RECORD OF DECISION

for the

FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

on

Replacement of National Oceanic and Atmospheric Administration Southwest Fisheries Science Center Demolition, Soil Stabilization and Seismic Improvements
La Jolla, California

Introduction

In April 2009, the National Oceanic and Atmospheric Administration (NOAA) prepared a Final Environmental Impact Statement/Environmental Impact Report (EIS/EIR) and issued a Record of Decision (ROD) for its proposed action to replace its Southwest Fisheries Science Center (SWFSC) facilities in La Jolla, California. The NOAA SWFSC is a National Marine Fisheries Service (NMFS) regional headquarters and laboratory located at the University of California at San Diego (UCSD) campus and the northern periphery of the Scripps Institution of Oceanography (SIO). The joint Final EIS/EIR was prepared and approved in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 U.S. Code 4321-4347), the President's Council on Environmental Quality (CEQ) implementing regulations (40 CFR Part 1500 – 1508), NOAA Administrative Order (NAO) 216-6 *Environmental Review Procedures for Implementing the National Environmental Policy Act* and the California Environmental Quality Act (CEQA) guidelines.

Since completion of the Final EIS/EIR, substantial changes to the actions proposed in 2009 are being considered by NOAA within portions of the project area containing the 2.5-acre property currently occupied by SWFSC and managed by NOAA under a 99-year deed from the University of California Office of the President (UCOP). These newly proposed actions were not previously analyzed in the Final EIS/EIR and generally involve additional demolition activities, trench excavation for the installation of tieback anchors and blocks for on-site soil stabilization, installation of additional parking areas and drainage features, additional site grading, and upgrades to Building D. These proposed actions were deemed necessary by NOAA based on additional geotechnical information and design recommendations received since approval of the Final EIS/EIR. A Draft and Final Supplemental EIS was prepared that fully examined these newly proposed actions and a no-action alternative. The Draft Supplemental EIS was publicly announced in the Federal Register and copies were submitted to the U.S. Environmental Protection Agency for review. Public comments were accepted during a 45-day comment period beginning September 16, 2011, and ending on October 31, 2011. Comments received and responses to comments are provided in Appendix F of the Final SEIS.

Decision to Be Made

This Record of Decision (ROD) sets forth NOAA's decision as to how the agency will proceed and what

measures NOAA will undertake to avoid or minimize the environmental harms that may result from implementation of the selected action. This decision is based on the analysis included in the Final Supplemental EIS, inclusive of public comments received on the Draft Supplemental EIS.

After careful review of the proposed actions, associated impacts, public comment and associated impact mitigation measures presented in the Final Supplemental EIS, NOAA is approving implementation of the proposed action alternative. NOAA intends to proceed with actions defined in its Final Supplemental EIS and Final EIS/EIR, including implementation of feasible and prudent impact mitigation measures described in these documents.

Alternatives Considered

Alternatives considered in the Supplemental EIS include the addition of newly proposed activities, referred to as the proposed action, and a no-action alternative. The proposed action generally consists of an expanded demolition effort, excavation and installation of tieback anchors and blocks for on-site soil stabilization, installation of additional parking areas and drainage features, additional site grading, and upgrades to Building D at the existing SWFSC property.

The expanded demolition effort would include the demolition of a majority of Building A, retaining only its mechanical equipment room on the basement level. On-site soil stabilization would include trench excavation for the installation of tieback anchors and anchor blocks for stabilizing the slope in the vicinity of Building D. Additional parking and drainage features would be installed in the area west of Building D and at the former site of Building A, which would require additional site grading. Building D would be seismically retrofitted in accordance with life safety standards outlined in American Society of Civil Engineers Standards Number 41-06, Seismic Rehabilitation of Existing Buildings (ASCE 41-06), and UC Office of the President (UCOP) Policy on Seismic Safety (UCOP, 1995; UCOP, 2007), and the current California Building Code.

The no-action alternative would be to implement the proposed action analyzed in the 2009 Final EIS/EIR, which would involve retention of Building A and would not include the implementation of seismic upgrades to Building D, substantive soil stabilization measures, and proposed grading, parking and public access within the subject property.

An analysis of the no-action alternative associated with not proceeding with facility relocation and demolition at all is presented in the 2009 Final EIS/EIR. That alternative is not included in the Supplemental EIS; hence, the baseline under the no-action alternative has shifted given NOAA's decision to proceed with the preferred action analyzed in the 2009 Final EIS/EIR.

Environmentally Preferable Alternative(s)

Based on the detailed environmental impact analysis contained in the Supplemental EIS/EIR, NOAA has determined that the proposed action alternative would be the environmentally preferable alternative. This determination is based on the following information contained in the Final Supplemental EIS:

- The proposed action would result in geotechnical stabilization and seismic improvements; under the no-action alternative, Building A could be affected by bluff retreat and Building D more likely to be substantially damaged during a seismic event.
- The proposed action would result in a net decrease in impervious area.
- The proposed action, specifically adding the removal of Building A, would provide a minor, positive effect upon visual resources, including the installation of an observation area and additional unobstructed view of the Pacific Ocean.

NOAA Decision and Factors Considered in Decision

The 2009 Final EIS/EIR analyzed the proposed NOAA action to relocate the SWFSC and demolish Buildings B and C due to the safety hazard to occupants associated with catastrophic bluff failure known at that time, and transfer ownership back to UCSD. Effects within multiple resource topics were considered, in addition to growth-inducing impacts, significant and unavoidable impacts, irreversible or irretrievable commitments of resources, short- and long-term environmental goals, and cumulative impacts. However, the property and remaining buildings would continue to be threatened by ongoing coastal bluff erosion and retreat.

NOAA, in coordination with UCSD planners, has subsequently determined that to meet SWFSC facility needs, the safe and effective long-term reuse of the existing SWFSC property would be better served if Building A were to be removed and soil stabilization at Building D performed. The purpose of these actions is to further reduce the risk of catastrophic failure of the bluff affecting the remaining Utility Room (currently within Building A) and Building D occupants. A Geologic Hazards Investigation was prepared by NOAA for SWFSC Buildings A and D in May 2010. The dynamic slope stability analysis within that investigation report indicates that Building A is at risk from potential slope failure and Building D will require geotechnical mitigation for long-term occupation. The results of the geologic hazards study were compared to target Building Performance Levels presented in ASCE 41-06 (Seismic Rehabilitation of Existing Buildings). Based on this information and guidelines in American Society of Civil Engineers Standard 41-06 (ASCE 41-06), it is the opinion of the investigators and NOAA that Building A no longer meets the criteria for Collapse Prevention, and that Building D would meet the Life Safety Performance Level per ASCE 41-06 provided that suitable geotechnical and structural mitigation is implemented.

Reuse of Building D would require geotechnical stabilization techniques. A proposed design has been prepared for NOAA by Wade Perrow Construction, Incorporated (WPC) that conforms to the recommendations in the Geologic Hazards Investigation and related studies prepared by GEOCON and approved by NOAA. The design prepared by WPC has been accepted by NOAA and is proposed as additional actions at its existing 2.5-acre SWFSC project area for the purpose of attaining a safe environment for future use of the 2.5-acre property.

As mentioned above, the Supplemental EIS analyzed substantial changes to the actions proposed in 2009. The Draft and Final Supplemental EIS concludes that no change in effects under NEPA would occur due to the proposed action. Impacts and mitigation measures presented in the Final EIS/EIR, and

those effects evaluated in the Supplemental EIS are summarized in Attachment 1 to this ROD. These measures, when implemented, would ensure anticipated effects would be less than significant.

Based on the considerations NOAA has taken, the proposed action would best meet the long-term needs of the SWFSC and, with the implementation of mitigation measures, would result in environmental effects that will be less-than-significant. NOAA has also determined that the proposed action would result in the least amount of environmental impact. In addition, since the no-action alternative would not meet the long-term needs of the SWFSC and would adversely affect the ability of the SWFSC to fulfill its mission, the proposed action has been selected to meet NOAA's long-term research needs. NOAA will implement the proposed action.

Mitigation Measures

NOAA will implement the mitigation measures contained in Attachment 1 to this ROD to eliminate or reduce the adverse environmental effects of the proposed action.

Contact Person

The NOAA contact for obtaining copies of the Final EIS/EIR or information regarding the selected action and the environmental review process is:

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Approval

In conformance with requirements set forth in Section 5 *Implementing Procedures* of NOAA Administrative Order 216-6, the undersigned approves this ROD and directs NOAA to implement the selected action. To minimize environmental harms, NOAA will also implement the mitigation measures listed in Attachment 1 to this document.

Edward Horton

7-16-2012
Date

NOAA Chief Administrative Officer

Attachment 1

Mitigation Measures

Summary of Impacts and Mitigation Measures

Impacts	Mitigation Measures	Significance
Land Use and Coastal Zone Management		
Proposed Action		
Impacts to Land Use and Coastal Zone Management	See Proposed Action mitigation measures listed for each resource below	The overall effect of the Proposed Action would not be substantial under NEPA (and less than significant under CEQA).
No-Action Alternative		
Impacts to Land Use and Coastal Zone Management	See No-Action mitigation measures listed for each resource below	The overall effect of the Proposed Action would not be substantial under NEPA (and less than significant under CEQA).
Geology, Soils, and Geologic Hazards		
Proposed Action		
Impact 1 – Vegetation Clearing and Soil Erosion	• This measure was previously identified and includes preparation and implementation of a SWPPP and BMPs (see CEQA impact identified in the Final EIS/EIR as Geo-1). • This measure was previously identified for use of straw mats and reseeding after construction/demolition activities are completed (see CEQA impact identified in the Final EIS/EIR as Geo-2).	Implementation of Mitigation Measures Geo-1 and Geo-2, as identified in the Final EIS/EIR and included below would result in erosion effects that are less than substantial under NEPA (and less than significant under CEQA).
Impact 2 – Seismic and Bluff Retreat Hazards	• Previous Geo-3 is modified to also include UCOP's Seismic Safety Policy and ASCE 41-6 guidelines (see CEQA impact identified in the Final EIS/EIR as Geo-3). • A Noise and Vibration Monitoring Plan will also be in effect during construction which would limit vibrations to 0.2 inch/second PPV within 40 ft of the source (see CEQA impact identified in the Final EIS/EIR as Noi-4). • The existing Bluff Erosion Monitoring System will continue to be operated. The construction specifications will include specific provisions to protect the existing slope inclinometers, and repair or replace these instruments if damaged (new measure). An up-to-date emergency response plan would be maintained including training managers and staff to implement the plan, as necessary (see CEQA impact identified in the Final EIS/EIR as Geo-4).	By implementing mitigation measures, construction impacts related to bluff instability hazards would be reduced to less than significant levels under NEPA (and less than significant under CEQA).
Impact 3 – Impact to Mineral Resources	None required.	Impacts to mineral resources would be less than significant under NEPA (and less than

Summary of Impacts and Mitigation Measures

Impacts	Mitigation Measures	Significance
		significant under CEQA).
No-Action Alternative		
Impact 1 – Vegetation Clearing and Soil Erosion	None required.	There would be no increased impacts resulting from exposure of soil to wind and water erosion, beyond those identified in the Final EIS/EIR.
Impact 2 – Seismic and Bluff Retreat Hazards	Buildings A and D would be left as-is. A hazardous geologic condition would exist and occupants would be at risk. The continued use of the buildings would not be consistent with the University's Seismic Safety policies	Without geotechnical stabilization, the existing structures could still be damaged. This would be a significant impact.
Impact 3 – Impact to Mineral Resources	None required.	There would be no impacts to mineral resources.
Drainage and Water Quality		
Proposed Action		
Permitting Discharge of Stormwater during Construction and Demolition	Hyd-1 *(Impact 1)*: NOAA will prepare an SWPPP and submit required notices of intent and termination to the RWQCB. The following BMPs will be incorporated into the SWPPP and implemented during and after construction and demolition activities: • The area of land disturbance will be kept to a minimum and existing vegetative cover will be retained as much as possible. • Disturbed areas will be stabilized with temporary placement of woven mesh or netting until vegetation becomes established. • Controls (silt fences, hay bales, and so on) will be placed at the perimeters of the construction and demolition areas. • The sites will be sloped and graded to direct runoff away from steep hillsides or denuded areas. • Disturbed areas will be replanted with native coastal sage scrub vegetation.	Effects due to the change in regulation would be negligible under NEPA (and less than significant under CEQA).
Changes in Impervious Surfaces and Runoff	None required.	The effects to runoff resulting from the decrease in impervious surfaces would be negligible under NEPA (and less than significant under CEQA).
Flood Hazards	None required.	The Proposed Action would be consistent with policies contained in E.O. 11988 and therefore impacts would be

Summary of Impacts and Mitigation Measures

Impacts	Mitigation Measures	Significance
		negligible under NEPA (and less than significant under CEQA).
Water Quality Effects of Storm Runoff	Hyd-2 *(Impacts 3 and 5)*: The new SWFSC will incorporate the design features listed below to retain storm water on-site, thereby mitigating any increase in storm runoff rates: • Landscaping using native species will be planted adjacent to foundations to reduce the velocity of runoff flow and prevent erosion. • Storm water from roofs will be directed to water retention areas. • A new drainage trough will help to further reduce the projected increase in runoff. • Permeable pavement will be used where appropriate for walkways and parking areas. Hyd-3 *(Impact 5)*: All storm drain inlets and catch basins at the SWFSC site will be marked with prohibitive language and/or graphical icons to discourage illegal dumping per UCSD standards. Hyd-4 *(Impact 7)*: Outdoor storage areas for materials that may affect water quality will be covered and protected by secondary containment. Hyd-5 *(Impact 7)*: All trash container areas will be enclosed to prevent off-site transport of trash and drainage will be directed to the sanitary sewer system or the covered containers to prevent exposure of trash to precipitation (SRI International, 2009).	If properly maintained, effects to stormwater quality from the parking lots at the existing SWFSC during operation of the project would be negligible under NEPA (and less than significant under CEQA).
Use and Discharge of Seawater	None required.	Effects from the use and discharge of seawater would be negligible under NEPA (and less than significant under CEQA).
No-Action Alternative		
Impacts to drainage and water quality	None required.	Under the No-Action Alternative, the environmental effects and associated mitigation measures described for the Proposed Action would remain the same. The primary difference would be a further reduction in pollution generating impervious areas (PGIAs) ~~surfaces~~ under the No-Action

Summary of Impacts and Mitigation Measures

Impacts	Mitigation Measures	Significance
		Alternative, since the newly proposed parking areas would not be built and water quality treatment would not occur for these areas. Total impervious surfaces will be reduced by approximately 0.23 acres.
Biological Resources (Threatened and Endangered Species) and Wetlands		
Proposed Action		
Demolition Impacts	None required.	The effects resulting from removal of ornamental vegetation and the replacement of landscaping with species not requiring irrigation would be negligible under NEPA (and less than significant under CEQA).
Excavation and soil stabilization impacts	None required.	No substantial effects to biological resources would result either during proposed demolition of structures and stabilization or restoration actions, or during long-term use of the subject property for research and education purposes under NEPA (and would be less than significant under CEQA).
Construction impacts to birds	If demolition and/or other project-related activities at the existing SWFSC site are expected to occur during the raptor breeding season, February 1 through August 31, a qualified biologist would conduct raptor nest surveys within 500 ft of the project area prior to start of such activities. If active raptor nests are observed, demolition activities within 500 ft of the nests would be suspended until the biologist determines that the nests are no longer active or upon further coordination and agreement with the USFWS.	With incorporation of mitigation, potential impacts would be less than significant.
Impacts to wetlands	None required.	There would be no impact under NEPA (and no impact under CEQA).
No-Action Alternative		
Impacts to biological resources	None required.	There would be no impacts to biological resources.

Summary of Impacts and Mitigation Measures

Impacts	Mitigation Measures	Significance
Transportation		
Proposed Action		
Traffic Impacts Resulting from Demolition of Buildings A, B and C and Soil Stabilization and Earthmoving Activities Surrounding the New Grading	Tra-2 NOAA would prepare a traffic control plan covering the demolition periods for review by UCSD. The traffic control plan would address lane and/or road closures, emergency access and egress, efficient traffic circulation, and use of flaggers to control traffic and avoid conflicts. The plan would include recommendations, such as signage, detours, and temporary traffic controls. The plan would prohibit construction vehicles from using Downwind Way or the north–south oriented section of Shellback Way (which passes in from of the Keck Center, Nierenberg Hall, Speiss Hall, and associated service yards). *(Impacts 4)*	There would be no impact under NEPA (and no impact under CEQA).
No-Action Alternative		
Traffic Generation Impacts	None required.	There would be no impacts to transportation under NEPA (and no impact under CEQA).
Recreational Resources		
Proposed Action		
Demolition of Building A Impacts	None required.	Demolition period impacts to recreational resources would be temporary and less than significant under NEPA (and less than significant under CEQA).
Excavation and soil stabilization impacts	None required.	Project impacts to recreational resources would be temporary and less than significant under NEPA (and less than significant under CEQA).
No-Action Alternative		
Impacts to recreational resources	NOAA would continue to monitor the rate of bluff retreat and signs of accelerating ground and building failure, such as increased tilting and expansion of tension cracks, at Building A. If warranted, NOAA would inform local authorities of the need to take measures to protect beach users.	The potential impact would be substantial under NEPA (and significant under CEQA) unless adequately mitigated through adequate geotechnical methods and means.
Farmlands		
Proposed Action		
Impacts to farmlands	None required.	The overall effect of the Proposed Action would not be substantial under NEPA (and less than significant under CEQA).

Summary of Impacts and Mitigation Measures

Impacts	Mitigation Measures	Significance
No-Action Alternative		
Impacts to farmlands	None required.	Under the No-Action Alternative, there would be no impacts to important farmlands.
Air Quality		
Proposed Action		
Emissions of Air Pollutants during Demolition of Buildings B and C.	Air-2 NOAA would request that construction and demolition contractors implement *SmartWay Truck Efficiency* and anti-idling practices to reduce the amount and effects of GHG emissions during the construction and demolition periods. These practices include retrofitting heavy-duty trucks and vehicles used during construction with the best available —SmartWay Transport and/or CARB-approved technology to reduce GHG. These technologies work by reducing aerodynamic drag and rolling resistance by using cab roof fairings, cab side gap fairings, cab side skirts, and on the trailer side, trailer side skirts, gap fairings, and trailer tail; and using single wide tires or low-rolling resistance tires and automatic tire inflation systems on both the tractor and the trailer. *(Impact 3).* Air-3 NOAA would prepare and implement Construction Emissions and Management Plan (CEMP) measures during the construction and demolition periods. The CEMP would identify detailed measures to minimize emissions of dust and other air pollutants, such as: • Stabilization of unpaved roads at the construction and demolition sites using water, chemical dust suppressants, and/or other stabilization techniques; • Pre-soaking and/or periodic sprinkling of areas to be cleared of vegetated and/or graded areas with water; • Periodic sweeping of streets surrounding the construction and demolition sites, to minimize dust emissions; • Limiting vehicle speeds on unpaved roads and areas to 15 mph; • Prompt revegetation of areas of exposed soil as soon as construction/demolition activities are completed; • Encouragement by NOAA for contractors to use alternate fuels and retrofit existing engines in construction equipment, to the extent that equipment is available and cost effective;	The effects of the Proposed Action would be less than substantial under NEPA (and less than significant under CEQA).

Summary of Impacts and Mitigation Measures

Impacts	Mitigation Measures	Significance
	• Limiting idling time of construction and demolition equipment to 10 minutes when not in use; and • Specify that contracts for demolition of Buildings A, B and C, soil stabilization and earthmoving activities at the existing SWFSC facility will require medium- and large-size construction fleets to comply with CARB regulations for in-use off-road diesel vehicles (California Code of Regulations, Title 13, Motor Vehicles, Article 4.8, Section 2449). (*Impact 3*)	
No-Action Alternative		
Impacts to Air Quality	None required.	The air quality impacts identified in the Final EIS/EIR would result.
Noise and Vibration		
Proposed Action		
Noise Impacts	**Noi-1:** NOAA would require construction and demolition contractors to comply with the construction noise abatement measures contained in the UCSD 2004 LRDP EIR, which are listed below. • Construction or demolition activities would be implemented in a manner that prevents the 12-hour average sound level from exceeding 75 dBA between 7:00 AM and 5:00 PM on Monday through Friday at the following noise sensitive land uses: residences located north of the existing SWFSC site and the Keck Center for Ocean Atmospheric Research. • Construction and demolition vehicles and equipment would be properly outfitted with manufacturer-recommended noise-reduction devices maintained in good working order. • Stationary construction and demolition equipment, such as generators, pumps, and batch plants, would be located as far as possible (at least 100 ft) from the residences located north of the existing and preferred SWFSC sites and the Keck Center for Ocean Atmospheric Research. • Laydown and staging areas for construction and demolition activities would be located as far as feasible from the residences located north of the existing and preferred SWFSC site and the Keck Center for Ocean Atmospheric Research.	This impact would be reduced to a less than significant level under NEPA (and less than significant under CEQA).

Summary of Impacts and Mitigation Measures

Impacts	Mitigation Measures	Significance
	• Residents of houses located north of the existing and preferred SWFSC site and occupants of the Keck Center for Ocean Atmospheric Research would be informed at least two weeks prior to the start of SWFSC demolition of Buildings A, B and C.	
Vibration Impacts	None required.	Impacts due to vibration would be less than significant under NEPA (and less than significant under CEQA).
No-Action Alternative		
Demolition of Buildings B and C impacts	To mitigate this potentially significant impact, construction noise abatement measures contained in the UCSD 2004 LRDP EIR would be applied to demolition of Buildings B and C at the existing SWFSC. In addition, the noise mitigation measures described for the Proposed Action should be implemented.	Implementation of these mitigation measures would reduce this impact to a less than significant level under NEPA (and less than significant under CEQA).
Visual Aesthetics		
Proposed Action		
Impact to visual setting	Existing mature trees at the existing SWFSC would be retained to the maximum extent feasible during demolition of Buildings A, B, and C.	The overall effect of the Proposed Action would not be substantial under NEPA (and less than significant under CEQA).
No-Action Alternative		
Impact to visual setting	None required.	No changes to the visual setting would result.
Historic and Cultural Resources		
Proposed Action		
Impacts to historic or potentially historic structures		Impacts to historic or potentially historic structures would be less than significant.
Impacts to archaeological resources	NOAA and UCSD will comply with PRC 5097.98 in the case where human remains are found. Any uncovered human remains would be treated with respect. This code section requires that excavations cease if potential human remains are uncovered and the County Medical Examiner/Coroner be notified. The Coroner must contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC will contact the most likely descendant to determine the appropriate manner of handling the remains. If human remains are uncovered during any phase of the Proposed Action, soil associated with the remains should not be removed from	Impacts to archaeological resources would not be substantial under NEPA (and less than significant under CEQA).

Summary of Impacts and Mitigation Measures

Impacts	Mitigation Measures	Significance
	the area.	
No-Action Alternative		
Impacts to historic and cultural resources	None required.	There would be no impacts to historic and cultural resources.
Socioeconomics and Environmental Justice		
Proposed Action		
Socioeconomic and environmental justice impacts	None required.	The effect of the Proposed Action would not create substantial socioeconomic impacts under NEPA (and less than significant under CEQA).
No-Action Alternative		
Socioeconomic and environmental justice impacts	None required.	No socioeconomic or environmental justice impacts would occur.
Public Services and Utilities		
Proposed Action		
Impacts of Proposed Action to public services and utilities	None required.	The effect of the Proposed Action would not create substantial public services and utilities impacts under NEPA (and would be less than significant under CEQA).
No-Action Alternative		
Impacts of Proposed Action to public services and utilities	None required.	Impacts to public services and utilities would be less than significant.
Population and Housing		
Proposed Action		
Impacts to population and housing	None required.	Proposed Action activities would not obstruct local evacuation routes or interfere with the ability of emergency service providers to respond to incidents (impacts to population and housing would be less than significant under CEQA).
No-Action Alternative		
Impacts to population and housing	None required.	There would be no impacts to population and housing from the No-Action Alternative.
Solid Waste and Hazardous Materials		
Proposed Action		

Summary of Impacts and Mitigation Measures

Impacts	Mitigation Measures	Significance
Generation of Solid/Hazardous Waste by Construction Activities – Impacts associated with solid wastes and hazardous materials associated with demolition and renovation	Removal of ACMs during demolition of Building A and additional renovation at Building D would be performed by an asbestos abatement contractor licensed by the California Division of Safety and Health. Removal of ACMs shall conform to applicable regulations of the Division. Loose and peeling LBP at Building A and affected portions of Building D shall be removed or stabilized prior to demolition activity. Universal wastes, including potentially mercury, PCB, or Freon containing products shall be removed from all buildings prior to demolition, and recycled or disposed as an appropriately profiled universal waste.	The effect of the Proposed Action would not create substantial impacts associated with hazardous waste and hazardous materials under NEPA (and would be less than significant under CEQA).
No-Action Alternative		
Impacts associated with hazardous wastes and hazardous materials	Removal of ACMs during demolition of Building A and additional renovation at Building D would be performed by an asbestos abatement contractor licensed by the California Division of Safety and Health. Removal of ACMs shall conform to applicable regulations of the Division. Loose and peeling LBP at Building A and affected portions of Building D shall be removed or stabilized prior to demolition activity. Universal wastes, including potentially mercury, PCB, or Freon containing products shall be removed from all buildings prior to demolition, and recycled or disposed as an appropriately profiled universal waste.	Impacts to solid waste and hazardous materials would be less than significant provided that the NOAA Hazardous Waste Abatement Plan is revised to include the disposal of materials containing mercury, PCBs and Freon.
Wild and Scenic Rivers		
Proposed Action		
Impacts to wild and scenic rivers	None Required.	The Proposed Action will have no impact on Sespe Creek or designated wild and scenic rivers under NEPA (and no impact would occur under CEQA).
No-Action Alternative		
Impacts to wild and scenic rivers	None Required.	There would be no impacts to wild and scenic rivers from the No-Action Alternative.