

June 27, 2008

City of Los Angeles  
Bureau of Sanitation  
1149 South Broadway, 9th Floor  
Los Angeles, CA 90015

RE: City of Los Angeles  
Green Acres Farm  
Review of Operational Noise Emissions  
B&V Project 149981

At the request of the City of Los Angeles, Black and Veatch Corporation conducted a review of noise associated with land application operations at the City's Green Acres Farm. This assessment consisted of a review of the 1989 Program EIR prepared by the City for its Offsite Sludge Transportation and Disposal Program and of available data and information concerning operations at Green Acres Farm.

### **Criteria Used**

For significance criteria, the 1989 Program EIR identifies noise guidelines promulgated by the U.S. EPA. These guidelines recommend a sound level goal of 55 dBA (Ldn) at residential and other noise-sensitive areas. The U.S. EPA does not regulate noise emissions, but rather provides guidelines that are generally considered protective of public health and welfare. The U.S. EPA emphasizes that since the protective sound levels were derived without concern for technical or economic feasibility, and contain a margin of safety to ensure their protective value, they must not be viewed as standards, criteria, regulations, or goals. Rather, they should be viewed as levels below which there is no reason to suspect that the general population will be at risk from any of the identified effects of noise.

The 1989 Program EIR also identifies the California Department of Health Services (DOHS) land-use compatibility guidelines for community noise environments (see EIR Figure 3.5-2). Under these guidelines, low-density residential (single family, duplex, and mobile home) land uses are deemed "normally acceptable" in areas with sound levels up to 60 dBA (Ldn). Similarly, multi-family and transient lodging land uses are deemed "normally acceptable" in areas with sound levels up to 65 dBA (Ldn). Business and commercial land uses are deemed "normally acceptable" in areas with sound levels up to 70 dBA (Ldn). "Normally acceptable" indicates the land use is satisfactory based upon the assumption that buildings are of normal, conventional construction. All residential and other noise-sensitive land uses are deemed "conditionally acceptable" in areas with sound levels up to 70 dBA (Ldn). "Conditionally acceptable" indicates the land use is only satisfactory when necessary noise reduction features are included in the building design or when the buildings include conventional construction and the windows are closed.

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Black and Veatch also reviewed the Noise Element of the Kern County General Plan. Kern's Noise Element includes a policy of limiting sound levels in noise-sensitive areas to 65 dBA (Ldn) in outdoor activity areas and 45 dB (Ldn) in interior spaces. Noise sensitive areas are defined as residences, schools, hospitals, parks and recreation areas, and churches. Transient lodging (hotels and motels) and commercial or industrial uses are not defined as noise-sensitive areas. Kern's General Plan policy is specifically focused on requiring that all new noise-sensitive land uses include proper noise mitigation when the existing area experiences outdoor sound levels exceeding 65 dBA (Ldn) or causes the sound levels in the interior living spaces to exceed 45 dBA (Ldn). Green Acres Farm is not a "new noise-sensitive land use" (and in fact is not a new land use at all), but Black and Veatch conservatively used this policy, as well as the noise guidelines described above, to assess the noise impacts associated with land application operations at Green Acres Farm on neighboring noise-sensitive land uses.

### **Adjacent Uses**

Based on the available information, the nearest residential receptors are located approximately 1,850 feet west of the Green Acres Farm property boundary (i.e., South Enos Lane). We understand there is also a motel development being constructed for the property located on the southwest corner of Taft Highway (Hwy 119) and South Enos Lane. It should also be noted that the area across Enos Lane from this development, at the southeast corner of the Taft Highway and South Enos Lane, is not part of Green Acres Farm.

### **Operations at Green Acres Farm**

The following operational information was provided by Responsible Biosolids Management (RBM), the City's biosolids contractor. RBM uses the following land application equipment: (a) one 2007 Caterpillar Challenger Tractor 95E at 410hp, used approximately 7.2 hours per day; (b) one 2006 Caterpillar Wheel Loader 928G at 143hp, used approximately 6.5 hours per day; (c) one 2007 Freightliner M2106 2,000 gallon Water Truck at 190hp, used approximately 7.0 hours per day; and (d) one Clark Water Wagon (Cummings 350 large cam), used intermittently, for a total of approximately 2.0 hours per day. In addition, RBM maintains a 100-foot buffer between all land application activities and the Green Acres Farm boundary. Moreover, in any given farm field within Green Acres Farm (the Farm contains over 50 separate farm fields), land application of biosolids occurs only once or twice per year.

### **Operational Noise**

Based on the equipment and operational activities listed above and on typical construction equipment sound levels indicated by the U.S. EPA (NTID 300.1, 1971), the operational sound level at the nearest residence, which is located approximately 1,850 feet to the west of the Green Acres Farm western boundary, is not expected to exceed 50 dBA (Ldn), which is below the EPA criteria (55 dBA Ldn), the California DOHS criteria (60 dBA Ldn), and the Kern County criteria (65 dBA Ldn). In addition, the operational sound level at the location of the motel project is not expect to

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exceed 55 dBA (Ldn) during the one or two days per year when land application operations occur in farm field of Green Acres Farm that is nearest to this location, which is below the EPA criteria (55 dBA Ldn), the California DOHS criteria (65 dBA Ldn), and the Kern County criteria (65 dBA Ldn). Moreover, it is reasonable to assume that newer construction equipment would have lower sound levels than those specified by the EPA in 1971, due to advances over the years in construction equipment technologies.

Finally, it is not expected that the land application operations at Green Acres Farm would result in sound levels exceeding the applicable criteria, or in any new or more significant effects than what has already been analyzed in the City's 1989 Program EIR.

Very truly yours,

A handwritten signature in black ink, appearing to read "W. Brent Ferren". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

W. Brent Ferren, P.E. INCE

BLACK & VEATCH CORPORATION

Enclosure

1. Resume - W. Brent Ferren