FINDINGS

FOR

Van Nuys Fire Station 39

W.O. E170094D

SCH #2015031067

Prepared by

CITY OF LOS ANGELES
BUREAU OF ENGINEERING

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VAN NUYS FIRE STATION 39

FINDINGS

1.0 INTRODUCTION

Section 21081 of the California Public Resources Code and Section 15091 of the California Environmental Quality Act (CEQA) Guidelines require a public agency, prior to approving a project, to identify significant impacts of the project and make one or more written findings for each such impact. The findings reported in the following pages summarize the discussions and conclusions regarding the significant or potentially significant environmental impacts of the proposed Van Nuys Fire Station 39 project, as presented in the Final Environmental Impact Report (Final EIR) for the project (which includes the Draft EIR).

This Findings document is divided into four major sections. The Introduction provides background information regarding the purpose of the document. The Project Description describes the City's objectives and the proposed Project. The Findings Regarding Environmental Effects section presents the effects associated with the proposed Project. The Alternatives Considered section describes alternatives developed and considered for the proposed Fire Station 39 project, the reasons for selection of the preferred alternative and the reasons for rejection of the remaining alternatives.

The Findings Regarding Environmental Effects section discusses the following for each significant or potentially significant impact associated with the proposed Project:

1) Descriptions of the Significant or Potentially Significant Effects - Specific descriptions of the environmental effects (Significant, Potentially Significant, and Not Significant) are identified in the Final EIR.

2) Mitigation Measures - Potential mitigation measures for the identified significant or potentially significant impacts.

3) Findings - The findings made are those allowed by Section 21081 of the Public Resources Code. One of three findings is made for each significant or potentially significant impact, following Section 15091 of the CEQA Guidelines:

    i. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially

lessen the significant environmental effect as identified in the Final EIR.

ii. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

iii. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

A judgment is then provided regarding the significance of the environmental impacts after mitigation.

4) References - A notation on the specific section in the Final EIR which supports the findings.

This Findings document describes only those impacts anticipated to be significant or potentially significant. For information regarding the impacts that were determined not to be significant, please see the Final EIR for the Van Nuys Fire Station 39 project.

The mitigation measures identified in the Mitigation Monitoring Program for the Van Nuys Fire Station 39 project, which is provided under separate cover, are those identified within this Findings document.

The documents and other materials that constitute the record of proceedings upon which the decision of the Los Angeles City Council is based are located in the Office of the City Clerk, and in the Department of Public Works Bureau of Engineering in the custody of the City Engineer at 1149 S. Broadway, 7th Floor, Los Angeles, California.

2.0 PROJECT DESCRIPTION

2.1 Objectives, Purposes and Needs

The broad goal of the Van Nuys Fire Station 39 Project (proposed Project) is to construct a new state-of-the-art fire station that meets the Los Angeles Fire Department's (LAFD's) operational needs and Proposition F bond requirements. The proposed fire station would provide fire protection, rescue, and emergency medical services in a facility that meets the operational needs of LAFD.

The objectives of the proposed Project are as follows:

- Accommodate current and anticipated demand for emergency services.
- Maintain or improve emergency response times.
- Provide modernized service facilities.
- Be on a site large enough to accommodate a standard fire/paramedic station (approximately 1.2 acres).
- Allow for construction of a Battalion Headquarters as part of the fire station facility.
- Be close to the geographical center of Fire District 39.
- Provide on-site parking for all on-duty personnel.
- Be located on a site that allows for pull-through access and is not in an anti-gridlock zone to ensure ease of ingress and egress.
- Be located on a street that is a secondary highway.
- Meet the budget requirements as defined by Proposition F.

The proposed Project is funded by Proposition F, a ballot measure approved by Los Angeles voters in November of 2000. Proposition F authorized the issuance of $532.6 million in General Obligation Bonds to finance construction and rehabilitation of fire stations and animal shelters throughout the City. Although the proposed Project was not initially programmed under Proposition F, the Los Angeles City Council approved the addition of Fire Station 39 to the program in September of 2009; it would be funded with accrued savings and interest from other fire station projects under Proposition F.

The proposed Project site has been developed through the process established by Proposition F. This process was guided by the Proposition F Administrative Oversight Committee, made up of representatives of the Mayor, the City Administrative Officer, the Chief Legislative Analyst, the Fire Chief, the General Manager of the Animal Services Department and the Bureau of Engineering.

2.2 The Proposed Project

The City is proposing to construct a replacement fire station on vacant lots located on the corner of Oxnard Street and Vesper Avenue in Van Nuys. The existing Fire Station 39, located at 14415 Sylvan Street (approximately 0.5 mile northeast), cannot house the additional resources needed to meet present and future demands for fire protection services. The proposed Project will use accrued interest and savings from Proposition F. The replacement fire station will include an approximate 18,500-square-foot fire station and associated improvements on the approximately 1.2-acre site. Disposition of the existing Fire Station 39 has not been determined at this time. Until such a determination is made, the Department of General Services will maintain the buildings.

3.0 FINDINGS REGARDING ENVIRONMENTAL EFFECTS

This section discusses impact areas for which mitigation measures were identified for the proposed Project, and makes findings for each of these impact areas. Significant or potentially significant impacts prior to the application of mitigation measures have been identified for the proposed Project in the following areas:

- Hazards and hazardous materials, and
- Noise.

Potentially significant impacts related to hazards and hazardous materials would be confined to the proposed Project's construction period. Significant noise impacts were identified during the operation of the proposed Project.

3.1 Hazards and Hazardous Materials

This section discusses the significant or potentially significant risks of encountering or accidentally releasing hazardous waste or hazardous materials related to the construction and operation of the proposed Project.

3.1.1 Description of Potential Effects

Potential impacts related to hazards and hazardous materials are analyzed in Section 4.5 and Appendices C and D of the Draft EIR. The presence of vinyl chloride in soil gas at a level above the California Human Health Screening Level represents a potential environmental and human health risk if disturbance or release of contaminated soils or soil gas during construction occurs.

During operation, the proposed Project would not involve the routine use, transport, or disposal of any significant amounts of hazardous materials.

3.1.2 Mitigation Measure

The following mitigation measure is expected to reduce the proposed Project's potential significant adverse impacts during construction.

MM HAZ-1: Identifying, Handling and Disposal of Contaminated Material

Recommendations included in Appendix E of the February 2013 Geotechnical Engineering Report (Appendix C of the Draft EIR) shall be followed. Appendix E of the Geotechnical Engineering Report includes a contingency plan for identifying, handling, and disposing of contaminated material in accordance with

applicable laws, regulations, ordinances, and formally adopted City standards. It describes measures that apply to handling and disposing of stained or hydrocarbon-contaminated soils should they be encountered during site excavations. These measures will reduce hazards to people or the environment from exposure to hazardous materials to a less-than-significant level.

- **Excavation of Contaminated Soils**

  The soils which have visible staining or an odor must be tested in the field by the contractor or qualified environmental subcontractor with an organic vapor analyzer (OVA) for volatile components, which require additional considerations in their handling Soil with OVA readings exceeding 50 ppm volatile organic compounds (probe held 3 inches from the excavated soil face), or which is visibly stained or has a detectable petrochemical odor should be stockpiled by the Contractor separately from uncontaminated soils. The stockpiles should be barricaded near the excavation area, away from drainage areas or catch basins, on an impermeable plastic liner (6 mil nominal thickness and tested at 100 psi strength). Caution must be taken to separate any contaminated soil from the remainder of the excavated material. If only a small amount of contaminated soil is encountered, it may be drummed in 55-gallon steel drums with sealing lids. The soil will then be sampled in a random and representative manner. To establish waste classification, samples will then be analyzed for Total Recoverable Petroleum Hydrocarbons (TRPH), volatile organics (VOC), Semi-volatile Organic Compounds (SVOCs, which were found in the exploration), Title 22 heavy metals, reactivity (pH), corrosivity and toxicity. The number of samples will depend upon the volume of material removed, one sample for approximately every ton of soil. Storage space available at the site and neighborhood sensitivity will determine the amount of soil that can be stockpiled.

  If volatile compounds are present at concentrations exceeding 50 ppm, an Air Quality Management District (AQMD) permit will be required, which most likely will require control of vapor, such as covering the stockpiles with plastic sheeting or wetting with water or a soap solution. The Contractor shall obtain all permits.

  Suspected contaminated soil samples can be taken to a State-certified environmental laboratory or tested in the field with a mobile lab and technician using infrared spectrometry with EPA Method 1664 for TRPH. Materials with elevated levels of TRPH, metals or other regulated contaminants will require handling by workers who have been adequately trained for health and safety aspects of hazardous material handling.

- **Removal and Classification of Excavated Soil**

  Any contaminated material (soil, asphalt, brick, burned material, concrete, or debris) that is to be hauled off the site is considered a "waste product" and must be classified as hazardous or nonhazardous waste under all criteria by both State and Federal Codes prior to disposal. If the waste soil or other material is determined hazardous, a hazardous waste manifest will prepared by the Contractor or its qualified representative and the material transported to an appropriate class of facility for recycling or landfill disposal by a registered hazardous material transporter. If the soil is nonhazardous but still exceeds levels that can be returned to the excavation, a less costly nonhazardous transporter and soil recycling facility may be used if no hazardous constituents are present above their respective action levels.

  The Bureau of Contract Administration Inspector for the proposed Project shall be notified of all contaminated material removals, and will document all quantities, help insure soil segregation and ensure copies of signed manifests are retained for the City records.

  Currently, there are no established regulatory limits or threshold values whereby soil with TRPH only can be classified as hazardous, although the California Code of Regulations (CCR) Title 22 provides limits for the volatile hydrocarbon constituents (including solvents), PCBs and metals. Therefore, until new criteria are released by the State or Federal agencies, soil levels of 100 ppm TRPH (crude oil, waste oil and diesel), 10 ppm gasoline, and 1/50/50/50/ ppm benzene, toluene, ethylbenzene and xylenes, respectively, are proposed. Soil contaminated with hydrocarbons at values less than these values may be backfilled, used for fill or paved over. A soil recycling facility should accept the material containing TRPH, assuming it is not hazardous due to metals or other contaminants, at a cost of $40 to $50 per ton. Depending upon the results of the sampling, this soil material is recycled into building foundation material, road pavement, landfill cover, etc. A recycling facility is preferred to landfills, as the latter raise future liability issues for the City should the landfill require remediation. The Bureau of Engineering Geotechnical Group (GEO) has a list of addresses and telephone numbers of local recyclers available. A Class III (municipal) landfill may also accept soils with only TRPH contamination above 1,000 but below certain levels specified by the Los Angeles Regional Water Quality Control Board, upon approval of an application (Report of Waste Discharge) with that agency. The disposal costs at a Class III landfill are approximately $35 per ton. All excavated material moved offsite must be manifested, transported by a registered hauler, and disposed of in the proper class landfill or recycler. Transportation costs to the Class II or III facilities are estimated at $5 per

ton within the Los Angeles area. These facilities can be contacted ahead of time regarding their acceptance of SVOCs.

- **Health and Safety Issues**

  The contractor shall be licensed for hazardous materials handling and hauling or have a qualified licensed subcontractor on call. The workers exposed to or handling contaminated soils shall have sufficient health and safety training, consistent with OSHA Hazardous Waste Operation Standards (29 CFR 1910.120), and Cal-OSHA "Hazardous Waste Operations & Emergency Response" (8 CCR 5192).

  The contractor, qualified subcontractor or an industrial hygienist shall prepare a site- specific health and safety plan. The plan shall appoint a site safety officer and establish responses to heavy metals, solvents, SVOCs and petroleum hydrocarbons, which may be encountered during excavations. Trapped pockets of methane and hydrogen sulfide gas and areas of low oxygen are common in excavations of this area, and are usually mitigated in confined excavations with proper monitoring and ventilation. The plan should specify particular action levels for each contaminant found during exploratory drilling and suspected to occur along the alignment and provide guidelines for personal safety and public protection, including monitoring and appropriate personal protective equipment needed on the jobsite during all phases of excavation of the project. The responsibility for maintenance and calibration of monitoring gear should be specified. The goal is to prevent health-significant inhalation and dermal exposure to hydrocarbon SVOC- or metal-contaminated soils, explosions and fires and to provide methods of decontaminating workers and equipment if contamination levels exceed those cited in the plan. Preventing unauthorized entry into the work and stockpile areas shall be included.

3.1.3 Findings

The City finds that changes or alterations have been required in, or incorporated into, the proposed Project which substantially lessen the significant environmental effect on hazards and hazardous materials as identified in the Final EIR. With these changes or alterations, the above potential impacts related to hazards and hazardous materials are found to be **not significant.**

3.1.4 References

Draft EIR Section 4.5, Appendices C and D of the Draft EIR and the Final EIR discuss the proposed Project's hazards and hazardous materials potential impacts and mitigation measures.

3.2 Noise

This section discusses the significant or potentially significant noise impacts related to the construction and operation of the proposed Project.

3.2.1 Description of Potential Effects

Increases in daily noise levels generated during operation of the proposed Project (primarily from vehicle sirens) would be greater than 5 dB CNEL at several of the closest residences.

Construction of the proposed Project would meet the requirements of the City's municipal code and CEQA Thresholds Guide so that construction noise does not exceed ambient exterior levels by 5 dB or more at the nearest noise-sensitive use. No significant or potentially significant noise impacts during construction were identified.

3.2.2 Mitigation Measures

The following mitigation measures have been adopted and are expected to reduce the proposed Project's potential significant adverse impacts during operation of the proposed Project:

MM NOI-1: Design and Construct Noise Barriers

The City shall construct noise barriers along the northern property line of residences with backyards adjacent to Oxnard Street. The goal of this measure is to reduce future with-project noise levels (i.e., with emergency response events at the proposed fire station) at residential uses to below 70 dB CNEL and to within 5 dB CNEL of the ambient levels that would exist without the project. An analysis indicates that such mitigation would be provided by noise barriers constructed as follows:

- The noise barriers shall have a minimum height of 10 feet relative to the elevation of the existing sidewalk or the adjacent residential yards, whichever is higher.

- The location of the noise barriers shall be as illustrated in Figure 4.7-3 of the Draft EIR.

- Each noise barrier shall be a continuous structure, without gaps, gates, or other openings.

- The noise barriers shall be constructed of a material with a minimum surface density of 4 pounds per square foot. Such materials may include concrete block, tempered glass, Plexiglas, or any combination of these materials. (It is noted that the minimum thickness required to achieve the necessary 4 pounds per square foot will vary depending on the specific

material selected.).

3.2.3 Findings

The City finds that changes or alterations have been required in, or incorporated into, the proposed Project which substantially lessen the significant environmental effect of project related noise identified in the Final EIR. With these changes or alterations, the above potential impacts are found to be **not significant.**

3.2.4 References

Draft EIR Section 4.7, Appendix E of the Draft EIR, and the Final EIR discuss the proposed Project's noise impacts and mitigation measures.

3.3 Cumulative Effects

The City has considered the potential for significant or potentially significant cumulative impacts due to the construction and operation of the proposed Project. The City finds the proposed Project, as mitigated by the changes or alterations identified in the foregoing, will not have any cumulatively significant impact during construction or operation for the reasons stated in the Final EIR.

3.3.1 References

The proposed Project's cumulative impacts are discussed in each issue section of Chapter 4 of the Draft EIR, in Chapter 6 of the Draft EIR, in the Final EIR, and in the relevant appendices.

3.4 Finding Regarding Response to Comments

The City finds that all information added to the Draft EIR after public notice of the availability of the Draft EIR for public review, but before certification, merely clarifies or makes insignificant modifications to the Draft EIR and does not require recirculation.

4.0 ALTERNATIVES CONSIDERED

In accordance with the requirements of CEQA, the No Project Alternative was analyzed in the Draft EIR as well as five alternative sites from an initial screening consideration of 18 sites, including the proposed Project site.

4.1 No Project Alternative

Under the No Project Alternative, a new Fire Station 39 facility would not be constructed and the existing Fire Station 39 would remain at its present location. This alternative would reduce impacts associated with construction. However, operational impacts would be largely similar to those for the proposed Project at the existing site. Many of the project objectives would not be achieved under the No Project Alternative. Specifically, the existing Fire Station 39 facility site is not

large enough to accommodate standard fire/paramedic facilities and proposed modernization improvements, and the site currently does not provide adequate on-site parking. Additionally, the existing Fire Station 39 site is located within an anti-gridlock zone and does not allow for pull-through access, which limits ingress/egress.

4.2 Alternative Sites

4.2.1 Alternatives Rejected from Further Consideration

Section 15126.6(c) of the State CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the lead agency's determination. Section 5.3 of the Draft EIR discusses the alternatives rejected from further consideration.

Several criteria are relevant to the selection of a site for a new fire station that would meet the project objectives. A potential project site must:

- Accommodate Demand (key objective): Accommodate current and anticipated demand for emergency services.

A potential project site should:

- Maintain/Improve Response: Maintain or improve emergency response times.
- Provide modern facility: Provide modernized service facilities.
- Land Use: Allow for construction of a Battalion Headquarters as part of the fire station facility.
- Geographic Center: Be close to the geographical center of Fire District 39.
- On-Site Parking: Provide on-site parking for all on-duty personnel.
- Anti-Gridlock: Be located on a site that allows for pull-through access and is not in an anti-gridlock zone to assure ease of ingress and egress.
- Secondary Highway: The site should front onto a secondary highway to provide sufficient access and to accommodate the capacity needed to respond to events.
- Meets Budget: The project should meet the allocated budget of $3.5 million.

Table 5-1 of the Draft EIR includes the 18 sites that were initially considered, along with an analysis of each of the sites applying the criteria identified above for each project objective. As part of the analysis, a scoring system is applied where a score of 1 means the site meets the criteria, and thus the project objective, and a score of 0 means it does not. As seen in Table 5-1, seven sites were disqualified from further consideration as they failed to meet the criteria for the key project objective of Accommodate Demand due to insufficient lot size or

frontage: 14243 Bessemer, 6454 Van Nuys, 6425 Tyrone Avenue, 6059 Van Nuys, 6551 Van Nuys, 6633 Van Nuys, and 6202 Van Nuys.

In addition to the alternatives screening as presented in Table 5-1, the proposed Project site at 14615 Oxnard Street is the only site that would meet the project objective of meeting budget requirements for the Fire Station 39 Project.

Based on Table 5-1, the list of alternative sites were narrowed down to those sites with scores of 5 or higher. In addition to the proposed Project site at 14615 Oxnard Street, this includes the following:

- 6550/6558 Van Nuys Boulevard
- 6103 Cedros
- 14400 Erwin Street
- 14415 Sylvan Street Expansion (includes site of existing Fire Station 39)
- 6001 Van Nuys Boulevard

To determine which of these sites to carry forward for further consideration, in addition to determining which of the alternatives would feasibly attain most of the basic objectives, an alternative should avoid or substantially lessen any of the significant effects of the project (CEQA Guidelines, Sections 15126.6(a),(f)(2)(A)). The significant environmental impacts of the proposed Project that were identified are related to noise and hazardous materials. Thus, as part of the analysis of the five sites listed above, the alternatives were further analyzed to determine if they could ostensibly reduce impacts related to noise and hazardous materials that were identified for the proposed Project. 14400 Erwin Street may reduce some, but not all, ofthe significant noise impacts associated with the proposed Project because it is farther from residential land uses, while none of the other sites are currently known to present the same potential soil contamination issues as highlighted by the Phase I and Phase II ESAs completed for the proposed Project site.

4.2.2 Comparison of Alternatives Analyzed

Five alternative sites were considered in detail in the Final EIR: 6550/6558 Van Nuys Boulevard, 6103 Cedros Avenue, 14400 Erwin Street, 14415 Sylvan Street (Expansion), and 6001 Van Nuys Boulevard. Section 5.4 of the Draft EIR discusses in detail the comparison of alternatives analyzed. Generally, impacts anticipated under each of the alternative sites identified above would, overall, be worse than impacts anticipated to occur under the proposed Project. Construction impacts for the proposed Project site would generally be reduced compared to each of the alternatives, which would all require demolition of existing buildings.

Table 5-2 of the Draft EIR provides a comparative summary of the impacts relative to the proposed Project including a comparative scoring of the impacts relative to the proposed Project, followed by a more detailed analysis of the

environmental resources that are addressed in the EIR for each alternative. The table is presented below:

Comparison of Impacts for Alternative Sites Analyzed (Draft EIR Table 5-2)

Environmental Resource	Proposed Project	No Project Alternative	3. 6550/6558 Van Nuys Blvd.	4. 6103 Cedros	5. 14400 Erwin Street	16. 14415 Sylvan Street Expansion	17. 6001 Van Nuys Blvd.
Aesthetics	Less Than Significant	No Impact -1	Less Than Significant 0	Less Than Significant 0	Less Than Significant 0	Less Than Significant +1	Less Than Significant 0
Air Quality	Less Than Significant	No Impact -1	Less Than Significant +1	Less Than Significant +1	Less Than Significant +1	Less Than Significant +1	Less Than Significant +1
Geology and Soils	Less Than Significant	No Impact -1	Less Than Significant 0	Less Than Significant 0	Less Than Significant 0	Less Than Significant 0	Less Than Significant 0
Greenhouse Gas Emissions	Less Than Significant	No Impact -1	Less Than Significant 0	Less Than Significant 0	Less Than Significant 0	Less Than Significant 0	Less Than Significant 0
Hazards and Hazardous Materials	Less Than Significant With Mitigation	No Impact -1	Less Than Significant 0	Less Than Significant 0	Less Than Significant 0	Less Than Significant 0	Less Than Significant 0
Hydrology and Water Quality	Less Than Significant	No Impact -1	Less Than Significant 0	Less Than Significant 0	Less Than Significant 0	Less Than Significant 0	Less Than Significant 0
Noise	Less Than Significant With Mitigation	No Impact -1	Less Than Significant With Mitigation 0	Less Than Significant With Mitigation 0	Less Than Significant With Mitigation 0	Less Than Significant With Mitigation 0	Less Than Significant With Mitigation 0

Environmental Resource	Proposed Project	No Project Alternative	3. 6550/6558 Van Nuys Blvd.	4. 6103 Cedros	5. 14400 Erwin Street	16. 14415 Sylvan Street Expansion	17. 6001 Van Nuys Blvd.
Other Considerations	-	This Alternative would not meet any project objective.	This alternative site fronts only a Major Class II Road (Van Nuys Blvd.), which, due to higher traffic volumes, would potentially require modifications to the traffic signals to accommodate ingress/egress of fire engines and rescue and command vehicles. This design modification would likely result in additional impacts on traffic circulation on Van Nuys Blvd. when compared to the proposed project. +1	-	Acquisition and demolition of a County of Los Angeles governmental building that has offices for the Van Nuys Courthouse and the County Sheriff would present difficult relocation and acquisition issues and potential secondary impacts due to the relocations. +1	This alternative site may involve the demolition or possible altering of the existing Fire Station 39 building, which is a historical resource, has been determined to be eligible for listing in the National Register of Historic Places, and is listed in the California Register of Historical Resources. +1 Closure of the alley behind the existing Fire Station 39 could result in impacts on traffic circulation. +1	Although this alternative site fronts a secondary highway, Oxnard Street, it also fronts a major Class II Road, Van Nuys Boulevard. Therefore, it would offer the same considerations as Alternative Site 3 (6550/6558 Van Nuys Blvd.). +1
Relative Impact Score		-7	+2	+1	+2	+4	+2

Notes:
(+) = Alternative would increase impact when compared with the proposed project.
(0) = Alternative would have similar impacts when compared with the proposed project and would be considered neutral.
(–) = Alternative would reduce impact when compared with the proposed project.

4.2.3 Findings on Alternatives

Section 5.4.7 of the Draft EIR provides the evaluation of the alternatives.

4.2.3.1 Alternative Site: 6550/6558 Van Nuys Boulevard

The alternative site at 6550/6558 Van Nuys Boulevard would meet most of the project objectives. However, locating the station on Van Nuys Boulevard, a Major Highway Class II, would not meet the last stated project objective of locating the facility on a Secondary Highway. This alternative site fronts only a Major Class II Road (Van Nuys Boulevard), which, due to higher traffic volumes, would potentially require modifications to the traffic signals to accommodate ingress/egress of fire engines and rescue and command vehicles. This design modification would likely result in additional impacts on traffic circulation on Van Nuys Boulevard when compared to the proposed Project. This alternative site would also require the displacement and relocation of existing businesses and would require demolition of the existing buildings on site, which makes this site less desirable than the proposed Project site. Additionally, this site would not reduce the significant noise impacts associated with the proposed Project.

4.2.3.2 Alternative Site: 6103 Cedros Avenue

The alternative site at 6103 Cedros Avenue would meet most of the project objectives but would not front onto a secondary highway. This alternative would require the displacement and relocation of an existing business and would require demolition of the existing buildings on site, which make this site less desirable than the proposed Project site. Additionally, this site would not reduce the significant noise impacts associated with the proposed Project.

4.2.3.3 Alternative Site: 14400 Erwin Street

The alternative site at 14400 Erwin Street would meet most of the project objectives but would not front onto a secondary highway. This alternative would require the displacement and relocation of a County of Los Angeles governmental building that has offices for the Van Nuys Courthouse and the County Sheriff, and it would require demolition of the existing buildings on site. The City would likely not want to displace these facilities because it would need to find suitable relocation sites in the vicinity, and there would be acquisition difficulties associated with other governmental entities. Furthermore, there may be secondary impacts associated with relocation of government entities, which generally require relocated sites nearby the original sites. Therefore, this site is far less desirable than the proposed Project site and may not be feasible. Additionally, this site would not reduce the significant noise impacts associated with the proposed Project.

4.2.3.4 Alternative Site: 14415 Sylvan Street

The alternative site at 14415 Sylvan Street would meet most of the project objectives but would not front onto a secondary highway. This alternative would require the displacement and relocation of existing businesses, and would require demolition of one or more of the existing buildings on site, which make this site less desirable than the proposed Project site. Additionally, this site would not reduce the significant noise and hazard impacts associated with the proposed Project. Furthermore, this alternative has the potential to create a new impacts related to traffic and cultural resources. This alternative site would require closure of the alley behind the existing Fire Station 39, which could result in impacts on traffic circulation. The existing fire station is also considered a historical resource and has been determined to be eligible for listing in the National Register of Historic Places and is listed in the California Register of Historical Resources. Thus, expansion of the existing station could result in impacts on the historic integrity of the existing building if it is required to be demolished or altered. If not demolished, the existing building would need to be retained and upgraded, which would be extremely expensive to retrofit. Furthermore, by expanding the site and retaining the building, efficiencies associated with development of an entirely new building would not be realized.

4.2.3.5 Alternative Site: 6001 Van Nuys Boulevard

The alternative site at 6001 Van Nuys Boulevard would meet most of the project objectives, including fronting a secondary highway, Oxnard Street. However, it would also front a Major Class II Road, Van Nuys Boulevard, and would likely require traffic signal modifications to accommodate the proposed fire station, thereby introducing traffic circulation impacts to a Major Class II Road as compared to the proposed Project. This alternative would require the displacement and relocation of existing business and would require demolition of the existing buildings on site, which make this site less desirable than the proposed Project site. Additionally, this site would not reduce the significant noise impacts associated with the proposed Project.

4.3 Environmentally Superior Alternative

As discussed in the Final EIR and summarized above, the No Project Alternative would result in the fewest impacts on the existing environment. However, operational impacts would be largely similar to those for the proposed Project at the existing site, and many of the project objectives would not be achieved under the No Project Alternative.

CEQA Guidelines 15126.6(e)(2) also requires that if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Generally, most of the alternative sites would also introduce new impacts that would not

occur as a result of the proposed Project. Therefore, none of the alternatives would be environmentally superior to the proposed Project.