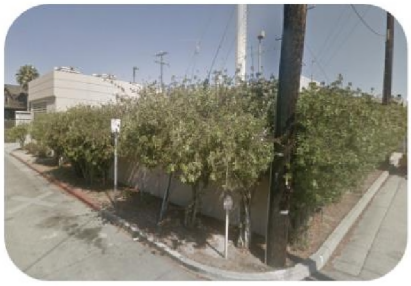
Employee Parking



Exhibit B

9. Lack of a Clear VPP/VAPP Maintenance Plan

Public Works Maintenance Report Card



2012



2022



2024

VPP Maintenance - 2024

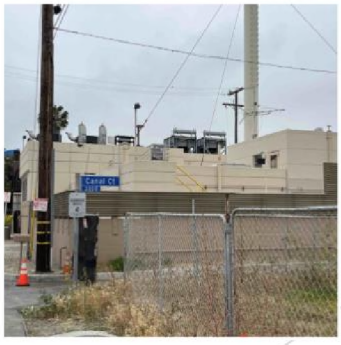












HURRICANE PUMPS

Our MDR Community in Action

Meeting With Coastal Staff: Feb 12, 2024

Chloe Seifert, Coastal Program Analyst

Shannon Vaughn, Coastal Program Manager

Community Speakers

- Steve Bradbury - Impacted Resident
- Marcia Hanscom - Co-Founder, Ballona Institute
- Michael Hickok - Impacted Resident, Environmental Attorney
- Keith Harrison – (fmr) Los Angeles County Office of Emergency Management
- Sean Silva – Venice Field Deputy, CD-11 Office of Traci Park
- Genevieve Morill-Borassi – Appellant and Impacted Resident
- Gary Stromberg – Impacted Resident
- Michael Holt – Impacted Resident

The VAPP Project

The community acknowledges the VAPP
is a necessary infrastructure project.

However,

“This has already been designed and it cannot be changed”

-- Los Angeles Public Works Dept

MDR, Then & Now

1960 - VPP

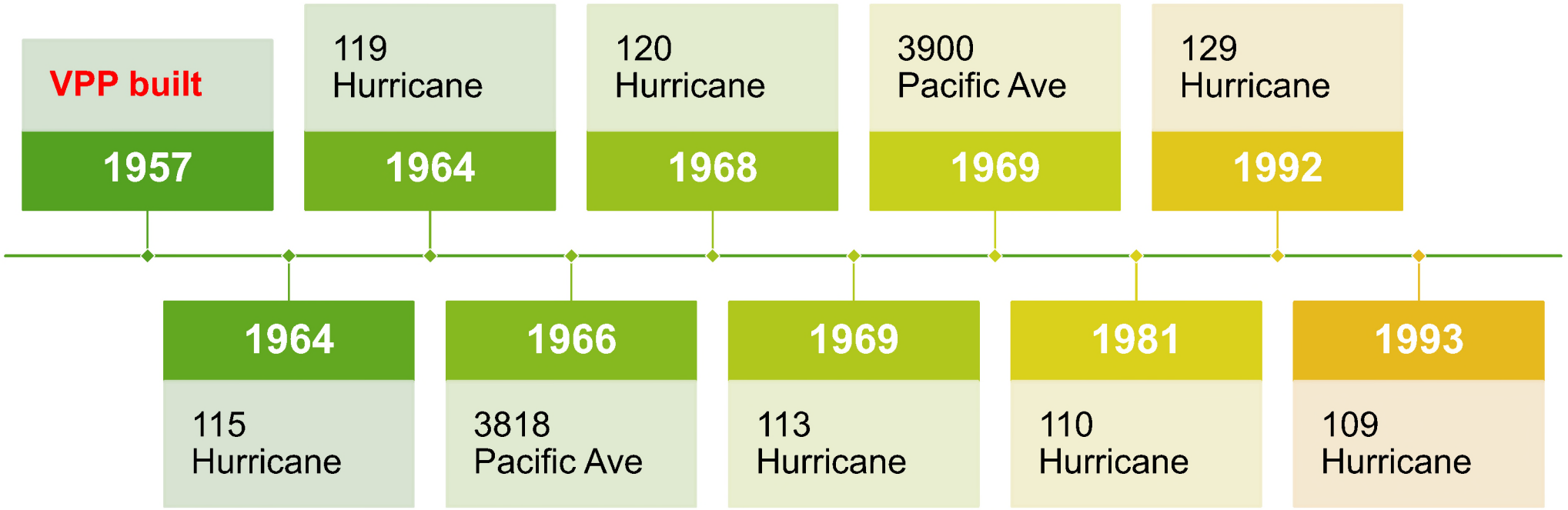


2024 - VAPP



Hurricane St Construction Timeline

The VPP was located, designed and built on Hurricane Street which, at that time, solely contained oil wells. There were NO residences, hence design and other impactful attributes were not material considerations.



“Significant & Unavoidable” Issues

Ground Vibration

- EIR *"Ground-borne vibration levels that are distinctly perceptible at a receiving residential use, or could potentially result in building damage"*
  - EIR: Offer pre-& post construction building inspections
    - City liability for unseen damage?
  - Compensation for lost property value (owners) & income (landlords)
    - Tenants will move out like Genevieve and Mike
    - Units may be re-rented albeit at lower rates
    - Buildings will be sold based on reduced valuations (3809 Esplanade)
  - Resident Mental/physical issues?
  - Relocation expenses?

Construction Noise

- EIR: *"Cumulative noise and vibration impacts during construction would also be significant and unavoidable."*
- EIR: *"Exceeds any of the construction noise criteria provided by the L.A. CEQA Thresholds Guide."*
  - *"Ambient noise levels at Receptor 2 by more than 5 dB CNEL, a potentially significant impact"*
- Impact to Residents
  - Work from home
  - Quality-of-life
  - Mental/physical issues
- This project will impact residents of the Silver Strand as well.

Parking & Construction Days

- 25 Cars Regularly Park on Hurricane
  - Most spots remain occupied during the day, year round
  - Where do these cars park when Hurricane St is closed down?
    - There is no excess capacity on adjoining streets
  - Impact to residents and visitors
- How will this impact parking on the Silver Strand?

- Construction 5 days/week vs 6 days/week (Gary Stromberg)
  - Impact to residents AND visitors
  - April-November beach access
    - Reduced parking avails
    - Traffic flow will be impacted
  - Summer Saturdays
  - Work-from-home (Michael Holt)

Mon-Fri Construction In Writing

City report produced 7 months after the EIR was certified

City of Los Angeles
Department of Public Works

Department of City Planning
Public Hearing for Planning Entitlements

for the Proposed
Venice Auxiliary Pumping Plant (VAPP) Project
December 4, 2017

environment LASANITATION CITY OF LOS ANGELES

ENGINEERING
CITY OF LOS ANGELES

1

Mitigation Measures

Noise and Vibration (For Construction Impacts)

MM NOI-1: Prepare and Implement a Construction Noise Control Plan.

Construction Hours
- Operation of construction equipment will be between ***8am and 6pm*** Monday through Friday
- The use of the pile driver, grader and jackhammer will be limited to the hours of ***9am to 3pm***
- Haul trucks can only access local neighborhood streets from ***9am to 4pm***, which will also help mitigate haul truck traffic in the neighborhood.

Piles
- All piles will be installed and extracted using vibration and percussive-free methods

15

“Significant & Unavoidable” Issues

Environmental Impact

Environmental Impact (Marcia Hanscom)

- Grand Canal & Ballona Lagoon - U.S. Essential Fisheries Habitat Area
- EIR: *"Loss of special status species or habitat"*
- EIR*: "Loss or reduction of a locally designated natural habitat or plant community"*
- EIR: *"Alteration of an existing wetland habitat"*
- EIR: *"Significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous chemicals into the environment"*
- 128 Hurricane - methane gas release
  - Cal/OSHA will monitor worker exposure. What about community exposure?
  - EIR: *"Encroachment/seepage of methane into the VAPP structure so impacts are considered potentially significant"*
  - EIR Addendum*:* Groundwater quality is poor and not suited for beneficial uses.

Lack of CEQA Compliance

- **Public Works certified its own EIR (2017) and Addendum (2021)**
  - No public outreach for the Addendum
  - Community was notified by the State Dept. of Toxic Substance Control that remediation was needed at the project site.
  - Certifying your own EIR is like auditing your company books – both do not pass the smell test.
- Each requirement of the MMRP should be included in public and recorded conditions
- EIR does not clearly state what the neighborhood would be exposed to during and after construction.

ESHA – Environmentally Sensitive Habitat Area

Section 30240 of the Coastal Act requires that ESHA be protected and that development adjacent to ESHA be designed to prevent impacts that significantly degrade the ESHA.

- Issues related to numerous sensitive species were raised and ignored by City of LA Planning and Sanitation
- Conditions on this development to require funding for restoration – phase 2 of the Grand Canal could mitigate for the impacts to ESHA
- Grand Canal area is identified in the recovery plan for the federally endangered El Segundo Blue Butterfly, for instance.



Environmental Impact – Proposed Solution

"We're looking for a regional solution to VAPP issues"

- Christine Heinrich-Josties, Environmental Engineering Associate IV, LASAN

Grand Canal Restoration Project – Phase Two

- Community proposed. Public Works rejected. CD-11 exploring.
  - Comprehensive environmental solutions
  - Visitor parking – Via Dolce
  - Beach access
  - Emergency preparedness – Driftwood St walk bridge
  - Improved traffic flow especially during Summer months
  - Unobtrusive public access walk path on Strongs Drive
  - Business benefits to Washington Square merchants

Grand Canal Restoration Project – Overview

- Enhanced public access
- More public parking spaces for beach, pier and lagoon
- Create walk path on Lagoon west bank from Washington to Driftwood



LEGEND

- Vehicular Route
- One-Way Vehicular Route
- Pedestrian Route
- Fencing
- Decorative Fencing
- Pedestrian Bridge
- P — Street Parking

A **Gateway Park:** Entrance to Grand Canal with decorative wrought iron gateway to be designed by a local artist; Shade structure or tree canopy; rock cobble area adjacent to canal; Stormwater treatment wetland adjacent to County Housing; large gathering area for tours; interpretive signage; lighting; seating

B **Sand Dune Park:** Restored sand dune area with interpretive signage; viewing area for historic Grand Canal walkway with interpretive signage including pictures of historic bridge; decomposed granite sidewalk with benches

C **Hurricane Park:** Constructed wetland to capture and treat stormwater runnoff from Hurricane Street with interpretive signage; highlights of unique vegetation;

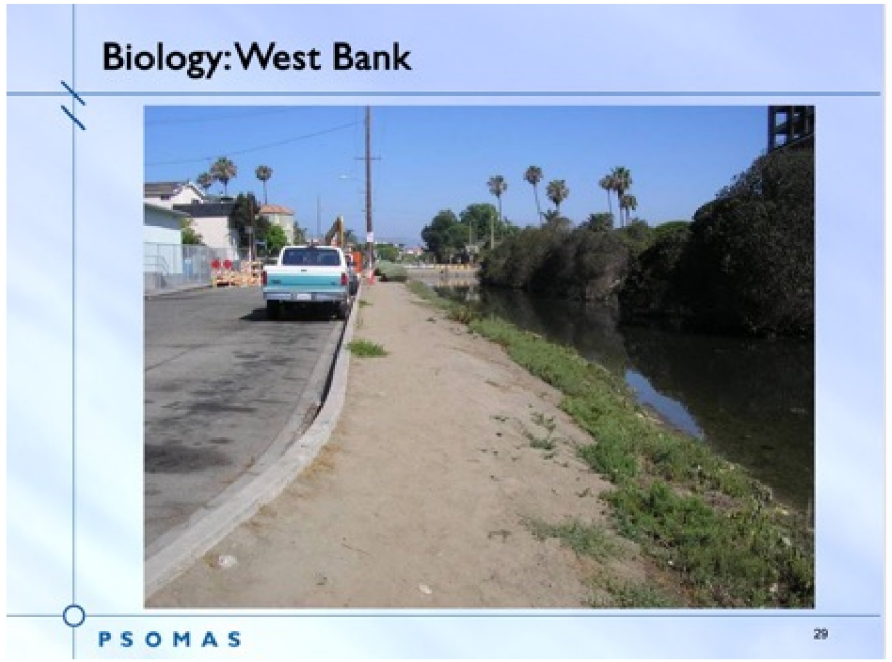
D **Wider Canal Banks:** Removal of parking along Strongs Dr. in addition to creating one-way traffic will allow for a larger area for resorting vegetation along the canal

E **Naturalized Area:** Existing sidewalk in this area to be broken up; no pedestrian traffic to encourage wildlife and plant material to flourish

F **Parking Median:** Parking to be added along a proposed median on Via Dolce to replace parking displaced along Strongs Drive

Grand Canal Restoration Project

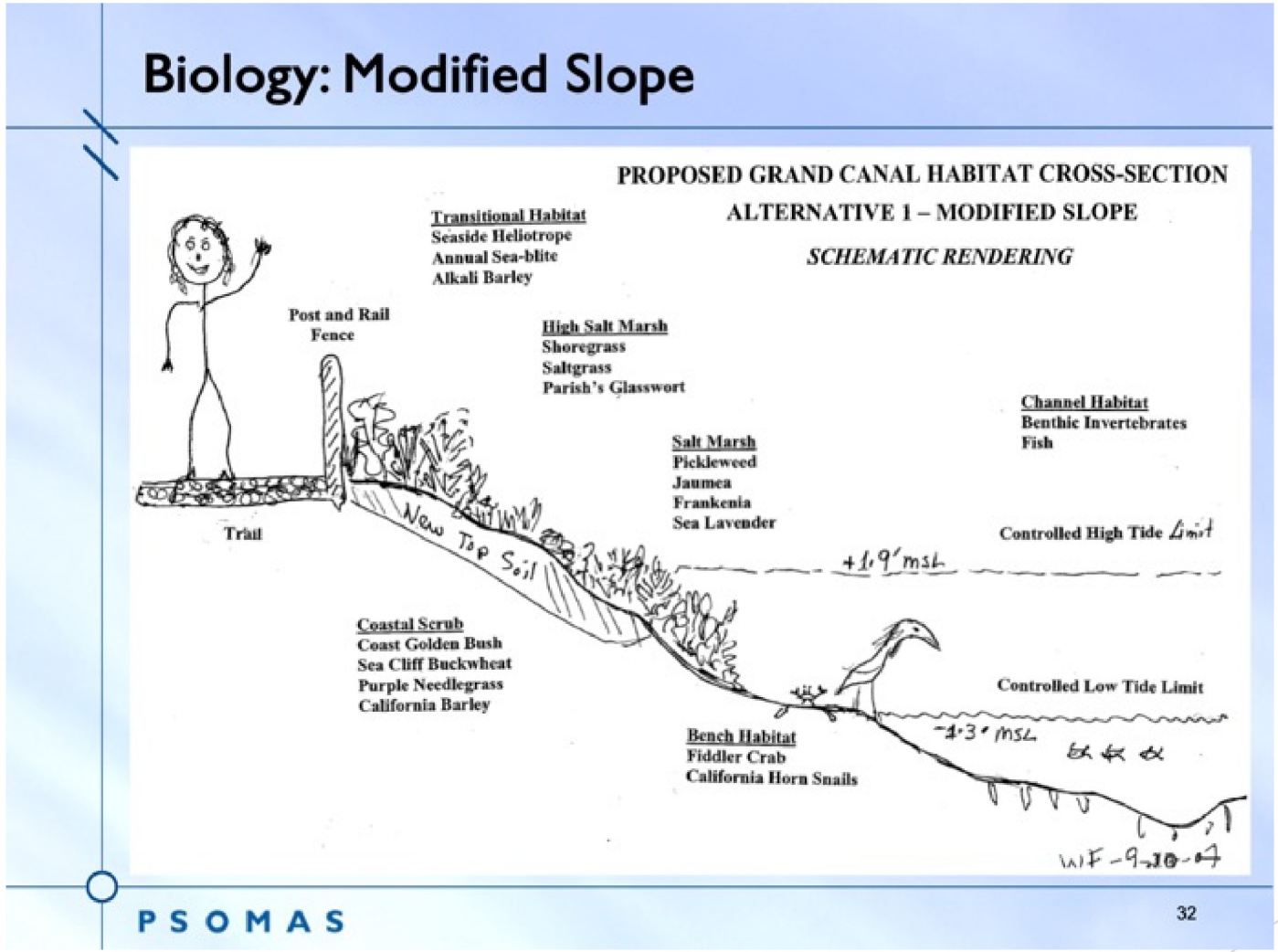
Undefined pedestrian path



Tide line



Grand Canal Restoration Project



Grand Canal Restoration Project

Street Parking – Strongs Drive



Driftwood Pedestrian Bridge (proposed)



Grand Canal Restoration Project

Angled Parking on Via Dolce

- Enhanced public access
- More public parking spaces for beach, pier and lagoon
- CD-11 facilitating new parking study





Additional Critical Issues

Emergency Preparedness/Access (Keith Harrison)

- EIR: *"Result in inadequate emergency access"*
- EIR: *"there is the potential for access to be temporarily blocked during loading and unloading activities or transport."*
- EIR: *The construction traffic impacts associated with the Project would be short-term in nature and limited to the period of time when construction activity is taking place.*
- EIR Addendum: *"**Adequate emergency access would be maintained** during lane closures along secondary highways and collector streets."* Where is this on the Marina Peninsula?
- Limited pedestrian walking space along west side of Grand Canal.
  - Lack of disability access
- Only pedestrian bridge connecting east & west sides of Lagoon is Lighthouse
  - Driftwood St walk bridge – will provide access & functional needs
- City agencies need to collaborate on a reality-based plan

Project Design Issues

Submerged Diversion Structure (Michael Hickok)

- City engineers have not adequately explained the need for this project element vs the proposed, less costly, alternative.

Finding for a Public Benefit project cannot be made

- Proposed compliance does not meet the purpose of the performance standards as required by LAMC 14.00.A.6 and 14.00.B.5.
- Large industrial facility parameters:
  - Adequate traffic infrastructure
  - Adequate buffers and landscaping consistent with the neighborhood.
- The property is designated for low-medium residential use only. A zone change and general plan amendment are required for this project.

Project Design Issues

- Master control for all city pumping plants continues to be located here – Why?
  - Could the structure have been designed with a smaller footprint?
- What happens to VPP plant?
- Poorly designed to fit within its residentially zoned neighborhood
  - The project does not include one blade of grass or other landscaping on the north or west perimeter of the site which directly adjoin residences.
  - The visual appearance of the site is overwhelmed by industrial sized transformers directly on the street and directly across the street from a beautiful landscaped residential property.
- Aesthetic design & proposed landscaping was never adequately presented to the community.

VAPP Design ≠ The Community









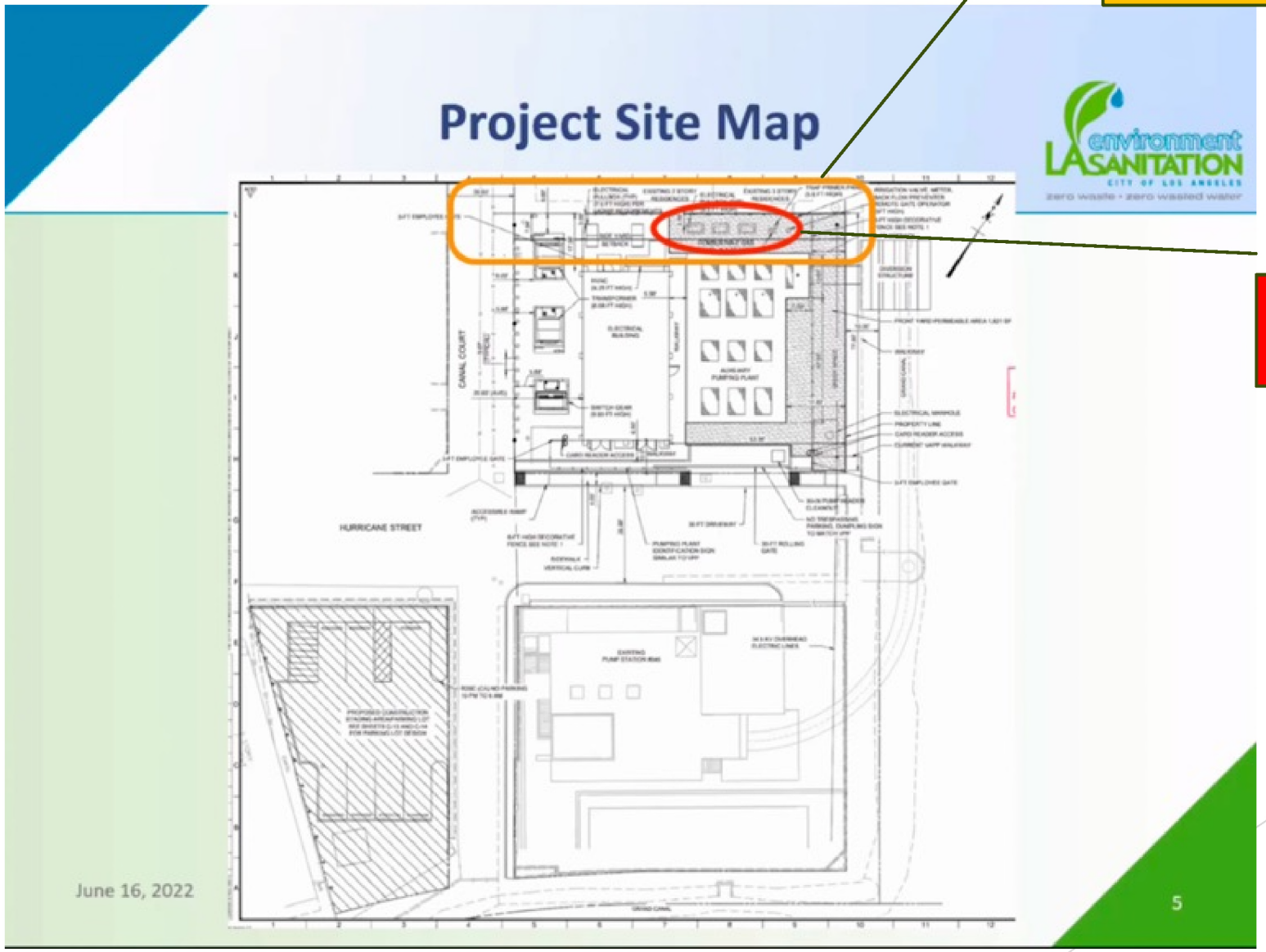


Project Design - No Buffer To Residences

(Genevieve Morrill-Borassi)



No Buffer To Residences



Zero property line to residences

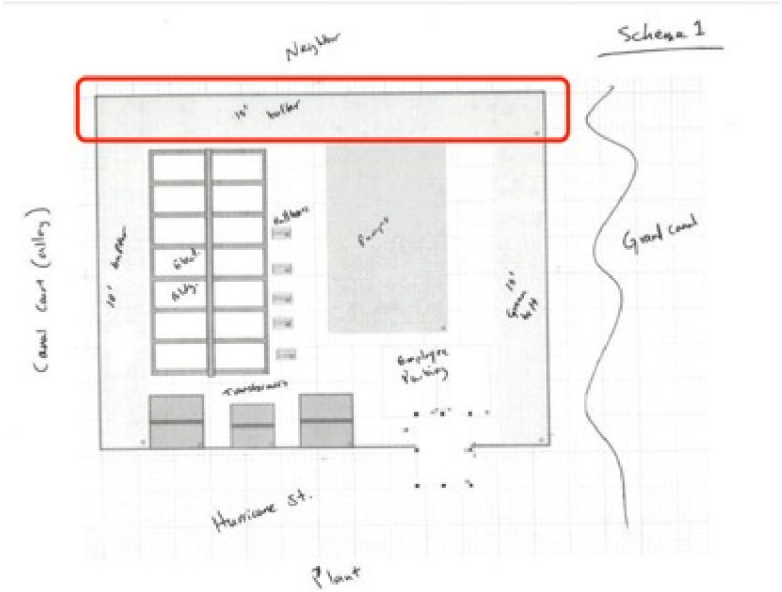
Electrical Equipment

Appellant 10’ Buffer Proposal

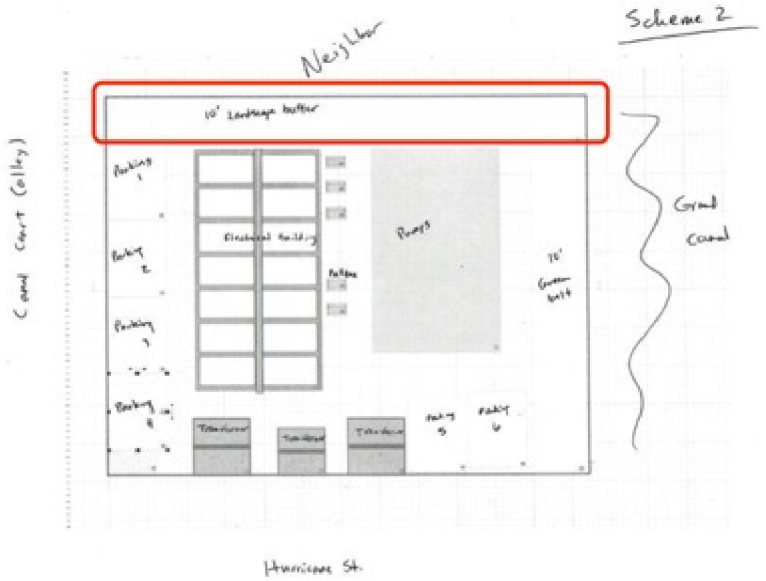
EIR: *“Adjust location of equipment items where practicable and feasible”*

- Proposed by appellants & community
- Rejected by the city

Scenario 1



Scenario 2



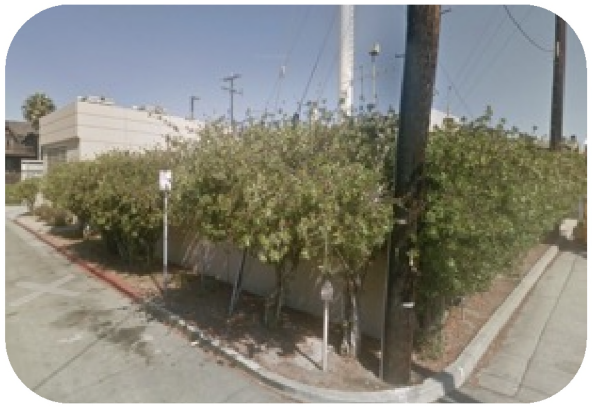
Project Design – Requested Modifications

- Shield entire structure with unobtrusive fencing and landscaping including the transformers
  - Move HVAC and electrical panels away from residences
  - Add solid sliding gates to shield transformers from view
  - Landscaped buffers to the north & west
  - All landscaping design done with active community collaboration
- Modify submerged diversion structure
- Full 10-foot setback and 6-foot solid block wall to the north
- Eliminate parking lot at 128 Hurricane
- VPP upgraded with landscaping, new sidewalk and guardrails
- Both facilities regularly cleaned, maintained, and patrolled for security.
- Written, recorded conditions of approval
  - Community can monitor and enforce all project obligations including MMRP

Maintenance

- VPP Maintenance
  - Environmentally-appropriate plants
  - Safety railings facing Ballona Lagoon
  - Painting
  - Remove graffiti
  - Landscaping
  - Sidewalks
- What happens to VPP plant?
- Future VAPP Maintenance
  - “What’s past is prologue” – William Shakespeare
  - How can Public Works be trusted to maintain the VAPP based on their track record?

VPP Maintenance Report Card



2012



2022



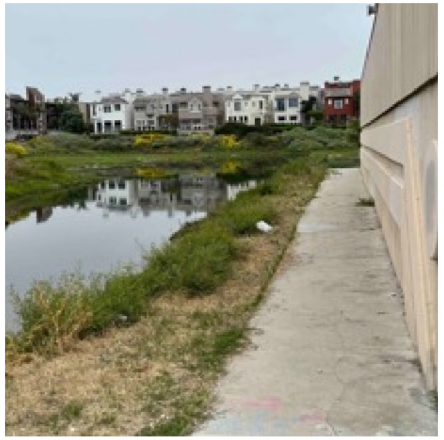
2024

VPP Maintenance Report Card - 2024













Protect Residents

Vibration damage

- City proposes a pre & post visual inspection
- What are the city's repair obligations?
- What about damages not readily visible?

Health & Well-being of residents

- The elderly
- Mental & physical?

Dirt & Dust

- Extremely poor experience with Dual Force Main project
- Landscape protection
- City Solution: Free car & window washing - Insufficient
- Request daily removable barriers to protect residence landscaping

Current Landscaping

- What will be done <u>proactively</u> to protect residential landscaping from dirt, dust and damage?
- Real $$ have been invested by these (and other) Hurricane property owners

109 Hurricane



110 Hurricane



128 Hurricane - A Parking Lot…Really?

- No Conditional Use for parking in a residential zone
- Parking was not part of the plan in 2016
  - Was not presented to the VNC
  - VNC rescinded support in 2022
- Public Works Proposal
  - Minimal parking (7 car spaces + 4 bicycle slots)
  - Primary use - employee parking during the day
    - City admission – “So inspectors don’t have to park on the street”
  - NO real security (no high fences or locked gates. No enforcement, just signage)
  - Insufficient setbacks & buffers adjacent to residential properties
- Lot is an expensive, unnecessary nuisance
  - $2.7M purchase via eminent domain – not an effective use of precious city funds
  - Would be the ONLY lot within a street on the Marina Peninsula
  - City has adequate space for employees without this lot.
  - Additional parking solution within the Grand Canal Restoration Plan

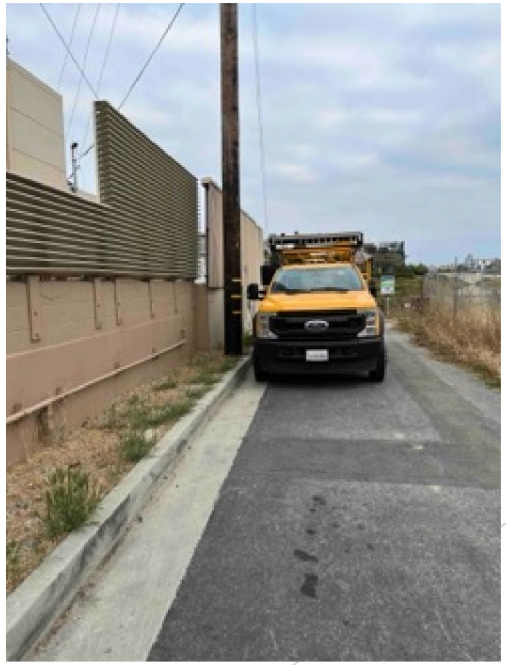
Available Employee Parking



(see next slide for details)



Currently used by city employees ↕



Available Employee Parking

One existing VPP parking spot

Currently used. Can hold 3-4 vehicles



Use 10’ setback for employee parking?

Can be a combination of public & restricted employee parking

Drawn orange lines represent potential city employee parking. There is NO need for a parking lot at 128 Hurricane.

Public Benefit Project Standards

- Does not meet Public Benefit Project standards
- No 10’ landscaped, irrigated buffer along all property lines (Finding 7h)
- The cited performance standards apply to projects on a major or secondary highway, which this site is not. (Finding 7o)
- Zone change and general plan amendment are required

Off-site Workspace & Binding Conditions of Approval

<u>Appropriate</u> Local Off-Site Workspace

- Rely on the construction company to provide?
- Parking?
- Resident input?

No Construction-Related Binding Conditions of Approval

- City solution: Complain to on-site person
- How will this be monitored & enforced, with teeth?
- Penalties for non-compliance?

Summary of Issues

- *"Significant & unavoidable mitigation issues"*
- Construction 6 days/week vs 5 days/week
- Critical environmental impacts
- Emergency Preparedness
- Parking & beach access
- Noise
- Impact to property
- Project design
- Maintenance
- Parking lot – 128 Hurricane
- Public benefits standards
- Off-site workspaces
- Binding conditions for approval



Thank you

The Marina Peninsula community, especially the residents of Hurricane St and adjacent blocks, thanks you, the Coastal Commission Staff, for your thoughtful consideration of these important issues.

"Many ideas grow better when transplanted into another mind than the one where they sprang up."

– Oliver Wendell Holmes

BY E-MAIL

President Millman and Honorable
Commissioners
City Planning Commission
200 North Spring Street
Los Angeles, California 90012

Email: cpc@lacity.org

Re: **Venice Auxiliary Pump Plant (VAPP), 128 and 133 Hurricane;**
DIR-2017-4167; ZA-2017-3950 (plant); DIR-2017-4173; ZA-2017-3953 (parking lot)

Continued April 28 hearing to August 11, 2022

Dear President Millman and Commissioners:

We are the appellants, Michael and Genevieve Morrill-Borassi, and owner Cannon Enterprises, who will be most directly impacted by the proposed Public Works project at 128 and 133 Hurricane on the Marina Peninsula. We filed the appeal for ourselves and all our impacted neighbors.

At the hearing on April 28, 2022, the Commission agreed with the community that Public Works had not adequately presented the design of the project or properly engaged with the community. The Commission continued the matter so that Public Works could meet with the neighbors, present more complete plans and images of the project, and show changes in the design which would accommodate neighbor concerns.

On June 18, 2022 Public Works did hold a presentation at the site and did show new renderings of the project never seen before by any neighbors. However, the Public Works response to every design-related issue raised by neighbors at that meeting was the refrain that "this is already designed and it cannot be changed."

The new renderings (see attached photos, Exhibit 1) show how **out of character** this project is with the neighborhood, how unsightly the project will be when viewed from the neighboring residential properties and streets, and how the findings needed for a Coastal Development Permit and Public Benefit project cannot be supported.

The goal of the appeal has always been to require Public Works to work with the community on a better design for this project which will fit within our community and will provide protection for adjoining residential neighbors from the impacts of this industrial-style facility on privacy, safety, noise, and aesthetics. No progress has been made.

This project is poorly designed to fit within its residentially zoned neighborhood. Noisy and dangerous equipment is located very close to two neighboring residential areas. However, on the other side, the project site is adjacent to a dead-end street and the exiting pump plant, and all noisy and dangerous equipment should be located nearer to this facility and away from residents.

Public Works has a history at this location of poor maintenance of the existing facility and landscaping, as well as noisy and intrusive construction for years during the recent Dual Force Main project at this location. The community simply does not trust Public Works to fulfill its promises to keep this facility and the parking lot safe and attractive. In fact, Public Works is currently using the site for a temporary diversion project which is being undertaken with no screening, no fencing, no noise attenuation. (See Exhibit 2, attached photographs of temporary diversion project and construction area.)

Pubic Works has also refused to address why the project is proposed with an oversized parking lot, when employee parking can be accommodated (as it is now) on site and on the street. The proposed parking lot will be an attractive nuisance in this residential area and will not be secured or patrolled. City parking should continue to be on the street and the additional lot is not needed.

In order to approve this project, the Commission must find that the project is visually compatible with the neighborhood, and that it meets the criteria for alternative compliance for a Public Benefit Project. These findings cannot be made. (See photos, Exhibit 3, of neighboring properties.)

The proposed Coastal Permit findings (at page F-6) state that "the project is visually compatible with the character of the area and will enhance the visual quality of the existing neighborhood." Review of the new renderings and photos of nearby homes show conclusively that this is not true. The project does not include one blade of grass or other landscaping on the north or west perimeter of the site which directly adjoin residences. Although the size of the "electrical building" has been designed to comply with required height, the visual appearance of the site is overwhelmed by industrial sized transformers directly on the street and directly across the street from a beautiful landscaped residential property.

The proposed findings for a Public Benefit project cannot be made because the project is not eligible for alternative compliance nor does the proposed compliance substantially meet the purpose of the performance standards as required by LAMC 14.00.A.6 and 14.00.B.5. Public Works seeks alternative compliance for 1) lack of landscaped buffers to the north and west; 2) lack of full setbacks to the north; and 3) being located on small local streets and alleys, rather than a major or secondary highway. These performance standards are designed to ensure that large industrial facilities such as this are kept to areas with adequate traffic infrastructure and contain adequate buffers and landscaping in keeping with the neighborhood. Here, those goals are not met.

We ask the Commission to impose conditions on Public Works to require:

1. The project be redesigned so that there is a ten-foot landscaped buffer and 6-foot solid block wall on the north property line next to our residential building. (See Exhibit 4: Landscaping on residential side, 10ft buffer already in place)

2. The industrial equipment including transformers, HVAC and electrical panels be moved away from residences and towards the existing pump plant along Hurricane. (See Exhibit 5: hand-drawing of possible relocation solutions)

3. The parking lot be eliminated and parking provided on the street and on the pump plant property, or as an alternative, secure the parking lot at all times.

4. Shield entire project with solid fencing including the transformers.

5. The existing pump plant be upgraded with landscaping, a new sidewalk, and all facilities, existing and new, be regularly cleaned, maintained, and patrolled for security.

6. Adopt written, recorded conditions of approval that clearly spell out all obligations in the future so that neighbors can monitor and enforce, including each requirement of the approvals and the MMRP, and mitigations during construction years.

We believe that within these exhibits and presentation you will see that this needs to be redesigned. In your capacity as Planning Commissioners any projects you review for private sector residential developers would never be allowed to have HVAC and Transformer equipment next to a residential property, nor would you allow something to be approved which is badly designed and not compatible with the residential area. Instead, you would send the developer or homeowner back to redesign and find alternative solutions. We respectfully ask you provide the same criteria for a public project as you would insist for a private one.

Sincerely,

Genevieve & Mike Morrill-Borassi
(Tenants)

Kristy Cannon
Cannon Enterprises (Owner)

EXHIBIT 1

Current photos of site with unshielded construction storage and diversion equipment including pump and wastewater overflow









Examples of lack of upkeep and creation of sidewalk (created specifically for the project) being new location for homeless encampments)





EXHIBIT 2

Public Works rendering viewed from Canal Court with massive industrial transformers



Public Works rendering viewed from Canal Court with massive industrial transformers



EXHIBIT 3

Examples of neighboring properties with landscaping




129


127

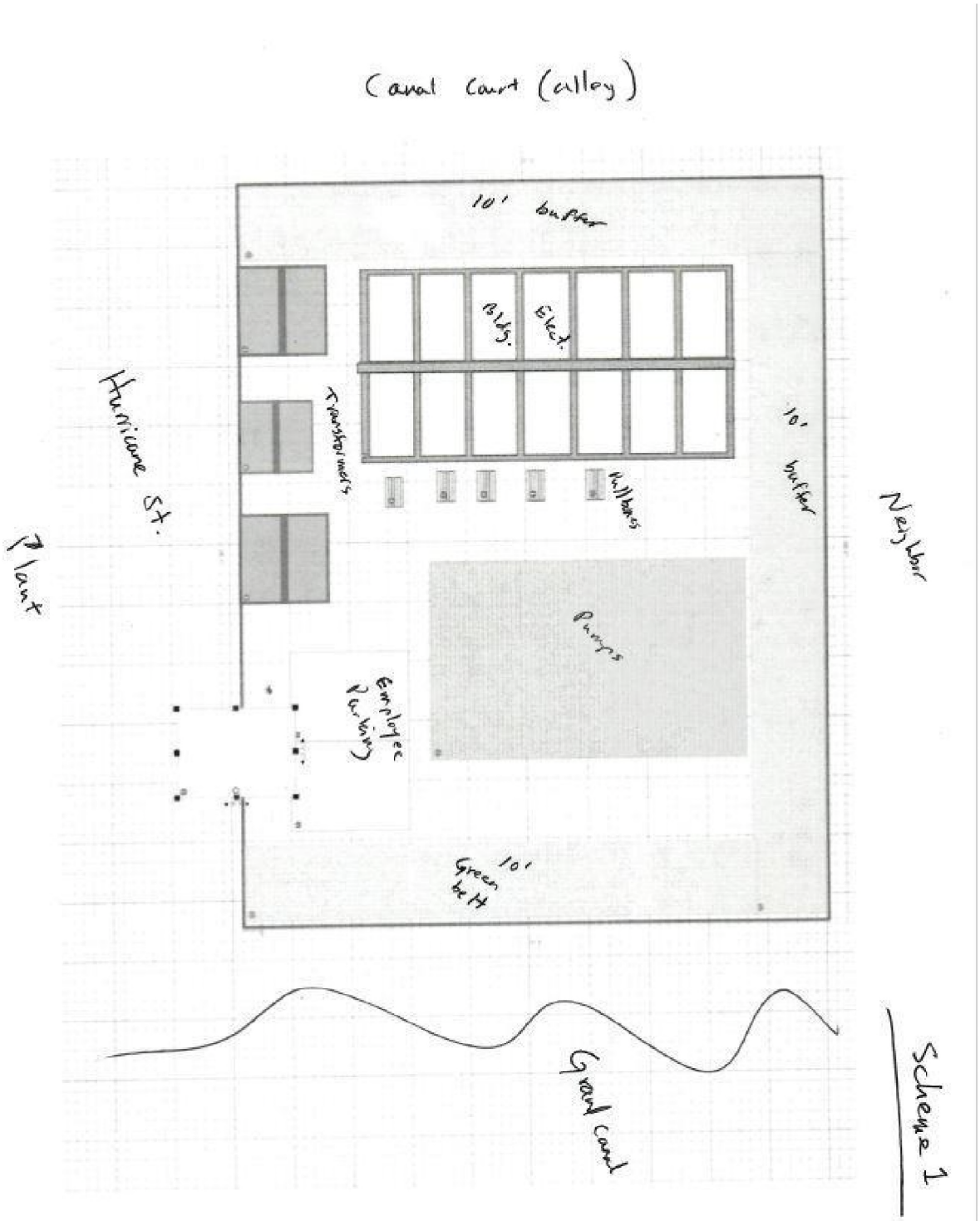
EXHIBIT 4

Existing 10 ft buffer of residential landscaping next to the project

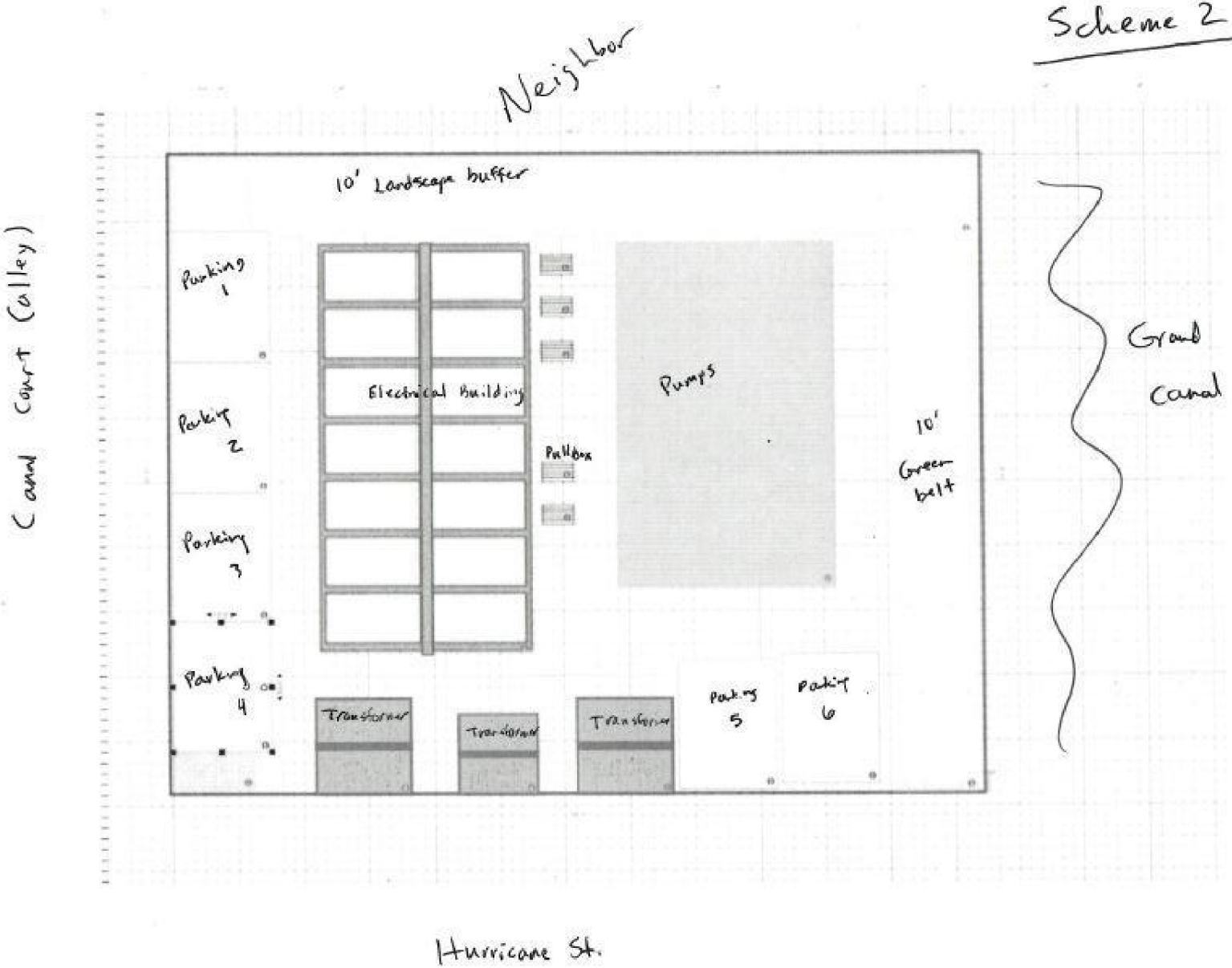


EXHIBIT 5

Examples of possible locations for HVAC, Transformers, and electrical boxes. (Also suggest looking at rooftop locations)



Scheme 2


Neighbor
10' Landscape buffer
Parking 1
Parking 2
Parking 3
Parking 4
Electrical Building
Pullbox
Pumps
10' Green belt
Grand Canal
Transformer
Transformer
Transformer
Parking 5
Parking 6
Canal Court (alley)
Hurricane St.

Grand Canal Lagoon
Venice Peninsula

Phase 2
Grand Canal Lagoon Restoration

Venice/Marina Peninsula
Immediately Adjacent to Marina del Rey

Description: Completion of a project long-desired by the community and the City of Los Angeles (CD-11), within the 2nd District of the County of Los Angeles, to beautify, restore and support public access along a waterway and natural gem between the Venice/Amsterdam Canals and the Ballona Lagoon Marine Preserve. This area is part of the historical Ballona Wetlands of the Los Angeles coast, and is only a few blocks from the Venice Pier and Venice Beach.

In the late 1990s the area had fallen into utter disrepair and had become a dangerous, crime-ridden area where drug deals were commonplace and homeless individuals lived among the vegetation that was also choking out the natural elements of the trash-strewn banks of the lagoon. Few birds were ever documented in this part of the historical Ballona Wetlands – mostly because non-native Myoporum and Pepper trees hung over the water, with little space for lower-to-the-ground native vegetation to grow.

Location: Just south of Washington Blvd. at Strongs Drive, south to Hurricane and the wider lagoon opening to the Ballona Lagoon Marine Preserve, where the Venice Pumping Plant sits. The waterway is open to the sea via a tide gate structure at the marina boat channel, giving twice-daily tide waters a chance to refresh the area. (Because of management protocols related to flood concerns when it rains and related to homeowner visual desires for the Venice Canals, sometimes the tide gate at the marina channel is closed, and sometimes the tide gates at Washington Blvd. are closed.)

Brief History: At this site, in 2002 environmental groups (with support from numerous community members) sued the Coastal Commission and the City of LA for their approvals of a project in the Coastal Zone that would have brought in heavy equipment, and dredged, as well as bulldozed fragile coastal wetlands for a highly-engineered beautification project. The lagoon area is designated as ESHA – Environmentally Sensitive Habitat Area. That designation, as well as the protections offered by the Coastal Act to wetlands, were central to the legal challenge brought by Wetlands Action Network, Sierra Club, Coalition to Save the Marina and Ballona Wetlands Land Trust.

Temporary Restraining Order (TRO):
Judge Halts Dredging in Ballona Wetlands – Jan. 12, 2002
https://www.latimes.com/archives/la-xpm-2002-jan-12-me-22228-story.html

Preliminary Injunction:
Judge Halts Work to Rehabilitate Venice Waterway - Jan. 18, 2002
https://www.latimes.com/archives/la-xpm-2002-jan-18-me-23406-story.html

February, 2024 – contact: Marcia Hanscom – (310) 877-2634

Grand Canal Lagoon
Venice Peninsula

Larger Story on the Controversy:

Sides Agree on Canal Upgrade, but Not on How - Jan. 21, 2002
https://www.latimes.com/archives/la-xpm-2002-jan-21-me-23983-story.html

Community Letters to the Editor:

Take the Long View for Venice Grand Canal - Jan. 27, 2002
https://www.latimes.com/archives/la-xpm-2002-jan-27-le-chr27_3-story.html

The City contractors began the project, with significant marine life and fish dying as a result, and photos and descriptions of the damage persuaded a Superior Court Judge to grant a temporary restraining order (*Jan. 12, 2002 article above*), and then a preliminary injunction (*Jan. 18, 2002 article above*) before finally ruling against the Coastal Commission and the City – declaring the project was not in alignment with the California Coastal Act (May 23, 2002 article below). The City, Coastal Commission and the winners of the litigation settled their lawsuit, with agreement not to appeal the Court's decision in exchange for collaborating on a plan that would not bring heavy machinery into this sensitive landscape and not lining the banks of the lagoon with concrete planters – opting for a natural, gentle restoration of the area.

Superior Court Victory:

Plan to Dredge Grand Canal on Hold – May 23, 2002
https://www.latimes.com/archives/la-xpm-2002-may-23-me-canal23-story.html

When LA City Councilmember Bill Rosendahl arrived in office, he championed moving forward with a collaborative planning effort for this project – and despite financial woes of 2008, resulting in a bankruptcy of a developer who'd agreed to help finance some of the work, the environmental groups dedicated to moving this project forward (Ballona Instiitute, Sierra Club), found ways to involve the community in what was known as "The Big Plant-In."

Community Groups, Local Developer, City come together to make a plan!
https://engineering.lacity.gov/grand-canal-restoration-project

December 8, 2009 – Ballona Wetlands Plant-In:
https://smmirror.com/2009/12/ballona-wetlands-plant-in/

Grand Canal Lagoon
Venice Peninsula



Current Opportunity:

Funds were unavailable to finish the plan, which included installing a walk path on the lagoon's west bank, from Washington Blvd. to Driftwood; removing non-native plants, planting native plants, creating and installing signage, installing trash & recycling receptacles; installing walk bridge at Driftwood, over the lagoon; and creating a parking plan that would ADD parking spaces and making Strongs safer, finishing a transportation/parking plan to remove parking on one side of Strong, moving those space to Via Dolce; create diagonal parking in the middle of Via Dolce – guiding those parking there to walk across bridge over lagoon to the each and/or Washington Square merchant area. All or part of this next phase of the restoration and beautification of this area could be mitigation for the damage to be done from construction of the upgrade of the Venice Pumping Plant.

Benefits:

- Restoration of banks of the lagoon – planting of native plants; removal of nonnatives (more appropriate and ecologically sound mitigation for damage done by construction/enlargement of Venice Pumping Plant)

- Protection of the waterway and marine life to the maximum extent possible (more appropriate and ecologically sound mitigation for damage done by construction/enlargement of Venice Pumping Plant)

- Installation & extension of walk path along Strongs, to provide increased public access (both to allow walk path installation, better traffic safety on Strongs & enhanced public access closer to the beach & Washington Square merchants than contemplated parking in neighborhood near VAPP)

- Involvement of local school(s) in planting and caring for the lagoon, as in Phase 1

- Providing increased and enhanced public access to the beach – via better, easier parking facilities and installation of walk bridge from the marina parking areas across the lagoon, within easy walking distance to the beach – "Marina del Rey for All"

February, 2024 – contact: Marcia Hanscom – (310) 877-2634

BALLONA INSTITUTE
restoration, research, education, artistic expression

The Voice for Nature on the Los Angeles Coast

April 27, 2022

To: Los Angeles Planning Commission
Re: 128 Hurricane & 3813 So. Esplanade ~ Venice Auxiliary Pumping Plant (VAPP)
ZA 2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A | DIR-2017-4167-PUB-CDP-SPP; ZA 2017-3953-CU
Email: cpc@lacity.org; elizabeth.gallard@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

Our organization has been - for nearly 20 years - concerned with and have been advocates for protection of the habitat and public access areas at Ballona Lagoon Marine Preserve and Ballona Wetlands Grand Canal Lagoon, which intersect where this project is being proposed.

Of course, we are understanding of the need to upgrade and provide sufficient infrastructure for sewage and wastewater movement, but we are at a loss as to why the City of Los Angeles – which knows of our concern of this area – did not notify us about this project and did not convene public hearings that would help interest group stakeholders like ours or neighbors who have been the ones to bring this project to our attention.

We've read relevant parts of the Environmental Impact Report (EIR), and we have significant, decades-long knowledge and observations of the ecology in the area. In fact, our organization worked under Mayor Antonio Villaraigosa's office and LA City Councilmember Bill Rosendahl's office to complete a plan for this area that would include a genuine restoration, as well as provide public access walk paths that were as inobtrusive as possible to the neighbors and to the wildlife. This is a plan that came about with broad community participation and agreement after the City was ruled against in a lawsuit, and through Councilmember Rosendahl's leadership, environmental advocates, residents and the City worked together to craft solutions that would work for all.

https://www.latimes.com/archives/la-xpm-2002-may-23-me-canal23-story.html

Unfortunately, some of the City funds anticipated to be made available for work subsequent to the phase that Ballona Institute led on the east side of the lagoon, closest to Washington Blvd., never occurred, and these spaces cry out to be a location where the

rest of this plan could and should be implemented as part of the mitigation needed for the VAPP.

That plan, in fact, still resides at the City's Bureau of Engineering website, and we cannot understand why some of the work that was contemplated in this report to be undertaken, has not been considered for mitigation that is woefully lacking in the EIR for the VAPP:

https://eng2.lacity.org/projects/Grandcanal/index.htm

https://eng2.lacity.org/projects/Grandcanal/reports/Main_PREDESIGN_REPORT-1.16.08_rev.1_.pdf

One of the most significant flaws in this planning process – besides leaving out and even ignoring most of the stakeholders interested in this area – is the fact that this plan is now more than five years old. There is sufficient case law, we believe, as well as changed circumstances, to require recirculation of a new EIR, with adequate community stakeholder engagement and with adequate mitigations – especially for the Biological Resources, that are not only lacking, but inaccurate in the EIR conclusions.

Here are just a few flaws in the Biological Resources section of the EIR:

The EIR states, in part:

El Segundo Blue Butterfly

The likelihood of occurrence of El Segundo blue butterfly within the project limits is low, based on the lack of lack of suitable habitat and host plant sea cliff buckwheat (*Eriogonum parviflora*). It is possible that stray individuals could temporarily occupy the adjacent restoration area along the western portion of Ballona Lagoon outside of the project footprint; however, no temporary direct or indirect impacts would occur given the disturbance footprint is approximately 390 feet northeast from the closest habitat containing the host plant. As such, there is a low probability of direct or indirect temporary impacts on this species during construction. In the event this species is present in the host plant during construction, impacts would be potentially significant. Although the host plant sea cliff buckwheat (*Eriogonum parvifolium*) is not a sensitive species, **Mitigation Measure MM-BIO-1**, conducting special-status plant surveys prior to initiating construction, would ensure that no host plants have established within the disturbance footprint prior to construction.

No permanent direct or indirect impacts on El Segundo blue butterfly are anticipated during construction based on the lack of suitable habitat and host plant sea cliff buckwheat (*Eriogonum parviflora*), within the project footprint.

However, on Pages 10 & 11 of the US Fish & Wildlife Service Recovery Plan update for this endangered butterfly, this area is included in the Recovery Plan area, which is one of the reasons why Ballona Institute, under the auspices of the Mayor's office in 2009 & 2010,

planted this species of the host plant Sea Cliff Buckwheat (*Eriogonum parviflora*) in the habitat restoration area just south of Washington Blvd., apparently unknown by the consultants who prepared the EIR for this proposed project. A recirculated, subsequent or supplemental EIR needs to be prepared to correct this erroneous information, and consultation with the US Fish & Wildlife Service needs to be undertaken, as well. It is possible that one of the open spaces contemplated for this site could be a site for Recovery efforts for this endangered butterfly.

Recovery Plan – El Segundo Blue Butterfly - Ballona Recovery Unit

"The Ballona recovery unit is constrained by Washington Boulevard to the north, Pacific Coast Highway to the east, Manchester Avenue to the south and the Pacific Ocean to the west. This recovery unit includes restored El Segundo blue butterfly habitat at the Ballona Wetlands and additional restorable habitat at the Ballona Lagoon and Toes Beach (Figure 2)."

https://ecos.fws.gov/docs/tess/species_nonpublish/1227.pdf

Another endangered species that could and should be required for consultation with the US Fish & Wildlife Service is the Ridgway's Rail (*Railus obsoletus*) - formerly named Light-footed Clapper Rail - which is mentioned in the EIR, but again with inaccurate scientific information. The planting years ago of Spiny Rush (*Juncus acutus*) all along the Ballona Lagoon Marine Preserve and the Ballona Wetlands Grand Canal Lagoon, is fortuitous for this bird species that, had it not been taken in by the USFWS for captive breeding, would now be extinct. This bird species nests in Spiny Rush at Pt. Mugu and also along a river at the south end of Camp Pendleton.

Additionally, three of the Special Status species that were identified in the EIR are very important, are increasingly rare with habitat being erased regularly for development, and need specific information as to mitigation for the EIR to be complete. It's not enough to say "we will design around these species later," which is essentially what the EIR states.

"Three were determined to be present and include woolly seablite, southwestern spiny rush, and red sand verbena; identified as CNPS CRPR 4.2 species. "

Additionally, an important point, possibly lost in the verbiage, is this:

"Southern Coastal Salt Marsh occurs within the disturbance footprint (see Figure 3.3-1)."

Under the California Coastal Act, coastal wetlands are not allowed to be destroyed for any except a handful of reasons, and this is not explained in the EIR, such that the City has already approved a CDP for this project, yet it is likely the California Coastal Commission would have significant concerns and likely deny this project unless it is redesigned to avoid

the destruction of any coastal wetlands. In California more than 95% of our coastal wetlands have been destroyed, which is partially why the law and the courts that have upheld the law do not allow for further destruction.

Finally, our other big concern is that, in the past few years, sea level rise projections have increased and caused new thinking about the risks to life and property. These new sea level rise projections need a much deeper and updated review in the EIR, given that this construction is subject to tidal influence from the sea on a regular basis.

This project needs:

- more detailed further design to include accurate information and to demonstrate full compliance with necessary protection measure for the Biological Resources in this area (there are others that need attention, but some of the highlights are included in this letter);
- consideration of stronger mitigation measures to include completing genuine restoration of areas of the Ballona Wetlands Grand Canal Lagoon to the north of the project site:
- sufficient stakeholder engagement; and
- an update to include new information related to sea level rise and other changed circumstance since the 2017 approval of the EIR.

Please accept the appeal and deny all approvals of this project. Do not allow the department to proceed until adequate stakeholder engagement occurs and meaningful, adequate mitigation for the damage to biological resources is included in the plans. Please direct the Sanitation Department to start over and make the things right that are delineated in this letter and in others submitted by the community.

Thank you for your time and consideration.
With best regards,

Marcia Hanscom /s/
Marcia Hanscom
Director

Robert "Roy" van de Hoek /s/
Robert "Roy" van de Hoek
Wetlands Biologist and Environmental Scientist

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Ira Brown <ira.brown@lacity.org>

Re: Serious Concerns re VAPP Project on Hurricane St (MDR)

1 message

Steve Bradbury <steve@mycyberstuff.com> Thu, Nov 7, 2024 at 4:48 PM
To: Ira Brown <ira.brown@lacity.org>
Cc: Juliet Oh <juliet.oh@lacity.org>, lisa.webber@lacity.org, Robin Rudisill <wildrudi@icloud.com>

Ira, please add me to your list of interested parties for advance notification with regard to any hearing and/or CPC commission meeting regarding this matter. My email is steve@mycyberstuff.com and mailing address is 109 Hurricane St, MDR, CA 90292.

Separate but related, please include in the public record the recent VNC motion passed in Sept as well as an overview of pertinent community issues and a compendium of neighborhood emails written over the past several years, all attached.

Finally, please be aware we continue to seek engagement with someone in LA Public Works who is legitimately empowered to make decisions (not lip service as has been the case to date) AND genuinely seeks a win-win for Public Works & the community. Our mission is not to stop this important infrastructure project nor are we are looking to be unreasonable. We simply seek solutions to real, impactful issues.

With appreciation,

Steve

~~~~~~~~~~~~~~~~~~~~
Steve Bradbury
310-428-5904
steve@mycyberstuff.com

On Nov 7, 2024, at 4:17 PM, Robin Rudisill <wildrudi@icloud.com> wrote:

CPC-2024-2010-GPA-ZC-CU2-SPPC
128 Hurricane, Venice
Venice Auxiliary Pumping Plant (VAPP)

Public Officials,

I live on Ocean Front Walk on the Marina Del Rey Peninsula. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more.

This project expands the pumping of sewage down to Dockweiler and is located in the middle of our residential neighborhood as well as in the middle of Environmentally Sensitive Habit Area (ESHA). It is an unacceptable land use for this area and yet it is critical infrastructure and we understand it must move forward. However, the lack of concern shown regarding finding reasonable mitigations for the impacts on our residential neighborhood and the lack of protection and mitigations for the ESHA is appalling and unacceptable.

The construction plans as designed will have a painful, material impact on this community and surrounding ESHA for decades.

Our primary concerns are:

- **Mitigation measures in order to conform as closely as possible with the certified Venice LUP, the state policy guidance for determining conformance with the Coastal Act.**
  - Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas.
  - Policy I.C.1 states that the scale and design of industrial facilities must be compatible with adjacent and neighboring uses.
  - Policy 1.A.5 seeks to preserve and protect stable multifamily neighborhoods.
  - Policy 1.D.1 states the only permitted development adjacent to the Grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.
- **Elimination of the proposed parking lot at 128 Hurricane St.** for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city.
- **Modification of the project design** so that it is visually compatible with the residentially zoned neighborhood.
~~~~~~~~~~~~~~~~~~~~

Given that this location is grossly incompatible with this location and never should have been allowed to happen, the City's Bureau of Engineering should be bending over backwards to keep the impacts on the residential neighborhood and surrounding ESHA to a bare minimum.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through reasonable and respectful negotiations in order to minimize impacts on the surrounding ESHA and residential neighborhoods.

PLEASE support this request for fairness. Please work with us to make reasonable changes to the project in order to protect our residential neighborhood and the ESHA.

Thank you.

For the Love of Los Angeles
and our precious Coast,
Robin Rudisill
(310) 721-2343

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3 attachments

VNC VAPP Motion.pdf
76K

VAPP Background.pdf
59K

Hurricane Pumps Neighbor Letters.pdf
855K

Hurricane Pumps Neighbor Letters

(Last updated: 11/8/24)

Re: Venice Auxiliary Pump Plant (VAPP), 128 and 133 Hurricane;
DIR-2017-4167; ZA-2017-3950 (plant); DIR-2017-4173; ZA-2017-3953 (parking lot)

The following members of our community have expressed their POV on this issue to date. We anticipate additional written responses as this process continues.

2024 Neighbor Letters

MIKE BORASSI & GENEVIEVE MORRILL-BORASSI – (FORMERLY) 3801 ESPLANADE. (ORIGINAL APPELLANTS) 5

LESLIE & MICHAEL ADLER – 3601 ESPLANADE 6

MICHAEL HOFFS – 110 HURRICANE ST. 7

BETHANY GORFINE – 3950 VIA DOLCE (OWNER AND CONDO BOARD PRESIDENT) 8

ELIANE GANS – 3933 ESPLANADE (PROPERTY OWNER) 9

ROBIN RUDISILL – 3003 OCEAN FRONT WALK 10

TING CHANG – 28 MAST 11

TOM DRUCKER & MARCIA SELIGSON DRUCKER – 4 LIGHTHOUSE 12

JENESA KURLAND – 4300 VIA DOLCE (CONDO OWNER) 13

ROBERT DIBIASE – 115 ½ HURRICANE ST (OWNER) 14

TRACI GAY – 310 WASHINGTON BLVD. 15

GARY STROMBERG – 125 HURRICANE ST 16

TING CHANG – 28 MAST 17

JENESA KURLAND – 4300 VIA DOLCE (CONDO OWNER) 18

PERRY ROD – 3818 PACIFIC AVE 19

MARY-DOROTHY LINE – 125 PRIVATEER MALL 20

MICHAEL HOFFS – 110 HURRICANE ST. 21

2022-23 Neighbor Letters

MARY LAING – 115 HURRICANE ST 23

STEVE & KAREN BRADBURY – 109 HURRICANE ST (OWNERS) 24

ADAM GOLDBERG – 110 HURRICANE ST. 25

ROBERT DIBIASE – 115 ½ HURRICANE ST (OWNER) 26

MURIEL BLAKE & JOHN LARKIN – 110 HURRICANE ST. 27

GARY STROMBERG – 125 HURRICANE 29

MIKE BORASSI & GENEVIEVE MORRILL-BORASSI – 3801 ESPLANADE 30

KRISTY CANON - 3809 ESPLANADE (BUILDING OWNER) 32

ROBERT & LUCIA WILLIAMS – 3805 ESPLANADE 33

ELIANE GANS – 3933 ESPLANADE (PROPERTY OWNER) 34

TANYA SPERO – 113 ½ HURRICANE ST 36

LARRY LESSER, MD & CLAUDE LESSER – 3609 ESPLANADE (OWNER) 37

JEFF LEE – 3701 ESPLANADE (OWNER) 38

CLARE BRONOWSKI – 3701 ESPLANADE (OWNER) 39

LESLIE & MICHAEL ADLER – 3601 ESPLANADE 40

JENNIFER KELTON – 3615 ESPLANADE 41

MELLY LIBURD – 120 ½ GALLEON (OWNER) 42

ANDREW FREEDMAN – 20 IRONSIDES 43

MARILYN MIKOS – 115 EASTWIND ST (OWNER) 46

ARIANNE FLEMMING & JUSTIN WASSER – 3812 PACIFIC 47

SUSAN AFRIAT & STEVE HYMAN – 4000 PACIFIC 48

BETHANY GORFINE – 3950 VIA DOLCE (OWNER AND CONDO BOARD PRESIDENT) 49

JONATHAN TILLMAN – 3719 VIA DOLCE 50

ROBIN RUDISILL 52

ADAM ROSE – 12 BUCCANEER ST. 53

ROBERT NAU – 4250 VIA DOLCE 54

FELICIA GLADE & MIKE PELLETIER – 116 GALLEON ST. 55

ELIANE GANS – 3933 ESPLANADE (OWNER) 56

JENESA KURLAND – 4300 VIA DOLCE (CONDO OWNER) 57

2024 Neighbor Letters

Mike Borassi & Genevieve Morrill-Borassi – (formerly) 3801 Esplanade. (Original appellants)

Dear Chair and members of the Venice Neighborhood Council Land Use & Planning Committee,

My name is Genevieve Morrill, and my husband and I filed the appeals to both City of Los Angeles Planning Commission, and more recently the California Coastal Commission. This project has been ill-conceived from the beginning and too large for the space. Understanding that it is an essential utility we need in our region, we were simply asking them to consider making it more compatible for the neighborhood and less intrusive on the community. At the time we filed the PC appeal, the city has not met or reached out to the community since 2016.

We are a casualty of this pending project, as our building is situated on the canal directly next to the vacant lot where the VAPP will be built. We have been renters for 28 years on the Canal and due to the pending construction, the owner sold the building, and the buyer decided to live there which therefore meant we had to move and find a new place to live at a considerable increase in market-based rate rents.

In my day job, I am the CEO of a Chamber of Commerce and therefore understand planning, zoning, and development. I attest that a developer would never be allowed to get away with such egregious disruption to a residential neighborhood. To have transformers and electrical equipment next to someone's bedroom window when the design can be flipped so that these electrical boxes would be on a vacated side of the street with no residents. They claim this impossible and frankly its only because they have already designed the project. A developer would be made, no matter what the expense to redesign.

This project is not compatible to the neighborhood aesthetics; it is too large for the location; it has negative impact to our community members; mitigation measures are not sufficient; has negative impact on the environment and a protected canal; and creates areas for more unhoused to encamp. Additionally, our understanding is that this project is an industrial use in a residential zone and no zoning was amended for its purpose.

Please oppose this project and help support the community members.

Thank you,

Genevieve Morrill
Formerly 3801 Esplanade/Grand Corso

Leslie & Michael Adler – 3601 Esplanade

I live along Esplanade Canal on Eastwind.

We have a few concerns:

1. Adherence to court-mandated ESHA protections in the surrounding lagoon area;

2. Mitigation of EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas release;

3. Mitigation of “significant and unavoidable” issues including ground-borne vibration, which could result in residential building damage, and construction noise that exceeds LA CEQA Thresholds guidelines;

4. Change to five day/week construction instead of proposed six days/week;

5. Modification of project design so that it is compatible with its residentially zoned neighborhood;

6. Protection of residential properties from dirt, dust and other construction impacts;

7. Upgrade of deficient maintenance plan for both the new and existing facility.

Thank you
Leslie & Mike Adler
3601 Esplanade

Michael Hoffs – 110 Hurricane St.

As a 20+ resident of 110 Hurricane Street, I am in strong support of the motion. This is a classic case of the city not listening to the boots on the ground describing why the installation of the parking lot is not only not needed but strongly opposed for security reasons. For VAPP personnel, alternative parking on Hurricane has been found in other areas within a half block or less of VAPP. Homeless encampments, drunken disorderly conduct and contempt for Hurricane residents, constant traffic to find parking in the lot, mounting trash and lack of city funds to police the area have not been addressed and frankly will not be before construction.

Please ask yourself, would you want this parking lot built on your street? If you would support installing the parking lot on your street, would you be concerned if the aforementioned was not thoroughly embedded in the parking plan before construction?

Thank you for listening, your time to think about Hurricane Street's resident thoughts and frankly the chance to use the funds suggested for the parking lot on something else that will benefit the area in greater need.

Sincerely,

Michael Hoffs
110 Hurricane St

Bethany Gorfine – 3950 Via Dolce (owner and condo board president)

As an association that lives across the lagoon from Hurricane, and an association that lived through the dual main project for five years, with drilling immediately outside our 7 buildings between Marquesas and Tahiti on Via Dolce and via Marina, we are still feeling the effects of the project. I will elaborate.

I would like to say a few things regarding the care of the Ballona Lagoon, and Grand Canal - parking issues, vibrations, care, concern and communication for and of neighbors, repairs, plumbing, mental health, 6 days of noise, chaos, construction, personnel are all issues. Day in. Day out.

Bethany Gorfine
President, Marina Strand Colony 1.
145 units

Eliane Gans – 3933 Esplanade (property owner)

To the Chairman of LUPC
To LUPC
To Traci Park

I have lived in my building on Esplanade & Hurricane (just 1/2 block from this proposed VAAP). for 35 years. **I love my neighborhood and my neighbors. I love the serenity and residential environment.**

1. **REGARDING VIBRATION:** This will disturb all residents and as a landlord I do not want any tenant moving as a result of vibration and constriction noise. This will impact my quality of life and my ability to support myself financially.

2. **INADEQUATE EMERGENCY ACCESS DURING CONSTRUCTION**: Children and animals, and elderly residents, **will be in danger** of obstruction in an emergency

4. **PARKING LOT**: The city has already eliminated 6 parking spaces on Hurricane—which was not necessary, and parking is a HUGE issue for residents and their families when visiting. Eliminating another parking lot is NOT A RESPONSIBLE ACTION.
WE MOVED TO THIS NEIGHBORHOOD FOR A REASON—AND THIS ENTIRE PROJECT WILL NEGATIVELY IMPACT THE QUALITY OF OUR LIVES.
The city should use the $2.5 million for a more advantageous purpose to actually enhance this community—so that the City could actually get more taxes if our properties were not devalued as a result of this VAAP project.

CLARIFYING #4. PARKING LOT: WE DO NOT WANT OR NEED A PARKING LOT. AND ESPECIALLY FOR NON-RESIDENTS.

5. PROJECT DESIGN: This is designed to look like a dungeon. Or a jail block. There is nothing that resembles a structure that one would consider to be compatible with the Beach and lagoon environment. The project design is not compatible with the residentially zoned neighborhood. Again, detracting anyone from wanting to live near this ugly eye sore. We need more beauty and aesthetics in our world, not a building that appears like a “block” house jail.

Sorry for being so blunt… but I wanted you to get the idea of our feelings.

Sincerely,

Robin Rudisill – 3003 Ocean Front Walk

Public Officials,

I live on Ocean Front Walk on the Marina Del Rey Peninsula. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more.

This project expands the pumping of sewage down to Dockweiler and is located in the middle of our residential neighborhood as well as in the middle of Environmentally Sensitive Habit Area (ESHA). It is an unacceptable land use for this area and yet it is critical infrastructure, and we understand it must move forward. However, the lack of concern shown regarding finding reasonable mitigations for the impacts on our residential neighborhood and the lack of protection and mitigations for the ESHA is appalling and unacceptable.

The construction plans as designed will have a painful, material impact on this community and surrounding ESHA for decades.

Our primary concerns are:

- **Mitigation measures in order to conform as closely as possible with the certified Venice LUP, the state policy guidance for determining conformance with the Coastal Act.**
    - Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas.
    - Policy I.C.1 states that the scale and design of industrial facilities must be compatible with adjacent and neighboring uses.
    - Policy 1.A.5 seeks to preserve and protect stable multifamily neighborhoods.
    - Policy 1.D.1 states the only permitted development adjacent to the Grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.
- **Elimination of the proposed parking lot at 128 Hurricane St.** for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city.
- **Modification of the project design** so that it is visually compatible with the residentially zoned neighborhood.

Given that this location is grossly incompatible with this location and never should have been allowed to happen, the City's Bureau of Engineering should be bending over backwards to keep the impacts on the residential neighborhood and surrounding ESHA to a bare minimum.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through reasonable and respectful negotiations in order to minimize impacts on the surrounding ESHA and residential neighborhoods.

PLEASE support this request for fairness. Please work with us to make reasonable changes to the project in order to protect our residential neighborhood and the ESHA.

Ting Chang – 28 Mast

To whom it may concern,

As a resident of the Marina Peninsula, I am writing to express my strong support for the Venice Neighborhood Council's (VNC) motion opposing the Venice Auxiliary Pumping Plant (VAPP) project as currently proposed under CPC-2024-2010-GPA-ZC-CU2-SPPC.

While I understand the necessity of infrastructure improvements, the current plan presents serious concerns that have not been adequately addressed by Los Angeles Public Works (LAPW). The project's non-conformance with the Venice Local Coastal Program (LUP) policies, particularly those aimed at protecting stable residential neighborhoods and preserving environmentally sensitive areas like the Grand Canal and Ballona Lagoon, is deeply troubling.

Moreover, the Environmental Impact Report (EIR) for the project has failed to address key issues, including the risk of habitat destruction, groundwater contamination, and methane gas release. The proposed six-day workweek for construction will significantly disrupt the lives of local residents, with excessive noise, vibration, and dust over an extended period. The plan's inadequate provision for emergency access during construction is another critical concern.

The addition of a parking lot at 128 Hurricane Street, which was not part of the original project, will only exacerbate traffic and safety issues in our community. The VNC's motion rightly calls for the elimination of this parking lot, proposing more suitable alternatives that would save the city millions of dollars while addressing community concerns.

I fully support the VNC's call for LAPW to engage in a meaningful, results-oriented dialogue with our community to address these issues. It is crucial that any development in our neighborhood is done thoughtfully, with full consideration of its impact on residents and the environment.

Thank you for your attention to this matter.

Sincerely,

Ting Chang
3933 Esplanade W.
Marina del Rey, CA 90292
(310) 339-4056

Tom Drucker & Marcia Seligson Drucker – 4 Lighthouse

As long-time Marina residents, we are opposed to this zoning change until Public Works addresses some of the issues below:

- Mitigation of "significant and unavoidable" issues including ground-borne vibration, which could result in residential building damage;
- Mitigation of construction noise that will exceed LA CEQA Thresholds guidelines;
- Potentially significant methane gas release (read the community feedback to the EIR Mitigation Plans via the website link below - starts on page 44);
- Inadequate emergency access during construction activities;
- Change to five day/week construction instead of proposed six days/week;
- 25 parking spaces that will be eliminated on Hurricane every day of construction. Where will these people park?
- Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), a savings of at least $2.5 million to the city;
- Conformance to the certified Venice LUP (Policies I.A.5, I.C.1, I.C.6, and I.D.1);
- Adherence to court-mandated ESHA protections in the surrounding Ballona Lagoon and Grand Canal;
- Mitigation of EIR issues related to loss of species and habitat, groundwater impact;
- Modification of project design so that it is compatible with its residentially zoned neighborhood;
- Protection of residential properties from dirt, dust and other construction impacts;
- Upgrade of deficient maintenance plan for both the new and existing facility.
- Compensation for lost property value - During construction, tenants may very well seek reduced rents or move out. Units may have to be re-rented at lower rates, if at all. As a result, property owners may have to sell at reduced valuations. This is not hypothetical, it has already occurred;
- Resident physical/mental issues due to construction;
- Real-time community recourse to on-site construction issues. Without teeth, there can be no enforcement.

Please include this email as part of the public record.

Sincerely,

Tom Drucker and Marcia Seligson Drucker

Jenesa Kurland – 4300 Via Dolce (condo owner)

Hello VNC Board -

The Venice Auxiliary Pumping Plant (Project) as designed should not occur within a Residential Zone; and regardless of Zone nomenclature, Project must avoid drilling/vibrating foundations. No home/building owner should be forced to have their foundations and structure compromised due to poor planning and poor execution by City of Los Angeles(City). A 'mere' cosmetic crack through drywall stems from a crack in building structure which stems from a foundation crack. In earthquake country, one cannot afford - literally - to have compromised foundations & structure. City Department of Public Works(LADPW) has well proved that they cannot be trusted to comply with EIR requirements nor fair guidelines. I still seethe with distain towards the Community Outreach folks' blatant lies during their Venice Dual Force Main(VDFM) project by simply writing to you now. Photographed pre-construction inspection survey by a third party contracted by City as a baseline and photographed post-construction inspection survey by City employees admitting to seeing cracks afterwards is meaningless.

If anyone pretends to think that Project's parking lot will become anything but a trash dump and under-housed tent camp, you know they are neither trustworthy nor grounded in reality; and therefore, should not be decision-maker.

Also, Project design detracts from the community. Given Project is within a beachside residential community, why cannot the building appear more contextually-friendly? I do not understand the difunctional brown slat awnings here & there which do not provide shade to anything. A small item, but indicative of City not paying attention to detail and nor Project's impact on community of tax-payers.

If absolutely nothing else, City needs to disallow work on Saturdays. City (work) projects drag on (& on), so there is no 'time is of the essence' condition which warrants six work days.

City allows drilling, vibrating, pounding starting at 7:00AM. City allows spilling of groundwater mixed with the oil fields below us to spill out onto streets 24-7. Thus, enforceable penalties for non-compliance with the EIR need to be in writing and should be available to all on VNC website.

Thank you,
J. Kurland
Via Dolce

Robert DiBiase – 115 ½ Hurricane St (owner)

Oct 10, 2024

To: Los Angeles Planning Commission

Subject: Proposed Pumping Station Addition,128 Hurricane St & 3813 South Esplanade

Dear Commissioners:

I have lived on Hurricane St since 1977 and witnessed the new construction of the present Pumping Station and it was a vast improvement to the old pumping station. This proposed additional pumping station construction has made many of our local residents angry, because you are not letting us give you our opinions on what we feel are legitimate objections.

1. Why is the project needed anyway. It appears that the present pumping station is doing the job just fine right now.

2. This area is an environmentally protected area. Court mandated ESHA protections in the Ballona Lagoon/Grand Canal area INCLUDE NO DREDGING AND /OR USE OF HEAVY EQUIPMENT -- BOTH OF WHICH ARE PART OF THE PROJECT PLAN. THIS IS NOT ACCEPATABLE.
3. Conversations with my neighbors are telling me that traffic on the street and car parking loss due to construction equipment will be a major problem. The noise and the impact on the canal itself could be devastating.

4. Are the transformers in the new station generating Electromagnetic fields which are known to cause Cancer?

5. Is this project absolutely NECESSARY?

6. Our neighborhood residents demand to have input into this planning process and to negotiate a possible site farther down the coast. This is a residential neighborhood, and the pumping station does not even belong here.

Respectfully submitted
Robert DeBiase
115 ½ Hurricane St

Traci Gay – 310 Washington Blvd.

I strongly oppose Venice Auxiliary pumping plant going forward! I am a resident at 310 Washington Blvd., #604, marina Del Rey 90292

Gary Stromberg – 125 Hurricane St

I live on Hurricane St in Marina Del Rey. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on our lives for multiple years.

My primary concerns are safety and mitigation of "significant and unavoidable" construction-related issues. Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone. PLEASE support this request for fairness.
Thank you.

Gary Stromberg
125 Hurricane St.
MDR

Ting Chang – 28 Mast

Hello,

My husband and I are residents of Mast Street in Marina Del Rey. For over seven years, our community has tried to work with Public Works to address significant concerns about the proposed VAPP project. Despite our persistent efforts, we've been met with empty promises and no real action.

This lack of consideration for our community's well-being is deeply disappointing. While I recognize the importance of this infrastructure project, the current construction plans, as proposed, will significantly and adversely impact our lives for years to come.

My main concerns are conformance with the certified Venice LUP (as homeowners we are held to the LUP and it is only fair that city projects are as well) and the upgrade of a deficient maintenance plan for both the new and existing facility (currently garbage is all over the canal and it looks like there has not been any efforts to maintain the sidewalk area).

We are not asking to halt the project but rather to engage in a meaningful dialogue with someone who has the authority and willingness to address these concerns through respectful and fair negotiations. Your support in ensuring this request for fairness is honored would be greatly appreciated.

Thank you for your attention.

Regards,

Ting Chang

Jenesa Kurland – 4300 Via Dolce (condo owner)

Dear City Representatives -

For over seven years our community has been **trying** to **collaborate** with Public Works to address critical concerns about the planned VAPP project. Though our efforts fall on deaf ears. We receive lip service and nothing more. This total lack of concern for our community is unacceptable.

Our community acknowledges this is a critical infrastructure project even if is a hazardous industrial facility located within our residential area. However, the construction plans as designed will have a painful, material impact on our lives for multiple years.

+ Change to five day/week construction and more restricted hours in lieu of six days/week.

+ Mitigation of other EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas release.

- The community has put forth concepts to address some of these issues including the Grand Canal Restoration Plan.

+ Mitigation of "significant and unavoidable" construction-related issues including ground-borne vibration which could result in residential building damage, and, construction noise that exceeds LA CEQA Thresholds guidelines

- Section MM-NOI-2 of the mitigation plans does not adequately protect property from potential damage. The current plan is far more reactive than proactive using terms such as "may include," "if considered appropriate," and "as feasible and practical." Also, there is no timely mechanism for issues to be addressed/project to be halted in the event damage is done.

Section MM-NOI-3 of the mitigation plan is also inadequate. It strains credibility to believe noise control features will "reduce overall operational noise levels from all Project related sources to within 5 dB of existing ambient noise levels in the surrounding community (53-57 db)."

+ Modification of the project design so that it is compatible with the residentially zoned neighborhood.

+ Upgrade of a deficient maintenance plan for both the new and existing facility.

- The existing VPP is ***not*** maintained in any meaningful way. There are environmental and safety issues. Garbage is strewn along the Grand Canal side of the structure which can readily fall into this ESHA. The sidewalk around the structure is in a constant state of disrepair to the point of being dangerous.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with AHJ and motivation to address these issues through respectful negotiations. PLEASE support this request for fairness. *Imagine* ***how you would feel in a similar situation****!?*

Thank you,
J. Kurland
Via Dolce, Marina del Rey

Perry Rod – 3818 Pacific Ave

To Whom It May Concern,

My 3-unit residential building is at 3818 Pacific Avenue in Marina Del Rey. We have been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. Although the industrial project is for critical infrastructure, the construction plans as designed require much more compatibility and dialogue with the immediately surrounding residentially zoned neighborhood. There was very little, if any, community input during the design process and this must change.

Thank you,

Perry Rod
Chief Investment Officer
Rod Capital Management

Mary-Dorothy Line – 125 Privateer Mall

I live on Privateer Mall in Marina Del Rey. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project.

All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on our lives for multiple years.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through respectful negotiations. PLEASE support this request for fairness.

Thank you.

Michael Hoffs – 110 Hurricane St.

As a 20+ resident of 110 Hurricane Street, I'm pleading with you to take a closer look at how the VAPP Project on Hurricane Street will affect the local neighborhood if our concerns are not faithfully considered. I am not alone on feeling the city is not listening to the boots on the ground describing why the installation of the parking lot is not only not needed but strongly opposed for security reasons. For VAPP personnel, alternative parking on Hurricane has been found in other areas within a half block or less of VAPP. Homeless encampments, drunken disorderly conduct and contempt for Hurricane residents, constant traffic to find parking in the lot, mounting trash and lack of city funds to police the area have not been addressed and frankly will not be before construction.

Please ask yourself, would you want this parking lot built on your street? If you would support installing the parking lot on your street, would you be concerned if the aforementioned was not thoroughly embedded in the parking plan before construction?

Thank you for listening, your time to think about Hurricane Street's resident thoughts and frankly the chance to use the funds suggested for the parking lot on something else that will benefit the area in greater need.

Sincerely,

Michael Hoffs

2022-23 Neighbor Letters

Mary Laing – 115 Hurricane St

ML **Mary Laing <mblaing1@aol.com>**
Hurricane Street Auxiliary Pumping Plant Project
To: Steve Bradbury <steve@mycyberstuff.com>

VNC Parking & Transport March 13, 2022 at 2:31 PM

Steve,

I would like to go on record that I oppose the current auxiliary pump plant project and parking lot that is being proposed at 133 Hurricane and the adjacent lot at 3813 South Esplanade.

I am a resident at 115 Hurricane for 20 years. Myself and my neighbors were forced to endure the disastrous nightmare construction of the existing pumping station constructed a few years ago. There was little to no community engagement or communication from the Public Works Department. Most importantly, the unkept promises from Public Works after the years of construction.

I understand that the current project is essential for the area, however I wane on trust due to past performance from Public Works. This is an industrial facility in a residential neighborhood and more care must be taken to buffer the use from existing homes and resources.

We as neighbors are also concerned that the parking lot will create an unsafe environment near our homes. What is the design? How will it be secured at night? We oppose moving forward with the project until these concerns are addressed.

I would like to voice my support for the VNC motion to rescind it's support of the project as it is currently configured.

Best,

Mary Laing
115 Hurricane St
MDR 90292

Steve & Karen Bradbury – 109 Hurricane St (owners)

July 27, 2022

My wife and I own 109 Hurricane St. We have lived here since 2007. During that time, we have experienced several city-led construction projects. None have effectively managed the impact on the community without our voices rising to generate awareness. The city's track record is dismal at best.

Now the city intends to build an auxiliary pumping station at the end of Hurricane St. While we understand the critical nature of this project, the fact there has been no meaningful community engagement since preliminary plans were shared in 2016 is abhorrent. It appears the project design has changed over that time including the addition of a sewage command and control center for entire city of Los Angeles. We thought this was simply an auxiliary pumping station to support the aging current plant.

The city cannot simply ramrod an industrial project down the throats of a neighborhood without incorporating our input. City employees work for the residents, not the other way around.

We understand one element of the plan is to create a public parking lot at 128 Hurricane. Why???? There are no other public lots on any MDR residential street. If there is truly a need for that much employee parking (which has never been adequately justified), it should be a 100% secure lot only accessible by pumping station workers. **No** public car spaces, **no** bike racks, **no** art installation, **no** use by beachgoers, **no** opportunity for homeless to camp out.

There have been recent suggestions the parking lot was incorporated into the plan to satisfy the coastal commission. Did the city ever convey this information to residents during the process? Did the city take a position that this would impact residents and push back? Does the city even care? We do.

We attended both community meetings (Zoom and in-person) conducted by Public Works. These were little more than sham, window-dressing efforts. The city representatives showed NO willingness to modify ANY aspect of the project to align with the interests of the community. This arrogance is unacceptable behavior by people whose job is to serve the community.

Our neighbors have spoken about many other issues with this project. We support them and request you reconsider all approvals for this project until the community has been given a meaningful opportunity to engage. We can work together. There's no reason to antagonize the community.

Thank you,

Steve & Karen Bradbury
109 Hurricane St., MDR

Adam Goldberg – 110 Hurricane St.

To Whom It May Concern/VNC:

I have lived on the Marina Peninsula since 2005 and on Hurricane St since 2013. Since 2013, the amount of construction and noise on Hurricane has increased with each year. And now, with the plans of building a parking lot along with a new pump station, it behooves us all to keep this to a minimum.

While I understand that the pump station is necessary, the parking lot is not. There is already plenty of parking for workers, so to add a space where the public can park, is completely unnecessary. This will not only cause more car and foot traffic on our small, little street, but it will also bring in an unwanted element. There is no doubt that the homeless population will find this parking lot and make it a place to loiter, make unwanted noise, and use drugs. I have a small child who does not need to see this, and there are plenty of other families who are in the same situation.

I am asking that you vote to make it so there is NOT a parking lot at the end of our street. We have endured enough over the last 5 years or so with street closures, construction that rattles our homes, and an increase in the homeless population in our neighborhood. Flatly, there is no reason/need for this parking lot and it will make life exponentially worse for those of us that live here.

Thank you for your time and assistance with this matter.

Best,
Adam M Goldberg
110 Hurricane St

Robert DiBiase – 115 ½ Hurricane St (owner)

HELLO STEVE: MY OPINION IS THAT THE PARKING LOT BE USED EXCLUSIVELY FOR THE PUMPING STATION EMPLOYEES AND THE HURRICANE ST RESIDENTS. IF THE LOT IS OPEN TO PEOPLE GOING TO THE BEACH THAT WOULD BE A NO-NO FOR ME, SINCE THEY ARE ALREADY PARKING ON THE STREET WHERE RESIDENTS USUALLY PARK.

BEST REGARDS

BOB DEBIASE

115 ½ HURRICANE ST

MARINA DEL REY, CA 90292

Muriel Blake & John Larkin – 110 Hurricane St.

RE: 128 Hurricane & 3813So. Esplanade, ZA 2017-3950-ZAA-1A;DIR-2017-4173-CDP-SPP-1A DIR-2017-4167-PUD-CDP-SPP; ZA 2017-3953-CU2
Sent

Muriel Blake murielblake@wealthbuildersinc.com

To: cpc@lacity.org, elizabeth.gallard@lacity.org

Cc: mike.bonin@lacity.org

Fri, Mar 4 at 5:30 PM

Dear Commissioners,

Please address and reply to the following important concerns of your constituents

No 1. I have been living at 110 Hurricane for 42 years. Our residence is located 1 building away from the proposed Pumping Plant construction. As you overwhelmingly know this is strictly an upscale residential neighborhood which was not intended to be used for Industrial purposes let alone a "Pumping Plant"; there must be many other locations which would be more suitable for a Pumping Plant...perhaps all of your neighborhoods. The last time this proposed new plant project was presented to our community was 5 years ago - in 2017. It's not clear from the "notice provided" five years ago, that there was any written response to our community's concerns regarding the impact on our residential street of a Pumping Plant.

a) So at this late date (2022) after five years, what are the architectural design and landscape design of your proposed industrial plant to fit in with the design of our residential neighborhood? What design steps have you taken to insure that this "plant" will it blend in with this residential design without it being a complete "eyesore" in this sought-after residential Marina Del Rey beach area. As well, our beautiful beach is exceedingly popular with those who live in the inner city and who look forward to spending the day in our neighboring beautiful beach. Of courses, it would be extremely negligent to not to note that this area is notably popularity with its shops and restaurants which bring revenue to your city.
b) b) What buffers will you provide between this proposed "Plant" and our dwellings?? Likewise, this block abuts sensitive wetlands so what buffers will be taken to protect this area?

No. 2.) I am extremely concerned about the proposed "Parking Lot" How many employees do you plan to have working at the "Plant" that it would necessitate of a Parking Lot??? And what about the residents on Hurricane St. that of the block? will there be a full time Guard?? How will it be secured at night? As you are alll well there is a large homeless population in our neighboring Venice. H ere there are vagrants who roam our street and, if not guarded at night they very well may seek refuge in the lot. It may well become a haven for car thefts or car parts theft. It brings an unsafe environment to those near homes and to the street parkers who come home after dark.. What measures will be taken to provide safety to the residents who live
next to this lot?

a) those of us on Hurricane Street recently lived through 3 years of construction in the same "plant area". The street was torn up, blocked with huge equipment, construction cranes, diggers etc. all emitting constant banging, dirt and dust; the workers parked their trucks up and down the entire street, leaving no space for the residents to park. this cannot go on once again with construction of your "Plant"

No. 3) Transformers proposed at this new location, generate electromagnetic field (EMF) known to cause cancer and we all believe to be a risk to our health and the community at large.

I, for one, oppose your moving forward with the proposed project until the above concerns are addressed, in writing, and sent to all those who reside near the proposed Industrial Plant.

Sincerely,
Muriel Blake
John Larkin
110 Hurricane St.
Marina del Rey, CA 90292

Muriel A. Blake, CFP®
WEALTHBUILDERS, INC.
11600 Washington Place #116D
Los Angeles, CA 90066
(310) 391-3921- phone
(310) 398-9859- fax

Gary Stromberg – 125 Hurricane

I'm writing to request that the equipment you are using to build this new facility, including transformers, HVAC and electrical panels be moved away from our residences and towards the existing pump plant on Hurricane, and that you shield the entire project with solid fencing. You have no idea how disruptive your project is to our little community.

Regards,

Gary Stromberg
125 Hurricane St.
(203) 984-4836

Mike Borassi & Genevieve Morrill-Borassi – 3801 Esplanade

(Note: On 2/28/22, Gen and Mike filed an appeal with the LA City Planning Commission. The following material has been taken from that appeal)

The goal of this appeal is to require Public Works to work with the community on a better design for this project which will fit within our community and will provide protection for adjoining residential neighbors from the impacts of this industrial-style facility on privacy, safety, noise and aesthetics.

- Public Works last presented this project to the community in 2017. The case has been on hold for almost 5 years. No additional information or contacts with the community were held during this time despite prior promises to work on design and mitigation. We have repeatedly asked for a new presentation of the project since changes were clearly made since the last City public hearings in 2017.
- The EIR for the project and prior presentations misrepresented the location of the project, which is in fact 10 -15 feet closer to the nearest residential structure than previously represented.
- The project is poorly designed to fit within its residentially zoned neighborhood. Noisy and dangerous equipment is located very close to two neighboring residential areas. However, on the other side, the project site is adjacent to a dead-end street and the exiting pump plant, and all noisy and dangerous equipment should be located nearer to this facility and away from residents.
- The project aesthetic design, proposed landscaping and “public art” has never been presented to the community and the simple elevation of the structure presented does not adequately show how this will fit into a 100% residential neighborhood.
- Public Works has a history at this location of poor maintenance of the existing facility and landscaping, as well as noisy and intrusive construction for years during the recent Dual Force Main project at this location. The community simply does not trust Public Works to fulfill its promises to keep this facility and the parking lot safe and attractive.
- The facility is adjacent to a sensitive wetland area and no effort is made to mitigate impacts or improve existing conditions.
- The proposed parking lot will be an attractive nuisance in this residential area and will not be secured or patrolled. City parking should continue to be on the street and the additional lot should be used for open space to buffer the facilities.
- The project approval and conditions do not properly include all required mitigation measures so that the community knows what must be done and enforced. The EIR, Addendum and MMRP plan are only found on an obscure Bureau of Engineering link and were not available to the neighbors.

The Venice Pump Plant has existed in this area for a long time. It is not well maintained. It has no landscaping or attractive fencing. It is never upgraded, cleaned, and graffiti is often left for months before painting. The existing plant is stark, abuts directly onto a sensitive waterway, is littered with trash and graffiti, with weeds poking through the scant gravel setbacks. Over the last five years, the site has been used as a staging area for the Hyperion Dual Force Main project, so the neighbors have endured constant construction traffic, noise, dust and equipment.

In order to build a safe and beneficial project here, Public Works must be required to include the following measures in the project:

- The project needs to mitigate its impact on the sensitive canal and lagoon. The existing pump plant has no vegetation whatsoever and the canal banks are not appropriately landscaped with native materials. Additional landscaping should be added to the existing facility including vines to cover walls which are frequently graffitied.
- Upgrades should be required to the aesthetics of the existing plant including painting, consideration of a mural, and additional planting in currently empty and trash filled planters and side yards.
- The new facility must be designed and landscaped in keeping with the residential area and sensitive lagoon.
- Provide a buffer of landscaping and walls between the new facilities and the directly adjacent residential buildings, including a minimum 6-foot block wall and 10 feet of landscaping between both the parking lot and the new facility and the nearest adjoining residential property to the north and west.
- Include an on-going obligation to clean and maintain the existing and new facilities when they are complete.

Adopt binding conditions of approval that clearly spell out all obligations in the future so that neighbors can monitor and enforce, including each requirement of the approvals and the MMRP.

For all of the above reasons, this project should not be approved, but should be sent back to the drawing board so that Public Works can design a compatible facility. To place this facility in a residential neighborhood in a sensitive wetland location requires careful consideration and strict conditions.

Kristy Canon - 3809 Esplanade (building owner)

From: **Cannon Enterprises, Inc.** <cannonenterprisesinc@gmail.com>
Date: Thu, Apr 14, 2022 at 8:16 AM
Subject: Auxiliary Pumping Plant in Venice
To: <cpc@lacity.org>, Elizabeth Gallardo <elizabeth.gallardo@lacity.org>, <mike.bonin@lacity.org>

To Whom it may concern,
I am the property owner directly north of the new pumping station location. This project is going to affect my income that is generated from my income property located at 3809 Esplanade. My current tenants may leave because of the project and the proximity of the industrial equipment to their bedrooms/ living space. It will be significantly harder to get market rent if some of the following concerns are not taken into account:

- The design is incompatible with the neighborhood
- No buffer from the project and residential homes
- We have health concerns of having transformers and electromagnetic fields near residential homes
- Equipment noise and construction impacts

I understand that this is a vital piece of infrastructure that the community needs, but my property being so close to the project and having owned this property for over 30 years, I feel my concerns are not being heard or given any value.

Thank you,
Kristy Cannon
--
Cannon Enterprises
8405 Pershing Dr. #500
Playa Del Rey, CA 90293
Phone: (310) 823-2082
Fax: (310) 823-2085

Robert & Lucia Williams – 3805 Esplanade

From: Lucia Williams <luciaw2012@gmail.com>
To: cpc@lacity.org, elizabeth.gallardo@lacity.org
Cc: mike.bonin@lacity.org

Mon. Feb 28. 2022 at 1:35 PM

Dear Commissioners:

We along with our neighbors are writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to community concerns as we were never shown a final architectural design or landscape plan. This is an industrial facility in a residential neighborhood abutting a sensitive wetland area--more care should be taken to buffer the use from existing homes and resources.

The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping and aesthetics.

Additionally, the transformers proposed within the new location generate electromagnetic field (EMF) known to cause cancer and we believe it to be a risk to our health and the community at large.

We are concerned that the parking lot will create an unsafe environment near homes and additionally will provide only two spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night? We understand that the project is essential for the area, however we wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication.

We oppose moving forward with the project until these concerns are addressed.

Sincerely,
Robert and Lucia Williams
3805 Esplanade
Marina del Rey, CA 90292

Eliane Gans – 3933 Esplanade (property owner)

From: Eliane Gans <elianegans@gmail.com>
Subject: Venice Axilliary Pumping Plant
Date: April 8, 2022 at 11:22:56 AM PDT
To: cpc@lacity.org, elizabeth.gallard@lacity.org, mike.bonin@lacity.org

To All of you, and to whom it may concern:

I have been a resident of my property at 3933 South Esplanade W. For over 35 years. I have endured cracked streets and lack parking for many years. And the pumping plant that reduces the value of my property.

I am writing to you today to voice my concerns and to object to the proposed Auxiliary Pumping Plant at the end of my street. At 133 East Hurricane and the adjacent lot at 3813 South Esplanade w. My property/residence will be impacted by this construction, and it will affect the future value or all of our properties.

- There has not been adequate community or resident communication
- The design has not been approved or reviewed by the residents or is not in keeping with the current neighborhood.
- The design should have a residential look and materials to blend with the residences and environment of the Lagoon.
- Residents should be given a chance veto review the design and comment and request any changes that are deemed necessary
- The proposed Pumping plant buttes right up against residential property—this is NOT OK.
- There are environmental and health concerns about the electronics, transformers and electromagnetic fields that will impact the residents
- Noise and equipment will destroy our wetland peace and quiet,,,,, and create parking and vehicle access problems. and in general create more congestion in an already contested neighborhood
- The unsecured parking lot will invite homeless people and will not create any additional parking and will even block any parking that might be accessible.
- There should be buffers between the parking and the residences.
- How will the parking lot be managed. And WHY are there only 2 public spaces, when parking is an issue already in this area
- There are no studies that I have seen, that address any environmental impact on our sensitive lagoon—which is why we all live here!!!
- Previous construction of this Public Works with the existing facility has had a bad track record for noise, debris, obstructions of the street and other problems.
- Past Public Works projects in our neighborhood have caused a barrage of constructions. Issues over 7 weeks causing discomfort to all neighbors and a lack or peace!

Lastly, what are the benefits to us, the residents? YOU do not live here, and have no knowledge about the very special residential area that this is, and why we have chosen to live here.

I AM STRONGLY OPPOSED TO THIS PROJECT—YOU HAVE NO RIGHT TO IMPACT OUR HOMES AND THE VALUES OF THIS NEIGHBORHOOD, AND OUR SAFETY AND HEALTH.

Thank you for reading this letter…. I hope that you will consider my concerns and dither concerns of all my neighbors—and or the entire Marina Peninsula!

Sincerely,

Eliane Gans
Owner
3933 Esplanade W.,
Marina Del Rey, CA 90292
(310) 339-4056

WE ARE ALL TENANTS OF 3933 South Esplanade W. And STRONGLY OPPOSE THIS PROJECT, AND WE DO NOT WISH TO MOVE AWAY AS A RESULT OF THIS PROJECT.
Hans Brofeldt
Wil Mavronicolas
Shawn Groshans
Kate Stone

ARTfully,
Eliane Gans
LONNY GANS & ASSOCIATES
Fine Art

Tanya Spero – 113 ½ Hurricane St

TS **Tanya Spero <tanya1040@aol.com>** VNC Parking & Transport March 12, 2022 at 2:35 PM

Re: Hurricane St Auxiliary Pumping Plant Project - It's A Mess

To: Rick <chucksteak897@yahoo.com>, Steve Bradbury <steve@mycyberstuff.com>

Hi Steve

I was forwarded the emails and I definitely would appreciate your representation. I allow you to represent me for this issue regarding the employee parking lot. I agree that the parking lot should not be built. It will bring more traffic and we have enough as it is on the weekends.
Thanks so much,
Tanya Spero

Sent from my iPhone

Larry Lesser, MD & Claude Lesser – 3609 Esplanade (owner)

From: Lawrence Lesser lessermd@mac.com

Date: Wed, Feb 23, 2022 at 5:03 PM

Subject: 128 Hurricane & So. Esplanade

To: <cpc@lacity.org>, <elizabeth.gallard@lacity.org>
Cc: mike.bonin@lacity.org

Dear commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plan project proposed at East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to the community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from existing homes and resources.The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics.

We are concerned that the parking lot will create an unsafe environment near homes, and additionally providing only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night. We understand that project is essential for the area, however we wane on trust due to past promised form Public Works and constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement of communication.

We oppose moving forward with the project until these concerns are addressed

We have been living in the area for 20 years, and never saw any attempt to fix the unpaved road abutting the proposed project. It is very unsafe to walk and a real eyesore.

Sincerely

Larry Lesser, MD, and Claude Lesser
Homeowner 3609 Esplanade. Marina del Rey 90292

Jeff Lee – 3701 Esplanade (owner)

From: Jeff Lee jlee@laurbanhomes.com

Date: Sun, Feb 27, 2022 at 12:11 PM

Subject: Venice Auxiliary Pump plant, March 10 hearing, Case ZA 2017-3950-ZAA-1A and related cases

To: <elizabeth.gallardo@lacity.org>
CC: cpc@lacity.org

Dear Planning Commission:

I have lived on Esplanade, two blocks from the proposed pump station, for twenty years raising my family. I am writing to oppose the current plans for the pump plant and parking lot.

I have been a real estate developer in the City of Los Angeles for over 40 years building over 40 projects through the City including hundreds of homes in CD 11.

The process followed by Public Works to design and permit the pump station would never be allowed for any private developer. For the past 40 years on every one of our developments we have had extensive community meetings, neighborhood council presentations, and meetings with the council office. We have been responsive to the community
and the council office.

In this case Public Works has been allowed to ignore the neighborhood keeping this case on hold for over four years. In 2016 we had a community meeting with representatives of the council office and the Department of Public Works. I was personally assured that my concerns of the community would be addressed and additional community meetings to
review design would be held. We asked many times when the City would respond which never happened. Had we treated the community this way in our business, our projects would never move forward. If we stonewalled the community for four years, our case would have been terminated.

I am not against the development of the pump station as the City needs to continually upgrade its infrastructure. The pump station is surrounded by 20' alleys and the ecologically sensitive Grand Canal. The community concerns need to be addressed including landscaping, design, construction, mitigation to enhance the area around the pump station, and continual maintenance. We lived through the construction work at this site for the Dual Force Main project, which was a disaster. We live on a daily basis with the eyesore of the existing pump station and lack of maintenance or pride in the neighborhood exhibited by Public Works.

I hope you will grant these appeals and require Public Works to live up to its promises.

Sincerely

Jeff Lee
3701 Esplanade

Clare Bronowski – 3701 Esplanade (owner)

Clare Bronowski <clareb1050@gmail.com> VNC Parking & Transport March 12, 2022 at 4:39 PM

Hurricane Pump Plant and Parking lot

To: Robert Thibodeau <robert.thibodeau@venicenc.org>, Jonathan Deer <virtualjonny@gmail.com>, Cc: Steve Bradbury <steve@mycyberstuff.com> Details

We live two blocks from the Venice Pump Plant, and we write to support the VNC Transportation Committee motion opposing the current plan for the Auxiliary pump plant and parking lot.
We are concerned that the current plan does not protect the nearby residences from noise, privacy and industrial type activities. Public Works needs to rethink the plan and include buffers, privacy walls, landscaping, security measures and long term maintenance to protect the neighborhood and the sensitive canal and lagoon area. The parking lot must be locked and secured when not in use by Public Works employees. The entire area must be well maintained, not allowed to be full of weeds, trash and graffiti as it currently is.

Thank you.
Clare Bronowski and Jeff Lee

Leslie & Michael Adler – 3601 Esplanade

April 24, 2022

To: Los Angeles Planning Commission

Re: 128 Hurricane & 3813 So. Esplanade
ZA2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A | DIR-2017-4167-PUB-CDP-SPP; ZA2017-3953-
CU

Email: cpc@lacity.org; elizabeth.gallardo@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from existing homes and resources.

The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics. Additionally, the transformers proposed within the new location generate an electromagnetic field (EMF) known to cause cancer and we believe to be a risk to our health and the community at large. We are concerned that the parking lot will create an unsafe environment near homes, and additionally provide only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night?

We understand that the project is essential for the area, however we wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication.

We oppose moving forward with the project until these concerns are addressed.

Sincerely,

Leslie and Michael Adler
Neighbor
3601 Esplanade MDR-Home Owner

Jennifer Kelton – 3615 Esplanade

On Mon, Apr 25, 2022 at 8:43 AM Nomad1800 <nomad1800@aol.com> wrote:

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade.

Please note that one of my main concerns is the public parking lot. I am not sure why it is needed? And it will only create problems - as you also are very aware of, and also based on the current state of homeless and transients in our area.

Jennifer Kelton
3615 Esplanade
MDR, CA 90292

Melly Liburd – 120 ½ Galleon (owner)

Wed, Apr 13, 2022 at 3:04 PM
Melly Liburd mellyliburd@yahoo.com

April 8, 2022

To: Los Angeles Planning Commission
Re: 128 Hurricane & 3813 So. Esplanade
ZA2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP.1A | DIR-2017-4167-PUB-CDP-SPP: ZA2017-3953-CU

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this proiect was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or If there was any response to community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to butter the use from existing nomes and resources

The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics. Additionally, the transformers proposed within the new location, generate electromagnetic field (EMF) known to cause cancer and we believe to be a risk to our health and the community at large.

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We oppose moving forward with the project until these concerns are addressed

Sincerely,
Melanie Liburd
120 1/2 Galleon Street, Marina Del Rey, CA 90292
Homeowner

Andrew Freedman – 20 Ironsides

April 13, 2022

To: Los Angeles Planning Commission
Re: Proposed Venice Auxiliary Pumping Plant (VAPP) 3813 S. Esplanade, 3817 S. Esplanade and 3913 S. Esplanade W. (128 E. Hurricane Street)
ZA 2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A; DIR-2017-4167-PUB-CDP-SPP; ZA 2017-3953-CU

Via Email: cpc@lacity.org; elizabeth.gallardo@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

In addition to the very astute comments made by Genevieve Morrill and other neighbors, I would like to share my concerns.

General
The Contract Documents for this project were submitted and cleared by Los Angeles Department of Building and Safety in 2017 without any public notice or review. Approval by two agencies (LA City Planning Department and California Coastal Commission) which both require public notification and public review, is only now being sought. Typically, Planning and Coastal clearances are the first to be addressed, not the last. The Public review of this project has been severely lacking, and City officials have both a legal and moral obligation to make sure the citizens of Los Angeles are heard.

This project spans two existing lots (which both front the Grand Canal) without an approved lot-tie agreement. All lot-tie agreements must go through a Public Hearing and review process. This has not been done, and all further consideration of this project should be suspended until the proper Public Hearing process has been completed and the lot-tie agreement approved.

The front yards of the two City lots of the proposed VAPP both face the Esplanade (Grand Canal). The rear yards of these two City lots face Canal Court. Hurricane Street is located along the side yard of only one of the parcels. The use of 133 and 139 Hurricane Street as the project address is both inaccurate and misleading. All references to 133 and 139 Hurricane Street for this project should be changed to 3813 and 3817 South Esplanade, respectively.

Design Issues
The recent Joint Determination letter from the LA City Director of Planning and Zoning Administrator states the following: "*As proposed, the project is visually compatible with the character of the area and will enhance the visual quality of the existing neighborhood.*" I couldn't disagree more.

The existing VPP is a one-story building surrounded by a sound wall, painted in neutral colors. It is quiet and odorless, and its low massing minimizes its effect on neighboring residences. In contrast, the proposed VAPP has a large concrete-walled Electrical Building that is oriented in a north-south direction – 90 degrees from the adjacent residences – which would form a 32-foot-high solid wall, not only blocking views to the Grand Canal, but creating shadows (between 10 am and 3 pm) directly onto all adjacent residences located to the north and west.

A recent change to the flood zone map in the Venice area was made effective by FEMA on April 21, 2021. As a participant to the National Flood Insurance Program (NFIP), the City of Los Angeles is required to enforce the flood clearance requirement for new construction and substantial improvement projects.

The two lots where the future VAPP is to be located were affected by this flood zone map update. The new Base Flood Elevation (BFE) is 8 feet above sea level and all new buildings require that the Lowest Finished Floor Elevation (LFFE) be at 9 feet (8 feet + 1 foot of free board) per LA City Ordinance 186952.

The current design for the VAPP has the Lowest Finished Floor Elevation (LFFE) at 7.67 feet – 16 inches below the minimum required level per the new FEMA requirements. Note, the building generator, all switchgear electrical equipment for the pump motors, and all exterior transformers will be underwater during a flood. This will lead to the complete failure of the pumps and a catastrophic environmental disaster. **The entire VAPP must be redesigned accordingly.**

The 32-foot Electrical Building height is excessive and unnecessary. It is twice the height of the existing VPP. The BFE issue noted above will only make this tall building even taller. Further, the current two-story design has no elevator to accommodate disabled employees, with the only restroom and office located on the second floor. **The Electrical Building should be changed to a one-story structure and reoriented in an east-west direction along Hurricane Street.**

These design changes would allow for a large open buffer area for the residences located directly to the north, eliminate shadows, reduce the project's visual impact, be more compatible with the existing VPP, accommodate disabled employees, and better comply with the Venice Coastal Zone Specific Plan.

The three large transformers (each 6.5' to 7' tall) located within the required setback are unacceptable. They are located outside the decorative fencing and surrounded by 19 steel bollards along the entire Canal Court property line. These transformers would be an eyesore. Additionally, they will generate noise. They must be repositioned out of sight and away from any adjacent residences. If a one-story VAPP were U-shaped facing the existing Venice Pumping Plant, the transformers could be placed within the recessed U-shape with direct access to Hurricane Street, but out of sight from adjacent residences.

The HVAC equipment for the Electrical Building is located outside near the north property line and in direct view from adjacent residences. This equipment will generate noise and heat, and should be relocated away from residences (perhaps on the roof) and screened from view.

Parking Lot/Green Space

The proposed public artwork located in the green space south of the proposed parking has <u>not</u> been designed or specifically defined. The design and massing of this proposed artwork should be clearly presented as part of the formal public review process prior to any project approval. In addition, the City must provide written assurances as part of the Conditions of Approval for this project that no artificial lighting, sound or kinetic movement will be associated with the public art. Landscaping shown in the same area as the public art should be revised accordingly prior to further public review.

The accessible aisle for the van parking space shown at 3913 S. Esplanade W. (128 E. Hurricane Street) should be located on the passenger side. The current configuration does not meet either Federal or State Accessibility Code requirements, and should be redesigned.

I oppose any further action on this project, including an indefinite postponement of the April 28, 2022 Public Hearing, until these issues are addressed and corrected.

Sincerely,

Andrew Freedman
20 Ironsides #18, Venice, CA 90292

Steve Freedman
732 Howard St., Venice, CA 90292

Marilyn Mikos – 115 Eastwind St (owner)

To Whom It May Concern:

I stand OPPOSED to the way in which the above referenced Pumping Plant is being constructed. Although I understand the sewage plant is a necessary evil, there are many issues that have not been taken into consideration with the construction design of the project.

I have lived in the same building (which I own) for 33 years. There has been literally zero attention paid to upgrading the infrastructure of this residential area by the City. The "roads" are in dire need of repair, including "Speedway" (which will be adjacent to the Plant) which floods every time it rains. The potholes are ridiculous and no amount of calls to have them repaired gets any attention at all. Yet, you seem to have a burning desire to build an industrial structure right smack dab in the middle of a lovely residential community.

This Plant is being constructed in the MIDDLE OF A BEAUTIFUL RESIDENTIAL AREA...People literally live inches away from where transformers will be housed, which could conceivably cause grave health concerns @ electromagnetic fields. The actual construction of the Plant will disrupt the entire neighborhood with noise, dust, etc. The last time Public Works did construction in this area, several people became ill from the particulate matter in the air and were forced to move. Add to this, the beautiful Lagoon and the indiginous flora and fauna that reside there (and have for decades) - all of which will be disrupted.

There has literally been no communication with the immediate community about what the plans are. From what we "understand", the design is incompatible with the community; further, you have offered no benefit to the community, not only aesthetically (no buffer between the Plant and the community), but also concerning the health and well being (including safety) of the people who live here. Why would you build an industrial project in the middle of a residential zone? It is beyond my comprehension.

I am in dire opposition to moving forward with this project until these (and other) concerns are addressed. I sincerely hope you will, for once, consider the concerns of those of us who live in the community. We pay taxes...and we vote.

Sincerely,

Marilyn Mikos (owner)
115 Eastwind
MdR 90292
marilyn.mikos@gmail.com

Arianne Flemming & Justin Wasser – 3812 Pacific

To Whom it May Concern,

We are residents of 3812 Pacific Ave, located at the corner of Pacific and Hurricane. We have heard the news that the City of Los Angeles plans to construct a large sewage plant at the two vacant lots at the end of Hurricane.

We are writing to express our great concern with this plan for a number of reasons.

First, and most importantly to us, we understand the building for the plant will house transformers, emitting electromagnetic fields. EMFs have been known to cause cancer and as residents we are seriously concerns about how this plant will put our health and the health of the neighborhood at risk.

Further, we love the ecological reserve and lagoon near our house, this plant could have significant impact on the ecological health and well-being of this sensitive lagoon.

Finally, we are concerned that the parking lot proposed near the plant will create an unsafe environment on our street. We are concerned about how the lot will be managed and controlled and secured and the potential safety risks it poses to the community.

We oppose moving forward with the project until these concerns are addressed.

Sincerely,

Arianne Flemming and Justin Wasser

3812 Pacific Ave Marina Del Rey 90292

Susan Afriat & Steve Hyman – 4000 Pacific

Susan Afriatafriats@gmail.com

To: elizabeth.gallardo@lacity.org

Dear Commissioner:

Thu, Mar 3, 2022 at 8:49 AM

We are neighbors writing to share our concerns regarding the Venice Pumping Plant projected proposed at the above addresses. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017. It is impossible to determine from the notice provided what the final design is or if there was
any response to community concerns - we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from existing homes and resources.

We have many concerns: the parking lot will create an unsafe environment near homes; buffers are needed between industrial and parking uses and the adjoining homes, etc.

We understand the project is essential for the area; however, past experience has led us to not trust the promises and assurances that will be made. We oppose moving forward until these concerns are addressed

Thank you for listening to our concerns.

Susan Afriat and Steve Hyman
4000 Pacific Avenue
310-893-4616

Bethany Gorfine – 3950 Via Dolce (owner and condo board president)

On Mar 15, 2022, at 8:53 PM, Bethany Gorfine <Bethany@federalhill.tv> wrote:

Sent from Bethany's iPhone

I live at 3950 Via Dolce, Our 145 unit condo complex (of which I'm HOA president) faces the lagoon and pumping plant site.

I don't appreciate when a design and proposal has been approved and then changed without notifications to the community including the VNC.

SIze does matter, construction matters especially to homeowners on via Dolce as well as surrounding Hurricane.

It was hard enough to to live through the past 5 years of construction and now more years across from us where sound really travels over the lagoon.

We just lived through 4 apartment complexes 2 hotels, and the sewer project.
It's relentless.

We understand the need for an additional plant for the community but keep it simple, small, and no public parking which will turn it into a hangout- luring outsiders into the community.

Adding bicycle racks? An art exhibit? We don't want folks congregating on Hurricane - especially on weekends. It's a huge liability to our community on the Strand that is already experiencing massive intrusions and thefts.

Thank you.

Jonathan Tillman – 3719 Via Dolce

April 13, 2022

To: Los Angeles Planning Commission
Re: 128 Hurricane & 3813 So. Esplanade
ZA 2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A | DIR-2017-4167-PUB-CDP-SPP; ZA 2017-3953- CU

cpc@lacity.org; elizabeth.gallardo@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from exisXng homes and resources. The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics. **Moreover, a licensed architect should be hired to design the structure's exterior and its landscaping.**

Additionally, the transformers proposed within the new location, generate electromagnetic field (EMF) known to cause cancer and we believe to be a risk to our health and the community at large.

We are concerned that the parking lot will create an unsafe environment near homes, and additionally providing only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night?

We understand that project is essential for the area, however we wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication. **One such promise was to repair Via Dolce and Marquesas Way to the extent they were damaged due to construction activity. The applicant, however, left portions of those roads with deep ruts and broken pavement until the community complained to their local representatives. Therefore, continuing community oversight is essential to make sure there is compliance with applicant's obligations in this project.**

We oppose moving forward with the project until these concerns are addressed. Sincerely,

Jonathan Tillman
3719 Via Dolce
Marina del Rey, CA 90292

P.S. If the location of the power boxes endanger the residents of the adjoining property, the city may be liable for inverse condemnation.

Robin Rudisill

April 27, 2022

Los Angeles Planning Commission

Re: 128 Hurricane & 3813 So. Esplanade
ZA2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A
DIR-2017-4167-PUB-CDP-SPP; ZA2017-3953-CU

Honorable City Planning Commissioners:

I live in the area surrounding this project. The last time this project was presented to the community was in 2017, five years ago, and I participated in the hearing down at the Corinth hearing room at that time, expressing numerous concerns. I am deeply concerned that as an "interested party" (I filled out a speaker card and signed a list to be emailed all determinations, as I do at every hearing I attend) I was not notified of any hearings or determinations since that time. I only found out about this hearing because someone asked me how I felt about it. I do not understand why so much time has passed. This should be explained to the community.

This is a sensitive wetland area, surrounded by ESHA, in the Dual Permit Jurisdiction Coastal Zone. I cannot think of a more sensitive area in the Los Angeles Coastal Zone. See attached certified Venice Land Use Plan map. Aesthetics in such a sensitive area should be paramount, and the project must be designed to be compatible with the surrounding residential neighborhood.

This is an industrial facility in a residential neighborhood and as such buffers must be provided between the industrial and parking uses and the adjoining homes. The surrounding community must be given an opportunity to review the architectural design or landscape plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics.

I am also concerned that the parking lot will create an unsafe environment near homes and that only two spaces would be provided to the public. Please inform us re. the design, how the lot will be managed and controlled, and how will it be secured at night. Please put the project on hold until all of these concerns are addressed.

Sincerely,

For the Love of Los Angeles
and our precious Coast,
Robin Rudisill
(310) 721-2343

Adam Rose – 12 Buccaneer St.

I live at 12 Buccaneer, so I'm a few blocks away. That's why I opened my questions/comments by noting that precedence with concerns should go to closer residents (who will deal with this around-the-clock). That said, my girlfriend and I walk a loop around Grand Canal (at least to Lighthouse Bridge) almost daily, so we must pass this site on foot at least 300 times per year. We also help out with local cat rescues, and over the years there have been a number who've lived and/or been caught along the canal. We're night owls and tend to walk around midnight, so we also try to keep an eye out for issues at odd hours (hence why I got them to adjust the new lights on the old plant a few months ago).

From what you just sent me, it seems there are a lot of issues they need to address. I'm a bit fatalistic about this project in the sense that it's reasonable they'll eventually need more capacity (the alternative seems terrible!) It's a big question about how they get there, so I support your pushback on multiple fronts because it needs to be reasonable for those closest. In terms of more ancillary things that my girlfriend and I were thinking about:

- We're still wary of the new plant's noise and vibrations under normal operation (i.e., after construction is done). I was relieved they said the motors will be underground and with more modern technology. However, I'd love to see some sort of engineering report that confirms the noise/vibration projections.

- If this project is going to happen, they should ensure it adds to the community in other ways, including aesthetics. Instead of the harsh floodlights like the older building, maybe decorative street lamps or sconces with proper shading so they don't shine on other people's property or glare across the canal (possibly interrupting wildlife). Some greenery on the walls would be nice (bougainvillea, jasmine or some kind of ivy so it grows up the walls). Alternately, I like the idea of the art project or at least some fun but not garish colors. I think our most "controversial" suggestion may be benches, as I can imagine some folks are wary of them attracting long-term homeless to stay. These could be smaller size, or maybe a series of chair-width seats. With this being such a popular walking area, it never ceases to amaze me that the only benches on the whole peninsula seem to be in the kids park on Via Dolce.

- I worry that EIRs only focus on certain types of wildlife and may not be accommodating for "common" waterfowl like ducks. Those fledglings bring a lot of joy to the community each spring! Unless the noise/vibrations are in issue, it might be nice if that flat area over the "pool" could have some bushes as a protective habitat for mothers and their young. I'd love to make sure the design considers potential places they might fall and get trapped, too, and holes big enough to get in and out of (but not so big people can get through, as the mentioned a security concern).

Robert Nau – 4250 Via Dolce

I am a concerned resident and a condo owner at 4250 Via Dolce. Thank you!

Felicia Glade & Mike Pelletier – 116 Galleon St.

Hi, as a resident living close to the hurricane pumps, I am very concerned about this project.

Please eliminate the parking lot, and instead use parking on the pump plant property or street. Having an unsecured lot will invite security issues that will affect our children who play outside around there and who we take walks with along the canals. Please have security Patrol planned for this residential area as this lot will attract unhoused people to a peaceful quiet and currently safe neighborhood.

Please adopt written recorded conditions of approval that clearly spell out all obligations in the future so that neighbors can monitor and enforce, including each requirement of the approvals and the MMRP, and mitigations during construction years.

Thank you for reading. I hope you protect nearby residents and our children.

Felicia

Eliane Gans – 3933 Esplanade (owner)

Aug 10, 2022

To President Millman and Honorable Commissioners
City Planning Commission

I am a resident on Pacific Court/ South Esplanade West- 1/2 block from the pumping station.

I have been a resident and own the three Unit property, where I reside, for the past 38 years. I feel that the residents of this community- especially the residents who live on the Canal, are being invaded, disrespected and disregarded.

We have moved to this community and this special area for reasons that the City Planning Commission may not understand. It is a peaceful, and non-commercial area with beautiful residences, lovely landscaping, water and peace.

Now we are being invaded with a design of the pumping station that is horrible, not in keeping with any structures in the neighborhood and will be an eye sore to any adjacent residences. The design, the noise from the transformers and other equipment will impact any neighboring homes and even visitors. The equipment may also be dangerous to the environment and to those of us who live here.

The City Planning Commission DOES NOT LIVE HERE. And We do! This is a matter of our well-being and our daily lives!

The parking lot is not necessary, and in addition -WHY HAVE YOU REMOVED 4 PARKING SPACES necessary to the residents on Hurricane?? This area already has limited parking! This is not necessary, and another invasion and destruction of our quality of life in our neighborhood.

Lastly, and importantly, all of our property values will be diminished. Who would want to live near a Pumping station that makes noise, spews chemicals into the air and looks ugly, and an eye sore to the neighborhood...

I respectfully request that you re-design the new facility and review the recommendations that you have received. I also request that you landscape the entire area. And, of course, protect the neighboring residences.

With a plea of hope for your consideration and revisions, as requested by all of us who are residents; and the requests made by Genevieve and Mile Morrill-Borassi. And Kristy Swanson.

These requests are truly from all of us in the neighborhood, and I respectfully ask for your assistance and re-consideration of the current plan.

Sincerely,

Eliane Gans
Property owner: 3933 Esplanade West, Marina del Rey, CA 90292

Jenesa Kurland – 4300 Via Dolce (condo owner)

Whatever City says they're going to do to mitigate or their useless report says regarding noise, vibration, home damage, etc. is all BS rhetoric: City takes no responsibility and homeowner is helpless. Their preconstruction survey of one's home carries as much weight as blank pieces of paper.

Venice Neighborhood Council

PO Box 550, Venice, CA 90294
venicenc.org

MOTION BACKGROUND: Los Angeles Public Works (LAPW) has proposed the Venice Auxiliary Pumping Plant (VAPP) at 128 Hurricane St and an associated parking lot for employees and limited public use at 133 Hurricane St, MDR. The residents acknowledge the VAPP is considered critical infrastructure. From 2017 through and including the final city approval process, LAPW never meaningfully and materially addressed issues raised by the community. In fact, the City Planning Commission instructed LAPW to meet with the community. Nothing changed because of those meetings despite a multitude of suggestions and proposals offered to LAPW. The issues include, but are not limited to:

1. Conformance with the certified Venice LUP (Policies I.A.5, I.C.1, I.C.6, and I.D.1);
2. Meeting established Public Benefit standards including a 10' landscaped, irrigated buffer along all property lines. The performance standards applied to this project are applicable to those on a major or secondary highway, not a residential street;
3. Adherence to court-mandated ESHA protections in the Ballona Lagoon/Grand Canal area including no dredging and/or use of heavy equipment both of which are part of the project plan;
4. Mitigation of EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas release. The community has put forth a plan to address some of these issues;
5. Mitigation of "significant and unavoidable" construction-related issues including ground-borne vibration which could result in residential building damage, and, construction noise that exceeds LA CEQA Thresholds guidelines;
6. Improvement of inadequate emergency access during construction activities;
7. Change to five day/week construction and more restricted hours in lieu of six days/week;
8. Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city;
9. Modification of the project design so that it is compatible with the residentially zoned neighborhood;
10. Actionable protection of residential properties from dirt, dust and other construction impacts;
11. Upgrade of a deficient maintenance plan for both the new and existing facility.

The intention of this motion is not to stop a necessary infrastructure project. It is to seek a meaningful, results-oriented dialogue with Public Works to identify reasonable solutions for these issues.

Venice Neighborhood Council

PO Box 550, Venice, CA 90294
venicenc.org

(sent via email)
Traci Park, LA City Council Person CD-11 - Councilmember.Park@lacity.org
Sean Silva, Venice Field Deputy, CD-11 - Sean.Silva@lacity.org
Juan Fregoso, District Director, CD-11 - Juan.Fregoso@lacity.org
Marqueece Harris-Dawson, LA City Council President - Marqueece.Harris-Dawson@lacity.org
Hydee Feldstein Soto, City Attorney - Hydee.FeldsteinSoto@lacity.org
Mike Davis, President Pro Tempore, LA Public Works Board of Commissioners - Mike.Davis@lacity.org
Teresa Villegas, Vice President, LA Public Works Board of Commissioners - Teresa.Villegas@lacity.org
Vahid Khorsand, Commissioner, LA Public Works Board of Commissioners - Vahid.Khorsand@lacity.org
Susana Reyes, Commissioner, LA Public Works Board of Commissioners - Susana.Reyes@lacity.org
Ted Allen, City Engineer, Bureau of Engineering - Ted.Allen@lacity.org
Chloe Seifert, Coastal Program Analyst, California Coastal Commission - Chloe.Seifert@coastal.ca.gov

On Sept 17 2024, the Venice Neighborhood Council Board of Officers passed the following motion by a vote of 13-4-0.

MOTION: The Venice Neighborhood Council opposes CPC-2024-2010-GPA-ZC-CU2-SPPC-- allowing the City of Los Angeles to obtain a General Plan Amendment (GPA) and Zone Change (ZC) from RW2-1 to Public Facilities at 133 Hurricane St., a Project Review (SPPC), and a Conditional Use for the construction, use, and maintenance of a public parking area in a residential zone (CU2) for the empty lots located at 128 Hurricane St/3913 Esplanade -- unless LA Public Works (LAPW) materially and in good faith addresses the community's serious issues with this project.

Sincerely,

Brian Averill
President
Venice Neighborhood Council

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Ira Brown <ira.brown@lacity.org>

VAPP Concerns - Hurricane Street - MDR

1 message

Susanne Cumming <cumming@earthlink.net> Mon, May 26, 2025 at 7:36 PM
To: ira.Brown@lacity.org

RE: Case # CPC-2024-2010-GPA-ZC-CU3-SPPC

Hello Deputy Brown,

I am writing because I am concerned about the impacts this VAPP construction project will have on my family as well as our community.

I reside at 14010 Captain's Row, Marina del Rey, adjacent to the Marina Peninsula.

Methane Gas: My family, friends and I are concerned about the potential release of methane Gas and other chemical hazards. The City's mitigation plan acknowledges that the release of hazardous materials poses a significant hazard to the public. This project should have (1) appropriate detection devices installed with real time data accessible by the community; (2) a plan to pro-actively address the same exposure concerns for the community as defined for workers, and (3) if an issue is discovered, the project should be shut down immediately until a solution is put in place.

Improved Emergency Preparedness: After the Palisades and Altadena fires, it is clear there should be better preparation for any disaster. What is the plan for the Marina Peninsula and adjacent communities like mine? This project will only exacerbate potential issues. I hope LASAN will take the lead to design and implement improved emergency preparedness.

Thank you for your consideration.

Susanne Cumming

Susanne L. Cumming, Esq.

CA State Bar #137426

Cell/Text: (310)962-3341

cumming@earthlink.net

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Ira Brown <ira.brown@lacity.org>

Hurricane St pump station

1 message

Victoria Wynn <vwsqueezeme@gmail.com> Sun, May 18, 2025 at 4:04 PM
To: Ira.Brown@lacity.org

Hello Mr. Brown,

I am writing to you because I own the apartment building at 110 Hurricane Street in Marina Del Rey where the Pump Station is. This is a 15 unit building all 2 bedroom units and many of my tenants either work from home or have small childern.

The construction of the new station is definitely is going to be loud and a lot of trucks on the street like the previous years long construction on the building. The noise is a big problem and there should be a sophisticted sound barrier especially with the pile drivers and jack hammers etc.

Secondly there is an empty lot at 120 Hurricane that I have been told is going to be made into a parking lot. This also is a real problem Hurricane is a very short narrow street that cannot handle the traffic coming through looking for parking as it is. We are inundated with cars on the weekends and holidays as it is with not enough parking on the street for the people that live in all the buildings to begin with. These are tenants who pay to live in the Marina and should come before anything when making these large decisions.

Lastly I would like to see a civil engineer due foundation checks up to Pacific Ave and draw a diameter line to check on adjoining buildings to the north end of the project if warranted. This is not the first time there has been major work done there and we need to be protected from damage to our buildings especially when those buildings are people's livelihood. If there is damage done because of all this continuous construction that lasts years at a time then the city of Los Angeles must make the necessary repairs.

Thank you for reading my letter and taking into account the people that live in apartments on Hurricane,
Victora Wynn

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Venice Neighborhood Council

PO Box 550, Venice, CA 90294
venicenc.org

(sent via email)
Traci Park, LA City Council Person CD-11 - Councilmember.Park@lacity.org
Sean Silva, Venice Field Deputy, CD-11 - Sean.Silva@lacity.org
Juan Fregoso, District Director, CD-11 - Juan.Fregoso@lacity.org
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Mike Davis, President Pro Tempore, LA Public Works Board of Commissioners - Mike.Davis@lacity.org
Teresa Villegas, Vice President, LA Public Works Board of Commissioners - Teresa.Villegas@lacity.org
Vahid Khorsand, Commissioner, LA Public Works Board of Commissioners - Vahid.Khorsand@lacity.org
Susana Reyes, Commissioner, LA Public Works Board of Commissioners - Susana.Reyes@lacity.org
Ted Allen, City Engineer, Bureau of Engineering - Ted.Allen@lacity.org
Chloe Seifert, Coastal Program Analyst, California Coastal Commission - Chloe.Seifert@coastal.ca.gov

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Sincerely,

Brian Averill
President
Venice Neighborhood Council

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Ira Brown <ira.brown@lacity.org>

RE: Venice Auxiliary Pumping Plant - CPC-2024-2010-GPA-ZC-CU3-SPPC

1 message

Whalen <whalen@ca.rr.com> Tue, May 13, 2025 at 3:45 PM
To: Ira Brown <ira.brown@lacity.org>

Thanks for accommodating my travel schedule delay.

Here are my comments regarding the proposed design.

And yes, I'd like to be added to the "interested parties" list.

My mailing address is:

578 Washington Blvd #578

Marina del Rey CA 90292

Thanks again,

Dan

From: Ira Brown <ira.brown@lacity.org>
Sent: Tuesday, May 13, 2025 11:33 AM
To: Whalen <whalen@ca.rr.com>
Subject: Re: Venice Auxiliary Pumping Plant - CPC-2024-2010-GPA-ZC-CU3-SPPC

Hello Whalen

Welcome back.

No. It is not too late to submit comments to me directly or to the City Planning Commission after the staff report is issued.

Further, if you would like to be added to the interested parties list to receive notification of the CPC date or to receive a copy of the decision letter please provide your mailing address.

Ira

On Tue, May 13, 2025 at 11:07 AM Whalen <whalen@ca.rr.com> wrote:

> Dear Mr. Brown,
>
> I just returned from a 6-week trip out of the country and found the Notice of Public Hearing for the Venice Auxiliary Pumping Plant (CPC-2024-2010-GPA-ZC-CU3-SPPC) that was held on May 5, 2025 in my mail.
>
> Is it too late for me to submit my written comments about this project?
>
> Sincerely,
>
> Dan Whalen, AIA
>
> Former Owner of 128 E Hurricane Street vacant lot

--

LOS ANGELES CITY PLANNING

Ira Brown

Pronouns: He, His, Him

City Planner

Los Angeles City Planning

200 N. Spring St., Room 721

Los Angeles, CA 90012

T: (213) 978-1453 | Planning4LA.org

E-NEWS

2 attachments

Daniel P. Whlaen - VAPP Public Hearing Comments - May 5, 2025.pdf
112K

Ord_186952.pdf
4553K

May 13, 2025

Mr. Ira Brown, City Planner
ira.brown@lacity.org
Los Angeles Department of City Planning
200 N Spring Street, Room 721
Los Angeles CA 90012

RE: Venice Auxiliary Pumping Plant (CPC-2024-2010-GPA-ZC-CU3-SPPC)

Dear Mr. Brown,

I am the former owner of 128 E Hurricane Street and a California registered architect. As you are aware, the City of Los Angeles acquired our property as part of an eminent domain action as part of the Venice Auxiliary Pumping Plant project, so I am quite familiar with the aspects of this project.

This project has been in the design and development phase for nearly 10 years. Since the original design was first developed, a significant change to the flood zone map in the Venice area was made by FEMA, effective April 21, 2021. Due to climate change, FEMA has raised the minimum Base Flood Elevation (BFE) which determines the Lowest Finished Floor Elevation (LFFE).

The new BFE affects the site where the new Venice Auxiliary Pumping Plant is located, but no change has been made to the original Auxiliary Pumping Plant design.

As currently designed, the new Auxiliary Pumping Plant building generator, all switchgear, electrical equipment for the pump motors, and all exterior transformers (all of which will be placed between 16-20" below the LFFE) will be underwater during the FEMA anticipated flood level. This flooding will short circuit all primary and backup power, and cause a complete failure of the new pumps. This in turn will create a catastrophic environmental disaster, as thousands of gallons of unpumped raw sewage overflow directly into the Grand Canal and Ballona Lagoon.

The existing Venice Pumping Plant's primary and backup electrical sources are even lower than the proposed VAPP design and will not alleviate this situation.

Note: As a participant in the National Flood Insurance Program (NFIP), the City of Los Angeles is required to enforce the flood clearance requirement for new construction and substantial improvement projects. The two lots where the future VAPP is to be located were affected by this flood zone map update. The new Base Flood Elevation (BFE) for these two

lots is now 8 feet above sea level, and all new buildings require that the Lowest Finished Floor Elevation (LFFE) be at least 9 feet (8 feet + 1 foot of free board) per LA City Ordinance 186952. The current design for the VAPP has the Lowest Finished Floor Elevation (LFFE) at 7.67 feet – 16 inches below the minimum required level per the new FEMA and LA City Ordinance requirements (The exterior electrical transformers are approximately even lower at approximately 20" below the minimum level).

Clearly, the proposed VAPP transformer pads and ground floor must be raised accordingly to prevent such an avoidable disaster. (Note: A second option would be to build a 20" high waterproof wall around the entire site, but this option would prevent all access to the facility and, therefore, is not feasible). I urge the Planning Department to withhold approval of this project until it complies with the minimum requirements established by FEMA and City of Los Angeles Ordinance 186952.

Increasing the ground floor and transformer pad elevations will make the VAPP Electrical Building taller than what is allowed by the Venice Coastal Zone Specific Plan. So other design changes may need to be considered.

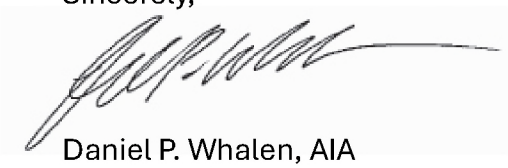
The 32-foot Electrical Building height is excessive and unnecessary. It is twice the height of the existing Venice Pumping Plant. Correcting the BFE issue noted above will only make this tall building even taller. (Note: Raising the ground floor by 16" will increase the height of the building above the allowable 30' maximum height for buildings located within 60' of the Grand Canal).

Further, the current two-story design has no elevator to accommodate disabled employees, since the only restroom and office are both located on the second floor. Perhaps the electrical components should be located on the second floor and the office and restroom on the first floor.

Finally, a small but important accessibility code issue concerns the accessible aisle for the van parking space shown on Sheets C-13 and C-14 (located at 3913 S. Esplanade W./128 E. Hurricane Street). This aisle should be located on the passenger side. The current configuration does not meet either Federal, State or City Accessibility Code requirements, and should be redesigned accordingly.

Thank you for your consideration.

Sincerely,



Daniel P. Whalen, AIA

Attachment: Ordinance 186952

ORDINANCE NO. 186952

An ordinance amending the Specific Plan for the Management of Flood Hazards, established by Ordinance No. 154,405 and amended by Ordinance Nos. 163,913 and 172,081, to update it to meet current federal standards and to rename it the Flood Hazard Management Ordinance.

WHEREAS, the Congress of the United States enacted the National Flood Insurance Act of 1968, as amended (42 USC 4001 et seq.), the Flood Disaster Protection Act of 1973 (Public Law 93-234, 87 Stat. 975), and subsequent laws for the protection of life and property and to forestall, to the extent possible, flood-related disaster;

WHEREAS, in enacting those laws, Congress has found that:

1. annual losses throughout the nation from floods and mudslides are increasing at an alarming rate, largely as a result of the accelerating development of, and concentration of population in, areas of flood and mudslide hazards;

2. the availability of federal loans, grants, guaranties, insurance and other forms of financial assistance are often determining factors in the utilization of land and the location and construction of public and private industrial, commercial and residential facilities;

3. property acquired or constructed with grants or other federal assistance may be exposed to risk of loss through floods, thus frustrating the purpose for which such assistance was extended;

4. federal instrumentalities insure or otherwise provide financial protection to banking and credit institutions whose assets include a substantial number of mortgage loans and other indebtedness secured by property exposed to loss and damage from floods and mudslides;

5. the nation cannot afford the tragic loss of life caused annually by flood occurrences, nor the increasing losses of property suffered by flood victims, most of whom are still inadequately compensated despite the provision of costly disaster relief benefits; and

6. it is in the public interest for persons already living in flood-prone areas to have both the opportunity to purchase flood insurance and access to more adequate limits of coverage, so they will be indemnified for their losses in the event of future flood disaster; and

WHEREAS, the Flood Disaster Protection Act of 1973:

1. substantially increases the limits of coverage authorized under the National Flood Insurance Program;

2. provides for the expeditious identification of, and the dissemination of information concerning, flood-prone areas;

3. requires state or local communities, as a condition of future federal financial assistance, including disaster relief and federally insured mortgages, to participate in the National Flood Insurance Program and to adopt adequate floodplain ordinances with effective enforcement provisions consistent with federal standards to reduce or avoid future flood losses; and

4. requires the purchase of flood insurance by property owners who are being assisted by federal programs or by federally supervised, regulated or insured agencies or institutions in the acquisition or improvement of land or facilities located or to be located in identified areas having special flood hazards; and

WHEREAS, it is imperative that the City adopt a floodplain management program in order to maintain Regular Status in the National Flood Insurance Program;

WHEREAS, Regular Status significantly increases the limits of coverage and significantly reduces the overall premium rates of flood insurance;

WHEREAS, Congress intended the National Flood Insurance Program to be the minimum basis upon which local communities should design their floodplain management regulations;

WHEREAS, the federal regulations, being designed for national coverage, do not fully recognize certain flood and/or mudflow hazards unique to the western states and particularly to Southern California;

WHEREAS, for the protection of human life, health, safety and for the protection of property, it is essential to fully develop an adequate floodplain management plan;

WHEREAS, the state Constitution empowers to the City the authority to make and enforce all laws and regulations with respect to municipal affairs;

WHEREAS, Section 554 of the City Charter provides that the purpose of the General Plan shall be to serve as a basic and continuous reference in: (a) planning for the development of the City; (b) developing, correlating and coordinating official regulations, controls, programs and services; and (c) attaining coordination of planning and administration by all agencies of the City government, other governmental bodies and private organizations and individuals involved in the development of the City;

WHEREAS, the policies, objectives and programs of the Conservation Plan, an element of the City's General Plan, are consistent with the applicable provisions and intent of the Flood Disaster Protection Act of 1973;

WHEREAS, it is a policy of the Safety Element of the General Plan that "hazards to life and property due to mudflow and storm runoff be minimized";

WHEREAS, Section 554 of the City Charter sets forth the authority for the establishment of ordinances with regulatory controls or incentives as may be required to insure the execution of the General Plan;

WHEREAS, because specific plans are a type of regulatory land use instrument and subject to certain provisions in Chapter One of the City's Municipal Code that are wholly unrelated to the regulations in this Ordinance, the Ordinance is being retitled to the Flood Hazard Management Ordinance; and

WHEREAS, this Ordinance revision, which must be completed by April 20, 2021, in order for the City to continue to be eligible for participation in the National Flood Insurance Program, is per the request of Federal Emergency Management Agency Region IX and the State DWR in order to comply with the Community Assistance Visit that was completed on April 10, 2020.

NOW, THEREFORE,

THE PEOPLE OF THE CITY OF LOS ANGELES
DO ORDAIN AS FOLLOWS:

Section 1. Ordinance No. 154,405 is hereby amended in its entirety to read as follows:

Section 1. PURPOSE AND OBJECTIVES. The City Council hereby establishes this Flood Hazard Management Ordinance, hereafter referred to as the Ordinance. The Ordinance shall apply to all public and private development. This Ordinance provides for the establishment, management and regulatory control of Flood Hazard areas.

Being hazard-specific, the provisions of this Ordinance deal with the unique problems of each hazard in addition to the Citywide policies and goals.

This Ordinance does not imply that land outside the areas of Special Flood Hazard identified on the Los Angeles Flood Hazard Map or that uses permitted within such areas will be free from Flooding or Flood-related damages. This map identifies areas expected to be impacted by One Hundred-Year Floods. As a matter of practicality, the City cannot provide protection against every eventuality and no guarantee is given or implied that all eventualities are protected against.

STATUTORY AUTHORIZATION.

The Legislature of the State of California has, in Government Code Sections 65302, 65560, and 65800, conferred upon local governments the authority to adopt regulations designed to promote the public health, safety, and general welfare of its citizenry. Therefore, the City of Los Angeles in the County of Los Angeles hereby adopts the following floodplain management regulations.

FINDINGS OF FACT.

1. The Flood Hazard areas of the City of Los Angeles are subject to periodic inundation which results in loss of life and property, health and safety hazards, disruption of commerce and governmental services, extraordinary public expenditures for Flood protection and relief, and impairment of the tax base, all of which adversely affect the public health, safety, and general welfare.

2. These Flood losses are caused by uses that are inadequately elevated, floodproofed, or protected from Flood damage. The cumulative effect of obstructions in areas of special Flood Hazards that increase Flood heights and velocities also contributes to Flood losses.

STATEMENT OF PURPOSE.

1. Protect human life and health;

2. Forestall, to the extent possible, Flood-related disaster (from any cause);

3. Provide a means by which public and private development is planned in such a manner as to avoid or otherwise minimize Flood-related risks to residents and structures on or near hillside areas, as well as upstream or downstream of any project;

4. Minimize expenditure of public money for costly Flood control projects;

5. Minimize the need for rescue and relief efforts associated with Flooding and generally undertaken at the expense of the general public;

6. Provide the authority under which special programs can be devised in order to provide for relief from Flood Hazards;

7. Minimize prolonged business interruptions;

8. Minimize damage to public facilities and utilities, such as water and gas mains, electric, telephone, and sewer lines, and streets and bridges located in areas of special Flood Hazard;

9. Help maintain a stable tax base by providing for the sound use and development of areas of special Flood Hazard, so as to minimize future blighted areas caused by Flood damage;

10. Require that potential buyers are notified that property is in an area of special Flood Hazard; and

11. Require that those who occupy the areas of special Flood Hazard assume responsibility for their actions.

Sec. 2. DEFINITIONS. For the purposes of this Ordinance, certain terms require special definitions. All other words or terms not herein defined shall be construed as defined in Sections 11.01, 12.03, and 17.02 of the Los Angeles Municipal Code.

Accessory Structure. A structure that is either:

1. Solely for the parking of no more than two cars; or

2. A small, low cost shed for limited storage, less than 150 square feet and $1,500 in value.

Administrator. The Federal Insurance Administrator. The person delegated the responsibility of the administration of the National Flood Insurance Program.

Appeal. A request for a review of a decision maker's interpretation of any provision of this Ordinance or a request for a Waiver.

Area of Special Mudslide (Mudflow) Hazard. The area subject to severe Mudslides (Mudflow). The area is designated as Zone M on the Flood Insurance Rate Map (FIRM).

Base Flood. Any flood having a one percent chance of being equated or exceeded in any given year. Base Flood may also be referred to as a One Hundred-Year Flood.

Basement. Any area of a building having its floor subgrade below ground level on all sides.

Breakaway Wall. Any type of wall, whether solid or lattice, and whether constructed of concrete, masonry, wood, metal, plastic, or any other suitable building material, which is not part of the structural support of the building, and which is designed to break away under abnormally high tides or wave action without causing any damage to the structural integrity of the building on which it is used or any building into which they might be carried by Flood waters. A Breakaway Wall shall have a safe design loading resistance of not less than ten and no more than 20 pounds per square foot. Use of a Breakaway Wall must be certified by a registered engineer or architect and shall meet the following conditions:

1. Breakaway Wall collapse shall result from a water load less than that which would occur during the Base Flood; and

2. The elevated portion of the building shall not incur any structural damage due to the effect of wind and water loads acting simultaneously in the event of the Base Flood.

Coastal High Hazard Area. Any area subject to high velocity waters including, but not limited to, wave wash or tsunami. This area is designated V1-30, V, or VE Zones on the Los Angeles Flood Hazard Map (LAFHM).

Debris. Any natural material including, but not limited to, silt, sand, rock, and wood, and any other objects, including, but not limited to, vehicles and structures or their component parts capable of being transported by water or Mudflow and deposited in a location other than the point of origin.

Developed Area. An area of a community as shown on the Zone AR-Developed Area Map adopted with this Ordinance (using Southern California Association of Governments land use coverage data), and that is:

1. A primarily urbanized, built-up area that is a minimum of 20 contiguous acres, has basic urban infrastructure, including roads, utilities, communications, and public facilities to sustain residential, commercial and industrial activities; and

   (a) within which 75 percent or more of the parcels, tracts or lots contain residential, commercial, or industrial structures or uses; or

   (b) is a single parcel, tract, or lot in which 75 percent of the area contains existing commercial, or industrial structures or uses; or

   (c) is a Subdivision developed at a density of at least two residential structures per acre within which 75 percent or more of the lots contain existing residential structures.

It has been determined that all AR zoned areas within the corporate boundaries of the City of Los Angeles are considered to be developed areas for the purpose of administrating the AR Zone Floodplain management regulations.

2. Undeveloped parcels, tracts, or lots, the combination of which is less than 20 acres, and which are contiguous on at least three sides to areas meeting the criteria of Subdivision 1 above.

3. A Subdivision that is a minimum of 20 contiguous acres that has obtained all necessary government approvals, provided that the actual tart of Construction of structures has occurred on at least:

(a) ten (10%) percent of the lots or remaining lots of a Subdivision or

(b) ten (10%) percent of the maximum building coverage or remaining building coverage allowed for a single lot Subdivision, and construction of structures is underway. Residential Subdivisions must meet the density criteria of Subdivision 1, Paragraph (c) above.

Development. Any person-made change to improved or unimproved real estate, including, but not limited to, buildings or other structures, mining, dredging, filling, grading, paving, excavation, or drilling operations. Development may also be referred to as a Project.

Emergency. Any occurrence which by reason of its magnitude is or is likely to become beyond the control of the normal services, personnel, equipment and facilities of the regularly constituted branches and departments of the City.

Existing Construction. Any Development for which Start of Construction commenced prior to October 9, 1980. Existing Construction may also be referred to as Existing Structures.

Existing Manufactured Home Park or Subdivision. A Manufactured Home Park or Subdivision for which the construction of facilities for servicing the lots on which the manufactured homes are to be affixed (including, at a minimum, the installation of utilities, the construction of streets, and either final site grading or the pouring of concrete pads) was completed before October 9, 1980.

Expansion to an Existing Manufactured Home Park or Subdivision. The preparation of additional sites by the construction of facilities for servicing the lots on which the Manufactured Homes are to be affixed (including the installation of utilities, the construction of streets, and either final site grading or the pouring of concrete pads).

Flood or Flooding.

1. A general and temporary condition of partial or complete inundation of normally dry land areas resulting from:

   (a) overflow of inland or tidal waters, including storm waves or seiches;

   (b) unusual and rapid accumulation or runoff of surface waters from any source;

   (c) rupture or breaching of water retaining structures including, but not limited to, dams, canals, and viaducts, caused by an unpreventable force of nature;

(d) Mudflow which is proximately caused or precipitated by accumulations of water on or under the ground;

(e) the collapse or subsidence of land resulting from Flood-related erosion.

Flood Boundary and Floodway Map (FBFM). The official map issued by the Administrator which delineates Floodways within the City of Los Angeles.

Flood Elevation Determination. A determination by the Administrator or by the City Engineer of the water surface elevations of the Base Flood.

Flood Hazard or Flood-Related Hazard. Any hazard covered by this Ordinance including, but not limited to: Flooding, Mudflow, Coastal High-Hazards, and Flood-Related Erosion.

Flood Hazard Study. An examination, evaluation, and determination of Flood Hazards from all causes and, if appropriate, corresponding water surface elevations; or an examination, evaluation, and determination of Mudflow or Flood-Related Erosion Hazards prepared by a licensed hydrologist or civil engineer.

Flood Insurance. Insurance coverage provided under the National Flood Insurance Program.

Flood Insurance Rate Map (FIRM). The official map issued by the Administrator delineating both the Special Hazard Areas and the risk premium zones for the City of Los Angeles.

Flood Protection System. Structural works which have been constructed specifically to modify Flooding in order to reduce the extent of the area and/or of Flood waters within areas of Special Flood Hazard. Such a system of specialized flood modifying works typically includes hurricane tidal barriers, dams, reservoirs, levees, dikes, and improved channels, and are constructed in conformance with sound engineering standards.

Floodplain or Flood-prone Area. Any land susceptible to being inundated by water from any source (see definition of Flooding).

Flood-proofing. Any combination of structural and non-structural additions, changes or adjustments to structures which reduce or eliminate Flood-related damage to real estate or improved real property, water and sanitary facilities, structures and their contents.

Flood-Related Erosion Hazard Area or Flood-Related Erosion-Prone Area. An area which is likely to suffer Flood-related erosion damage resulting from the collapse or subsidence of land along the shore or bank of an ocean, lake, river, or watercourse as a result of undermining caused by waves or currents of water exceeding anticipated cyclical levels or suddenly caused by an unusually high water level in a natural body of

water, resulting from a severe storm, or by an unanticipated force of nature, such as a tsunami, an abnormal tidal surge, flash flood, or some similarly unusual and unforeseeable event which results in Flooding.

Floodway. The channel of a river or other major drainage course and the adjacent land area that must be reserved in order to discharge the Base Flood without cumulatively increasing the water surface elevation more than 1 foot.

Freeboard. A factor of safety denoting the vertical distance above a Flood level for the purposes of floodplain management. The determination of Freeboard should take into account factors that could contribute to Flood heights greater than the height calculated for a selected size Flood and Floodway conditions, such as wave action, bridge openings and the hydrological effect of urbanization of the watershed and/or burn of the natural vegetation cover of the watershed.

Functionally Dependent Use. A use which cannot perform its intended purpose unless it is located or carried out in close proximity to water. The term includes only docking facilities, port facilities that are necessary for the loading and unloading of cargo or passengers, ship building and ship repair facilities, but does not include long-term storage or related manufacturing facilities.

Highest Adjacent Grade. The highest natural elevation of the ground surface prior to construction next to the proposed walls of a Structure-.

Historic Structure.

Any Structure that is:

1. Listed individually in the National Register of Historic Places (a listing maintained by the Department of Interior) or preliminarily determined by the Secretary of the Interior as meeting the requirements for individual listing on the National Register;

2. Certified or preliminarily determined by the Secretary of the Interior as contributing to the historical significance of a registered historic district or a district preliminarily determined by the Secretary to qualify as a registered historic district;

3. Individually listed on a state inventory of historic places in states with historic preservation programs which have been approved by the Secretary of Interior; or

4. Individually listed on a local inventory of historic places in communities with historic preservation programs that have been certified either by an approved state program as determined by the Secretary of the Interior or directly by the Secretary of the Interior in states without approved programs.

Los Angeles Flood Hazard Map (LAFHM). The official map for the City of Los Angeles showing the boundaries of hazard areas and consisting of a number of separate sheets, actual or computer-stored, bearing marks, notations, references and other pertinent information.

Lowest Floor. The lowest floor of the lowest enclosed area (including Basement). An unfinished or Flood resistant enclosure, usable solely for parking of vehicles, building access or storage, in an area other than a Basement area, is not considered a building's Lowest Floor, provided that such enclosure is built so that it does not violate the applicable non-elevation design requirements of this Ordinance.

Manufactured Home. A Structure, transportable in one or more sections which is built on a permanent chassis and designed to be used with or without a permanent foundation when connected to the required utilities. Recreational vehicles or travel trailers used only for vacations are not considered Manufactured Homes. The term includes, but is not limited to, the definition of "Manufactured Home" as set forth in the regulations governing the Mobile Home Safety and Construction Standards Program (24 CFR 3282.7(u)). For floodplain management purposes the term "Manufactured Home" also includes park trailers, travel trailers and other similar vehicles placed on a site for greater than 180 consecutive days.

Manufactured Home Park or Subdivision. A parcel (or contiguous parcels) of land divided into two or more Manufactured Home lots for rent or sale and having facilities for servicing the lot on which the Manufactured Home is to be affixed (including at a minimum site grading or the pouring of concrete pads, installation of utilities and the construction of streets).

Market Value. Shall be determined by estimating the cost to replace the Structure in new condition and adjusting that cost figure by the amount of depreciation which has accrued since the structure was constructed.

1. The cost of replacement of the structure shall be based on a square foot cost factor determined by reference to a building cost estimating guide recognized by the building construction industry.

2. The amount of depreciation shall be determined by taking into account the age and physical deterioration of the structure and functional obsolescence as approved by the floodplain administrator, but shall not include economic or other forms of external obsolescence.

   Use of replacement costs or accrued depreciation factors different from those contained in recognized building cost estimating guides may be considered only if such factors are included in a report prepared by a licensed appraiser registered in the State of California, Department of Consumer Affairs, Bureau of Real Estate (BRE) Appraisers and supported by a written explanation of the differences.

Mean Sea Level. The National Geodetic Vertical Datum (NGVD) of 1929 or other datum, to which Base Flood elevations shown on the Community Flood Insurance Rate Maps (FIRM) are referenced and applicable to the National Flood Insurance Program (NFIP).

Mudflow. The condition wherein there is a river, flow, or inundation of liquid mud down a hillside usually, but not limited to, the result of a dual condition of loss of brush cover and the subsequent accumulation of water on or under the ground preceded by a period of unusually heavy or sustained rain. A Mudflow may occur as a distinct phenomenon while a landslide is in progress.

Mudflow-Prone Areas. An area with land surfaces and slopes of unconsolidated material where the history, geology and climate indicate a potential for Mudflow.

Mudslide. Describes a condition where there is a river, flow, or inundation of liquid mud down a hillside, usually as a result of a dual condition of loss of brush cover and the subsequent accumulation of water on the ground, preceded by a period of unusually heavy or sustained rain.

New Construction, New Development, or New Project. Any public project or any phase of a public project for which a contract has not been entered into, or any private project for which a grading or building permit is issued on or after October 9, 1980. It is not intended in this definition that the issuance of a grading permit prior to October 9, 1980 abrogate the necessity for compliance with this Ordinance for any additional permits issued on or after October 9, 1980.

New Manufactured Home Parks or New Manufactured Home Subdivision. Any Manufactured Home Park or Manufactured Home Subdivision for which a grading or building permit is issued on or after October 9, 1980.

One Hundred-Year Flood. See definition of Base Flood.

Ordinance. The Flood Hazard Management Ordinance.

Person. Includes any individual or group of individuals, corporation, partnership, association or other entity, including federal, state, regional and local governments and agencies.

Project. See definition of Development.

Recreational vehicle means a vehicle which is:

1. Built on a single chassis;

2. 400 square feet or less when measured at the largest horizontal projection;

3. Designed to be self-propelled or permanently towable by a light duty truck; and

4. Designed primarily not for use as a permanent dwelling but as temporary living quarters for recreational, camping, travel, or seasonal use.

Shallow Flooding Area. A designated AO, AH, AR/AO, or AR/AH Zone on the LAFHM with Base Flood depths from 1 to 3 feet where a clearly defined channel does not exist, where the path of Flooding is unpredictable and indeterminate and where velocity flow may be evident. Such flow is characterized by ponding or sheet flow.

Special Flood Hazard Area. All land in the Floodplain subject to a one percent or greater chance of Flooding in any given year. This area is designated as A, AO, AE, AH, AI-30, A-99, AR, AR/A1-30, AR/AE, AR/AO, AR/AH, AR/A, V, VE, and VI-30 Zones on the LAFHM.

Special Flood-Related Erosion Hazard Area. Land which is most likely to be subject to severe flood-related erosion losses. This area is a designated E Zone on the LAFHM.

Special Hazard Area. An area having special Flood, Mudflow, Coastal High Hazard or Flood-Related Erosion Hazards and shown on a FIRM or FBFM as Zone A, AO, AE, AH, AI-30, A-99, AR, AR/A1-30, AR/AE, AR/AO, AR/AH, AR/A, V1-30, VE, or V.

Special Mudflow Hazard Area. Land which is most likely to be subject to severe Mudflow. This area is a designated Zone M on the LAFHM.

Start of Construction. For other than New Construction or a Substantial Improvement under the Coastal Barrier Resources Act (Pub. L 92-348), means the date the building permit was issued, provided the actual commencement of construction, repair, reconstruction, placement, or other improvement was within 180 days of the permit date. The actual commencement of construction means the first placement of permanent construction of a Structure on a site, such as the pouring of slab or footings, the installation of piles, the construction of columns, or any work beyond the stage of excavation; and includes the placement of a Manufactured Home on a foundation. Permanent construction does not include land preparation, such as clearing, grading, and filling; nor does it include the installat1980ion of streets or walkways; nor does it include excavation for a Basement, footings, piers, or foundations or erection of temporary forms; nor does it include the installation on the property of Accessory Buildings, such as garages or sheds not occupied as dwelling units or not part of the main Structure.

Structure. Anything constructed or erected either upon or below the surface of the earth and which is supported directly or indirectly by the earth including Manufactured Homes.

Substantial Damage.

1. Damage of any origin sustained by a Structure whereby the cost of restoring the Structure to its before damaged condition would equal or exceed 50 percent of the Market Value of the Structure before the damage occurred; or

2. Flood-related damages sustained by a Structure on two separate occasions during a 10-year period for which the cost of repairs at the time of each such event, on the average, equals or exceeds 25 percent of the Market Value of the Structure before the damage occurred. This is also known as "repetitive loss."

Substantial improvement. Any reconstruction, rehabilitation, addition, or other improvement of a Structure, the cost of which equals or exceeds 50 percent of the Market Value of the Structure before the Start of Construction of the improvement. This term includes a Structure which has incurred Substantial Damage, regardless of the actual repair work performed. Substantial Improvement does not include either:

1. Any Project for improvement of a Structure to correct existing violations or state or local health, sanitary, or safety code specifications which have been identified by the local code enforcement official and which are the minimum necessary to assure safe living conditions; or

2. Any alteration of a Historic Structure provided that the alteration will not preclude the Structure having continued designation as a Historic Structure.

Violation. The failure of a Structure or other Development to be fully compliant with this Ordinance. A Structure or other Development without the elevation certificate, other certifications, or other evidence of compliance required in this Ordinance is presumed to be in violation until such time as that documentation is provided.

Waiver. A grant of relief from any or all of the terms of this Ordinance or implementing regulations thereof.

Water Surface Elevation. The projected heights in relation to National Geodetic Vertical Datum (NAVD) of 1988 or other datum reached by Floods of various magnitudes and frequencies in the Flood Plains of coastal, lacustrine, riverine, or other riparian areas.

Zones - following are the Special Flood Hazard zones as shown on the LAFHM:

A Zone - areas of One Hundred-Year Flood where the Base Flood elevations and flood hazard factors have not been determined.

AE, A1-30 Zones - areas of One Hundred-Year Flood where the Base Flood elevations and Flood Hazard factors have been determined.

AH Zone - areas of One Hundred-Year Flood where Flood depths are between 1 and 3 feet and Base Flood elevations have been determined, but no Flood Hazard factors have been determined.

AO Zone - areas of One Hundred-Year Flood where Flood depths are between 1 and 3 feet and average depths of inundation are shown, but no Flood Hazard factors have been determined.

AR Zone - a Special Flood Hazard Area that results from the decertification of a previously accredited flood protection system that is determined to be in the process of being restored to provide a One Hundred-Year or greater level of Flood protection.

A99 Zone - a Special Flood Hazard Area that results from the decertification of a previously accredited flood protection system that is determined to be substantially restored to provide a One Hundred-Year or greater level of Flood protection where Base Flood elevations and Flood Hazard factors have not been determined.

D Zone - areas of undetermined, but possible, Flood Hazards.

V Zone - areas of coastal One Hundred-Year Flood with velocity (wave action) where Base Flood elevations and Flood Hazard factors have not been determined.

VE, V1-30 Zones - areas of coastal One Hundred-Year Flood with velocity (wave action) where Base Flood elevations and Flood Hazard factors have been determined.

X-Shaded/B Zone - areas between limits of the One Hundred-Year Flood and Five Hundred-Year Flood; or certain areas subject to a One Hundred-Year Flood with average depths less than 1 foot or where the contributing drainage area is less than one square mile; or areas protected by levees from the Base Flood.

X-Unshaded/C Zone - areas of minimal Flooding.

Sec. 3. LOS ANGELES FLOOD HAZARD MAP. The LAFHM shall be established and revised by Ordinance. The LAFHM is on file in the office of the Floodplain Administrator.

A. The LAFHM shall include:

1. the FIRM (effective Jul 6, 1998), the Digital FIRM (effective December 2, 1980) and the FBFM, and any subsequent updates, which, together with the Flood Insurance Study for the City of Los Angeles and any subsequent updates issued by the Federal Insurance Administration, are by this reference incorporated herein.

2. other maps designated by the City Council.

B. The LAFHM shall be executed at a scale sufficient to allow a lot-by-lot determination of applicability to these regulations.

C. Copies of the LAFHM shall be available for inquiry and inspection at the public counters in the central and district offices of the:

1. Department of City Planning

2. Bureau of Engineering

3. Department of Building and Safety

D. The Bureau of Engineering shall be responsible for maintaining the official maps and providing the Department of City Planning and BOE map data updates as they are made available by the Federal Emergency Management Agency (FEMA).

Sec. 4. POLICIES.

A. General Provisions.

1. BASIS FOR ESTABLISHING THE AREAS OF SPECIAL FLOOD HAZARD. The areas of special flood hazard identified by the FEMA in the Flood Insurance Study (FIS) for The Los Angeles County dated December 2, 1980, with accompanying FIRM's and FBFM's, dated December 2, 1980, and all subsequent amendments and/or revisions, are hereby adopted by reference and declared to be a part of this Ordinance. This FIS and attendant mapping is the minimum area of applicability of this Ordinance and may be supplemented by studies for other areas which allow implementation of this Ordinance and which are recommended to the City of Los Angeles by the Floodplain Administrator. The study, FIRM's and FBFM's are on file at the Bureau of Engineering.

   As changes and revisions to the FIRMs and FBFM's occur, newly added properties to the Special Flood Hazard Areas are to be notified by the Bureau of Engineering.

2. COMPLIANCE. No structure or land shall hereafter be constructed, located, extended, converted, or altered without full compliance with the terms of this Ordinance and other applicable regulations. Violation of the requirements (including violations of conditions and safeguards) shall constitute a misdemeanor. Nothing herein shall prevent the City of Los Angeles from taking such lawful action as is necessary to prevent or remedy any violation.

3. ABROGATION AND GREATER RESTRICTIONS. This Ordinance is not intended to repeal, abrogate, or impair any existing easements, covenants, or deed restrictions. However, where this Ordinance and another ordinance, easement, covenant, or deed restriction conflict or overlap, whichever imposes the more stringent restrictions shall prevail.

4. INTERPRETATION. In the interpretation and application of this Ordinance, all provisions shall be:

    1. Considered as minimum requirements;

    2. Liberally construed in favor of the governing body; and

    3. Deemed neither to limit nor repeal any other powers granted under state statutes.

5. WARNING AND DISCLAIMER OF LIABILITY. The degree of flood protection required by this Ordinance is considered reasonable for regulatory purposes and is based on scientific and engineering considerations. Larger floods can and will occur on rare occasions. Flood heights may be increased by human-made or natural causes. This Ordinance does not imply that land outside the areas of Special Flood Hazards or uses permitted within such areas will be free from flooding or flood damages. This Ordinance shall not create liability on the part of the City of Los Angeles, any officer or employee thereof, the State of California, or FEMA, for any flood damages that result from reliance on this Ordinance or any administrative decision lawfully made hereunder.

B. Citywide. It is the City's policy that:

1. Public and private development be prohibited in areas where flood-related hazards would seriously endanger human life, health or property.

2. Nonessential public utilities, public or quasi-public facilities not be located in special hazard areas; but when public utilities, public or quasi-public facilities must be located in hazard areas, that they are constructed to minimize or eliminate any Flood Hazards.

3. As the General Plan elements and Community Plans are restudied and revised, areas needing the protection provided by this Ordinance will be appropriately designated.

4. The City consider, during the processing of development proposals, the potential for flooding and flood-related damage in areas not otherwise identified as flood hazard areas due to factors including, but not limited to, the rupture, breakage, or structural failure of a dam, reservoir, aqueduct, or other large water or sewer conduit, whether by an earthquake or by any other cause.

5. Uses compatible with flooding shall be encouraged in Special Hazard Areas as opposed to other uses.

6. The City, in considering proposals for all new public and private development, take into account the potential for adverse effects on development already existing within Special Hazard Areas.

7. All future public and private developments including rehabilitation, reconstruction, and add-on construction be located and designed with regard to Flood-Related Hazards.

8. All development presently existing in Flood-Related Hazard Areas be encouraged to institute protective and remedial measures for protection from Flood Hazards.

9. Land subject to repeated and/or severe flood damage where feasible and practicable be acquired by the City and held as open space or be used in a manner compatible with Flood-Related Hazards.

10. The City prepares flood warning and emergency preparedness plans as a part of the City's Emergency Preparedness Plan, with an emphasis on phased early warning to citizens in potentially affected areas.

11. Alternative access and escape routes be designated when normal routes may be blocked or destroyed by flooding.

12. All persons who occupy property subject to flood hazards bear full responsibility for their actions.

13. As more information becomes available or new situations arise, additional flood hazard studies be undertaken and, pursuant to such studies, provisions be added to this Ordinance as necessary for the fullest implementation of the spirit and intent of the Ordinance.

14. The City coordinates its efforts in the management of flood-related hazard areas with neighboring jurisdictions.

15. Means be sought by which relief from flood-related disasters can be expedited.

16. The broadest range of design and construction alternatives consistent with this Ordinance be considered for new development in flood-related hazard areas.

17. The City seeks innovative means to achieve the goals and to carry out the intent and purpose of this Ordinance.

18. Demonstration grants be applied for as one of many methods to carry out the programs of this Ordinance.

C. Floodways. In addition to citywide policies, in Floodways it is the policy of the City that:

1. Drainage channels adequate to discharge the flood waters or runoff of a Base Flood be preserved from encroachment in areas which are still substantially undeveloped.

2. No new development be allowed in Floodways.

3. Where existing development now occupies Floodways measures be taken to either:

   a. Provide flood works sufficient to discharge a Base Flood, or

   b. Encourage relocation of such development outside of areas which must be preserved as Floodways as required for the overall safety, health, and well-being of the community.

4. Floodways be maintained in good repair and free of debris by the agency or organization (public or private) responsible for such activity.

D. Floodplains. In addition to citywide policies, in floodplains it is the policy of the City that:

1. The existence and extent of flooding be considered in the planning, siting, design and construction of public and private development, and

2. Full consideration be given to the fact that development in flood-prone areas may create a potential for loss of life and personal injuries, loss to public and private property and exposure to flood hazards.

E. **Mudflow-Prone Areas.** In addition to the citywide policies, in Mudflow-Prone Areas it is the policy of the City that:

1. The existence and extent of mudflow hazard areas be considered in the planning, siting, design and construction of public and private development.

2. Full consideration be given to the fact that development in Mudflow-Prone Areas may create a potential for loss of life and personal injuries, loss to public and private property and exposure to hazards.

F. **Coastal High-Hazard and Flood-Related Erosion Hazard Areas.** In addition to the Citywide policies, in Coastal High-Hazard Areas and Flood-Related Erosion Hazard Areas, including Special Flood-Related Erosion Hazard Areas, it is the policy of the City that:

1. The existence and extent of coastal high-hazard and/or flood-related erosion be considered in the planning, siting, design and construction of public and private development, and

2. Full consideration be given to the fact that development in Coastal High-Hazard or Flood-Related Erosion Areas may create a potential for loss of life and personal injuries, loss to public and private property and exposure to Coastal High-Hazard and/or Flood-Related Erosion Hazards.

Sec. 5. DEVELOPMENT REGULATIONS. This section prescribes the regulations by which all New Construction and Substantial Improvements to public and private development shall be governed.

A. General.

1. These regulations apply to the Special Flood Hazard Area designations and water surface elevations furnished by the Administrator and the City Engineer.

2. To the extent permitted by law, all public and private development shall be subject to these regulations, and construction may not commence without compliance with the provisions and intent of this Ordinance, and without the necessary permits from those governmental agencies whose approval is required by local, state, and federal law.

3. These regulations shall be considered to be the minimum requirements and where sound engineering and prudence demand, such additional measures shall be taken to assure full compliance with the intent and purpose of this Ordinance.

4. This section shall not create liability on the part of the City of Los Angeles, the United States or any officer or employee thereof.

5. It is not the intent of these regulations to abrogate or lessen in any respect any other provision of the Los Angeles Municipal Code. Should any provisions of this section conflict with any other provision of the Los Angeles Municipal Code, the more restrictive provision shall prevail.

B. Planning Discretionary Reviews.

1. Applications and procedures for zone changes, variances, conditional use permits, divisions of land, coastal development permits, environmental clearances, or any other permit procedure pertinent to this Ordinance shall contain additional information on the application forms sufficient to determine the existence and extent of Flood-Related Hazards, and to provide sufficient data to enable thorough and complete review of the development as it relates to this Ordinance.

2. For all projects processed by the Department of City Planning, including the office of Zoning Administration, a finding of fact shall be made as to whether or not a project is located within a Special Hazard Area. For projects found to be located in a Special Hazard Area, the following finding shall be made: "The project conforms with both the specific provisions and the intent of the Floodplain Hazard Management Ordinance." Specific factual evidence supporting this finding shall be contained in the record pertaining to the project.

3. No new zone variance or conditional use permit may be granted or existing zone variance or conditional use permit extended for development within a Floodway.

4. Subdivisions. Notwithstanding the provisions of Section 5.A.1, herein, these regulations shall also apply to all subdivisions located within the boundaries of a "Hillside Area", as that term is defined in Section 12.03 of the Municipal Code.

    a. Subdivisions shall be designed in such a manner as to prevent flood-related damage to the subdivision and to existing watershed development, both during and subsequent to construction.

    b. Public and private drainage and sanitary facilities and utilities shall be designed and installed so as to eliminate or minimize damage from Flood-Related Hazards.

c. For areas involving natural or human-made channels for potential run-off of a Base Flood, subdividers shall be required to furnish delineation for Floodways, if not already mapped or if changes are proposed to the mapped Floodways.

d. Alterations of drainage courses shall be governed by the procedure set forth in Section 8 of this Ordinance, Alteration of Drainage Courses.

e. All division of land proposals shall include within such proposals Base Flood elevation data.

f. Provisions for alternative vehicular access and escape routes when normal routes are blocked or destroyed by flooding and/or Mudflow shall be required wherever possible.

g. The City, in approving the location of new Manufactured Home Parks, shall require an evacuation plan indicating alternate vehicular access and escape routes to be filed with the Emergency Operations Board.

h. All new subdivisions proposals and other proposed development greater than 50 lots or 5 acres (whichever is the lesser), including proposals for Manufactured Home Parks and Subdivisions, shall:

    1. Identify the Special Flood Hazard Areas and Base Flood elevations.

    2. Identify the elevations of lowest floors of all proposed structures and pads on the final plans.

    3. If the site is filled above the Base Flood elevation, the following as-built information for each structure shall be certified by a registered civil engineer or licensed land surveyor and provided as part of an application for a "Letter of Map Revision Based on Fill" to the Floodplain Administrator:

        i. Lowest floor elevation,

        ii. Pad elevation, and

        iii. Lowest adjacent grade.

i. All subdivision proposals and other proposed development shall be consistent with the need to minimize flood damage.

j. All subdivision proposals and other proposed development shall have public utilities and facilities such as sewer, gas, electrical and water systems located and constructed to minimize flood damage.

k. All subdivisions and other proposed development shall provide adequate drainage to reduce exposure to Flood Hazards.

C. Construction Regulations.

1. **General.**

a. All public and private development which has the potential to cause flooding or mud damage to neighboring communities shall be designed in such a manner as to be consistent with the floodplain management programs of those communities.

b. Site exploration and investigation by the developer shall be required before approving any development in a Special Flood-Related Hazard Area.

c. Insofar as enforceable by State law, public and quasi-public facilities, including schools, hospitals, nursing homes, orphanages, correctional and other residential institutions, fire and police stations, communication centers, electric power transformers and substations, water and sewer pumping stations and any other public or quasi-public institutions situated in a Special Hazard Area shall be located and designed so as to enable them to withstand flood-related damage and to facilitate emergency operations.

d. All new and replacement water supply and sanitary sewage systems shall be designed to minimize or eliminate:

1. Infiltration of flood waters into the systems; and

2. Discharge from the systems into flood waters.

e. On-site waste disposal systems shall be located to avoid impairment to them, or contamination from them during flooding.

f. It shall be mandatory that sellers, lessors, or renters give written notice to all prospective and interested parties, including but not limited to, purchasers, lessees and centers, prior to finalization of such a transaction when the subject land and/or structures are located within special hazard areas. The notice shall contain the following information:

1. The nature and classification of the special hazard,

2. The hazard zone designation,

3. Whether Waivers have been granted for development located within the Special Hazard Area, and

4. That premium rates for Flood Insurance of new structures built at elevations below the Base Flood shall substantially increase as the elevations decrease. Failure to give such notice shall be a basis for rescinding any sale, lease, or rental agreement.

2. **Standards of Construction**

In all Special Flood Hazards Areas the following standards are required:

a. **Anchoring.** All New Construction and Substantial Improvements of structures, including Manufactured Homes, shall be adequately anchored to prevent flotation, collapse or lateral movement of the structure resulting from hydrodynamic and hydrostatic loads, including the effects of buoyancy.

b. **Construction Materials and Methods.**

All New Construction and Substantial Improvements of structures, including Manufactured Homes, shall be constructed:

1. With flood resistant materials, and utility equipment resistant to flood damage for areas below the Base Flood elevation;

2. Using methods and practices that minimize flood damage;

3. With electrical, heating, ventilation, plumbing and air conditioning equipment and other service facilities that are designed and/or located so as to prevent water from entering or accumulating within the components during conditions of flooding; and

4. Within Zones AH or AO, so that there are adequate drainage paths around structures on slopes to guide flood waters around and away from proposed structures.

c. **Elevation and Floodproofing.**

1. **Residential Construction.**

All New Construction or Substantial Improvements of residential structures shall have the lowest floor, including basement:

a. In AE, AH, A1-30 Zones, elevated to 1 foot above the Base Flood elevation.

b. In an AO zone, elevated above the highest adjacent grade to a height equal to one-foot above the depth number specified in feet on the FIRM, or elevated at least 2 feet plus 1 foot of Freeboard above the highest adjacent grade if no depth number is specified.

c. In an A zone, without Base Flood elevations specified on the FIRM [unnumbered A zone], elevated to or above the Base Flood elevation plus one-foot of Freeboard.

Upon the completion of the structure, the elevation of the lowest floor, including basement, shall be certified by a registered civil engineer or licensed land surveyor, and verified by the community building inspector to be properly elevated. Such certification and verification shall be provided to the Floodplain Administrator.

2. **Nonresidential Construction.**

All New Construction or Substantial Improvements of nonresidential structures shall either be elevated to conform with Residential Construction or:

a. Be floodproofed, together with attendant utility and sanitary facilities, below the elevation recommended under Residential Construction, so that the structure is watertight with walls substantially impermeable to the passage of water;

b. Have structural components capable of resisting hydrostatic and hydrodynamic loads and effects of buoyancy; and

c. Be certified by a registered civil engineer or architect that the standards Residential Construction and Nonresidential Construction are satisfied. Such certification shall be provided to the Floodplain Administrator.

3. **Flood Openings**. All New Construction and Substantial Improvements of structures with fully enclosed areas below the lowest floor (excluding basements) that are usable solely for parking of vehicles, building access or storage, and which are subject to flooding, shall be designed to automatically equalize hydrostatic flood forces on exterior walls by allowing for the entry and exit of floodwater. Designs for meeting this requirement must meet the following minimum criteria:

a. For non-engineered openings:

1. Have a minimum of two openings on different sides having a total net area of not less than one square inch for every square foot of enclosed area subject to flooding;

2. The bottom of all openings shall be no higher than one foot above grade;

3. Openings may be equipped with screens, louvers, valves, or other coverings or devices provided that they permit the automatic entry and exit of floodwater; and

4. Buildings with more than one enclosed area must have openings on exterior walls for each area to allow flood water to directly enter; or

b. Be certified by a registered civil engineer or architect.

4. **Garages and Low Cost Accessory Structures.**

a. Attached garages.

1. A garage attached to a residential structure, constructed with the garage floor slab below the Base Flood elevation, must be designed to allow for the automatic entry of flood waters per Flood Opening, as described above. Areas of the garage below the Base Flood elevation must be constructed with flood resistant materials per Construction Materials and Methods.

2. A garage attached to a nonresidential structure must meet the above requirements or be dry floodproofed. For guidance on below grade parking areas, see FEMA Technical Bulletin TB-6.

b. Detached garages and Accessory Structures.

1. Accessory Structures may be constructed such that its floor is below the Base Flood elevation, provided the structure is designed and constructed in accordance with the following requirements:

a. Use of the Accessory Structure must be limited to parking or limited storage;

b. The portions of the Accessory Structure located below the Base Flood elevation must be built using flood-resistant materials;

c. The Accessory Structure must be adequately anchored to prevent flotation, collapse and lateral movement;

d. Any mechanical and utility equipment in the Accessory Structure must be elevated or floodproofed to or above the Base Flood elevation plus Freeboard;

e. The Accessory Structure must comply with floodplain encroachment provisions for detached garages and Accessory Structures; and

f. The Accessory Structure must be designed to allow for the automatic entry of flood waters in accordance with the provisions pertaining to Flood Openings above.

2. Detached garages and Accessory Structures not meeting the above standards must be constructed in accordance with all applicable standards for garages and Accessory Structures above.

3. **Floodways**.

Since Floodways are an extremely hazardous area due to the velocity of flood waters which carry debris, potential projectiles, and erosion potential, the following provisions apply:

a. Until a regulatory Floodway is adopted, no New Construction, substantial development, or other development (including fill) shall be permitted within Zones A1-30 and AE, unless it is demonstrated that the cumulative effect of the proposed development, when combined with all other development, will not increase the water surface elevation of the base flood more than one foot at any point within the City of Los Angeles.

b. Within an adopted regulatory Floodway, the City of Los Angeles shall prohibit encroachments, including fill, New Construction, Substantial Improvements, and other development, unless certification by a registered civil engineer is provided demonstrating that the proposed encroachment shall not result in any increase in Flood levels during the occurrence of the base flood discharge.

c. All development existing within Floodways at the time of the adoption of Ordinance No. 154,405 (effective October 9, 1980) may continue. No grants, privileges or considerations shall be given which would prolong the life of the development unless alternative means are provided for the unimpeded discharge of a base flood.

d. Manufacturing buildings or other facilities in which hazardous substances are stored, manufactured or used shall be prohibited within any Floodway.

4. **Floodplains**. In addition to the General Regulations, the following shall apply in Special Flood Hazard Areas:

a. The lowest floor of all residential structures shall be constructed at least 1 foot above the Base Flood elevation, and in Zones AH, AO and VO shall be elevated above the highest adjacent grade at least 1 foot higher than the depth number specified in feet on the FIRM, or at least 2 feet if no depth number is specified. Non-residential structures may be floodproofed in lieu of elevation. The elevation of the lowest floor shall be provided to and maintained by the Superintendent of Building and Safety. In any case, construction below the Base Flood level shall use flood-resistant materials. In areas where base flood data has not been furnished by the Administrator, the City Engineer shall provide the Base Flood elevation.

b. Adverse cumulative effects of new development on development already existing in floodplains shall be considered in determining whether to issue a permit, and the new development shall not be approved unless it can be adequately demonstrated that the project will not increase the exposure of existing development to Flood-Related Hazards.

c. All New Construction and Substantial Improvements in areas subject to subsidence shall have the lowest floor elevated a minimum of one foot above the Base Flood level plus a factor for the expected subsidences for the life of the structure and the elevation of the lowest floor shall be provided to and maintained by the Superintendent of Building and Safety.

d. For all New Construction and Substantial Improvements, fully enclosed areas below the Lowest Floor that are subject to flooding shall be designed to automatically equalize hydrostatic flood forces on exterior walls by allowing for the entry and exit of floodwaters.

e. Floodproofing. Where floodproofing is utilized, either a registered professional engineer or architect shall certify that the flood proofing methods are adequate to withstand the flood depths, pressures, velocities, impact and uplift forces and other factors associated with the Base Flood and a record of such certificates indicating the specific elevation (in relation to mean sea level) to which such structures are floodproofed shall be maintained by the Superintendent of Building.

5. **Standards for Manufactured Homes**.

   a. All Manufactured Homes that are placed or substantially improved, on sites located: (1) outside of a Manufactured Home Park or Subdivision; (2) in a new Manufactured Home Park or Subdivision; (3) in an expansion to an existing Manufactured Home Park or Subdivision; or (4) in an existing Manufactured Home Park or Subdivision upon which a Manufactured Home has incurred Substantial Damage as the result of a flood, shall:

      1. Within Zones A1-30, AH, and AE on the community's Flood Insurance Rate Map, be elevated on a permanent foundation such that the Lowest Floor of the Manufactured Home is elevated 1 foot above the Base Flood elevation and be securely fastened to an adequately anchored foundation system to resist flotation, collapse, and lateral movement.

      2. Within Zones V1-30, V, and VE on the community's Flood Insurance Rate Map, meet the requirements of Coastal High Hazards Areas.

   b. All Manufactured Homes to be placed or substantially improved on sites in an existing Manufactured Home Park or Subdivision within Zones A1-30, AH, AE, V1-30, V, and VE on the community's Flood Insurance Rate Map that are not subject to the provisions of Manufactured Homes will be securely fastened to an adequately anchored foundation system to resist flotation, collapse, and lateral movement, and be elevated so that either the:

      1. Lowest Floor of the Manufactured Home is at least 1 foot above the Base Flood elevation; or

      2. Manufactured Home chassis is supported by reinforced piers or other foundation elements of at least equivalent strength that are no less than 36 inches in height above grade.

Upon the completion of the structure, the elevation of the Lowest Floor, including basement, shall be certified by a registered civil engineer or licensed land surveyor, and verified by the community building inspector to be properly elevated. Such certification and verification shall be provided to the Floodplain Administrator.

c. Within Zones AO, AH, and AE on the LAFHM, for all new Manufactured Home Parks and Manufactured Home Subdivisions, expansions to existing Manufactured Home Parks and Manufactured Home Subdivisions and existing Manufactured Home Parks and Manufactured Home Subdivisions where the repair, reconstruction or improvement of the streets, utilities and pads equals or exceeds 50% of the value of the streets, utilities and pads before the repair, reconstruction or improvement has commenced, and for all Manufactured Homes to be placed within Zones Al-30, A-99, AO, AH and AE on the LAFHM, but not into a Manufactured Home Park or Manufactured Home Subdivision, the following shall be required:

1. Stands or lots shall be elevated on compacted fill or on pilings so that the lowest floor of the Manufactured Home will be at least 1 foot above the Base Flood level;

2. Adequate surface drainage and access for a hauler shall be provided; and

3. In the instance of elevation on pilings, lots shall be large enough to permit steps, piling foundations shall be placed in stable soil no more than 10 feet apart and reinforcement shall be provided for pilings more than 6 feet above the ground level.

4. In areas of flooding, adequate Freeboard and additional Floodproofing, where necessary, shall be required.

6. **Standards for Recreational Vehicles.**

a. All recreational vehicles placed in Zones A1-30, AH, AE, V1-30 and VE will either:

1. Be on the site for fewer than 180 consecutive days; or

2. Be fully licensed and ready for highway use. A recreational vehicle is ready for highway use if it is on its wheels or jacking system, is attached to the site only by quick disconnect type utilities and security devices, and has no permanently attached additions; or

3. Meet the permit requirements of this Ordinance and the elevation and anchoring requirements for Manufactured Homes.

b. Recreational vehicles placed on sites within Zones V1-30, V, and VE on the community's Flood Insurance Rate Map will meet the requirements of Recreational Vehicles and Coastal High Hazard Areas.

7. **Mudflow Areas and Mudflow-prone Areas**. In addition to the general regulations, the following shall apply in Special Mudflow Hazard Areas:

a. Each permit application shall be reviewed to determine whether the proposed site and improvements will be reasonably safe from Mudflows.

b. To the extent permitted by State law the location and design of public utilities and service facilities, such as sewer, water, gas, and electrical systems shall be such as to minimize exposure to Mudflow hazards.

c. Require, if a proposed site and improvements may have Mudflow hazards, that:

1. Site investigation review be made by persons qualified and licensed in geology and/or soil engineering to ascertain the location and extent of the Mudflow hazard and to recommend remedial measures;

2. The proposed grading, excavations, New Construction and Substantial Improvements are adequately designed and protected to withstand Mudflow damages;

3. The proposed grading, excavations, New Construction and Substantial Improvements do not aggravate the existing hazard by creating either on-site or off-site disturbances; and

4. The proposed drainage, planting, watering and maintenance be such as not to endanger slope stability.

d. Enforce and periodically review the grading ordinance or regulations with regard to the following:

1. Regulation of the location of foundation systems and utility systems of New Construction and Substantial Improvements;

2. Regulation of the location, drainage and maintenance of all excavations, cuts and fills and planted slopes;

3. Providing special requirements for protective measures including, but not necessarily limited to, retaining walls, buttress fills, subdrains, diverter terraces, benchings, etc.; and

4. Requiring engineering drawings and specifications to be submitted for all corrective measures, accompanied by supporting soils engineering and geology reports.

8. **Coastal High-Hazard**. In addition to the General Regulations, within Coastal High Hazard Areas, Zones V, V1-30, and VE, the Flood Hazard Mitigation Coordinator shall submit updated map data to Bureau of Engineering and Department of City Planning automated mapping systems on an annual basis, at minimum, or upon updates to the map, and shall be required in Coastal High Hazard Areas.

   a. All new residential and non-residential construction, including substantial improvement/damage, shall be elevated on adequately anchored pilings or columns and securely anchored to such pilings or columns so that the bottom of the lowest horizontal structural member of the lowest floor (excluding the pilings or columns) is elevated to one-foot above the Base Flood level. The pile or column foundation and structure attached thereto is anchored to resist flotation, collapse, and lateral movement due to the effects of wind and water loads acting simultaneously on all building components. Water loading values used shall be those associated with the base flood. Wind loading values used shall be those required by applicable state or local building standards. A registered civil engineer, structural engineer or architect shall certify that the structure is securely anchored to adequately anchored pilings or columns in order to withstand velocity waters and hurricane wave wash.

   b. All New Construction and other development shall be located on the landward side of the reach of mean high tide.

   c. All New Construction and substantial improvement shall have the space below the lowest floor free of obstructions or constructed with "breakaway walls" intended to collapse under stress without jeopardizing the structural support of the structure so that the impact on the structure by abnormally high tides or wind-driven water is minimized. Such temporarily enclosed space shall not be used for human habitation and will be usable solely for parking of vehicles, building access or storage.

   d. Fill shall not be used for structural support of buildings.

e. Artificial alteration of sand dunes which would increase potential flood damage is prohibited.

f. The Floodplain Administrator shall obtain and maintain the following records:

   1. Certification by a registered engineer or architect that a proposed structure complies with Coastal High Hazard Areas; and

   2. The elevation (in relation to mean sea level) of the bottom of the lowest horizontal structural member of the lowest floor (excluding pilings or columns) of all new and substantially improved structures, and whether such structures contain a basement.

g. Each permit application shall contain information sufficient to determine whether the proposed site alterations and improvements will be reasonably safe from coastal high-hazards and will not cause or otherwise aggravate the existing coastal high-hazards. Each application shall further provide the elevation (in relation to mean sea level) of the bottom of the lowest structural member of the lowest floor (excluding pilings or columns) of all new and substantially improved structures and whether such structures contain a basement; and the Superintendent of Building and Safety shaft maintain a record of such elevations.

h. Where a proposed improvement is found to be in the path of coastal high-hazards or to increase coastal high-hazards, require the improvement to be relocated or adequate protective measures to be taken which will not aggravate the hazard or shift the hazard to another location.

i. The placement of Manufactured Homes, except in existing Manufactured Home Parks and Manufactured Home Subdivisions, within Zones V1-30, V or VE on the LAFHM will not be prohibited if they are in compliance with conventional housing standards.

9. **Flood-related Erosion Hazard Areas**. In addition to the general regulations, the following shall be required in areas of special flood-related erosion hazards:

   a. Each permit application for construction or other development shall contain sufficient information to determine the extent of exposure to flood-related erosion hazards and to provide sufficient data to enable thorough review of the development;

b. Each permit application shall be reviewed to determine whether the proposed site alterations and improvements will be reasonably safe from flood-related erosion and will not cause or otherwise aggravate the existing flood-related erosion hazard; and

c. Where a proposed improvement is found to be in the path of flood-related erosion or to increase the erosion hazard, require the improvement to be relocated or adequate protective measures to be taken which will not aggravate the existing erosion hazard.

d. All new development shall be set back from the ocean, lake, bay, river front or other body of water to create a safety buffer consisting of natural vegetation or a contour strip. The buffer may be used for suitable open space purposes, such as for open space purposes and temporary and portable structures only.

10. **AR Zone Areas**. Within areas designated as AR, AR/A1-30, AR/AE, AR/AH, AR/AO or AR/A, the following standards shall apply:

a. Developed Areas. All New Construction, including Manufactured Homes, in areas designated as developed areas shall meet the standards of this section, using the lower of either the AR Base Flood elevation or the elevation that is 3 feet above the highest adjacent grade.

b. Non-developed Areas. All New Construction, including Manufactured Homes, in areas that are not designated as developed areas:

1. Where the AR flood depth is equal to or less than 5 feet above the highest adjacent grade - shall meet the standards of this section, using the lower of either the AR Base Flood elevation or the elevation that is 3 feet above the highest adjacent grade; or

2. Where the AR flood depth is greater than 5 feet above the highest adjacent grade - shall meet the standards of this section, using the AR Base Flood elevation.

c. Dual Zone Areas.

1. All New Construction in areas within Zones AR/A1-30, AR/AE, AR/AH, AR/AO or AR/A shall meet the standards of this section, using the higher of either the applicable AR Zone elevation or the Base Flood elevation (or flood depth) for the underlying A1-30, AE, AH, AO or A Zone.

2. All Substantial Improvements to existing construction within Zones AR/A1-30, AR/AE, AR/AH, AR/AO, or AR/A shall meet the standards of this section, using the Base Flood elevation (or flood depth) for the underlying A1-30, AE, AH, AO or A Zone.

3. All Manufactured Homes that are placed or substantially improved (in Dual Zones only) within Zones AR/A1-30, AR/AE, AR/AH, AR/AO, or AR/A shall be elevated on a permanent foundation such that the lowest floor of the Manufactured Home is elevated in accordance with the elevation requirements prescribed in Standards of Construction for Manufactured Homes and Recreational Vehicles.

Sec. 6. CITY IMPLEMENTATION.

A. General.

1. All City codes, ordinances, regulations, policies, and procedures shall be amended as necessary to carry out the provisions and intent of this Ordinance.

2. All City development permit forms and processes shall be amended as necessary to carry out the provisions and intent of this Ordinance.

3. If the Administrator has not provided sufficient data, the City shall obtain, review and reasonably utilize other data in the development of regulations adequate to carry out the intent and purpose of this Ordinance.

B. Designation of The Floodplain Administrator. The City Engineer is hereby designated as the Floodplain Administrator to administer, implement, and enforce this Ordinance by granting or denying permits in accord with its provisions.

C. Duties and Responsibilities of the Floodplain Administrator. The duties and responsibilities of the Floodplain Administrator shall include, but not be limited to, the following:

1. **Permit Review**. Review all development permits to determine:

   a. Permit requirements of this Ordinance have been satisfied, including determination of Substantial Improvement and Substantial Damage of existing Structures;

   b. All other required state and federal permits have been obtained;

   c. The site is reasonably safe from Flooding;

d. The proposed development does not adversely affect the carrying capacity of areas where Base Flood elevations have been determined but a Floodway has not been designated. This means that the cumulative effect of the proposed development when combined with all other existing and anticipated development will not increase the water surface elevation of the Base Flood more than 1 foot at any point within the City of Los Angeles; and

e. All Letters of Map Revision (LOMR's) for flood control projects are approved prior to the issuance of building permits. Building permits must not be issued based on Conditional Letters of Map Revision (CLOMR's). Approved CLOMR's allow construction of the proposed flood control project and land preparation as specified in the Start of Construction definition.

2. A **permit** shall be obtained before any construction or other development, including Manufactured Homes, within any Special Flood Hazard Area established by this Ordinance. Application for a development permit shall be made on forms furnished by the City of Los Angeles. The applicant shall provide the following minimum information:

   a. Plans in duplicate, drawn to scale, showing:

      1. Location, dimensions, and elevation of the area in question, existing or proposed structures, storage of materials and equipment and their location;

      2. Proposed locations of water supply, sanitary sewer, and other utilities;

      3. Grading information showing existing and proposed contours, any proposed fill, and drainage facilities;

      4. Location of the regulatory Floodway when applicable;

      5. Base flood elevation information;

      6. Proposed elevation in relation to mean sea level, of the lowest floor (including basement) of all structures; and

      7. Proposed elevation in relation to mean sea level to which any nonresidential structure will be floodproofed, as required in this Ordinance and detailed in FEMA Technical Bulletin TB 3-93;

b. Certification from a registered civil engineer or architect that the nonresidential floodproofed building meets the floodproofing criteria;

c. For a crawl-space foundation, location and total net area of foundation openings as required in this Ordinance and detailed in FEMA Technical Bulletins 1-93 and 7-93;

d. Description of the extent to which any watercourse will be altered or relocated as a result of proposed development; and

e. All appropriate certifications listed in this Ordinance.

D. Development of Substantial Improvement and Substantial Damage Procedures. Procedures are established by the Floodplain Administrator and are coordinated with other departments/divisions and implemented by Floodplain Administrator and Los Angeles Department of Building and Safety staff.

E. Review, Use and Development of Other Base Flood Data. When Base Flood elevation data has not been provided in accordance with this Ordinance, the Floodplain Administrator shall obtain, review, and reasonably utilize any Base Flood elevation and Floodway data available from a federal or state agency, or other source, in order to administer this Ordinance.

NOTE: A Base Flood elevation shall be obtained using one of two methods from the FEMA publication, FEMA 265, "Managing Floodplain Development in Approximate Zone A Areas – A Guide for Obtaining and Developing Base (100-year) Flood Elevations" dated July 1995.

F. Notification of Other Agencies.

1. When there is an alteration or relocation of a watercourse, the Floodplain Administrator shall:

   a. Notify adjacent communities and the California Department of Water Resources prior to alteration or relocation;

   b. Submit evidence of such notification to the Federal Emergency Management Agency; and

   c. Assure that the flood carrying capacity within the altered or relocated portion of said watercourse is maintained.

2. Base Flood elevation changes due to physical alterations:

    a. Within 6 months of information becoming available or Project completion, whichever comes first, the Floodplain Administrator shall submit or assure that the permit applicant submits technical or scientific data to FEMA for a Letter of Map Revision (LOMR).

    b. All LOMR's for flood control projects are approved prior to the issuance of building permits. Building Permits must not be issued based on Conditional Letters of Map Revision (CLOMR's). Approved CLOMR's allow construction of the proposed flood control project and land preparation as specified in the "Start of Construction" definition.

    c. Such submissions are necessary so that upon confirmation of those physical changes affecting flooding conditions, risk premium rates and floodplain management requirements are based on current data.

3. Changes in corporate boundaries:

    The Floodplain Administrator shall notify FEMA in writing whenever the corporate boundaries of the City have been modified by annexation or other means and include a copy of a map of the community clearly delineating the new corporate limits.

G. **Documentation of Floodplain Development**. The Floodplain Administrator or other City designee shall obtain and maintain for public inspection and make available as needed the following:

1. Certification required by Standards of Construction for Elevation and Floodproofing and Manufactured Homes);

2. Certification required by Standards of Construction for Elevation and Floodproofing;

3. Certification required by Standards of Construction for Flood Openings;

4. Certification of elevation required by Planning Discretionary Reviews for all new Subdivisions;

5. Certification required by Standards of Construction for Floodways;

6. Information required by Standards of Construction for Coastal High Hazard Areas; and

7. Maintain a record of all Variance actions, including justification for their issuance, and report such Variances issued in its biennial report submitted to the Federal Emergency Management Agency.

H. **Map Determination**. The Floodplain Administrator shall make interpretations where needed, as to the exact location of the boundaries of the areas of special flood hazard, where there appears to be a conflict between a mapped boundary and actual field conditions. The person contesting the location of the boundary shall be given a reasonable opportunity to appeal the interpretation as provided under Variances and Waivers.

I. **Remedial Action**. The Floodplain Administrator or other City designee shall take action to remedy violations of this Ordinance as specified in Section 4.

J. **Biennial Report**. The Floodplain Administrator shall complete and submit a Biennial Report to FEMA.

K. **Planning**. The Floodplain Administrator or other City designee assure the City of Los Angeles' General Plan is consistent with floodplain management objectives herein.

L. **City Planning**. It shall be the duty of the Director of Planning to establish, insofar as the responsibilities of the Planning Department are affected, all standards and other regulations and to propose regulations necessary to carry out the provisions of this Ordinance. The Director shall take into consideration and implement this Ordinance in all areas of the planning process including, but not limited to, the following:

1. Geographically specific plans shall include regulations implementing the policies of this Ordinance and the applicable community plan where that plan has specifically addressed flood-related hazards within the plan area.

2. Annexations. All territory annexed to the City shall first have a flood hazard study. If a flood hazard study has been completed under another jurisdiction, it shall be reviewed. If it is deficient in any way or if it is more than one year old, it shall be amended or supplemented. Both the flood hazard study and report shall be submitted to the City Council when considering the annexation.

3. Any areas subject to special flood-related hazards shall be incorporated into the City's adopted LAFHM. In addition to the flood hazard study, a report shall be prepared containing recommendations for the elimination or minimization of flood-related hazards by appropriate land uses and/or physical improvements.

M. Public Works. The Board of Public Works (Board) is the head of the Department of Public Works and responsible for the activities of the various Bureaus within the Department of Public Works. The Board may require the Bureau Directors of the appropriate Bureaus which make up the Department of Public Works to promulgate all standards and codes or other regulations necessary to carry out the provisions and intent of this Ordinance.

1. **Bureau of Engineering**.

   a. The City Engineer shall acquire or cause to be acquired all data necessary for the identification and delineation of flood hazard areas for the purposes of reporting to the Administrator in accordance with this Ordinance, and to advise the City Council of flood hazards the City Engineer recommends be delineated on the LAHFM.

   b. The City Engineer shall generate and maintain the Los Angeles Flood Hazard Map including the preparation and presentation of any and all ordinances required to establish and maintain the LAFHM.

   c. The City Engineer shall maintain, at one central location, a file of all flood, drainage and mud-related hazard information including all Waivers, findings and appeals.

   d. The City Engineer shall be responsible for precise determination of the location of the boundaries of flood-related hazard areas shown on the LAFHM and to make determinations as to whether a property or portion thereof is located within a special hazard area.

   e. The City Engineer shall assure compliance with this Ordinance in the planning, design, construction or reconstruction of all projects within the City Engineer's jurisdiction.

2. **Bureau of Sanitation**. The Director of the Bureau of Sanitation shall assure compliance with this Ordinance in the operation of:

   a. Industrial waste operations, including, but not limited to, the handling, storage, collection, transportation, and disposal of chemical waste or other hazardous materials;

   b. Refuse collection, transportation, reclamation, and disposal;

   c. Sewer and storm drain maintenance;

   d. Pumping plants; and

   e. Sewer treatment facilities.

3. **Building and Safety**. It shall be the duty of the General Manager of Building and Safety to establish, insofar as the responsibilities of the Department of Building and Safety are affected, all standards and regulations and to propose codes necessary to carry out the provisions and intent of this Ordinance relating to:

   a. New Construction and Substantial Improvements;

   b. Rehabilitation or reconstruction;

   c. Grading, including excavation and fills;

   d. Complete and thorough Flood and/or Mudflow studies as may be appropriate in keeping with the intent of this Ordinance;

   e. The granting of Certificates of Occupancy and final approval of projects; and

   f. The maintenance of records sufficient to document compliance with the intent and purpose of this Ordinance.

   g. AR Zone Duties.

      1. To use the adopted official map or legal description of those designated developed areas within Zones AR, AR/A1-30, AR/AE, AR/AH, AR/AO, or AR/A to determine if a proposed project is in a developed area.

      2. To determine the Base Flood elevation to be used for individual projects within developed areas, areas not designated as developed areas and dual zone areas.

      3. To require the applicable standards in Standards of Construction.

      4. To provide written notification to the permit applicant that the area has been designated as AR, AR/A1-30, AR/AE, AR/AH, AR/AO, or AR/A Zone, and whether the Structure will be elevated or protected to or above the AR Base Flood elevation.

4. **Department of Water and Power**. It shall be the duty of the appropriate Chief Engineer of the respective systems which make up the Department of Water and Power to promulgate all standards and other regulations and to implement planning necessary to carry out the provisions and intent of this Ordinance insofar as it pertains to their respective systems including, but not limited to, the design, construction, reconstruction, and maintenance of the following:

a. Water System

1. Storage systems

2. Transmission systems

3. Treatment systems

4. Distribution systems

b. Power System

1. Generation systems

3. Transmission systems

4. Distribution systems

5. **Harbor**. It shall be the duty of the Executive Director/General Manager of the Harbor Department to establish, insofar as the responsibilities of the Harbor Department are affected, all standards and regulations and to propose codes necessary to carry out the provisions and intent of the Ordinance relating to:

a. New Construction or Substantial Improvements;

b. Rehabilitation or reconstruction; and

c. Dredging, excavation, and fills.

1. Complete and thorough Floodand Coastal High-hazard studies as may be appropriate with the intent of this Ordinance.

2. Floodproofing of functionally dependent use facilities and Variances to contend with the needs of the City for loading and unloading of cargo, ship building, ship repair, storage and manufacturing, food processing, and any other harbor functionally dependent use works.

6. **Other Departments**. At the discretion of the City Council such other City departments or agencies not mentioned above may be directed to render assistance and/or implement their own regulations and policies in the effectuation of the provisions of this Ordinance.

Sec. 7. EMERGENCIES.

Temporary remedial measures may be taken in response to an emergency caused by a sudden and unanticipated Flooding, Mudflow or coastal high-hazards when such measures are required for the immediate protection of life, property, essential services and the general health and safety of the people.

A. All emergency projects undertaken under this emergency clause shall be permitted to proceed without prior approval or approvals that would otherwise be necessary in absentia of a genuine emergency.

B. All emergency projects excepted by this section shall be deemed temporary and no vested rights are implied or granted by the City.

C. All projects which would otherwise require licenses and/or permits and which are undertaken under the emergency provisions of this section shall have the required applications filed with the appropriate agency of the City within seven working days after the emergency abates.

D. Any emergency project which remains in place after the emergency abates shall be constructed or altered to meet all applicable standards and shall be inspected to verify that all applicable standards have been met.

Sec. 8. ALTERATION OF DRAINAGE COURSES.

A. No natural or human-made drainage course shall be altered or relocated without prior notification to all adjacent communities affected or potentially affected by such alteration or relocation. Copies of such notifications shall be submitted to the State Coordinating Office (the California Department of Water Resources) and the Administrator at the same time the affected communities are notified. Evidence of such notification shall be submitted to the Federal Emergency Management Agency.

B. No natural or human-made drainage course shall be altered or relocated in any way which would diminish its Flood carrying capacity.

C. No natural or human-made drainage course shall be altered or relocated in any way not in keeping with the provisions and intent of the Ordinance.

Sec. 9. VARIANCES AND WAIVERS.

Notwithstanding any other regulations in the Zoning Code or Charter, the following provisions apply to Waivers and Variances from the requirements of this Ordinance only.

A. **Nature of Variances.**

1. The issuance of a Variance pursuant to this Ordinance is for Floodplain management purposes only. Insurance premium rates are determined by statute according to actuarial risk and will not be modified by the granting of a Variance.

2. The Variance criteria set forth in this section of the Ordinance are based on the general principle of zoning law that Variances pertain to a piece of property and are not personal in nature. A Variance may be granted for a parcel of property with physical characteristics so unusual that complying with the requirements of this Ordinance would create an exceptional hardship to the applicant or the surrounding property owners. The characteristics must be unique to the property and not be shared by adjacent parcels. The unique characteristic must pertain to the land itself, not to the structure, its inhabitants, or the property owners.

3. It is the duty of the City of Los Angeles to help protect its citizens from Flooding. This need is so compelling and the implications of the cost of insuring a structure built below Flood level are so serious that Variances from the flood elevation or from other requirements in the flood ordinance are quite rare. The long term goal of preventing and reducing flood loss and damage can only be met if Variances are strictly limited. Therefore, the Variance guidelines provided in this Ordinance are more detailed and contain multiple provisions that must be met before a Variance can be properly granted. The criteria are designed to screen out those situations in which alternatives other than a Variance are more appropriate.

B. **Condition for Variances.**

1. Generally, Variances may be issued for New Construction, substantial improvement, and other proposed new development to be erected on a lot of one-half acre or less in size contiguous to and surrounded by lots with existing structures constructed below the Base Flood level, providing that the procedures of this Ordinance have been fully considered. As the lot size increases beyond one-half acre, the technical justification required for issuing the Variance increases.

2. Variances may be issued for the repair or rehabilitation of "historic structures" upon a determination that the proposed repair or rehabilitation will not preclude the structure's continued designation as an historic structure and the Variance is the minimum necessary to preserve the historic character and design of the structure.

3. Variances shall not be issued within any mapped regulatory Floodway if any increase in Flood levels during the Base Flood discharge would result.

4. Variances shall only be issued upon a determination that the Variance is the "minimum necessary" considering the flood hazard, to afford relief. "Minimum necessary" means to afford relief with a minimum of deviation from the requirements of this Ordinance. For example, in the case of Variances to an elevation requirement, this means the City of Los Angeles need not grant permission for the applicant to build at grade, or even to whatever elevation the applicant proposes, but only to that elevation which the City of Los Angeles believes will both provide relief and meet the intent of this Ordinance.

5. Any applicant to whom a Variance is granted shall be given written notice over the signature of a City official that:

    a. The issuance of a Variance to construct a structure below the Base Flood level will result in increased premium rates for flood insurance up to amounts as high as $25 for $100 of insurance coverage, and

    b. Such construction below the Base Flood level increases risks to life and property. A copy of the notice may be recorded by the Floodplain Administrator in the Office of the County of Los Angeles Recorder and be recorded with a covenant of the affected parcel of land.

6. The Floodplain Administrator will maintain a record of all Variance actions, including justification for their issuance, and report such Variances issued in its biennial report submitted to FEMA.

C. **Appeals.** If the applicant, or any other affected party is dissatisfied with the action of the decision maker pertaining to a Waiver, he or she may appeal such action as follows:

1. The actions of the City Engineer shall be appealed to the Board of Public Works; the actions of the General Manager of the Department of Building and Safety to the Building and Safety Commission.

2. The appeal shall be on a form prescribed therefore and shall contain in detail the basis on which the applicant is dissatisfied with the action of the decision maker and a statement as to whether the Waiver is in violation of this Ordinance or implementing regulations and, if so, how it constitutes a violation.

3. The appeal must be filed with the appropriate body within 15 days after the mailing of the determination by the decision maker. The commission or board shall hear the matter within 30 days after filing of the appeal.

4. At the appeal hearing the commission or board shall hear the testimony of the appellant, the applicant, the person rendering the decision on the Waiver and any witnesses called by such participants.

5. Within ten days after the conclusion of the hearing the commission or board shall declare its determination. It may sustain, modify, reject or overrule any determination by the decision maker. In granting or sustaining a Waiver, findings as required by this section must be adopted by the appeal body.

6. In considering requests for Variances, the Board of Public Works and the Building and Safety Commission shall consider all technical evaluations, all relevant factors, standards specified in other sections of this Ordinance, and the:

   a. Danger that materials may be swept onto other lands to the injury of others;

   b. Danger of life and property due to Flooding or erosion damage;

   c. Susceptibility of the proposed facility and its contents to Flood damage and the effect of such damage on the existing individual owner and future owners of the property;

   d. Importance of the services provided by the proposed facility to the community;

   e. Necessity to the facility of a waterfront location, where applicable;

   f. Availability of alternative locations for the proposed use which are not subject to Flooding or erosion damage;

   g. Compatibility of the proposed use with existing and anticipated development;

   h. Relationship of the proposed use to the comprehensive plan and Floodplain management program for that area;

   i. Safety of access to the property in time of Flood for ordinary and emergency vehicles;

   j. Expected heights, velocity, duration, rate of rise, and sediment transport of the Flood waters expected at the site; and

   k. Costs of providing governmental services during and after flood conditions, including maintenance and repair of public utilities and facilities such as sewer, gas, electrical, and water system, and streets

and bridges.

7. Variances shall only be issued upon a:

   a. Showing of good and sufficient cause;

   b. Determination that failure to grant the Variance would result in exceptional "hardship" to the applicant; and

   c. Determination that the granting of a Variance will not result in increased flood heights, additional threats to public safety, or extraordinary public expense, create a nuisance (see "Public safety and nuisance"), cause "fraud and victimization" of the public, or conflict with existing local laws or ordinances.

8. Variances may be issued for New Construction, substantial improvement, and other proposed new development necessary for the conduct of a functionally dependent use provided that the provisions of the Appeals section of this Ordinance are satisfied and that the structure or other development is protected by methods that minimize flood damages during the base flood and does not result in additional threats to public safety and does not create a public nuisance.

9. Upon consideration of the factors of the Conditions for Variances and the purposes of this Ordinance, the City of Los Angeles may attach such conditions to the granting of Variances as it deems necessary to further the purposes of this Ordinance.

D. **Responsibilities.**

1. The City Engineer for the Department of Public Works and the General Manager of the Department of Building and Safety or their designees, may grant Variances and Waivers from the requirements of this Ordinance.

2. The authority to grant Variances and Waivers shall be delegated as follows:

   a. The City Engineer - design and construction of Public Works;

   b. General Manager, Department of Building and Safety - construction of private structures and grading on private property; and

   c. The Flood Hazard Mitigation Coordinator shall be notified of all requests for Variances and Waivers.

E. **Procedures**.

1. An application for a Waiver shall be filed with the appropriate City office of authorized to grant Waivers upon a form and accompanied by such data and information as has been prescribed for that purpose. Each application shall be verified by the owner or lessee of the property concerned and accompanied by the fee set forth in Los Angeles Municipal Code Section 91.107.

2. Upon the filing of a verified application for Waiver, the matter shall be set for public hearing before the City official authorized to grant Variances. Notice of the time, place and purpose of the public hearing shall be mailed not less than ten days prior to the date of such hearing to the applicant and to the owners of property within 300 feet of the subject property. The names and addresses of owners of property located within the City shall be determined by reference to the records of the City Clerk, and for property outside the City from records of the County Assessor. The decision maker authorized to grant Variances shall investigate each such application as expeditiously as possible and render a decision thereon within 75 days from the date the completed application is accepted for filing.

3. The determination of the decision maker shall be in writing and shall be supported by findings of fact based on evidence presented to the decision maker. The decision maker may attach such conditions to the grant of a Waiver as he or she deems necessary to further the purposes of this Ordinance. A copy of the determination of the decision maker together with notification that: (a) issuance of a Waiver to construct a structure below the Base Flood level will result in increased premium rates for insurance coverage; and (b) such construction below the Base Flood Level increases risk to life and property shall be mailed to the applicant. Copies of a determination approving a Waiver shall be sent to the Flood Administrator and the Flood Hazard Mitigation Coordinator for the City, as that role is described in Section 11 of this Ordinance.

Sec. 10. REVISIONS.

A. Amendments or revisions to this Ordinance may be initiated by the City Council, the Director of Planning, or the City Planning Commission.

B. The City Engineer and/or Director of Planning shall review changes in applicable Federal regulations and, as necessary, report and make recommendations to the City Council.

Sec.11. CITYWIDE FLOOD HAZARD COORDINATION AND REPORTING.

A. Coordinating.

1. The City Administrative Officer is designated as liaison between the City and FEMA and other Federal, State, regional and local agencies. Flood-related disaster relief activities shall be coordinated through this office.

2. The City Engineer is designated as the Flood Hazard Mitigation Coordinator for the City. The Flood Hazard Mitigation Coordinator shall be responsible for coordinating the implementation of this Ordinance among the Planning, Building and Safety, and Public Works Departments. He or she shall submit all reports required by Federal regulations and/or this Ordinance in accordance with procedures set forth below.

3. All affected divisions of the Emergency Operations Organization shall cooperate with and assist the above-designated officials. The Citywide Flood Hazard Coordination Program will be the responsibility of the Emergency Operations Board.

   Under Los Angeles Administrative Code Section 8.41, the Board is responsible for preparation for and response to emergency situations within the City. The Board is composed of department managers who are primarily involved in various aspects of the flood hazards program.

B. Reporting.

1. The Flood Hazard Mitigation Coordinator shall be responsible for the required notification to the Administrator and the State and regional clearinghouses of Waivers from the Ordinance. Each department shall submit copies of each Waiver, its findings and supporting justifications to the Flood Hazard Mitigation Coordinator.

2. Annually, each affected department shall submit a summary report of: (a) the number of permits approved in Special Flood Hazard Areas; (b) the number of Waivers applied for; (c) the number of Waivers approved; and (d) any other data requested by the Flood Hazard Mitigation Coordinator. These Departmental reports shall be received by the Flood Hazard Mitigation Coordinator in sufficient time for him or her to make his/her annual or biennial Summary Report to the Administrator.

3. The Flood Hazard Mitigation Coordinator shall submit an annual or biennial Summary Report to the Administrator in the form and including such information as is required by federal regulations or as requested by the Administrator.

4. The Flood Hazard Mitigation Coordinator shall be responsible for notifications of intent to change or alter drainage courses.

5. The Flood Hazard Mitigation Coordinator shall submit to the Administrator, as often as necessary, requests for revision to the federally regulated components (FIRM and FBFM) of the Los Angeles Flood Hazard Map. The Flood Hazard Mitigation Coordinator shall submit updated map data to the Bureau of Engineering and Department of City Planning automated mapping systems on an annual basis, at minimum, or upon updates to the map.

6. The Flood Hazard Mitigation Coordinator shall notify the Administrator, upon occurrence, whenever the boundaries of the City have been modified by annexation or when the City has otherwise assumed or no longer has authority to adopt and enforce floodplain management regulations for a particular area.

Sec. 12. SEVERABILITY. If any portion, subsection, sentence, clause or phrase of this ordinance is for any reason held by a court of competent jurisdiction to be invalid, such a decision shall not affect the validity of the remaining portions of this ordinance. The City Council hereby declares that it would have passed this ordinance and each portion or subsection, sentence, clause and phrase herein, irrespective of the fact that any one or more portions, subsections, sentences, clauses or phrases be declared invalid.

Sec. 13. PROGRAMS. These programs are suggested for possible future study and their inclusion in this Ordinance does not imply either a rigid methodology or any budgetary obligation on the part of the City. Each program must be individually authorized and funded by the City Council and their inclusion here does not obligate the City of Los Angeles to their implementation.

Recommended are:

A. Initiation of a program for the relocation of occupants away from Flood-Related Hazard Areas wherein human life, safety and health is endangered as follows:

   1. Examination of the inventory of vacant properties owned by the City for initiation of a program to study the relationship between fire and Flood-Related Hazards;

   2. An equitable arrangement of exchange for property rights to be acquired within Floodways;

   3. Preservation of the Flood-prone Areas for open space purposes;

4. Acquisition, where feasible, of land or land development rights for public purposes consistent with a policy of minimization of future property losses;

5. Acquisition of frequently Flood-damaged structures.

B. Designation of the City's Automated Mapping System as the replacement for the present district maps and accelerate its implementation by:

1. Increasing the present capability of the Bureau of Engineering to construct the computerized base map;

2. Allocation of staff positions for each department to transfer its district map data items onto the Automated Mapping System;

3. Acquisition of the remote terminals for the public counters of the central and district offices as required.

C. Initiation of a program to study the relationship between fire and Flood-Related Hazards by:

1. Taking into account that the native vegetation (particularly the climax vegetation) which covers hillside areas is extremely flammable and that brush fires in such areas are frequently followed by Floods and Mudflows;

2. Studying the complex interplay between drought, fire, heavy rain and Mudflow so as to be better able to identify potentially hazardous situations;

3. Establishing plans and procedures aimed at minimizing such hazards and preventing the possible disasters they may cause.

D. Initiation of a program for the purpose of assessing Coastal High-Hazards for the purpose of establishing coastal development criteria, including preventive and remedial measures, for the protection of human life and property by:

1. Completing a bathymetric study to chart the ocean floor in sufficient detail (including topography and depths) to permit engineering calculations to be made concerning hypothetical tsunami and hurricane wave behavior and coastal impacts;

2. Studying the inter-relationships between: (a) type of origin (i.e., earthquake or hurricane); (b) strength of origins (i.e., magnitude of earthquake or strength of winds); (c) directional orientation of origin (i.e., is it aimed directly at us; the directness of path); (d) distance from origin; (e) travel-time between origin and point of coastal impact; (f) degeneration factor (i.e., diminution of strength over distance and time); (g) bathymetry of our coastal shelf; (h) shoaling effect; and (i) coastal landforms and

landward barriers or features, so as to be able to identify hazardous situations and to be able to forecast problem areas;

3. Investigating means to mitigate impacts of Coastal High-hazards on human life, safety and welfare, such as: (a) construction of submarine barriers to "trip" incoming waves; (b) construction of shore works; (c) prohibition of new habitable development on or near unprotected coast frontage; and (d) relocation of habitable development and/or vital public facilities away from coastal frontages which are unfeasible to protect;

4. Developing early warning and emergency preparedness plans, including evacuation, temporary relocation alternatives, disaster relief centers and adequate contingencies for policing the area.

E. Initiation of a program to prevent Mudflows, erosion and Floods including, but not limited to:

1. Inspection of Flood control and drainage facilities on private property to recommend clearing or cleaning of Debris and/or construction of new facilities;

2. Strengthen the brush clearance ordinance and enforcement to prevent brush fires and concomitant erosion problems;

3. Promote the use of low fuel volume and erosion control landscaping through public education and displays;

4. Provide intensive slope rehabilitation after brush fires, including grading and planting with barley and other stiff, deep rooting grasses.

Sec. 14. URGENCY CLAUSE. The City finds and declares that this Ordinance is required for the immediate protection of the public peace, health, and safety for the following reasons: Adoption of this Ordinance is a prerequisite for continued eligibility of property in the City of Los Angeles for federal flood insurance and federal disaster assistance monies. So that federal flood insurance will continue to be available for City of Los Angeles property owners, it is imperative that this Ordinance be made effective prior to April 21, 2021. For these reasons, this Ordinance shall become effective upon publication pursuant to Section 253 of the Los Angeles City Charter.

Sec. 15. The City Clerk shall certify to the passage of this ordinance and have it published in accordance with Council policy, either in a daily newspaper circulated in the City of Los Angeles or by posting for ten days in three public places in the City of Los Angeles: one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall; one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall East; and one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

Approved as to Form and Legality

MICHAEL N. FEUER, City Attorney

By _____
ADRIENNE S. KHORASANEE
Deputy City Attorney

Date 4/8/21

Pursuant to Charter Section 559, I **approve** this ordinance on behalf of the City Planning Commission and recommend that it be adopted.

_____
VINCENT P. BERTONI, AICP
Director of Planning

Date April 7, 2021

File No. 21-0346

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The Clerk of the City of Los Angeles hereby certifies that the foregoing ordinance was passed by the Council of the City of Los Angeles, **by a vote of not less than three-fourths** of all its members.

CITY CLERK

MAYOR

Ordinance Passed April 14, 2021

Approved 04/14/2021

Published Date: 04-19-21
Ordinance Effective Date: 04-19-21

INITIAL SUBMISSIONS

The following submissions by the public are in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3a. Please note that "compliance" means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. The Commission's ROPs can be accessed at **http://planning.lacity.org**, by selecting "Commissions & Hearings" and selecting the specific Commission.

The following submissions are not integrated or addressed in the Staff Report but have been distributed to the Commission.

Material which does not comply with the submission rules is not distributed to the Commission.

ENABLE BOOKMARKS ONLINE:

**If you are using Explorer, you will need to enable the Acrobat  toolbar to see the bookmarks on the left side of the screen.

If you are using Chrome, the bookmarks are on the upper right-side of the screen. If you do not want to use the bookmarks, simply scroll through the file.

If you have any questions, please contact the Commission Office at (213) 978-1300.

Case No: **CPC-2024-2010-GPA-ZC-CU2-SPPC (128 Hurricane Way)**

January 8, 2026

Via Submission for the Official Zoning Hearing Record

Re: Opposition to Zoning Change – Venice Auxiliary Pumping Plant (VAPP)
Project Site: 3813 Esplanade, Venice, CA

Honorable Commissioners,

I submit this letter for inclusion in the official record to formally state my opposition to any zoning change or land-use approval for the Venice Auxiliary Pumping Plant (VAPP) at or near **3813 Esplanade** until the City adopts clear, enforceable, resident-protective safeguards addressing health, safety, and habitability impacts to nearby homes. My family resides within close proximity of the proposed site. This is not a speculative concern. A zoning decision that increases the intensity of use and permits heavy construction activity near residences—without binding protections—constitutes an unreasonable transfer of risk onto residents.

1) Zoning approval requires compatibility with residential use and protection of health and safety

Zoning is not a ministerial step or a formality. It is a legal decision that must be supported by evidence and written findings that the proposed use is compatible with surrounding land uses, does not create a nuisance or hazardous condition, and will not unreasonably impair the health, safety, and welfare of neighboring residents. A project of this nature—heavy construction, ground disturbance, and subsurface work in an area with historic oil activity—requires enforceable conditions that prevent foreseeable impacts to nearby homes.

Approving a zoning change without such conditions is premature because it removes the final point of leverage the public has to ensure resident protections are mandatory rather than optional.

2) The record reflects known subsurface and contamination concerns in the project area

Based on materials presented in the Coastal Commission process and the City's own environmental discussions of oil-well re-abandonment and contaminated soil work in the vicinity, the City has acknowledged that legacy oil infrastructure in this area was abandoned under outdated standards and that prior leakage has been documented in the surrounding context. Where historic oil activity exists, and where subsurface pathways can transmit soil gas and vapors beyond a single parcel, a zoning decision must account for off-site risk and cumulative impacts—not simply the footprint of construction.

Subsurface conditions do not obey parcel lines. Utility trenches, vibration, drilling, and soil disturbance can alter pathways and increase migration risk. These are foreseeable consequences of the type of work contemplated for the VAPP. The City cannot reasonably approve a zoning

change without first demonstrating—through independent, site-specific verification and monitoring plans—that nearby residences will be protected from migration, emissions, and habitability impacts during construction and afterward.

3) Coastal conditions are not the same as resident protections

I understand the Coastal Commission imposed multiple conditions intended to protect sensitive habitat and ensure regulatory compliance. However, those conditions do not equal resident protection. Environmental compliance aimed at wetlands or habitat does not necessarily address:

- whether residents will be exposed to elevated methane or soil-gas conditions;
- whether vapor intrusion protections are available if monitoring indicates risk;
- whether residents will be displaced or lose the use of their home during construction;
- whether there is a clear remedy if habitability is compromised.

In plain terms: even robust ecological protections can coexist with inadequate protections for families living nearby. Zoning is the appropriate place to require enforceable resident safeguards.

4) The project is not "ready" for a zoning change because critical safeguards are missing or not enforceable

Before any zoning change is approved, the City must adopt enforceable conditions of approval that include, at minimum:

A. Independent verification and transparency

- Independent third-party petroleum/environmental verification (not tied to City contractors) that subsurface risks have been evaluated and will not impact nearby homes.
- Public access to key technical documents, monitoring plans, and incident protocols.

B. Baseline testing and continuous monitoring for nearby homes

- Baseline soil-gas/methane/VOC testing for parcels within a defined radius of the project (at minimum 100 feet).
- Continuous monitoring during construction and for a defined long-term period post-construction, with public reporting.

C. Mandatory mitigation triggers and stop-work authority

- Clear thresholds that require immediate mitigation, including vapor intrusion controls where appropriate.
- Stop-work requirements when exceedances, migration indicators, or safety alarms occur.

D. Resident remedies and habitability protections

- A written relocation and habitability plan for residents if conditions arise that make occupancy unsafe or unreasonable.
- A defined compensation/remedy framework for loss of use, property impacts, and related costs attributable to the project.

E. Clear responsibility and enforceability

- An enforceable indemnification and responsibility framework—so residents are not forced to carry the burden of proving harm after impacts occur.
- A "re-opener" mechanism requiring additional mitigation if new evidence emerges.

Without these protections adopted as binding conditions of approval, the City cannot credibly make the necessary findings that a zoning change will not harm nearby residents or undermine residential habitability.

5) Approving zoning now improperly shifts known risk onto residents

I respectfully submit that approving this zoning change now would functionally shift the risk of subsurface conditions, emissions, construction impacts, and habitability disruptions onto families living nearby. That is not an acceptable policy outcome, and it is not what zoning is intended to do. The City may pursue infrastructure and cleanup; however, it must do so without sacrificing resident safety, health, and the basic expectation that homes remain habitable throughout construction.

Requested action

For the reasons stated above, I respectfully request that the Commission:

1. **Deny or continue** the zoning change request until enforceable resident-protective conditions are adopted; or, at minimum,
2. Condition any approval on binding safeguards that include baseline testing, continuous monitoring, mandatory mitigation triggers, stop-work protocols, a habitability/relocation plan, and a clear remedy framework for impacted residents.

Thank you for placing this letter into the official record and for considering the health, safety, and welfare of residents who will bear the real-world impacts of this decision.

Respectfully submitted,

Joey Jackson
3709 /Property Owner
Venice,CA

Hurricane Pumps Neighbor Letters

(Last updated: 12/2/24)

Re: Venice Auxiliary Pump Plant (VAPP), 128 and 133 Hurricane;
DIR-2017-4167; ZA-2017-3950 (plant); DIR-2017-4173; ZA-2017-3953 (parking lot)

The following members of our community have expressed their POV on this issue to date. We anticipate additional written responses as this process continues.

2024 Neighbor Letters

MIKE BORASSI & GENEVIEVE MORRILL-BORASSI – (FORMERLY) 3811 ESPLANADE. (ORIGINAL APPELLANTS) 5

KENYA LEE & JOEY JACKSON – 3811 ESPLANADE 6

HARVEY PLOTNICK – 125 & 127 HURRICANE ST (PROPERTY OWNER) 7

LESLIE & MICHAEL ADLER – 3601 ESPLANADE 9

MICHAEL HOFFS – 110 HURRICANE ST 10

MICHAEL HOLT – 127 HURRICANE 11

BETHANY GORFINE – 3950 VIA DOLCE (OWNER AND CONDO BOARD PRESIDENT) 12

ELIANE GANS – 3933 ESPLANADE (PROPERTY OWNER) 13

ROBIN RUDISILL – 3003 OCEAN FRONT WALK 14

TING CHANG – 28 MAST 15

TOM DRUCKER & MARCIA SELIGSON DRUCKER – 4 LIGHTHOUSE 16

JENESA KURLAND – 4300 VIA DOLCE (CONDO OWNER) 17

ROBERT DIBIASE – 115 ½ HURRICANE ST (OWNER) 18

TRACI GAY – 310 WASHINGTON BLVD. 19

GARY STROMBERG – 125 HURRICANE ST 20

TING CHANG – 28 MAST 21

JENESA KURLAND – 4300 VIA DOLCE (CONDO OWNER)....22

PERRY ROD – 3818 PACIFIC AVE....23

MARY-DOROTHY LINE – 125 PRIVATEER MALL....24

MICHAEL HOFFS – 110 HURRICANE ST....25

2022-23 Neighbor Letters

MARY LAING – 115 HURRICANE ST....27

STEVE & KAREN BRADBURY – 109 HURRICANE ST (OWNERS)....28

ADAM GOLDBERG – 110 HURRICANE ST....29

ROBERT DIBIASE – 115 ½ HURRICANE ST (OWNER)....30

MURIEL BLAKE & JOHN LARKIN – 110 HURRICANE ST.....31

GARY STROMBERG – 125 HURRICANE....33

MIKE BORASSI & GENEVIEVE MORRILL-BORASSI – 3801 ESPLANADE....34

KRISTY CANON - 3809 ESPLANADE (BUILDING OWNER)....36

ROBERT & LUCIA WILLIAMS – 3805 ESPLANADE....37

ELIANE GANS – 3933 ESPLANADE (PROPERTY OWNER)....38

TANYA SPERO – 113 ½ HURRICANE ST....40

LARRY LESSER, MD & CLAUDE LESSER – 3609 ESPLANADE (OWNER)....41

JEFF LEE – 3701 ESPLANADE (OWNER)....42

CLARE BRONOWSKI – 3701 ESPLANADE (OWNER)....43

LESLIE & MICHAEL ADLER – 3601 ESPLANADE....44

JENNIFER KELTON – 3615 ESPLANADE....45

MELLY LIBURD – 120 ½ GALLEON (OWNER)....46

ANDREW FREEDMAN – 20 IRONSIDES 47

MARILYN MIKOS – 115 EASTWIND ST (OWNER) 50

ARIANNE FLEMMING & JUSTIN WASSER – 3812 PACIFIC 51

SUSAN AFRIAT & STEVE HYMAN – 4000 PACIFIC 52

BETHANY GORFINE – 3950 VIA DOLCE (OWNER AND CONDO BOARD PRESIDENT) 53

JONATHAN TILLMAN – 3719 VIA DOLCE 54

ROBIN RUDISILL 56

ADAM ROSE – 12 BUCCANEER ST. 57

ROBERT NAU – 4250 VIA DOLCE 58

FELICIA GLADE & MIKE PELLETIER – 116 GALLEON ST. 59

ELIANE GANS – 3933 ESPLANADE (OWNER) 60

JENESA KURLAND – 4300 VIA DOLCE (CONDO OWNER) 61

2024 Neighbor Letters

Mike Borassi & Genevieve Morrill-Borassi – (formerly) 3811 Esplanade. (original appellants)

Dear Chair and members of the Venice Neighborhood Council Land Use & Planning Committee,

My name is Genevieve Morrill, and my husband and I filed the appeals to both City of Los Angeles Planning Commission, and more recently the California Coastal Commission. This project has been ill-conceived from the beginning and too large for the space. Understanding that it is an essential utility we need in our region, we were simply asking them to consider making it more compatible for the neighborhood and less intrusive on the community. At the time we filed the PC appeal, the city has not met or reached out to the community since 2016.

We are a casualty of this pending project, as our building is situated on the canal directly next to the vacant lot where the VAPP will be built. We have been renters for 28 years on the Canal and due to the pending construction, the owner sold the building, and the buyer decided to live there which therefore meant we had to move and find a new place to live at a considerable increase in market-based rate rents.

In my day job, I am the CEO of a Chamber of Commerce and therefore understand planning, zoning, and development. I attest that a developer would never be allowed to get away with such egregious disruption to a residential neighborhood. To have transformers and electrical equipment next to someone's bedroom window when the design can be flipped so that these electrical boxes would be on a vacated side of the street with no residents. They claim this impossible and frankly its only because they have already designed the project. A developer would be made, no matter what the expense to redesign.

This project is not compatible to the neighborhood aesthetics; it is too large for the location; it has negative impact to our community members; mitigation measures are not sufficient; has negative impact on the environment and a protected canal; and creates areas for more unhoused to encamp. Additionally, our understanding is that this project is an industrial use in a residential zone and no zoning was amended for its purpose.

Please oppose this project and help support the community members.

Thank you,

Genevieve Morrill
Formerly 3801 Esplanade/Grand Corso

Kenya Lee & Joey Jackson – 3811 Esplanade

I am writing to express my deep concerns regarding the ongoing plans for the Venice Auxiliary Pumping Plant (VAPP) project near my home at 3809-3811 Esplanade St in Marina del Rey. For over seven years, our community has diligently attempted to engage with Public Works to address critical concerns related to this project. Unfortunately, our efforts have largely been met with inadequate responses, leaving us feeling overlooked and unsupported.

While I recognize the importance of the VAPP as a critical infrastructure initiative, I am deeply troubled by the substantial and long-term negative impacts the current construction plans will have on my family and our community. Specifically, my primary concerns include:

Exposure to Toxins: The project involves significant excavation directly next to my home, raising serious concerns about potential exposure to hazardous substances that could endanger the health of residents, particularly children.

Structural Vibrations: Intense vibrations from construction activities could compromise the structural integrity of nearby homes, including my own, potentially leading to costly and irreversible damage.

Extreme Noise Levels: Construction noise will significantly affect my household's quality of life, particularly for my young child, whose well-being and development depend on a quiet and stable living environment. I also work from home and need a conducive environment to conduct my business.

Improvement of inadequate emergency access during construction activities.
Having a family residing next to this project concerns us to have an adequate emergency plan,a well thought out plan for emergency services during the time of construction.

Our community has never sought to halt this essential project. Instead, we have consistently requested an open and meaningful dialogue with project stakeholders to ensure fairness and adequate mitigation of these impacts. However, to date, we have seen little action or acknowledgment of our concerns.

The health, safety, and quality of life of our residents must be prioritized as this project moves forward. We are not opposed to progress; we simply seek fairness and the opportunity to live without unnecessary ha.rm or disruption

Thank you for your attention to this matter. I look forward to your prompt response and to working collaboratively toward a solution that benefits both the community and the project's success.

Sincerely,
Kenya Lee
3811 Esplanade, 90292
313-999-0264

Harvey Plotnick – 125 & 127 Hurricane St (property owner)

I own a property on Hurricane Street in Marina del Rey. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP Project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on lives for multiple years. My primary concern are:

* Conformance with the certified Venice LUP Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas. Policy 1.C.1 states that the sale and design of industrial facilities must be compatible with adjacent and neighboring uses. Policy 1.A.5 that seeks to preserve and protect stable multifamily neighborhoods. Policy 1.D.1 states the only permit development adjacent to the grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.

*Meeting established public Benefit standards including a 10' landscaped irrigated buffer along all property lines. The performance stands applied to this project are applicable to those on a major or secondary highway, not a residential street.

* Adherence to court-mandated ESHA protections in the Ballona Lagoon/Grand Canal area including no dredging and/or use of heavy equipment both of which are parr of the project plan *The community that introduced elements of the Grand Canal Restoration Plan (Phase 2) to address some of these issues. It is not an all or nothing

*Mitigation of other EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas releases. The community has put forth concepts to address some of these issues including the grand Canal Restoration Plan

* Mitigation of "significant and unavoidable" construction-related issues including ground borne vibration which could result in residential building damage, and construction noise that exceeds LA CEQA Thresholds guidelines. Section MM-NOI-2 of the mitigation plans does not adequately protect property from potential damage. The current plan is for more reactive than proactive using terms such as "may include." "If considered appropriate," and "as feasible and practical." Also, there is no timely mechanism for issues to be addressed/project to be halted in the event damage is done. Section MM-NO-3 of the mitigation plan is also inadequate. It strains credibility to believe noise control features will "reduce overall operational noise levels from all Project related sources to within 5db of existing ambient noise levels in the surrounding community (53-57db)."

* Change to five day/week construction and more restricted hours in lieu of six days/week.

* Alternative parking for up to 25 cars, most owned by residents, that park on Hurricane St daily during non-summer days and weekends year round. Hurricane St parking will cease to exist during construction hours. Where do these cars park?

* Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted Street parking around the current Venice Pumping Plant (VPP), at

a savings of at least $3.5 million to the city. The community has proposed a viable alternative that does not require this lot.

* Modification of the project design so that it is compatible with the residentially zoned neighborhood. There was very little, if any, community input during the design process,

*Actionable protection of residential properties from dirt, dust and other construction impacts. The community has offered viable suggestions.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through respectful negotiations. PLEASE support this request for fairness,

Thank you,
Harvey Plotnick

Leslie & Michael Adler – 3601 Esplanade

I live along Esplanade Canal on Eastwind.

We have a few concerns:

1. Adherence to court-mandated ESHA protections in the surrounding lagoon area;

2. Mitigation of EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas release;

3. Mitigation of "significant and unavoidable" issues including ground-borne vibration, which could result in residential building damage, and construction noise that exceeds LA CEQA Thresholds guidelines;

4. Change to five day/week construction instead of proposed six days/week;

5. Modification of project design so that it is compatible with its residentially zoned neighborhood;

6. Protection of residential properties from dirt, dust and other construction impacts;

7. Upgrade of deficient maintenance plan for both the new and existing facility.

Thank you
Leslie & Mike Adler
3601 Esplanade

Michael Hoffs – 110 Hurricane St.

As a 20+ resident of 110 Hurricane Street, I am in strong support of the motion. This is a classic case of the city not listening to the boots on the ground describing why the installation of the parking lot is not only not needed but strongly opposed for security reasons. For VAPP personnel, alternative parking on Hurricane has been found in other areas within a half block or less of VAPP. Homeless encampments, drunken disorderly conduct and contempt for Hurricane residents, constant traffic to find parking in the lot, mounting trash and lack of city funds to police the area have not been addressed and frankly will not be before construction.

Please ask yourself, would you want this parking lot built on your street? If you would support installing the parking lot on your street, would you be concerned if the aforementioned was not thoroughly embedded in the parking plan before construction?

Thank you for listening, your time to think about Hurricane Street's resident thoughts and frankly the chance to use the funds suggested for the parking lot on something else that will benefit the area in greater need.

Sincerely,

Michael Hoffs
110 Hurricane St

Michael Holt – 127 Hurricane

Greetings,

I live on Hurricane St in Marina Del Rey.

For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on our lives for multiple years. My primary concerns are

- Mitigation of "significant and unavoidable" construction-related issues including ground-borne vibration which could result in residential building damage, and, construction noise that exceeds LA CEQA Thresholds guidelines.
- Change to five day/week construction and more restricted hours in lieu of six days/week.
- Off-site workspaces for home-based workers
    - The city says it will be managed by the construction company but there have not been any guarantees of location or suitability.
- Actionable protection of residential properties from dirt, dust and other construction impacts.
    - The community has offered viable suggestions.
- Alternative parking for up to 25 cars, most owned by residents, that park on Hurricane St daily during non-summer days and weekends year round
    - Hurricane St parking will cease to exist during construction hours. Where do these cars park?
- Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through respectful negotiations.

PLEASE support this request for fairness.

Thank you,

Michael Holt
127 Hurricane Street

Bethany Gorfine – 3950 Via Dolce (owner and condo board president)

As an association that lives across the lagoon from Hurricane, and an association that lived through the dual main project for five years, with drilling immediately outside our 7 buildings between Marquesas and Tahiti on Via Dolce and via Marina, we are still feeling the effects of the project. I will elaborate.

I would like to say a few things regarding the care of the Ballona Lagoon, and Grand Canal - parking issues, vibrations, care, concern and communication for and of neighbors, repairs, plumbing, mental health, 6 days of noise, chaos, construction, personnel are all issues. Day in. Day out.

Bethany Gorfine
President, Marina Strand Colony 1.
145 units

Eliane Gans – 3933 Esplanade (property owner)

To the Chairman of LUPC
To LUPC
To Traci Park

I have lived in my building on Esplanade & Hurricane (just 1/2 block from this proposed VAAP). for 35 years. **I love my neighborhood and my neighbors. I love the serenity and residential environment.**

1. **REGARDING VIBRATION:** This will disturb all residents and as a landlord I do not want any tenant moving as a result of vibration and constriction noise. This will impact my quality of life and my ability to support myself financially.

2. **INADEQUATE EMERGENCY ACCESS DURING CONSTRUCTION**: Children and animals, and elderly residents, **will be in danger** of obstruction in an emergency

4. **PARKING LOT:** The city has already eliminated 6 parking spaces on Hurricane—which was not necessary, and parking is a HUGE issue for residents and their families when visiting. Eliminating another parking lot is NOT A RESPONSIBLE ACTION.
WE MOVED TO THIS NEIGHBORHOOD FOR A REASON—AND THIS ENTIRE PROJECT WILL NEGATIVELY IMPACT THE QUALITY OF OUR LIVES.
The city should use the $2.5 million for a more advantageous purpose to actually enhance this community—so that the City could actually get more taxes if our properties were not devalued as a result of this VAAP project.

CLARIFYING #4. PARKING LOT: WE DO NOT WANT OR NEED A PARKING LOT. AND ESPECIALLY FOR NON-RESIDENTS.

5. PROJECT DESIGN: This is designed to look like a dungeon. Or a jail block. There is nothing that resembles a structure that one would consider to be compatible with the Beach and lagoon environment. The project design is not compatible with the residentially zoned neighborhood. Again, detracting anyone from wanting to live near this ugly eye sore. We need more beauty and aesthetics in our world, not a building that appears like a “block” house jail.

Sorry for being so blunt… but I wanted you to get the idea of our feelings.

Sincerely,

Robin Rudisill – 3003 Ocean Front Walk

Public Officials,

I live on Ocean Front Walk on the Marina Del Rey Peninsula. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more.

This project expands the pumping of sewage down to Dockweiler and is located in the middle of our residential neighborhood as well as in the middle of Environmentally Sensitive Habit Area (ESHA). It is an unacceptable land use for this area and yet it is critical infrastructure, and we understand it must move forward. However, the lack of concern shown regarding finding reasonable mitigations for the impacts on our residential neighborhood and the lack of protection and mitigations for the ESHA is appalling and unacceptable.

The construction plans as designed will have a painful, material impact on this community and surrounding ESHA for decades.

Our primary concerns are:

- **Mitigation measures in order to conform as closely as possible with the certified Venice LUP, the state policy guidance for determining conformance with the Coastal Act.**
    - Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas.
    - Policy I.C.1 states that the scale and design of industrial facilities must be compatible with adjacent and neighboring uses.
    - Policy 1.A.5 seeks to preserve and protect stable multifamily neighborhoods.
    - Policy 1.D.1 states the only permitted development adjacent to the Grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.
- **Elimination of the proposed parking lot at 128 Hurricane St.** for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city.
- **Modification of the project design** so that it is visually compatible with the residentially zoned neighborhood.

Given that this location is grossly incompatible with this location and never should have been allowed to happen, the City's Bureau of Engineering should be bending over backwards to keep the impacts on the residential neighborhood and surrounding ESHA to a bare minimum.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through reasonable and respectful negotiations in order to minimize impacts on the surrounding ESHA and residential neighborhoods.

PLEASE support this request for fairness. Please work with us to make reasonable changes to the project in order to protect our residential neighborhood and the ESHA.

Ting Chang – 28 Mast

To whom it may concern,

As a resident of the Marina Peninsula, I am writing to express my strong support for the Venice Neighborhood Council's (VNC) motion opposing the Venice Auxiliary Pumping Plant (VAPP) project as currently proposed under CPC-2024-2010-GPA-ZC-CU2-SPPC.

While I understand the necessity of infrastructure improvements, the current plan presents serious concerns that have not been adequately addressed by Los Angeles Public Works (LAPW). The project's non-conformance with the Venice Local Coastal Program (LUP) policies, particularly those aimed at protecting stable residential neighborhoods and preserving environmentally sensitive areas like the Grand Canal and Ballona Lagoon, is deeply troubling.

Moreover, the Environmental Impact Report (EIR) for the project has failed to address key issues, including the risk of habitat destruction, groundwater contamination, and methane gas release. The proposed six-day workweek for construction will significantly disrupt the lives of local residents, with excessive noise, vibration, and dust over an extended period. The plan's inadequate provision for emergency access during construction is another critical concern.

The addition of a parking lot at 128 Hurricane Street, which was not part of the original project, will only exacerbate traffic and safety issues in our community. The VNC's motion rightly calls for the elimination of this parking lot, proposing more suitable alternatives that would save the city millions of dollars while addressing community concerns.

I fully support the VNC's call for LAPW to engage in a meaningful, results-oriented dialogue with our community to address these issues. It is crucial that any development in our neighborhood is done thoughtfully, with full consideration of its impact on residents and the environment.

Thank you for your attention to this matter.

Sincerely,

Ting Chang
3933 Esplanade W.
Marina del Rey, CA 90292
(310) 339-4056

Tom Drucker & Marcia Seligson Drucker – 4 Lighthouse

As long-time Marina residents, we are opposed to this zoning change until Public Works addresses some of the issues below:

- Mitigation of "significant and unavoidable" issues including ground-borne vibration, which could result in residential building damage.
- Mitigation of construction noise that will exceed LA CEQA Thresholds guidelines.
- Potentially significant methane gas release (read the community feedback to the EIR Mitigation Plans via the website link below - starts on page 44).
- Inadequate emergency access during construction activities.
- Change to five day/week construction instead of proposed six days/week.
- 25 parking spaces that will be eliminated on Hurricane every day of construction. Where will these people park?
- Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), a savings of at least $2.5 million to the city.
- Conformance to the certified Venice LUP (Policies I.A.5, I.C.1, I.C.6, and I.D.1).
- Adherence to court-mandated ESHA protections in the surrounding Ballona Lagoon and Grand Canal.
- Mitigation of EIR issues related to loss of species and habitat, groundwater impact.
- Modification of project design so that it is compatible with its residentially zoned neighborhood.
- Protection of residential properties from dirt, dust and other construction impacts.
- Upgrade of deficient maintenance plan for both the new and existing facility.
- Compensation for lost property value - During construction, tenants may very well seek reduced rents or move out. Units may have to be re-rented at lower rates, if at all. As a result, property owners may have to sell at reduced valuations. This is not hypothetical. It has already occurred.
- Resident physical/mental issues due to construction.
- Real-time community recourse to on-site construction issues. Without teeth, there can be no enforcement.

Please include this email as part of the public record.

Sincerely,

Tom Drucker and Marcia Seligson Drucker

Jenesa Kurland – 4300 Via Dolce (condo owner)

Hello VNC Board -

The Venice Auxiliary Pumping Plant (Project) as designed should not occur within a Residential Zone; and regardless of Zone nomenclature, Project must avoid drilling/vibrating foundations. No home/building owner should be forced to have their foundations and structure compromised due to poor planning and poor execution by City of Los Angeles (City). A 'mere' cosmetic crack through drywall stems from a crack in building structure which stems from a foundation crack. In earthquake country, one cannot afford - literally - to have compromised foundations & structure. City Department of Public Works (LADPW) has well proved that they cannot be trusted to comply with EIR requirements nor fair guidelines. I still seethe with distain towards the Community Outreach folks' blatant lies during their Venice Dual Force Main (VDFM) project by simply writing to you now. Photographed pre-construction inspection survey by a third party contracted by City as a baseline and photographed post-construction inspection survey by City employees admitting to seeing cracks afterwards is meaningless.

If anyone pretends to think that Project's parking lot will become anything but a trash dump and under-housed tent camp, you know they are neither trustworthy nor grounded in reality; and therefore, should not be decision-maker.

Also, Project design detracts from the community. Given Project is within a beachside residential community, why cannot the building appear more contextually-friendly? I do not understand the difunctional brown slat awnings here & there which do not provide shade to anything. A small item, but indicative of City not paying attention to detail and nor Project's impact on community of taxpayers.

If absolutely nothing else, City needs to disallow work on Saturdays. City (work) projects drag on (& on), so there is no 'time is of the essence' condition which warrants six workdays.

City allows drilling, vibrating, pounding starting at 7:00AM. City allows spilling of groundwater mixed with the oil fields below us to spill out onto streets 24-7. Thus, enforceable penalties for non-compliance with the EIR need to be in writing and should be available to all on VNC website.

Thank you,
J. Kurland
Via Dolce

Robert DiBiase – 115 ½ Hurricane St (owner)

Oct 10, 2024

To: Los Angeles Planning Commission

Subject: Proposed Pumping Station Addition,128 Hurricane St & 3813 South Esplanade

Dear Commissioners:

I have lived on Hurricane St since 1977 and witnessed the new construction of the present Pumping Station and it was a vast improvement to the old pumping station. This proposed additional pumping station construction has made many of our local residents angry, because you are not letting us give you our opinions on what we feel are legitimate objections.

1. Why is the project needed anyway. It appears that the present pumping station is doing the job just fine right now.

2. This area is an environmentally protected area. Court mandated ESHA protections in the Ballona Lagoon/Grand Canal area INCLUDE NO DREDGING AND /OR USE OF HEAVY EQUIPMENT -- BOTH OF WHICH ARE PART OF THE PROJECT PLAN. THIS IS NOT ACCEPATABLE.
3. Conversations with my neighbors are telling me that traffic on the street and car parking loss due to construction equipment will be a major problem. The noise and the impact on the canal itself could be devastating.

4. Are the transformers in the new station generating Electromagnetic fields which are known to cause Cancer?

5. Is this project absolutely NECESSARY?

6. Our neighborhood residents demand to have input into this planning process and to negotiate a possible site farther down the coast. This is a residential neighborhood, and the pumping station does not even belong here.

Respectfully submitted
Robert DeBiase
115 ½ Hurricane St

Traci Gay – 310 Washington Blvd.

I strongly oppose Venice Auxiliary pumping plant going forward! I am a resident at 310 Washington Blvd., #604, marina Del Rey 90292

Gary Stromberg – 125 Hurricane St

I live on Hurricane St in Marina Del Rey. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on our lives for multiple years.

My primary concerns are safety and mitigation of "significant and unavoidable" construction-related issues. Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone. PLEASE support this request for fairness. Thank you.

Gary Stromberg
125 Hurricane St.
MDR

Ting Chang – 28 Mast

Hello,

My husband and I are residents of Mast Street in Marina Del Rey. For over seven years, our community has tried to work with Public Works to address significant concerns about the proposed VAPP project. Despite our persistent efforts, we've been met with empty promises and no real action.

This lack of consideration for our community's well-being is deeply disappointing. While I recognize the importance of this infrastructure project, the current construction plans, as proposed, will significantly and adversely impact our lives for years to come.

My main concerns are conformance with the certified Venice LUP (as homeowners we are held to the LUP and it is only fair that city projects are as well) and the upgrade of a deficient maintenance plan for both the new and existing facility (currently garbage is all over the canal and it looks like there has not been any efforts to maintain the sidewalk area).

We are not asking to halt the project but rather to engage in a meaningful dialogue with someone who has the authority and willingness to address these concerns through respectful and fair negotiations. Your support in ensuring this request for fairness is honored would be greatly appreciated.

Thank you for your attention.

Regards,

Ting Chang

Jenesa Kurland – 4300 Via Dolce (condo owner)

Dear City Representatives -

For over seven years our community has been **trying** to **collaborate** with Public Works to address critical concerns about the planned VAPP project. Though our efforts fall on deaf ears. We receive lip service and nothing more. This total lack of concern for our community is unacceptable.

Our community acknowledges this is a critical infrastructure project even if is a hazardous industrial facility located within our residential area. However, the construction plans as designed will have a painful, material impact on our lives for multiple years.

+ Change to five day/week construction and more restricted hours in lieu of six days/week.

+ Mitigation of other EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas release.

- The community has put forth concepts to address some of these issues including the Grand Canal Restoration Plan.

+ Mitigation of "significant and unavoidable" construction-related issues including ground-borne vibration which could result in residential building damage, and, construction noise that exceeds LA CEQA Thresholds guidelines

- Section MM-NOI-2 of the mitigation plans does not adequately protect property from potential damage. The current plan is far more reactive than proactive using terms such as "may include," "if considered appropriate," and "as feasible and practical." Also, there is no timely mechanism for issues to be addressed/project to be halted in the event damage is done.

Section MM-NOI-3 of the mitigation plan is also inadequate. It strains credibility to believe noise control features will "reduce overall operational noise levels from all Project related sources to within 5 dB of existing ambient noise levels in the surrounding community (53-57 db)."

+ Modification of the project design so that it is compatible with the residentially zoned neighborhood.

+ Upgrade of a deficient maintenance plan for both the new and existing facility.

- The existing VPP is ***not*** maintained in any meaningful way. There are environmental and safety issues. Garbage is strewn along the Grand Canal side of the structure which can readily fall into this ESHA. The sidewalk around the structure is in a constant state of disrepair to the point of being dangerous.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with AHJ and motivation to address these issues through respectful negotiations. PLEASE support this request for fairness. *Imagine* ***how you would feel in a similar situation****!?*

Thank you,
J. Kurland
Via Dolce, Marina del Rey

Perry Rod – 3818 Pacific Ave

To Whom It May Concern,

My 3-unit residential building is at 3818 Pacific Avenue in Marina Del Rey. We have been trying to collaborate with Public Works to address critical concerns about the planned VAPP project. Although the industrial project is for critical infrastructure, the construction plans as designed require much more compatibility and dialogue with the immediately surrounding residentially zoned neighborhood. There was very little, if any, community input during the design process and this must change.

Thank you,

Perry Rod
Chief Investment Officer
Rod Capital Management

Mary-Dorothy Line – 125 Privateer Mall

I live on Privateer Mall in Marina Del Rey. For over seven years, our community has been trying to collaborate with Public Works to address critical concerns about the planned VAPP project.

All of our efforts have fallen on deaf ears - we've received lip service and nothing more. This total lack of concern for our community is appalling and unacceptable. I acknowledge this is a critical infrastructure project. However, the construction plans as designed will have a painful, material impact on our lives for multiple years.

Our community is not looking to stop this project. We've consistently been seeking a meaningful dialogue with someone who has the authority and motivation to address these issues through respectful negotiations. PLEASE support this request for fairness.

Thank you.

Michael Hoffs – 110 Hurricane St.

As a 20+ resident of 110 Hurricane Street, I'm pleading with you to take a closer look at how the VAPP Project on Hurricane Street will affect the local neighborhood if our concerns are not faithfully considered. I am not alone on feeling the city is not listening to the boots on the ground describing why the installation of the parking lot is not only not needed but strongly opposed for security reasons. For VAPP personnel, alternative parking on Hurricane has been found in other areas within a half block or less of VAPP. Homeless encampments, drunken disorderly conduct and contempt for Hurricane residents, constant traffic to find parking in the lot, mounting trash and lack of city funds to police the area have not been addressed and frankly will not be before construction.

Please ask yourself, would you want this parking lot built on your street? If you would support installing the parking lot on your street, would you be concerned if the aforementioned was not thoroughly embedded in the parking plan before construction?

Thank you for listening, your time to think about Hurricane Street's resident thoughts and frankly the chance to use the funds suggested for the parking lot on something else that will benefit the area in greater need.

Sincerely,

Michael Hoffs

2022-23 Neighbor Letters

Mary Laing – 115 Hurricane St

ML **Mary Laing <mblaing1@aol.com>**
Hurricane Street Auxiliary Pumping Plant Project
To: Steve Bradbury <steve@mycyberstuff.com>

VNC Parking & Transport March 13, 2022 at 2:31 PM

Steve,

I would like to go on record that I oppose the current auxiliary pump plant project and parking lot that is being proposed at 133 Hurricane and the adjacent lot at 3813 South Esplanade.

I am a resident at 115 Hurricane for 20 years. Myself and my neighbors were forced to endure the disastrous nightmare construction of the existing pumping station constructed a few years ago. There was little to no community engagement or communication from the Public Works Department. Most importantly, the unkept promises from Public Works after the years of construction.

I understand that the current project is essential for the area, however I wane on trust due to past performance from Public Works. This is an industrial facility in a residential neighborhood and more care must be taken to buffer the use from existing homes and resources.

We as neighbors are also concerned that the parking lot will create an unsafe environment near our homes. What is the design? How will it be secured at night? We oppose moving forward with the project until these concerns are addressed.

I would like to voice my support for the VNC motion to rescind it's support of the project as it is currently configured.

Best,

Mary Laing
115 Hurricane St
MDR 90292

Steve & Karen Bradbury – 109 Hurricane St (owners)

July 27, 2022

My wife and I own 109 Hurricane St. We have lived here since 2007. During that time, we have experienced several city-led construction projects. None have effectively managed the impact on the community without our voices rising to generate awareness. The city's track record is dismal at best.

Now the city intends to build an auxiliary pumping station at the end of Hurricane St. While we understand the critical nature of this project, the fact there has been no meaningful community engagement since preliminary plans were shared in 2016 is abhorrent. It appears the project design has changed over that time including the addition of a sewage command and control center for entire city of Los Angeles. We thought this was simply an auxiliary pumping station to support the aging current plant.

The city cannot simply ramrod an industrial project down the throats of a neighborhood without incorporating our input. City employees work for the residents, not the other way around.

We understand one element of the plan is to create a public parking lot at 128 Hurricane. Why???? There are no other public lots on any MDR residential street. If there is truly a need for that much employee parking (which has never been adequately justified), it should be a 100% secure lot only accessible by pumping station workers. **No** public car spaces, **no** bike racks, **no** art installation, **no** use by beachgoers, **no** opportunity for homeless to camp out.

There have been recent suggestions the parking lot was incorporated into the plan to satisfy the coastal commission. Did the city ever convey this information to residents during the process? Did the city take a position that this would impact residents and push back? Does the city even care? We do.

We attended both community meetings (Zoom and in-person) conducted by Public Works. These were little more than sham, window-dressing efforts. The city representatives showed NO willingness to modify ANY aspect of the project to align with the interests of the community. This arrogance is unacceptable behavior by people whose job is to serve the community.

Our neighbors have spoken about many other issues with this project. We support them and request you reconsider all approvals for this project until the community has been given a meaningful opportunity to engage. We can work together. There's no reason to antagonize the community.

Thank you,

Steve & Karen Bradbury
109 Hurricane St., MDR

Adam Goldberg – 110 Hurricane St.

To Whom It May Concern/VNC:

I have lived on the Marina Peninsula since 2005 and on Hurricane St since 2013. Since 2013, the amount of construction and noise on Hurricane has increased with each year. And now, with the plans of building a parking lot along with a new pump station, it behooves us all to keep this to a minimum.

While I understand that the pump station is necessary, the parking lot is not. There is already plenty of parking for workers, so to add a space where the public can park, is completely unnecessary. This will not only cause more car and foot traffic on our small, little street, but it will also bring in an unwanted element. There is no doubt that the homeless population will find this parking lot and make it a place to loiter, make unwanted noise, and use drugs. I have a small child who does not need to see this, and there are plenty of other families who are in the same situation.

I am asking that you vote to make it so there is NOT a parking lot at the end of our street. We have endured enough over the last 5 years or so with street closures, construction that rattles our homes, and an increase in the homeless population in our neighborhood. Flatly, there is no reason/need for this parking lot and it will make life exponentially worse for those of us that live here.

Thank you for your time and assistance with this matter.

Best,
Adam M Goldberg
110 Hurricane St

Robert DiBiase – 115 ½ Hurricane St (owner)

HELLO STEVE: MY OPINION IS THAT THE PARKING LOT BE USED EXCLUSIVELY FOR THE PUMPING STATION EMPLOYEES AND THE HURRICANE ST RESIDENTS. IF THE LOT IS OPEN TO PEOPLE GOING TO THE BEACH THAT WOULD BE A NO-NO FOR ME, SINCE THEY ARE ALREADY PARKING ON THE STREET WHERE RESIDENTS USUALLY PARK.

BEST REGARDS

BOB DEBIASE

115 ½ HURRICANE ST

MARINA DEL REY, CA 90292

Muriel Blake & John Larkin – 110 Hurricane St.

RE: 128 Hurricane & 3813So. Esplanade, ZA 2017-3950-ZAA-1A;DIR-2017-4173-CDP-SPP-1A DIR-2017-4167-PUD-CDP-SPP; ZA 2017-3953-CU2
Sent

Muriel Blake murielblake@wealthbuildersinc.com

To: cpc@lacity.org, elizabeth.gallard@lacity.org

Cc: mike.bonin@lacity.org

Fri, Mar 4 at 5:30 PM

Dear Commissioners,

Please address and reply to the following important concerns of your constituents

No 1. I have been living at 110 Hurricane for 42 years. Our residence is located 1 building away from the proposed Pumping Plant construction. As you overwhelmingly know this is strictly an upscale residential neighborhood which was not intended to be used for Industrial purposes let alone a "Pumping Plant"; there must be many other locations which would be more suitable for a Pumping Plant...perhaps all of your neighborhoods. The last time this proposed new plant project was presented to our community was 5 years ago - in 2017. It's not clear from the "notice provided" five years ago, that there was any written response to our community's concerns regarding the impact on our residential street of a Pumping Plant.

a) So at this late date (2022) after five years, what are the architectural design and landscape design of your proposed industrial plant to fit in with the design of our residential neighborhood? What design steps have you taken to insure that this "plant" will it blend in with this residential design without it being a complete "eyesore" in this sought-after residential Marina Del Rey beach area. As well, our beautiful beach is exceedingly popular with those who live in the inner city and who look forward to spending the day in our neighboring beautiful beach. Of courses, it would be extremely negligent to not to note that this area is notably popularity with its shops and restaurants which bring revenue to your city.
b) b) What buffers will you provide between this proposed "Plant" and our dwellings?? Likewise, this block abuts sensitive wetlands so what buffers will be taken to protect this area?

No. 2.) I am extremely concerned about the proposed "Parking Lot" How many employees do you plan to have working at the "Plant" that it would necessitate of a Parking Lot??? And what about the residents on Hurricane St. that of the block? will there be a full time Guard?? How will it be secured at night? As you are alll well there is a large homeless population in our neighboring Venice. H ere there are vagrants who roam our street and, if not guarded at night they very well may seek refuge in the lot. It may well become a haven for car thefts or car parts theft. It brings an unsafe environment to those near homes and to the street parkers who come home after dark.. What measures will be taken to provide safety to the residents who live

next to this lot?

a) those of us on Hurricane Street recently lived through 3 years of construction in the same "plant area". The street was torn up, blocked with huge equipment, construction cranes, diggers etc. all emitting constant banging, dirt and dust; the workers parked their trucks up and down the entire street, leaving no space for the residents to park. this cannot go on once again with construction of your "Plant"

No. 3) Transformers proposed at this new location, generate electromagnetic field (EMF) known to cause cancer and we all believe to be a risk to our health and the community at large.

I, for one, oppose your moving forward with the proposed project until the above concerns are addressed, in writing, and sent to all those who reside near the proposed Industrial Plant.

Sincerely,
Muriel Blake
John Larkin
110 Hurricane St.
Marina del Rey, CA 90292

Muriel A. Blake, CFP®
WEALTHBUILDERS, INC.
11600 Washington Place #116D
Los Angeles, CA 90066
(310) 391-3921- phone
(310) 398-9859- fax

Gary Stromberg – 125 Hurricane

I'm writing to request that the equipment you are using to build this new facility, including transformers, HVAC and electrical panels be moved away from our residences and towards the existing pump plant on Hurricane, and that you shield the entire project with solid fencing. You have no idea how disruptive your project is to our little community.

Regards,

Gary Stromberg
125 Hurricane St.
(203) 984-4836

Mike Borassi & Genevieve Morrill-Borassi – 3801 Esplanade

(Note: On 2/28/22, Gen and Mike filed an appeal with the LA City Planning Commission. The following material has been taken from that appeal)

The goal of this appeal is to require Public Works to work with the community on a better design for this project which will fit within our community and will provide protection for adjoining residential neighbors from the impacts of this industrial-style facility on privacy, safety, noise and aesthetics.

- Public Works last presented this project to the community in 2017. The case has been on hold for almost 5 years. No additional information or contacts with the community were held during this time despite prior promises to work on design and mitigation. We have repeatedly asked for a new presentation of the project since changes were clearly made since the last City public hearings in 2017.
- The EIR for the project and prior presentations misrepresented the location of the project, which is in fact 10 -15 feet closer to the nearest residential structure than previously represented.
- The project is poorly designed to fit within its residentially zoned neighborhood. Noisy and dangerous equipment is located very close to two neighboring residential areas. However, on the other side, the project site is adjacent to a dead-end street and the exiting pump plant, and all noisy and dangerous equipment should be located nearer to this facility and away from residents.
- The project aesthetic design, proposed landscaping and “public art” has never been presented to the community and the simple elevation of the structure presented does not adequately show how this will fit into a 100% residential neighborhood.
- Public Works has a history at this location of poor maintenance of the existing facility and landscaping, as well as noisy and intrusive construction for years during the recent Dual Force Main project at this location. The community simply does not trust Public Works to fulfill its promises to keep this facility and the parking lot safe and attractive.
- The facility is adjacent to a sensitive wetland area and no effort is made to mitigate impacts or improve existing conditions.
- The proposed parking lot will be an attractive nuisance in this residential area and will not be secured or patrolled. City parking should continue to be on the street and the additional lot should be used for open space to buffer the facilities.
- The project approval and conditions do not properly include all required mitigation measures so that the community knows what must be done and enforced. The EIR, Addendum and MMRP plan are only found on an obscure Bureau of Engineering link and were not available to the neighbors.

The Venice Pump Plant has existed in this area for a long time. It is not well maintained. It has no landscaping or attractive fencing. It is never upgraded, cleaned, and graffiti is often left for months before painting. The existing plant is stark, abuts directly onto a sensitive waterway, is littered with trash and graffiti, with weeds poking through the scant gravel setbacks. Over the last five years, the site has been used as a staging area for the Hyperion Dual Force Main project, so the neighbors have endured constant construction traffic, noise, dust and equipment.

In order to build a safe and beneficial project here, Public Works must be required to include the following measures in the project:

- The project needs to mitigate its impact on the sensitive canal and lagoon. The existing pump plant has no vegetation whatsoever and the canal banks are not appropriately landscaped with native materials. Additional landscaping should be added to the existing facility including vines to cover walls which are frequently graffitied.
- Upgrades should be required to the aesthetics of the existing plant including painting, consideration of a mural, and additional planting in currently empty and trash filled planters and side yards.
- The new facility must be designed and landscaped in keeping with the residential area and sensitive lagoon.
- Provide a buffer of landscaping and walls between the new facilities and the directly adjacent residential buildings, including a minimum 6-foot block wall and 10 feet of landscaping between both the parking lot and the new facility and the nearest adjoining residential property to the north and west.
- Include an on-going obligation to clean and maintain the existing and new facilities when they are complete.

Adopt binding conditions of approval that clearly spell out all obligations in the future so that neighbors can monitor and enforce, including each requirement of the approvals and the MMRP.

For all of the above reasons, this project should not be approved, but should be sent back to the drawing board so that Public Works can design a compatible facility. To place this facility in a residential neighborhood in a sensitive wetland location requires careful consideration and strict conditions.

Kristy Canon - 3809 Esplanade (building owner)

From: **Cannon Enterprises, Inc.** <cannonenterprisesinc@gmail.com>
Date: Thu, Apr 14, 2022 at 8:16 AM
Subject: Auxiliary Pumping Plant in Venice
To: <cpc@lacity.org>, Elizabeth Gallardo <elizabeth.gallardo@lacity.org>, <mike.bonin@lacity.org>

To Whom it may concern,
I am the property owner directly north of the new pumping station location. This project is going to affect my income that is generated from my income property located at 3809 Esplanade. My current tenants may leave because of the project and the proximity of the industrial equipment to their bedrooms/ living space. It will be significantly harder to get market rent if some of the following concerns are not taken into account:

- The design is incompatible with the neighborhood
- No buffer from the project and residential homes
- We have health concerns of having transformers and electromagnetic fields near residential homes
- Equipment noise and construction impacts

I understand that this is a vital piece of infrastructure that the community needs, but my property being so close to the project and having owned this property for over 30 years, I feel my concerns are not being heard or given any value.

Thank you,
Kristy Cannon
--
Cannon Enterprises
8405 Pershing Dr. #500
Playa Del Rey, CA 90293
Phone: (310) 823-2082
Fax: (310) 823-2085

Robert & Lucia Williams – 3805 Esplanade

From: Lucia Williams <luciaw2012@gmail.com>
To: cpc@lacity.org, elizabeth.gallardo@lacity.org
Cc: mike.bonin@lacity.org

Mon. Feb 28. 2022 at 1:35 PM

Dear Commissioners:

We along with our neighbors are writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to community concerns as we were never shown a final architectural design or landscape plan. This is an industrial facility in a residential neighborhood abutting a sensitive wetland area--more care should be taken to buffer the use from existing homes and resources.

The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping and aesthetics.

Additionally, the transformers proposed within the new location generate electromagnetic field (EMF) known to cause cancer and we believe it to be a risk to our health and the community at large.

We are concerned that the parking lot will create an unsafe environment near homes and additionally will provide only two spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night? We understand that the project is essential for the area, however we wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication.

We oppose moving forward with the project until these concerns are addressed.

Sincerely,
Robert and Lucia Williams
3805 Esplanade
Marina del Rey, CA 90292

Eliane Gans – 3933 Esplanade (property owner)

From: Eliane Gans <elianegans@gmail.com>
Subject: Venice Axilliary Pumping Plant
Date: April 8, 2022 at 11:22:56 AM PDT
To: cpc@lacity.org, elizabeth.gallard@lacity.org, mike.bonin@lacity.org

To All of you, and to whom it may concern:

I have been a resident of my property at 3933 South Esplanade W. For over 35 years. I have endured cracked streets and lack parking for many years. And the pumping plant that reduces the value of my property.

I am writing to you today to voice my concerns and to object to the proposed Auxiliary Pumping Plant at the end of my street. At 133 East Hurricane and the adjacent lot at 3813 South Esplanade w. My property/residence will be impacted by this construction, and it will affect the future value or all of our properties.

- There has not been adequate community or resident communication
- The design has not been approved or reviewed by the residents or is not in keeping with the current neighborhood.
- The design should have a residential look and materials to blend with the residences and environment of the Lagoon.
- Residents should be given a chance veto review the design and comment and request any changes that are deemed necessary
- The proposed Pumping plant buttes right up against residential property—this is NOT OK.
- There are environmental and health concerns about the electronics, transformers and electromagnetic fields that will impact the residents
- Noise and equipment will destroy our wetland peace and quiet,,,,, and create parking and vehicle access problems. and in general create more congestion in an already contested neighborhood
- The unsecured parking lot will invite homeless people and will not create any additional parking and will even block any parking that might be accessible.
- There should be buffers between the parking and the residences.
- How will the parking lot be managed. And WHY are there only 2 public spaces, when parking is an issue already in this area
- There are no studies that I have seen, that address any environmental impact on our sensitive lagoon—which is why we all live here!!!
- Previous construction of this Public Works with the existing facility has had a bad track record for noise, debris, obstructions of the street and other problems.
- Past Public Works projects in our neighborhood have caused a barrage of constructions. Issues over 7 weeks causing discomfort to all neighbors and a lack or peace!

Lastly, what are the benefits to us, the residents? YOU do not live here, and have no knowledge about the very special residential area that this is, and why we have chosen to live here.

I AM STRONGLY OPPOSED TO THIS PROJECT—YOU HAVE NO RIGHT TO IMPACT OUR HOMES AND THE VALUES OF THIS NEIGHBORHOOD, AND OUR SAFETY AND HEALTH.

Thank you for reading this letter…. I hope that you will consider my concerns and dither concerns of all my neighbors—and or the entire Marina Peninsula!

Sincerely,

Eliane Gans
Owner
3933 Esplanade W.,
Marina Del Rey, CA 90292
(310) 339-4056

WE ARE ALL TENANTS OF 3933 South Esplanade W. and STRONGLY OPPOSE THIS PROJECT, AND WE DO NOT WISH TO MOVE AWAY AS A RESULT OF THIS PROJECT.
Hans Brofeldt
Wil Mavronicolas
Shawn Groshans
Kate Stone

ARTfully,
Eliane Gans
LONNY GANS & ASSOCIATES
Fine Art

Tanya Spero – 113 ½ Hurricane St

TS **Tanya Spero <tanya1040@aol.com>** VNC Parking & Transport March 12, 2022 at 2:35 PM

Re: Hurricane St Auxiliary Pumping Plant Project - It's A Mess

To: Rick <chucksteak897@yahoo.com>, Steve Bradbury <steve@mycyberstuff.com>

Hi Steve

I was forwarded the emails and I definitely would appreciate your representation. I allow you to represent me for this issue regarding the employee parking lot. I agree that the parking lot should not be built. It will bring more traffic and we have enough as it is on the weekends.
Thanks so much,
Tanya Spero

Sent from my iPhone

Larry Lesser, MD & Claude Lesser – 3609 Esplanade (owner)

From: Lawrence Lesser lessermd@mac.com

Date: Wed, Feb 23, 2022 at 5:03 PM

Subject: 128 Hurricane & So. Esplanade

To: <cpc@lacity.org>, <elizabeth.gallard@lacity.org>
Cc: mike.bonin@lacity.org

Dear commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plan project proposed at East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to the community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from existing homes and resources.The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics.

We are concerned that the parking lot will create an unsafe environment near homes, and additionally providing only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night. We understand that project is essential for the area, however we wane on trust due to past promised form Public Works and constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement of communication.

We oppose moving forward with the project until these concerns are addressed

We have been living in the area for 20 years, and never saw any attempt to fix the unpaved road abutting the proposed project. It is very unsafe to walk and a real eyesore.

Sincerely

Larry Lesser, MD, and Claude Lesser
Homeowner 3609 Esplanade. Marina del Rey 90292

Jeff Lee – 3701 Esplanade (owner)

From: Jeff Lee ilee@laurbanhomes.com

Date: Sun, Feb 27, 2022 at 12:11 PM

Subject: Venice Auxiliary Pump plant, March 10 hearing, Case ZA 2017-3950-ZAA-1A and related cases

To: <elizabeth.gallardo@lacity.org>
CC: cpc@lacity.org

Dear Planning Commission:

I have lived on Esplanade, two blocks from the proposed pump station, for twenty years raising my family. I am writing to oppose the current plans for the pump plant and parking lot.

I have been a real estate developer in the City of Los Angeles for over 40 years building over 40 projects through the City including hundreds of homes in CD 11.

The process followed by Public Works to design and permit the pump station would never be allowed for any private developer. For the past 40 years on every one of our developments we have had extensive community meetings, neighborhood council presentations, and meetings with the council office. We have been responsive to the community
and the council office.

In this case Public Works has been allowed to ignore the neighborhood keeping this case on hold for over four years. In 2016 we had a community meeting with representatives of the council office and the Department of Public Works. I was personally assured that my concerns of the community would be addressed and additional community meetings to
review design would be held. We asked many times when the City would respond which never happened. Had we treated the community this way in our business, our projects would never move forward. If we stonewalled the community for four years, our case would have been terminated.

I am not against the development of the pump station as the City needs to continually upgrade its infrastructure. The pump station is surrounded by 20' alleys and the ecologically sensitive Grand Canal. The community concerns need to be addressed including landscaping, design, construction, mitigation to enhance the area around the pump station, and continual maintenance. We lived through the construction work at this site for the Dual Force Main project, which was a disaster. We live on a daily basis with the eyesore of the existing pump station and lack of maintenance or pride in the neighborhood exhibited by Public Works.

I hope you will grant these appeals and require Public Works to live up to its promises.

Sincerely

Jeff Lee
3701 Esplanade

Clare Bronowski – 3701 Esplanade (owner)

CB **Clare Bronowski <clareb1050@gmail.com>** VNC Parking & Transport March 12, 2022 at 4:39 PM

Hurricane Pump Plant and Parking lot

To: Robert Thibodeau <robert.thibodeau@venicenc.org>, Jonathan Deer <virtualjonny@gmail.com>, Cc: Steve Bradbury <steve@mycyberstuff.com> Details

We live two blocks from the Venice Pump Plant, and we write to support the VNC Transportation Committee motion opposing the current plan for the Auxiliary pump plant and parking lot.
We are concerned that the current plan does not protect the nearby residences from noise, privacy and industrial type activities. Public Works needs to rethink the plan and include buffers, privacy walls, landscaping, security measures and long term maintenance to protect the neighborhood and the sensitive canal and lagoon area. The parking lot must be locked and secured when not in use by Public Works employees. The entire area must be well maintained, not allowed to be full of weeds, trash and graffiti as it currently is.

Thank you.
Clare Bronowski and Jeff Lee

Leslie & Michael Adler – 3601 Esplanade

April 24, 2022

To: Los Angeles Planning Commission

Re: 128 Hurricane & 3813 So. Esplanade
ZA2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A | DIR-2017-4167-PUB-CDP-SPP; ZA2017-3953-
CU

Email: cpc@lacity.org; elizabeth.gallardo@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from existing homes and resources.

The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics. Additionally, the transformers proposed within the new location generate an electromagnetic field (EMF) known to cause cancer and we believe to be a risk to our health and the community at large. We are concerned that the parking lot will create an unsafe environment near homes, and additionally provide only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night?

We understand that the project is essential for the area, however we wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication.

We oppose moving forward with the project until these concerns are addressed.

Sincerely,

Leslie and Michael Adler
Neighbor
3601 Esplanade MDR-Home Owner

Jennifer Kelton – 3615 Esplanade

On Mon, Apr 25, 2022 at 8:43 AM Nomad1800 <nomad1800@aol.com> wrote:

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade.

Please note that one of my main concerns is the public parking lot. I am not sure why it is needed? And it will only create problems - as you also are very aware of, and also based on the current state of homeless and transients in our area.

Jennifer Kelton
3615 Esplanade
MDR, CA 90292

Melly Liburd – 120 ½ Galleon (owner)

Wed, Apr 13, 2022 at 3:04 PM
Melly Liburd mellyliburd@yahoo.com

April 8, 2022

To: Los Angeles Planning Commission
Re: 128 Hurricane & 3813 So. Esplanade
ZA2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP.1A | DIR-2017-4167-PUB-CDP-SPP: ZA2017-3953-CU

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this proiect was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or If there was any response to community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to butter the use from existing nomes and resources

The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics. Additionally, the transformers proposed within the new location, generate electromagnetic field (EMF) known to cause cancer and we believe to be a risk to our health and the community at large.

We are concerned that the parking lot will create an unsafe environment near homes, and additionally providing only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night?

We understand that project is essential for the area, however vie wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication.

We oppose moving forward with the project until these concerns are addressed

Sincerely,
Melanie Liburd
120 1/2 Galleon Street, Marina Del Rey, CA 90292
Homeowner

Andrew Freedman – 20 Ironsides

April 13, 2022

To: Los Angeles Planning Commission
Re: Proposed Venice Auxiliary Pumping Plant (VAPP) 3813 S. Esplanade, 3817 S. Esplanade and 3913 S. Esplanade W. (128 E. Hurricane Street)
ZA 2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A; DIR-2017-4167-PUB-CDP-SPP; ZA 2017-3953-CU

Via Email: cpc@lacity.org; elizabeth.gallardo@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

In addition to the very astute comments made by Genevieve Morrill and other neighbors, I would like to share my concerns.

General
The Contract Documents for this project were submitted and cleared by Los Angeles Department of Building and Safety in 2017 without any public notice or review. Approval by two agencies (LA City Planning Department and California Coastal Commission) which both require public notification and public review, is only now being sought. Typically, Planning and Coastal clearances are the first to be addressed, not the last. The Public review of this project has been severely lacking, and City officials have both a legal and moral obligation to make sure the citizens of Los Angeles are heard.

This project spans two existing lots (which both front the Grand Canal) without an approved lot-tie agreement. All lot-tie agreements must go through a Public Hearing and review process. This has not been done, and all further consideration of this project should be suspended until the proper Public Hearing process has been completed and the lot-tie agreement approved.

The front yards of the two City lots of the proposed VAPP both face the Esplanade (Grand Canal). The rear yards of these two City lots face Canal Court. Hurricane Street is located along the side yard of only one of the parcels. The use of 133 and 139 Hurricane Street as the project address is both inaccurate and misleading. All references to 133 and 139 Hurricane Street for this project should be changed to 3813 and 3817 South Esplanade, respectively.

Design Issues
The recent Joint Determination letter from the LA City Director of Planning and Zoning Administrator states the following: "*As proposed, the project is visually compatible with the character of the area and will enhance the visual quality of the existing neighborhood.*" I couldn't disagree more.

The existing VPP is a one-story building surrounded by a sound wall, painted in neutral colors. It is quiet and odorless, and its low massing minimizes its effect on neighboring residences. In contrast, the proposed VAPP has a large concrete-walled Electrical Building that is oriented in a north-south direction – 90 degrees from the adjacent residences – which would form a 32-foot-high solid wall, not only blocking views to the Grand Canal, but creating shadows (between 10 am and 3 pm) directly onto all adjacent residences located to the north and west.

A recent change to the flood zone map in the Venice area was made effective by FEMA on April 21, 2021. As a participant to the National Flood Insurance Program (NFIP), the City of Los Angeles is required to enforce the flood clearance requirement for new construction and substantial improvement projects.

The two lots where the future VAPP is to be located were affected by this flood zone map update. The new Base Flood Elevation (BFE) is 8 feet above sea level and all new buildings require that the Lowest Finished Floor Elevation (LFFE) be at 9 feet (8 feet + 1 foot of free board) per LA City Ordinance 186952.

The current design for the VAPP has the Lowest Finished Floor Elevation (LFFE) at 7.67 feet – 16 inches below the minimum required level per the new FEMA requirements. Note, the building generator, all switchgear electrical equipment for the pump motors, and all exterior transformers will be underwater during a flood. This will lead to the complete failure of the pumps and a catastrophic environmental disaster. **The entire VAPP must be redesigned accordingly.**

The 32-foot Electrical Building height is excessive and unnecessary. It is twice the height of the existing VPP. The BFE issue noted above will only make this tall building even taller. Further, the current two-story design has no elevator to accommodate disabled employees, with the only restroom and office located on the second floor. **The Electrical Building should be changed to a one-story structure and reoriented in an east-west direction along Hurricane Street.**

These design changes would allow for a large open buffer area for the residences located directly to the north, eliminate shadows, reduce the project's visual impact, be more compatible with the existing VPP, accommodate disabled employees, and better comply with the Venice Coastal Zone Specific Plan.

The three large transformers (each 6.5' to 7' tall) located within the required setback are unacceptable. They are located outside the decorative fencing and surrounded by 19 steel bollards along the entire Canal Court property line. These transformers would be an eyesore. Additionally, they will generate noise. They must be repositioned out of sight and away from any adjacent residences. If a one-story VAPP were U-shaped facing the existing Venice Pumping Plant, the transformers could be placed within the recessed U-shape with direct access to Hurricane Street, but out of sight from adjacent residences.

The HVAC equipment for the Electrical Building is located outside near the north property line and in direct view from adjacent residences. This equipment will generate noise and heat, and should be relocated away from residences (perhaps on the roof) and screened from view.

Parking Lot/Green Space

The proposed public artwork located in the green space south of the proposed parking has <u>not</u> been designed or specifically defined. The design and massing of this proposed artwork should be clearly presented as part of the formal public review process prior to any project approval. In addition, the City must provide written assurances as part of the Conditions of Approval for this project that no artificial lighting, sound or kinetic movement will be associated with the public art. Landscaping shown in the same area as the public art should be revised accordingly prior to further public review.

The accessible aisle for the van parking space shown at 3913 S. Esplanade W. (128 E. Hurricane Street) should be located on the passenger side. The current configuration does not meet either Federal or State Accessibility Code requirements, and should be redesigned.

I oppose any further action on this project, including an indefinite postponement of the April 28, 2022 Public Hearing, until these issues are addressed and corrected.

Sincerely,

Andrew Freedman
20 Ironsides #18, Venice, CA 90292

Steve Freedman
732 Howard St., Venice, CA 90292

Marilyn Mikos – 115 Eastwind St (owner)

To Whom It May Concern:

I stand OPPOSED to the way in which the above referenced Pumping Plant is being constructed. Although I understand the sewage plant is a necessary evil, there are many issues that have not been taken into consideration with the construction design of the project.

I have lived in the same building (which I own) for 33 years. There has been literally zero attention paid to upgrading the infrastructure of this residential area by the City. The "roads" are in dire need of repair, including "Speedway" (which will be adjacent to the Plant) which floods every time it rains. The potholes are ridiculous and no amount of calls to have them repaired gets any attention at all. Yet, you seem to have a burning desire to build an industrial structure right smack dab in the middle of a lovely residential community.

This Plant is being constructed in the MIDDLE OF A BEAUTIFUL RESIDENTIAL AREA...People literally live inches away from where transformers will be housed, which could conceivably cause grave health concerns @ electromagnetic fields. The actual construction of the Plant will disrupt the entire neighborhood with noise, dust, etc. The last time Public Works did construction in this area, several people became ill from the particulate matter in the air and were forced to move. Add to this, the beautiful Lagoon and the indiginous flora and fauna that reside there (and have for decades) - all of which will be disrupted.

There has literally been no communication with the immediate community about what the plans are. From what we "understand", the design is incompatible with the community; further, you have offered no benefit to the community, not only aesthetically (no buffer between the Plant and the community), but also concerning the health and well being (including safety) of the people who live here. Why would you build an industrial project in the middle of a residential zone? It is beyond my comprehension.

I am in dire opposition to moving forward with this project until these (and other) concerns are addressed. I sincerely hope you will, for once, consider the concerns of those of us who live in the community. We pay taxes...and we vote.

Sincerely,

Marilyn Mikos (owner)
115 Eastwind
MdR 90292
marilyn.mikos@gmail.com

Arianne Flemming & Justin Wasser – 3812 Pacific

To Whom it May Concern,

We are residents of 3812 Pacific Ave, located at the corner of Pacific and Hurricane. We have heard the news that the City of Los Angeles plans to construct a large sewage plant at the two vacant lots at the end of Hurricane.

We are writing to express our great concern with this plan for a number of reasons.

First, and most importantly to us, we understand the building for the plant will house transformers, emitting electromagnetic fields. EMFs have been known to cause cancer and as residents we are seriously concerns about how this plant will put our health and the health of the neighborhood at risk.

Further, we love the ecological reserve and lagoon near our house, this plant could have significant impact on the ecological health and well-being of this sensitive lagoon.

Finally, we are concerned that the parking lot proposed near the plant will create an unsafe environment on our street. We are concerned about how the lot will be managed and controlled and secured and the potential safety risks it poses to the community.

We oppose moving forward with the project until these concerns are addressed.

Sincerely,

Arianne Flemming and Justin Wasser

3812 Pacific Ave Marina Del Rey 90292

Susan Afriat & Steve Hyman – 4000 Pacific

Susan Afriatafriats@gmail.com

To: elizabeth.gallardo@lacity.org

Dear Commissioner:

Thu, Mar 3, 2022 at 8:49 AM

We are neighbors writing to share our concerns regarding the Venice Pumping Plant projected proposed at the above addresses. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017. It is impossible to determine from the notice provided what the final design is or if there was
any response to community concerns - we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from existing homes and resources.

We have many concerns: the parking lot will create an unsafe environment near homes; buffers are needed between industrial and parking uses and the adjoining homes, etc.

We understand the project is essential for the area; however, past experience has led us to not trust the promises and assurances that will be made. We oppose moving forward until these concerns are addressed

Thank you for listening to our concerns.

Susan Afriat and Steve Hyman
4000 Pacific Avenue
310-893-4616

Bethany Gorfine – 3950 Via Dolce (owner and condo board president)

On Mar 15, 2022, at 8:53 PM, Bethany Gorfine <Bethany@federalhill.tv> wrote:

Sent from Bethany's iPhone

I live at 3950 Via Dolce, Our 145 unit condo complex (of which I'm HOA president) faces the lagoon and pumping plant site.

I don't appreciate when a design and proposal has been approved and then changed without notifications to the community including the VNC.

SIze does matter, construction matters especially to homeowners on via Dolce as well as surrounding Hurricane.

It was hard enough to to live through the past 5 years of construction and now more years across from us where sound really travels over the lagoon.

We just lived through 4 apartment complexes 2 hotels, and the sewer project.
It's relentless.

We understand the need for an additional plant for the community but keep it simple, small, and no public parking which will turn it into a hangout- luring outsiders into the community.

Adding bicycle racks? An art exhibit? We don't want folks congregating on Hurricane - especially on weekends. It's a huge liability to our community on the Strand that is already experiencing massive intrusions and thefts.

Thank you.

Jonathan Tillman – 3719 Via Dolce

April 13, 2022

To: Los Angeles Planning Commission
Re: 128 Hurricane & 3813 So. Esplanade
ZA 2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A | DIR-2017-4167-PUB-CDP-SPP; ZA 2017-3953- CU

cpc@lacity.org; elizabeth.gallardo@lacity.org cc: mike.bonin@lacity.org

Dear Commissioners:

We are neighbors writing to share our concerns regarding the Venice Pumping Plant project proposed at 133 East Hurricane and the adjacent lot at 3813 South Esplanade. Our residence is located near the proposed new plant. The last time this project was presented to the community was in 2017, five years ago. It is impossible to determine from the notice provided what the final design is or if there was any response to community concerns as we were never shown a final architectural design or landscape plan.

This is an industrial facility in a residential neighborhood abutting a sensitive wetland area, and more care should be taken to buffer the use from exisXng homes and resources. The project needs to be designed with a residential look and materials to help blend in with the area. Buffers are needed between the industrial and parking uses and the adjoining homes. The community should be given an opportunity to review final plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics. **Moreover, a licensed architect should be hired to design the structure's exterior and its landscaping.**

Additionally, the transformers proposed within the new location, generate electromagnetic field (EMF) known to cause cancer and we believe to be a risk to our health and the community at large.

We are concerned that the parking lot will create an unsafe environment near homes, and additionally providing only 2 spaces to the public. How will this be managed and controlled? What is the design? And how will it be secured at night?

We understand that project is essential for the area, however we wane on trust due to past promises from Public Works and a constant barrage of construction in the same location for over seven (7) years with unkept promises and very little community engagement or communication. **One such promise was to repair Via Dolce and Marquesas Way to the extent they were damaged due to construction activity. The applicant, however, left portions of those roads with deep ruts and broken pavement until the community complained to their local representatives. Therefore, continuing community oversight is essential to make sure there is compliance with applicant's obligations in this project.**

We oppose moving forward with the project until these concerns are addressed. Sincerely,

Jonathan Tillman
3719 Via Dolce
Marina del Rey, CA 90292

P.S. If the location of the power boxes endanger the residents of the adjoining property, the city may be liable for inverse condemnation.

Robin Rudisill

April 27, 2022

Los Angeles Planning Commission

Re: 128 Hurricane & 3813 So. Esplanade
ZA2017-3950-ZAA-1A; DIR-2017-4173-CDP-SPP-1A
DIR-2017-4167-PUB-CDP-SPP; ZA2017-3953-CU

Honorable City Planning Commissioners:

I live in the area surrounding this project. The last time this project was presented to the community was in 2017, five years ago, and I participated in the hearing down at the Corinth hearing room at that time, expressing numerous concerns. I am deeply concerned that as an "interested party" (I filled out a speaker card and signed a list to be emailed all determinations, as I do at every hearing I attend) I was not notified of any hearings or determinations since that time. I only found out about this hearing because someone asked me how I felt about it. I do not understand why so much time has passed. This should be explained to the community.

This is a sensitive wetland area, surrounded by ESHA, in the Dual Permit Jurisdiction Coastal Zone. I cannot think of a more sensitive area in the Los Angeles Coastal Zone. See attached certified Venice Land Use Plan map. Aesthetics in such a sensitive area should be paramount, and the project must be designed to be compatible with the surrounding residential neighborhood.

This is an industrial facility in a residential neighborhood and as such buffers must be provided between the industrial and parking uses and the adjoining homes. The surrounding community must be given an opportunity to review the architectural design or landscape plans showing how the look of the facility will be compatible with the adjoining neighborhood in terms of privacy, landscaping, and aesthetics.

I am also concerned that the parking lot will create an unsafe environment near homes and that only two spaces would be provided to the public. Please inform us re. the design, how the lot will be managed and controlled, and how will it be secured at night. Please put the project on hold until all of these concerns are addressed.

Sincerely,

For the Love of Los Angeles
and our precious Coast,
Robin Rudisill
(310) 721-2343

Adam Rose – 12 Buccaneer St.

I live at 12 Buccaneer, so I'm a few blocks away. That's why I opened my questions/comments by noting that precedence with concerns should go to closer residents (who will deal with this around-the-clock). That said, my girlfriend and I walk a loop around Grand Canal (at least to Lighthouse Bridge) almost daily, so we must pass this site on foot at least 300 times per year. We also help out with local cat rescues, and over the years there have been a number who've lived and/or been caught along the canal. We're night owls and tend to walk around midnight, so we also try to keep an eye out for issues at odd hours (hence why I got them to adjust the new lights on the old plant a few months ago).

From what you just sent me, it seems there are a lot of issues they need to address. I'm a bit fatalistic about this project in the sense that it's reasonable they'll eventually need more capacity (the alternative seems terrible!) It's a big question about how they get there, so I support your pushback on multiple fronts because it needs to be reasonable for those closest. In terms of more ancillary things that my girlfriend and I were thinking about:

- We're still wary of the new plant's noise and vibrations under normal operation (i.e., after construction is done). I was relieved they said the motors will be underground and with more modern technology. However, I'd love to see some sort of engineering report that confirms the noise/vibration projections.

- If this project is going to happen, they should ensure it adds to the community in other ways, including aesthetics. Instead of the harsh floodlights like the older building, maybe decorative street lamps or sconces with proper shading so they don't shine on other people's property or glare across the canal (possibly interrupting wildlife). Some greenery on the walls would be nice (bougainvillea, jasmine or some kind of ivy so it grows up the walls). Alternately, I like the idea of the art project or at least some fun but not garish colors. I think our most "controversial" suggestion may be benches, as I can imagine some folks are wary of them attracting long-term homeless to stay. These could be smaller size, or maybe a series of chair-width seats. With this being such a popular walking area, it never ceases to amaze me that the only benches on the whole peninsula seem to be in the kids park on Via Dolce.

- I worry that EIRs only focus on certain types of wildlife and may not be accommodating for "common" waterfowl like ducks. Those fledglings bring a lot of joy to the community each spring! Unless the noise/vibrations are in issue, it might be nice if that flat area over the "pool" could have some bushes as a protective habitat for mothers and their young. I'd love to make sure the design considers potential places they might fall and get trapped, too, and holes big enough to get in and out of (but not so big people can get through, as the mentioned a security concern).

Robert Nau – 4250 Via Dolce

I am a concerned resident and a condo owner at 4250 Via Dolce. Thank you!

Felicia Glade & Mike Pelletier – 116 Galleon St.

Hi, as a resident living close to the hurricane pumps, I am very concerned about this project.

Please eliminate the parking lot, and instead use parking on the pump plant property or street. Having an unsecured lot will invite security issues that will affect our children who play outside around there and who we take walks with along the canals. Please have security Patrol planned for this residential area as this lot will attract unhoused people to a peaceful quiet and currently safe neighborhood.

Please adopt written recorded conditions of approval that clearly spell out all obligations in the future so that neighbors can monitor and enforce, including each requirement of the approvals and the MMRP, and mitigations during construction years.

Thank you for reading. I hope you protect nearby residents and our children.

Felicia

Eliane Gans – 3933 Esplanade (owner)

Aug 10, 2022

To President Millman and Honorable Commissioners
City Planning Commission

I am a resident on Pacific Court/ South Esplanade West- 1/2 block from the pumping station.

I have been a resident and own the three Unit property, where I reside, for the past 38 years. I feel that the residents of this community- especially the residents who live on the Canal, are being invaded, disrespected and disregarded.

We have moved to this community and this special area for reasons that the City Planning Commission may not understand. It is a peaceful, and non-commercial area with beautiful residences, lovely landscaping, water and peace.

Now we are being invaded with a design of the pumping station that is horrible, not in keeping with any structures in the neighborhood and will be an eye sore to any adjacent residences. The design, the noise from the transformers and other equipment will impact any neighboring homes and even visitors. The equipment may also be dangerous to the environment and to those of us who live here.

The City Planning Commission DOES NOT LIVE HERE. And We do! This is a matter of our well-being and our daily lives!

The parking lot is not necessary, and in addition -WHY HAVE YOU REMOVED 4 PARKING SPACES necessary to the residents on Hurricane?? This area already has limited parking! This is not necessary, and another invasion and destruction of our quality of life in our neighborhood.

Lastly, and importantly, all of our property values will be diminished. Who would want to live near a Pumping station that makes noise, spews chemicals into the air and looks ugly, and an eye sore to the neighborhood...

I respectfully request that you re-design the new facility and review the recommendations that you have received. I also request that you landscape the entire area. And, of course, protect the neighboring residences.

With a plea of hope for your consideration and revisions, as requested by all of us who are residents; and the requests made by Genevieve and Mile Morrill-Borassi. And Kristy Swanson.

These requests are truly from all of us in the neighborhood, and I respectfully ask for your assistance and re-consideration of the current plan.

Sincerely,

Eliane Gans
Property owner: 3933 Esplanade West, Marina del Rey, CA 90292

Jenesa Kurland – 4300 Via Dolce (condo owner)

Whatever City says they're going to do to mitigate or their useless report says regarding noise, vibration, home damage, etc. is all BS rhetoric: City takes no responsibility and homeowner is helpless. Their preconstruction survey of one's home carries as much weight as blank pieces of paper.

Planning CPC <cpc@lacity.org>

CPC-2024-2010-GPA-ZC-SPPC-CU3--VAPP: please remove the 128 Hurricane parking lot component

Robin Rudisill <wildrudi@icloud.com> Mon, Jan 12, 2026 at 3:59 PM
To: Ira Brown <ira.brown@lacity.org>, Planning Cpc <cpc@lacity.org>

Re: Venice Auxiliary Pumping Plant (VAPP)

Case No. CPC-2024-2010-GPA-ZC-SPPC-CU3

City Planning,

I'm writing regarding the Venice Auxiliary Pumping Plant (VAPP) project and, specifically, the 128 Hurricane Street lot.

Since the City's approval of the 128 Hurricane St lot for project parking—and prior to the Coastal Commission hearing—the Applicant modified the project such that this lot is no longer required for project parking and would instead provide, simply, seven public spaces. That change is significant: it means the City now has a clear opportunity to remove the permanent parking lot component from the project entirely. If the lot is not needed for project operations, then the related zoning change from residential to "public facilities" use should no longer be necessary. The Coastal Commission could process a straightforward amendment to the State CDP to reflect this change.

Given that the City purchased the 128 Hurricane St lot for approximately $2.7 million, it is both fiscally responsible and neighborhood-protective to treat it as construction-only and then require its sale upon completion. In that spirit, I strongly urge City Planning to incorporate the following approach/conditions:

1. **Construction-only use.** The 128 Hurricane St lot should be used only during construction for temporary project needs consistent with approved plans.

2. **Mandatory sale post-construction.** Upon completion of construction, the 128 Hurricane St lot should be sold to a private owner and should not be retained or converted into a permanent public parking lot.

3. **Use of proceeds.** Sale proceeds should be directed to fund community benefits related to this project and other community needs (as directed by Council District 11) and/or deposited to support the City's General Fund to address other fiscal priorities. In the City's current budget environment, converting an unnecessary permanent parking lot into liquid assets on the order of $2–3 million is a common-sense measure.

On top of the significant impacts already associated with a major pumping plant expansion, it is simply not fair or prudent for this residential neighborhood to be permanently saddled with the negative impacts of an unnecessary public parking lot on the 4,229 square foot 128 Hurricane St property. Post-construction, the lot can and should be sold to support community benefits, City fiscal needs, and/or potentially affordable housing.

Thank you for considering this request. I would appreciate confirmation that City Planning will evaluate removing the permanent parking lot component and will consider conditions requiring construction-only use and a mandatory sale after construction.

For the Love of Los Angeles
and our precious Coast,
Robin Rudisill
(310) 721-2343

January 12, 2026

To: Mr. Ira Brown, City Planner ira.brown@lacity.org
To: City Planning Commission cpc@lacity.org
200 North Spring Street, Room 272
Los Angeles, CA 90012

Re: Venice Auxiliary Pumping Plant (VAPP) – Case No. CPC-2024-2010-GPA-ZC-SPPC-CU3
Project Location: 128, 133 & 139 E. Hurricane Street; 3817 & 3813 S. Esplanade; 3913 S. Esplanade

Dear Ira and City Planning Commissioners:

I'm writing to express the Hurricane St. community's strong concern with the lack of an adequate parking plan to address displaced resident vehicles during the VAPP construction process. We are aware this project requires that no parking be allowed on Hurricane St during construction hours (whether Mon-Fri or Mon-Sat). This will displace 20-25 cars that park on the street daily. This calculation comes from the following data as well as anecdotal observations taken over the past year:

Vehicles Parked on Hurricane St Between Pacific Ave and Canal Court					
Day	**Date**	**Time**	**Hurricane North**	**Hurricane South**	**Total Vehicles**
Wednesday	1/7/26	8:44 AM	13	6	19
		4:16 PM	14	6	20
Thursday	1/8/26	11:04 AM	11	5	16
		2:15 PM	13	6	19
Friday	1/9/26	8:11 AM	14	6	20
		12:15 PM	15	6	21
Saturday	1/10/26	11:42 AM	17	7	24
Sunday	1/11/26	11:48 AM	12	7	19
	1/11/26	8:15 PM	17	7	24
Average	**9 measurements**				**20.2**

- This research was conducted on a typical non-holiday, off-season week during Jan 2026 to accurately capture the parking habits of residents, sans tourists and beach goers.
- The number cars parked on Hurricane St. materially increases during other times during the year.
- The data does not intentionally include Mon/Tues which are alternate parking days.
- The Sunday evening data (24 cars) is a clear indicator of resident usage most evenings which would be most impacted by early construction hours.

Venice LUP - You should also be aware of the Shoreline Access chapter of the current Venice LUP (Section II.A.3) which references the Venice Parking & Traffic Study:

> ***Public Parking is extremely limited in the area between Galleon St and Ketch St,*** *particularly on summer weekends, which restricts public access to the beach and creates traffic congestion on Pacific Ave and adjacent residential streets. Reduced parking in this corridor is considered a Coastal Act public access constraint.* ***Any project reducing parking or increasing demand must be evaluated under Coastal Act §§ 30210–30212.5. Both the City and Coastal Commission have already recognized this area as parking-deficient and access-sensitive.***

We are requesting The Applicant implement a parking mitigation plan at no cost to residents to fully mitigate the loss of parking during construction hours on Hurricane Street for the duration of construction. Solutions may include (but not be limited to):

- Remove or otherwise reduce existing weekly no-parking restrictions (for street cleaning) on the full length of, at minimum, Galleon, Hurricane and Ironside St. to the maximum extent permitted by law and safety requirements.
- Restore the three parking spaces on the north side of Hurricane Street east of Pacific Avenue that were removed by DOT without community input.
- Provide an equal number of alternative parking spaces located as close as possible to minimize resident inconvenience. One such possibility is to create special permit parking at the south end of the Venice Pier parking lot.

This is a critical issue that will have a detrimental impact on residents, especially the elderly and those who work from home. Without a viable solution in place, residents could be forced to move which would materially impact property owners through unwanted vacancies, decreasing revenues to local merchants, utility revenues and property valuations, the latter in turn decreasing property tax payments to LA County.

The community requests that any zoning change approved for the properties referenced above be conditioned with a viable, appropriate solution to this parking issue. Thank you for your consideration.

Respectfully,



Steve Bradbury
109 Hurricane St
on behalf of the Hurricane St community.

VAPP Community Proposed Conditions
(May 5, 2025)

Overview: When the original VPP was built in the late 1950's, the Marina Peninsula was primarily comprised of oil derricks and marshland. The first residential properties on and around Hurricane St were constructed in the mid-1960's so design and other impactful attributes of the VPP were not material considerations.

Construction of the VAPP (the "Project") will have a significant, negative impact on our densely populated community and the surrounding environment including the Grand Canal and Ballona Lagoon, both recognized as ESHAs. Nonetheless, the community acknowledges the critical nature of this infrastructure project. Our goal has been and continues to seek modifications that will mitigate its impact on our quality of life.

Importantly, the Project does not conform to the Venice Land Use Plan (LUP) as follows:

- Policy I.C.1 states that the scale and design of industrial facilities must be compatible with adjacent and neighboring uses. The design does not meet this criterion.
- Policy 1.C.6 states that hazardous industrial uses shall not be located adjacent to residential areas. While the community does not claim to be experts on the chemicals and operations to be used at the plant, the operation is industrial in nature and some operations of the plant could reasonably constitute a hazardous use for nearby residents due to the potential for activities such as (but not limited to) transformer explosions, equipment fumes, sewage overflows etc.
- The Project conflicts with Policy 1.A.5 that seeks to preserve and protect stable multifamily neighborhoods.
- The Project conflicts with Policy 1.D.1 that states that only permitted development adjacent to the Grand Canal and Ballona Lagoon shall be habitat restoration, single family homes and parks.

Therefore, the community requests the following Project issues be addressed through the placement of conditions as detailed below:

1. The Project Does Not Meet Public Benefit Performance Standards

The Project does not meet the performance standards as required by LAMC 14.00.A.6 and 14.00.B.5. Public Works is not eligible for alternative compliance due to 1) lack of landscaped buffers to the north and west; 2) lack of full setbacks to the north; and 3) the majority of frontage is located on small local streets and alleys, rather than a major or secondary highway. These performance standards are designed to ensure that large industrial facilities such as this are kept to areas with adequate traffic infrastructure and contain adequate buffers and landscaping in keeping with the neighborhood. These goals are not met. Conditions requested:

a. A ten-foot landscaped buffer which will be maintained and equipped with an automatic irrigation system as well as a 6-foot solid block wall on the north property line next to 3811 Esplanade.

b. Shield entire structure with unobtrusive fencing as well as landscaping of a height adequate to screen the transformers and power poles.
c. The existing VPP shall be upgraded with landscaping, a new sidewalk, and all facilities, existing and new, shall be regularly cleaned, maintained, and patrolled for security.

2. Potential Release of Methane Gas and Other Chemical Hazards

The VAPP Mitigation Plan acknowledges "a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous chemicals into the environment." This includes encroachment or seepage of methane into the VAPP structure whose impact is considered potentially significant. Conditions requested:

a. A sufficient # of detection devices around the community shall be installed to provide ongoing accurate measurements.
b. The mitigation plan should proactively address the same exposure concerns for the community as defined for workers on the Project.
c. Should any analysis under the Mitigation Plan identify this issue, the entire Project must be shut down immediately until a realistic plan can be put in place to mitigate both short and long-term impacts.

3. Need for Appropriate Off-Site Workspace

Given the many "significant and unavoidable" issues identified on this Project, work from home conditions will be adversely impacted. Condition requested:

a. The city shall guarantee in writing the provision of suitable, local workspace, reasonably approved by the community, for all impacted home-based workers located within 500' of the Project for the duration of all construction activities.
b. The city will survey the community every six months during the term of construction to determine how much workspace is needed.

4. Ongoing Noise, Air & Dust Release

The Mitigation plan states "Project construction noise will exceed construction noise criteria provided by the LA CEQA Thresholds Guide. However, Section MM-NOI-3 of the same Mitigation plan, states noise control features will "reduce overall operational noise levels from all Project related sources to within 5 dB of existing ambient noise levels in the surrounding community (53-57 dB)." These two statements are in conflict. Conditions requested:

a. The city shall retain an independent 3rd party, reasonably approved by the community, to review and recommend changes to the mitigation plans.
b. The city shall provide independent (3rd party) noise and air quality monitoring whose results shall be available to the community in real time. If necessary, the city shall distribute or reimburse the cost of high-quality air purifiers to impacted households (up to $500/unit).
c. The city shall comply with residential noise thresholds including the provision of all sound barriers necessary to comply with municipal code requirements and CEQA thresholds.
d. Each construction day, the city shall erect temporary barriers of sufficient height to mitigate dust and dirt from impacting residential property. Barriers shall be removed at the end of each construction day to allow for street parking.

5. Lack of Adequate Emergency Access & Preparedness

The Project will exacerbate ongoing issues of emergency egress and ingress, by expanding density, blocking routes (even temporarily), and adding equipment & workers into the potential hazard zone. Evacuation plans have been generally ad hoc and done in the heat of the emergency. This approach has not been highly successful as recent problems with the Palisades Fire have demonstrated. Hazards facing the community include tsunami, tropical storm flooding, hazardous materials incidents and targeted violence, which will be complicated by the construction Project. Conditions requested:

a. LASAN shall, as the responsible party for the Project, initiate a Working Group including representatives from the Los Angeles Police Department (LAPD), Los Angeles Fire Department (LAFD), Los Angeles Department of Transportation (LADOT), Los Angeles Emergency Management Department (LAEMD) and the LA Department of Sanitation as the responsible party for the contract work, as well as a minimum of three representatives selected by the community.
b. Essential elements of the plan shall be as hazard specific as possible and include, but not be limited to:
    i. Identification of evacuation routes and emergency ingress routes.
    ii. Estimated evacuation times and numbers evacuated.
    iii. Mitigate blocking of evacuation routes/cooperate with the evacuation process.
    iv. Effective alternatives to evacuation such as shelter in place.
    v. Alert and warning procedures.
    vi. Addressing and including the needs of Persons with Disabilities and Access and Functional Needs (PDAFN).
    vii. Public education and practice.
c. The city shall install a walk bridge across the Grand Canal at Driftwood St as detailed in the previously approved Grand Canal Restoration Plan. The details of this plan can be found here: https://engineering.lacity.gov/grand-canal-restoration-project.

6. Lack of Street Parking on Hurricane St.

The VAPP plan proposes that all parking on Hurricane St will be removed during construction hours. This will displace 20-25 cars that park on the street during times of low demand, non-summer, non-holiday days, Monday-Saturday. Further, after construction, the city proposes using 128 Hurricane for employee parking and a public parking lot. This would be the only lot of its kind on the entire Marina Peninsula. There is no community support for a public parking lot. It will materially increase traffic on a residential street, will become an easily accessible haven for homeless, is not secure and LAPD does not have the resources to provide appropriate response when issues arise. Conditions requested:

a. During construction, the city shall securely enclose 128 Hurricane as a temporary permit-only lot at no cost to displaced residents in lieu of a construction staging site. Alternately, a similar number of spaces shall be made available on the South end of the Venice Pier parking lot at no charge to residents.
b. After construction is completed, the city shall implement the community-proposed red-zone parking solution for employee parking - see Exhibit A.

c. The city shall support the community by actively seeking an exception to the public parking requirement for a public utility.
d. Remove existing weekly no parking restrictions from Hurricane St to provide enhanced public parking.
e. At the completion of construction, the 128 Hurricane lot, which was purchased by the city for $2.7M, shall be sold to a private owner, the proceeds of which will be used to fund community benefits related to this Project as well as other needs as directed by CD-11 Councilmember Traci Park.

7. Excessive Construction Hours

The city plans for six day/week construction, 8a-5p. An internal city report produced seven months after the EIR was certified proposed a five-day construction work week as well as limitations on pile drivers, graders and jackhammers & haul trucks identical to these requested conditions:

a. Work shall be permitted Monday-Saturday November-March. Work shall be permitted Monday-Friday, April-October.
b. Equipment operation hours: 8a-5p
c. Pile driver, grader, jackhammer: 9a-3p - No pile driver, grader or jackhammer work shall be conducted on Saturdays any time during the year.
d. Haul trucks to access local neighborhood streets: 9a-4p

8. Lack of Binding Written, Recorded Conditions of Approval Between the City & Construction Company

It is unclear how the contractual conditions between the city and construction company will be enforced. How will resident complaints be addressed in real time? Current plans indicate a process where complaints are filed with an on-site city representative and addressed in an undetermined future time frame. Conditions requested:

a. Adopt written, recorded conditions of approval that clearly spell out all obligations with meaningful penalties for non-performance so they can be monitored by the community and enforced by the city, including each requirement of the approvals and the MMRP as well as mitigations during construction years.
b. Actively monitor and enforce all Project obligations including MMRP
c. Commit a city representative to be on-site every day from start to end of Project work who is empowered to satisfactorily address issues in real time or immediately shut the Project down pending resolution.

9. Lack of a Clear VPP/VAPP Maintenance Plan

The current VPP is not maintained in any meaningful way. The issues go far beyond graffiti and painting. There are environmental and safety issues. Garbage is strewn along the Grand Canal and Ballona Lagoon sides of the structure which can readily fall into the water (ESHA protection). The sidewalk around the structure is in a constant state of disrepair to the point of being dangerous. And as referenced in the Coastal Staff presentation made in February, the VPP was, back in 2012, landscaped to (at least partially) help blend into the neighborhood – see Exhibit B.

Since then, the VPP has been left in a state of disrepair. There was and is no maintenance plan. How will the VAPP be different? And what will become of the VPP as it is transitioned out of use?

What will eventually become of that structure and lot? Nobody within Public Works has ever provided a clear response. Conditions requested:

a. The city shall develop, in a timely manner, a meaningful maintenance plan for both the VPP and VAPP.
b. The city shall install safety railings around the VPP on the two sides facing the Lagoon
c. The city shall repair and maintain sidewalks surrounding the VPP.
d. The city shall plant and maintain environmentally appropriate plants & landscaping surrounding both the VPP and VAPP
e. The city shall communicate its short and long-term plans for the VPP after VAPP construction is completed.

# # #

Additionally, we seek appropriate, reasonable solutions to the following issues:

1. Significant & Unavoidable Residential Property Damage

The VAPP Mitigation Plan acknowledges "significant and unavoidable impact to surrounding land uses" including "ground-borne vibration levels that are distinctly perceptible at a receiving residential use or could potentially result in building damage." Section MM-NOI-2 of the mitigation plans does not adequately protect property from potential damage. In addition, Construction GEO-1 of the mitigation plan states the Project will "Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking and/or seismically related ground failure, including liquefaction**."** The plan to address residential impact uses terms such as "may include," "if considered appropriate," and "as feasible and practical." The discretion is left entirely to a Project assigned engineer. The city has strong motivation to look past issues that may arise as a path to completing the Project faster, especially with the Olympics on the horizon.

There must be an enforceable plan to cure defects to any adjacent or neighboring residential property caused by the Project. There is also no timely mechanism to address root causes in the event damage is done. The "process," as we have been told, will not mitigate additional damage before the cause is investigated and modified. Conditions requested:

a. An independent inspector, approved by the community and paid for by the city, shall be contracted to inspect all properties within 500' of the Project prior to construction to determine baseline conditions. Additional inspections shall take place no less than semi-annually or upon resident request for the duration of the Project.
b. Per Section 8 above, the on-site city representative shall be empowered to satisfactorily address these issues in real time or shut the Project down pending resolution.

2. Expected Reduction in Property Value

The anticipated severity of construction-related disruptions, including high-decibel noise, vibration, airborne debris, traffic blockage, and the potential release of subsurface gases such as methane will materially impact property values. Conditions requested:

a. We request the city collaborate with LA County to secure reduced property valuations/lower property taxes for all properties within 500' for the duration of the Project.

3. Anticipated Lost Income for Landlords

Given the circumstances described above, it is likely some tenants will be forced to leave their current residences. This may impact the landlord's ability to find new tenants and/or maintain current rental income, which can be a vital revenue stream. How will landlords be compensated for this loss of income?

4. Compensation for Displaced Residents

Residents living with 500' of the Project may be adversely impacted to the extent they can no longer remain in their current residence on either a temporary or permanent basis. How will they be compensated? Note: While many residences will be impacted, the greatest impact will be to 3811 Esplanade. This should be treated as a discreet case.

# # #

Exhibit A

6. Lack of Street Parking on Hurricane St.

The community proposes the following red-zone solution for staff parking (identified in orange below). At the existing VPP, one employee is present at any given time. There is one on-site parking space to satisfy this requirement. Even if the VAPP requires multiple employees (in addition to the VPP employee, whose necessity is not clear), this plan will provide sufficient parking for employees and city officials while obviating the need for employee parking at 128 Hurricane.

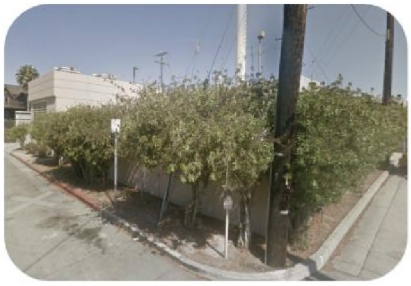
Employee Parking



Exhibit B

9. Lack of a Clear VPP/VAPP Maintenance Plan

Public Works Maintenance Report Card



2012



2022



2024

VPP Maintenance - 2024

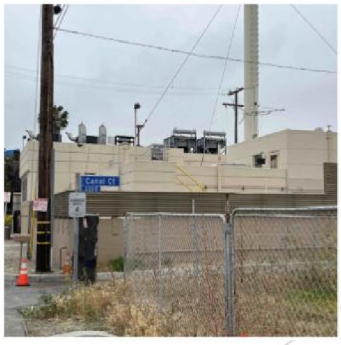












Venice Neighborhood Council

PO Box 550, Venice, CA 90294
venicenc.org

(sent via email)
Traci Park, LA City Council Person CD-11 - Councilmember.Park@lacity.org
Sean Silva, Venice Field Deputy, CD-11 - Sean.Silva@lacity.org
Juan Fregoso, District Director, CD-11 - Juan.Fregoso@lacity.org
Marqueece Harris-Dawson, LA City Council President - Marqueece.Harris-Dawson@lacity.org
Hydee Feldstein Soto, City Attorney - Hydee.FeldsteinSoto@lacity.org
Mike Davis, President Pro Tempore, LA Public Works Board of Commissioners - Mike.Davis@lacity.org
Teresa Villegas, Vice President, LA Public Works Board of Commissioners - Teresa.Villegas@lacity.org
Vahid Khorsand, Commissioner, LA Public Works Board of Commissioners - Vahid.Khorsand@lacity.org
Susana Reyes, Commissioner, LA Public Works Board of Commissioners - Susana.Reyes@lacity.org
Ted Allen, City Engineer, Bureau of Engineering - Ted.Allen@lacity.org
Chloe Seifert, Coastal Program Analyst, California Coastal Commission - Chloe.Seifert@coastal.ca.gov

On Sept 17 2024, the Venice Neighborhood Council Board of Officers passed the following motion by a vote of 13-4-0.

MOTION: The Venice Neighborhood Council opposes CPC-2024-2010-GPA-ZC-CU2-SPPC-- allowing the City of Los Angeles to obtain a General Plan Amendment (GPA) and Zone Change (ZC) from RW2-1 to Public Facilities at 133 Hurricane St., a Project Review (SPPC), and a Conditional Use for the construction, use, and maintenance of a public parking area in a residential zone (CU2) for the empty lots located at 128 Hurricane St/3913 Esplanade -- unless LA Public Works (LAPW) materially and in good faith addresses the community's serious issues with this project.

Sincerely,

Brian Averill
President
Venice Neighborhood Council

Venice Neighborhood Council

PO Box 550, Venice, CA 90294
venicenc.org

MOTION BACKGROUND: Los Angeles Public Works (LAPW) has proposed the Venice Auxiliary Pumping Plant (VAPP) at 128 Hurricane St and an associated parking lot for employees and limited public use at 133 Hurricane St, MDR. The residents acknowledge the VAPP is considered critical infrastructure. From 2017 through and including the final city approval process, LAPW never meaningfully and materially addressed issues raised by the community. In fact, the City Planning Commission instructed LAPW to meet with the community. Nothing changed because of those meetings despite a multitude of suggestions and proposals offered to LAPW. The issues include, but are not limited to:

1. Conformance with the certified Venice LUP (Policies I.A.5, I.C.1, I.C.6, and I.D.1);
2. Meeting established Public Benefit standards including a 10' landscaped, irrigated buffer along all property lines. The performance standards applied to this project are applicable to those on a major or secondary highway, not a residential street;
3. Adherence to court-mandated ESHA protections in the Ballona Lagoon/Grand Canal area including no dredging and/or use of heavy equipment both of which are part of the project plan;
4. Mitigation of EIR issues related to loss of species and habitat, groundwater impact, and potentially significant methane gas release. The community has put forth a plan to address some of these issues;
5. Mitigation of "significant and unavoidable" construction-related issues including ground-borne vibration which could result in residential building damage, and, construction noise that exceeds LA CEQA Thresholds guidelines;
6. Improvement of inadequate emergency access during construction activities;
7. Change to five day/week construction and more restricted hours in lieu of six days/week;
8. Elimination of the proposed parking lot at 128 Hurricane St. for which parking requirements can be fulfilled via restricted street parking around the current Venice Pumping Plant (VPP), at a savings of at least $2.5 million to the city;
9. Modification of the project design so that it is compatible with the residentially zoned neighborhood;
10. Actionable protection of residential properties from dirt, dust and other construction impacts;
11. Upgrade of a deficient maintenance plan for both the new and existing facility.

The intention of this motion is not to stop a necessary infrastructure project. It is to seek a meaningful, results-oriented dialogue with Public Works to identify reasonable solutions for these issues.