

4.6 HAZARDS AND HAZARDOUS MATERIALS

This section provides an overview of the hazards and hazardous materials and evaluates the construction and operational impacts associated with the Proposed Project. Topics addressed include transport use/disposal and upset/accident condition of hazardous material, hazardous material sites, airport hazards, emergency response plans, and wildland fire within the Project Area. This section was prepared utilizing the Environmental Data Resources (EDR) Data Map Area Study, compiled in September 2013 and included in its entirety in **Appendix D**. The Proposed Project is evaluated in terms of whether its implementation would expose people or structures to adverse effects related to hazardous materials compared to existing conditions.

Hazard versus Risk. Workers' health and general public health are potentially at risk whenever hazardous materials have been used or where there could be an exposure to such materials. Inherent in the setting and analyses presented in this section are the concepts of the "hazard" of these materials and the "risk" they pose to human health. Exposure to some chemical substances may harm internal organs or systems in the human body, ranging from temporary effects to permanent disability, or death. Hazardous materials that result in adverse effects are generally considered "toxic." Other chemical materials, however, may be corrosive, or react with other substances to form other hazardous materials, but they are not considered toxic because organs or systems are not affected. Because toxic materials can result in adverse health effects, they are considered hazardous materials, but not all hazardous materials are necessarily "toxic." For purposes of the information and analyses presented in this section, the terms hazardous substances or hazardous materials are used interchangeably and include materials that are considered toxic.

The risk to human health is determined by the probability of exposure to a hazardous material and the severity of harm such exposure would pose. That is to say, the likelihood and means of exposure, in addition to the inherent toxicity of a material, are used to determine the degree of risk to human health. For example, a high probability of exposure to a low toxicity chemical would not necessarily pose an unacceptable human health or ecological risk, whereas a low probability of exposure to a very high toxicity chemical might. Various regulatory agencies, such as the U.S. Environmental Protection Agency (USEPA), California Environmental Protection Agency (Cal/EPA), State Water Resources Control Board (SWRCB), Cal/EPA Department of Toxic Substances Control (DTSC), and state and federal Occupational Safety and Health Administration (OSHA) are responsible for developing and/or enforcing risk-based standards to protect the public and the environment.

REGULATORY FRAMEWORK

FEDERAL

U.S. Environmental Protection Agency (USEPA) Regulations. The USEPA's mission is to protect human health and the environment. The USEPA takes action to reduce risks associated with exposure to chemicals in commerce, indoor and outdoor environments, and products and food. The USEPA oversees the introduction and use of pesticides, improvement of the Integrated Risk Information System (IRIS) program, reduction of radon risks, identification of and response to children's health risks in schools and homes, and improvement of chemical management practices. Oversight of chemical storage and manufacturing in coordination with their interagency partners is also a key focus of the USEPA, as well as efforts to reduce urban air toxics.

U.S. Department of Transportation (USDOT) Regulations. USDOT prescribes strict regulations for the safe transportation of hazardous materials, including requirements for hazardous waste containers and licensed haulers who transport hazardous waste on public roads. The Secretary of the Department of Transportation receives the authority to regulate the transportation of hazardous materials from the Hazardous Materials Transportation Act (HMTA), as amended and codified in 49 United States Code

Section 5101 *et seq.* The Secretary is authorized to issue regulations to implement the requirements of 49 United States Code. The Pipeline and Hazardous Materials Safety Administration (PHMSA), formerly the Research and Special Provisions Administration, is delegated the responsibility to write the hazardous materials regulations, which are contained in 49 Code of Federal Regulations (CFR) Parts 100-180. Title 49 of the CFR, which contains the regulations set forth by the HMTA, specifies requirements and regulations with respect to the transport of hazardous materials. It requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Under the HMTA, the Secretary "...may authorize any officer, employee, or agent to enter upon inspect, and examine, at reasonable times and in a reasonable manner, the records and properties of persons to the extent such records and properties relate to: (1) the manufacture, fabrication, marking, maintenance, reconditioning, repair, testing, or distribution of packages or containers for use by any "person" in the transportation of hazardous materials in commerce; or (2) the transportation or shipment by any "person" of hazardous materials in "commerce."

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Enacted in 1980, CERCLA, commonly known as Superfund, creates a tax on the chemical and petroleum industries and provides broad Federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. The tax goes into a trust fund for cleaning up abandoned or uncontrolled hazardous waste sites. CERCLA:

- Established prohibitions and 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 established the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS). CERCLIS is the USEPA's system for tracking potential hazardous-waste sites within the Superfund program. A site's presence on CERCLIS does not imply a level of federal activity or progress at a site, nor does it indicate that hazardous conditions necessarily exist at the location.

In addition, CERCLA authorizes two kinds of response actions:

- Short-term removals, where actions may be taken to address releases or threatened releases requiring prompt response.
- Long-term remedial response actions, that permanently and significantly reduce the dangers associated with releases or threats of releases of hazardous substances that are serious, but not immediately life threatening. These actions can be conducted only at sites listed on the USEPA's National Priorities List (NPL).

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 NPL.

Resource Conservation and Recovery Act (RCRA). RCRA gives the USEPA the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste by "large-quantity generators" (1,000 kilograms/month or more). Under RCRA regulations, hazardous wastes must be tracked from the time of generation to the point of disposal. At a minimum, each generator of hazardous waste must register and obtain a hazardous waste activity identification number. If hazardous wastes are stored for more than 90 days or treated or disposed at a facility, any treatment, storage, or disposal unit must be permitted under RCRA. Additionally, all hazardous waste transporters are required to be permitted and must have an identification number. RCRA allows individual states to develop their own program for the regulation of hazardous waste as long as it is at least as stringent as RCRA. The USEPA has delegated RCRA enforcement to the State of California.

Toxic Substances Control Act (TSCA). Congress enacted the TSCA of 1976, codified in Title 40 of the Code of Federal Regulations (CFR), to give USEPA the ability to track the 75,000 industrial chemicals currently produced or imported into the United States. USEPA repeatedly screens these chemicals and can require reporting or testing of those that may pose an environmental or human-health hazard. USEPA can ban the manufacture and import of those chemicals that pose an unreasonable risk. More specifically, in California, polychlorinated biphenyls (PCBs) are regulated by both state (RCRA and Title 22 of the California Code of Regulations) and federal (TSCA) rules; the TSCA has banned the manufacture, processing, use, and distribution in commerce of PCBs. The TSCA gives USEPA the authority to develop, implement and enforce regulations concerning the use, manufacture, cleanup, and disposal of PCBs. The TSCA also establishes USEPA's Lead Abatement Program regulations, which provide a framework for lead abatement, risk assessment, and inspections. Those performing these services are required to be trained and certified by USEPA.¹

Research and Special Programs Administration (RSPA) Regulations. RSPA regulations cover definition and classification of hazardous materials, communication of hazards to workers and the public, packaging and labeling requirements, operational rules for shippers, and training. They apply to interstate, intrastate, and foreign commerce by air, rail, ships, and motor vehicles, and also cover hazardous waste shipments. The Federal Highway Administration (FHWA) is responsible for highway routing of hazardous materials and highway safety permits. The U.S. Coast Guard regulates bulk transport by vessel. The hazardous material regulations include emergency response provisions, including incident reporting requirements. Reports of major incidents go to the National Response Center, which in turn is linked with CHEMTREC, a service of the chemical manufacturing industry that provides details on most chemicals shipped in the United States.

Superfund Amendments and Reauthorization Act of 1986 (SARA). SARA amended CERCLA on October 17, 1986. SARA reflected USEPA's experience in administering the complex Superfund program during its first six years and made several important changes and additions to the program. Primarily, SARA:

- Stressed the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites;
- Required Superfund actions to consider the standards and requirements found in other state and federal environmental laws and regulations;
- Provided new enforcement authorities and settlement tools;
- Increased state involvement in every phase of the Superfund program;
- Increased the focus on human health problems posed by hazardous waste sites;
- Encouraged greater citizen participation in making decisions on how sites should be cleaned up; and
- Increased the size of the trust fund to \$8.5 billion.

SARA also required USEPA to revise the Hazard Ranking System (HRS) to ensure that it accurately assessed the relative degree of risk to human health and the environment posed by uncontrolled hazardous waste sites that may be placed on the NPL.

Occupational Safety and Health Act of 1970. The U.S. Department of Labor's Occupational and Safety Health Administration (OSHA) was created by the Occupational Safety and Health Act to assure safe and healthful working conditions by setting and enforcing standards and by providing training, outreach, education, and assistance. OSHA provides standards for general industry and construction industry on hazardous waste operations and emergency response. The Occupational Safety and Health Act, implemented by the federal OSHA, contains provisions with respect to hazardous materials handling. Federal OSHA requirements, as set forth in Title 29 of the CFR Section 1910, *et. seq.*, are designed to promote worker safety, worker training, and a worker's right-to-know. OSHA has delegated the authority to administer OSHA regulations to the State of California.

¹U.S. Environmental Protection Agency, 40 CFR Part 745, Rules 402 and 404, August 29, 1996.

Title 49 of the CFR, which contains the regulations set forth by the Hazardous Materials Transportation Act of 1975, specifies additional requirements and regulations with respect to the transport of hazardous materials. Title 49 of the CFR requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Drivers are also required to be trained in function and commodity specific requirements.

Emergency Planning and Community Right-to-Know Act (EPCRA). EPCRA was enacted by Congress as the national legislation on community safety. This law was designated to help local communities protect public health, safety, and the environment from chemical hazards. EPCRA was passed in response to concerns regarding the environmental and safety hazards posed by the storage and handling of toxic chemicals. EPCRA establishes requirements for federal, state and local governments, tribes and industry regarding emergency planning and “Community Right-to-Know” reporting on hazardous and toxic chemicals. The Community Right-to-Know provisions help increase the public’s knowledge and access to information on chemicals at individual facilities, their uses, and releases into the environment. States and communities, working with facilities, can use the information to improve chemical safety and protect public health and the environment. To implement EPCRA, Congress required each state to appoint a State Emergency Response Commission (SERC). The SERC is required to divide their states into Emergency Planning Districts and to name a Local Emergency Planning Committee for each district.

Other Hazardous Materials Regulations. In addition to the USDOT regulations for the safe transportation of hazardous materials, there are other applicable federal laws that also address hazardous materials:

- Community Environmental Response Facilitation Act (CERFA) of 1992
- Clean Water Act
- Clean Air Act
- Safe Drinking Water Act
- Atomic Energy Act
- Toxic Substances Control Act (TSCA)

FEDERAL INSECTICIDE, FUNGICIDE, AND RODENTICIDE ACT (FIFRA) STATE

Authority for the statewide administration and enforcement of RCRA rests with the California Environmental Protection Agency (Cal/EPA) Department of Toxic Substances Control (DTSC). While the DTSC has primary state responsibility in regulating the generation, storage and disposal of hazardous materials, DTSC may further delegate enforcement authority to local jurisdictions. In addition, the DTSC is responsible and/or provides oversight for contamination cleanup, and administers state-wide hazardous waste reduction programs. DTSC operates programs to accomplish the following: (1) deal with the aftermath of improper hazardous waste management by overseeing site cleanups; (2) prevent releases of hazardous waste by ensuring that those who generate, handle, transport, store, and dispose of wastes do so properly; and (3) evaluate soil, water, and air samples taken at sites.

The storage of hazardous materials in underground storage tanks (USTs) is regulated by CalEPA’s State Water Resources Control Board (SWRCB), which has delegated authority to the Regional Water Quality Control Board (RWQCB) and typically on the local level, to the local fire department.

The California Occupational Safety and Health Administration (Cal/OSHA) program is administered and enforced by the Division of Occupational Safety and Health (DOSHS). Cal/OSHA is very similar to the federal OSHA program. For example, both programs contain rules and procedures related to exposure to hazardous materials during demolition and construction activities. In addition, Cal/OSHA requires employers to implement a comprehensive, written Injury and Illness Prevention Program (IIPP). An IIPP is an employee safety program for potential workplace hazards, including those associated with hazardous materials.

The State Office of Emergency Services Hazardous Materials (HazMat) section under the Fire and Rescue Division coordinates statewide implementation of hazardous materials accident prevention and emergency response programs for all types of hazardous materials incidents and threats. In response to any hazardous materials emergency, the HazMat section staff is called upon to provide state and local emergency managers with emergency coordination and technical assistance.

Hazardous Waste Source Reduction and Management Review Act of 1989. This act requires generators of 12,000 kilograms/year of typical/operational hazardous waste to conduct an evaluation of their waste streams every four years and to select and implement viable source reductions alternatives. This act does not apply to non-typical hazardous waste (such as asbestos and PCBs).

California Vehicle Code Title 13. The California Vehicle Code (Title 13 of the CCR) states that every motor carrier transporting hazardous materials (for which the display of hazardous materials placards is required or in excess of 500 pounds, transported for a fee, which would require placarding if shipped in greater amounts in the same manner) must have a Hazardous Materials Transportation License issued by the California Highway Patrol.

California Health and Safety Code. The transport of hazardous waste materials is further governed by the California Health and Safety Code Section 25163 and Title 22, Chapter 13 of the CCR. Specifically, Section 25163 of the Health and Safety Code requires transporters of hazardous waste to hold a valid registration issued by the DTSC in his/her possession while transporting hazardous waste. Additionally, Title 22, Chapter 13 of the CCR contains a number of requirements including, but are not limited to, the following:

- Transporters shall not transport hazardous waste without first receiving an identification number and a registration certificate from DTSC.
- Registration as a hazardous waste transporter expires annually, on the last day of the month in which the registration was issued.
- To be registered as a hazardous waste transporter, an application must be submitted.
- Hazardous waste shall not be accepted for transport without a Uniform Hazardous Waste Manifest that has been properly completed and signed by generator and transporter.
- Hazardous waste shall be delivered to authorized facilities only.

California Occupational Safety and Health Administration (Cal/OSHA) Regulations. Cal/OSHA has set forth work requirements for disturbance of Asbestos Containing Construction Materials (ACCMs) including removal operations for all types of ACCMs. Cal/OSHA requires contractors and employers that remove ACCMs to be registered and consultants and technicians who conduct sampling and/or removal to be certified. In addition, the agency has developed standards for general industry and the construction industry hazardous waste operations and emergency response. Cal/OSHA ensures that employers must have controls to reduce and monitor exposure levels of hazardous materials, an informational program describing any exposure during operations and the inspection of drums and containers prior to removal or opening. Decontamination procedures and emergency response plans must be in place before employees begin working in hazardous waste operations.

California Office of Emergency Services (CalOES) Regulations. The CalOES Hazardous Materials Section under the Fire and Rescue Division coordinates statewide implementation of hazardous materials accident prevention and emergency response programs for all types of hazardous materials incidents and threats. In response to any hazardous materials emergency, the Section staff is called upon to provide state and local emergency managers with emergency coordination and technical assistance.

California Code of Regulations (CCR) Title 8 Section 1529. This section of the CCR regulates asbestos exposure in all worked defined in Section 1502, including demolition or salvage of structures where asbestos is present, removal or encapsulation of materials containing asbestos, construction, alteration, repair, maintenance, or renovation of structures, substrates, or portions thereof, that contain asbestos, installation of products containing asbestos, asbestos spill/emergency cleanup, transportation, disposal, storage, containment of and housekeeping activities involving asbestos or products containing asbestos, on the site or location at which construction activities are performed, and excavation which may involve exposure to asbestos as a natural constituent which is not related to asbestos mining and milling activities.

California Code of Regulations (CCR) Title 8 Section 1532.1. This section of the CCR applies to all construction work where employees could be occupationally exposed to lead, including demolition or salvage of structures where lead or materials containing lead are present; removal or encapsulation of materials containing lead; new construction, alteration, repair, or renovation of structures, substrates, or portions thereof, that contain lead or materials containing lead; installation of products containing lead; lead contamination/emergency clean-up; transportation, disposal, storage, or containment of lead or materials containing lead on the site or location at which construction activities are performed; and maintenance operations associated with construction activities. This section sets a maximum exposure limit; requires an assessment to determine whether employees may be exposed to lead; requires employees to create a compliance program to ensure that employee exposure to lead are at or below the permissible exposure limit to the extent feasible; and requires that employees with exposure to lead are provided with respiratory protection, protective work clothing and equipment.

Hazardous Waste Control Act. The Hazardous Waste Control Act created the state hazardous waste management program, which is similar to but more stringent than the RCRA program. This Act is implemented by regulations contained in Title 26 of the CCR, which describes the following required aspects for the proper management of hazardous waste: identification and classification; generation and transportation; design and permitting of recycling, treatment, storage, and disposal facilities; treatment standards; operation of facilities and staff training; and closure of facilities and liability requirements. These regulations list more than 800 materials that may be hazardous and establish criteria for identifying, packaging, and disposing of such waste. Under this Act and Title 26, the generator of hazardous waste must complete a manifest that accompanies the waste from generator to transporter to the ultimate disposal location. Copies of the manifest must be filed with DTSC.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program). The Unified Program required the administrative consolidation of six hazardous materials and waste programs (Program Elements) under one agency, a Certified Unified Program Agency (CUPA). The Program Elements consolidated under the Unified Program are:

- Hazardous Waste Generator and On-site Hazardous Waste Treatment Programs (also known as Tiered Permitting);
- Aboveground Petroleum Storage Tank Spill Prevention Control and Countermeasure Plan (SPCC);
- Hazardous Materials Release Response Plans and Inventory Program (also known as Hazardous Materials Disclosure or “Community-Right-To-Know”);
- California Accidental Release Prevention Program (Cal/ARP);
- Underground Storage Tank (UST) Program; and
- Uniform Fire Code Plans and Inventory Requirements.

The Unified Program is intended to provide relief to businesses complying with the overlapping and sometimes conflicting requirements of formerly independently managed programs. The Unified Program is implemented at the local government level by CUPAs. Most CUPAs have been established as a function of a local environmental health or fire department. Some CUPAs have contractual agreements with another local agency, a participating agency, which implements one or more Program Elements in coordination with the CUPA.

Hazardous Materials Release Response Plans and Inventory Act of 1985. This Act, also known as the Business Plan Act, requires businesses using hazardous materials to prepare a plan that describes their facilities, inventories, emergency response plans, and training programs. Hazardous materials are defined as unsafe raw or unused materials that are part of a process or manufacturing step. They are not considered hazardous waste. Health concerns pertaining to the release of hazardous materials, however, are similar to those relating to hazardous waste.

2009 State of California Emergency Plan. The 2009 State of California Emergency Plan, also referred to as the State Emergency Plan (SEP), addresses the state's response to extraordinary emergency situations associated with natural disasters or human-caused emergencies. The California Emergency Services Act provides the basic authorities for conducting emergency operations following the proclamation of emergencies by appropriate local officials and/or the Governor.² The provisions of this act are further reflected and expanded upon by local emergency ordinances. In accordance with this act, the SEP describes the methods for carrying out emergency operations, the process for rendering mutual aid, the emergency services of governmental agencies, how resources are mobilized, how the public will be informed and the process to ensure continuity of government during an emergency or disaster. The SEP emphasizes mitigation programs to reduce the vulnerabilities to disaster and preparedness activities to ensure the capabilities and resources are available for an effective response. To assist communities and governments to recover from the disaster, the SEP outlines programs that establish a consistent, statewide framework to enable state, local, tribal governments, federal government and the private sector to work together to mitigate, prepare for, respond to and recover from the effects of emergencies regardless of cause, size, location, or complexity.³

Asbestos Regulations. The Clean Air Act regulates asbestos as a hazardous air pollutant, which subjects it to regulation by South Coast Air Quality Management District (SCAQMD) under its Rule 1403. OSHA also regulates asbestos as a potential worker safety hazard. These rules and regulations prohibit emissions of asbestos from demolition or construction activities, require medical examinations and monitoring of employees engaged in activities that could disturb asbestos fibers, and require notice to federal and local government agencies prior to renovation or demolition activities that could disturb asbestos.

Lead Regulations. Because of its toxic properties, lead is regulated as a hazardous material. Lead is also regulated as a toxic air contaminant. State-certified contractors must perform inspection, testing, and removal (abatement) of lead-containing building materials in compliance with applicable health and safety and hazardous materials regulations, including those outlined in Title 17 of the CCR. Other state laws include:

- Hazardous Waste Control Law
- Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)
- Carpenter-Presley-Tanner Hazardous Substances Account Act
- Hazardous Waste Management Planning and Facility Siting (Tanner Act)
- Hazardous Materials Release Response Plan and Inventory Law of 1985 (Business Plan Act)
- California Medical Waste Management Act

LOCAL

The primary local agency with responsibility for implementing federal and State laws and regulations pertaining to hazardous materials management is the Los Angeles County Health Department, Environmental Health Division. The Los Angeles County Health Department is the CUPA for the County of Los Angeles. The Unified Program is the consolidation of six state environmental regulatory programs into one program under the

²California Government Code Section 8560.

³California Emergency Management Agency, *State of California Emergency Plan*, July 2009.

authority of a CUPA. A CUPA is a local agency that has been certified by CalEPA to implement the six state environmental programs within the local agency's jurisdiction. This program was established under the amendments to the California Health and Safety Code made by Senate Bill 1082 in 1994. The six consolidated programs are:

- Hazardous Materials Release Response Plan and Inventory (Business Plans)
- California Accidental Release Prevention (CalARP)
- Hazardous Waste (including Tiered Permitting)
- Underground Storage Tanks (USTs)
- Above Ground Storage Tanks (Spill Prevention Control and Countermeasures [SPCC] requirements)
- Uniform Fire Code (UFC) Article 80 Hazardous Material Management Program (HMMP) and Hazardous Material Identification System (HMIS)

As the CUPA for the County of Los Angeles, the Los Angeles County Health Department, Environmental Health Division maintains the records regarding location and status of hazardous materials sites in the county and administers programs that regulate and enforce the transport, use, storage, manufacturing, and remediation of hazardous materials. By designating a CUPA, Los Angeles County has accurate and adequate information to plan for emergencies and/or disasters and to plan for public and firefighter safety.

A Participating Agency is a local agency that has been designated by the local CUPA to administer one or more Unified Programs within their jurisdiction on behalf of the CUPA. The Los Angeles Fire Department (LAFD) is a Participating Agency with the Los Angeles County Health Department, Environmental Health Division as the CUPA. The LAFD monitors the storage of hazardous materials in the City for compliance with local requirements. Specifically, businesses and facilities which store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the California Health and Safety Code are required to file an Accidental Risk Prevention Program with the LAFD. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. The LAFD also has delegated authority to administer and enforce federal and state laws and local ordinances for USTs. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LAFD Inspectors.

South Coast Air Quality Management District (SCAQMD) Rule 1403. SCAQMD Rule 1403 establishes asbestos survey requirements, notification, and work practice requirements to prevent asbestos emissions from emanating during building renovation and demolition activities. Rule 1403 incorporates the requirements of the federal asbestos requirements found in the National Emission Standards for Hazardous Air Pollutants (NESHAP) found in CFR Title 40, Part 61, Subpart M. USEPA delegated SCAQMD the authority to enforce the federal asbestos NESHAP and SCAQMD is the local enforcement authority for asbestos.

Los Angeles County Operational Area Emergency Response Plan (ERP). The County of Los Angeles developed the ERP to ensure the most effective allocation of resources for the maximum benefit and protection of the public in time of emergency. The ERP does not address normal day-to-day emergencies or the well-established and routine procedures used in coping with them. Instead, the operational concepts reflected in this plan focus on potential large-scale disasters like extraordinary emergency situations associated with natural and man-made disasters and technological incidents which can generate unique situations requiring an unusual or extraordinary emergency response. The purpose of the plan is to incorporate and coordinate all the facilities and personnel of County government, along with the jurisdictional resources of the cities and special districts within the County, into an efficient Operational Area organization capable of responding to any emergency using a Standard Emergency Management System, mutual aid and other appropriate response procedures. The goal of the plan is to take effective life-safety measures and reduce property loss, provide for the rapid resumption of impacted businesses and community services, and provide accurate documentation and records required for cost-recovery.

City of Los Angeles General Plan Safety and Conservation Elements. The Safety Element provides a contextual framework for understanding the relationship between hazard mitigation, response to a natural disaster, and initial recovery from a natural disaster. The policies of the Safety Element address the storage, accidental release, and containment of hazardous materials.

Policies of the Conservation Element address the conservation of petroleum resources (i.e., oil and gas) and appropriate, environmentally sensitive extraction of petroleum deposits to protect the petroleum resources for the use of future generations and to reduce the city's dependency on imported petroleum and petroleum products.

Goals, objectives, and policies from the Safety and Conservation Elements related to Hazards and Hazardous Materials are listed below in **Table 4.6-1**.

TABLE 4.6-1: RELEVANT GENERAL PLAN HAZARDOUS MATERIALS GOALS, OBJECTIVES, AND POLICIES	
SAFETY ELEMENT – HAZARD MITIGATION	
Policy 1.1.1	Coordination. Coordinate information gathering, program formulation and program implementation between City agencies, other jurisdictions and appropriate public and private entities to achieve the maximum mutual benefit with the greatest efficiency of funds and staff.
Policy 1.1.2	Disruption reduction. Reduce, to the greatest extent feasible and within the resources available, potential critical facility, governmental functions, infrastructure and information resource disruption due to natural disaster.
Policy 1.1.3	Facility/systems maintenance. Provide redundancy (back-up) systems and strategies for continuation of adequate critical infrastructure systems and services so as to assure adequate circulation, communications, power, transportation, water and other services for emergency response in the event of disaster related systems disruptions.
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.
Policy 1.1.5	Risk reduction. Reduce potential risk hazards due to natural disaster to the greatest extent feasible within the resources available, including provision of information and training.
SAFETY ELEMENT – EMERGENCY RESPONSE (MULTI-HAZARD)	
Policy 2.1.1	Coordination. Coordinate program formulation and implementation between City agencies, adjacent jurisdictions and appropriate private and public entities so as to achieve, to the greatest extent feasible and within the resources available, the maximum mutual benefit with the greatest efficiency of funds and staff.
Policy 2.1.2	Health and environmental protection. Develop and implement procedures to protect the environment and public, including animal control and care, to the greatest extent feasible within the resources available, from potential health and safety hazards associated with hazard mitigation and disaster recovery efforts.
Policy 2.1.3	Information. Develop and implement, within the resources available, training programs and informational materials designed to assist the general public in handling disaster situations in lieu of or until emergency personnel can provide assistance.
Policy 2.1.4	Interim procedures. Develop and implement pre-disaster plans for interim evacuation, sheltering and public aid for disaster victims displaced from homes and for disrupted businesses, within the resources available. Plans should include provisions to assist businesses, which provide significant services to the public and plans for reestablishment of the financial viability of the City.
Policy 2.1.5	Response. Develop, implement, and continue to improve the City's ability to respond to emergency events.

TABLE 4.6-1: RELEVANT GENERAL PLAN HAZARDOUS MATERIALS GOALS, OBJECTIVES, AND POLICIES	
Policy 2.1.6	<p>Standards/fire. Continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression. The Fire Department and/or appropriate City agencies shall revise regulations or procedures to include the establishment of minimum standards for location and expansion of fire facilities, based upon fire flow requirements, intensity and type of land use, life hazard, occupancy and degree of hazard so as to provide adequate fire and emergency medical event response. At a minimum, site selection criteria should include the following standards which were contained in the 1979 General Plan Fire Protection and Prevention Plan:</p> <ul style="list-style-type: none"> • Fire stations should be located along improved major or secondary highways. If, in a given service areas, the only available site is on a local street, the site must be on a street which leads directly to an improved major or secondary highway. • Fire station properties should be situated so as to provide drive-thru capability for heavy fire apparatus. • If a fire station site is on the side of a street or highway where the flow of traffic is toward a signalized intersection, the site should be at least 200 feet from that intersection in order to avoid blockage during ingress and egress. <p>The total number of companies which would be available for dispatch to first alarms would vary with the required fire flow and distance as follows: (a) less than 2,000 g.p.m. would require not less than 2 engine companies and 1 truck company; (b) 2,000 but less than 4,500 g.p.m., not less than 2 or 3 engine companies and 1 or 2 truck companies; and (c) 4,500 or more g.p.m., not less than 3 engine companies and 2 truck companies.</p>
Policy 2.1.7	Volunteers. Develop and implement, within the resources available, strategies for involving volunteers and civic organizations in emergency response activities.
SAFETY ELEMENT – DISASTER RECOVERY (MULTI-HAZARD)	
Policy 3.1.1	Coordination. Coordinate with each other, with other jurisdictions and with appropriate private and public entities prior to a disaster and to the greatest extent feasible within the resources available, to plan and establish disaster recovery programs and procedures which will enable cooperative ventures, reduce potential conflicts, minimize duplication and maximize the available funds and resources to the greatest mutual benefit following a disaster.
Policy 3.1.2	Health/safety/environment. Develop and establish procedures for identification and abatement of physical and health hazards which may result from a disaster. Provisions shall include measures for protecting workers, the public and the environment from contamination or other health and safety hazards associated with abatement, repair and reconstruction programs.
Policy 3.1.4	Interim services/systems. Develop and establish procedures prior to a disaster for immediate reestablishment and maintenance of damaged or interrupted essential infrastructure systems and services so as to provide communications, circulation, power, transportation, water and other necessities for movement of goods, provision of services and restoration of the economic and social life of the City and its environs pending permanent restoration of the damaged systems.
Policy 3.1.5	Restoration. Develop and establish prior to a disaster short- and long-term procedures for securing financial and other assistance, expediting assistance and permit processing and coordinating inspection and permitting activities so as to facilitate the rapid demolition of hazards and the repair, restoration and rebuilding, to a comparable or a better condition, those parts of the private and public sectors which were damaged or disrupted as a result of the disaster.
CONSERVATION ELEMENT – RESOURCE MANAGEMENT (FOSSIL LIBRARY) - PETROLEUM (OIL AND GAS)	
Policy 1	Continue to encourage energy conservation and petroleum product reuse.
Policy 3	Continue to protect neighborhoods from potential accidents and subsidence associated with drilling, extraction and transport operations, consistent with California Department of Conservation, Division of Oil and Gas requirements.
SOURCE: City of Los Angeles General Plan, <i>Safety Element</i> , 1996, and <i>Conservation Element</i> , 2001.	

Los Angeles Municipal Code (LAMC). One of the primary purposes of zoning is to segregate uses that are thought to be incompatible; in practice, zoning is used as a permitting system to prevent new development from harming existing residents or businesses and to preserve the "character" of a community. With respect to hazards, the City uses zoning to separate businesses that use, store, transport, treat, or dispose of hazardous materials, or businesses that engage in potentially hazardous activities, such as manufacturing or refining, from residential areas and the general public.

The Methane Seepage Regulations, contained within LAMC Chapter IX, Article 1, Division 71 (Sections 91.7101 through 91.7109), establishes requirements for mitigation and other general building requirements to prevent potential environmental and harmful health effects that could be caused by the construction of buildings located in a defined Methane Hazard Zone within the City of Los Angeles. All new buildings and paved areas located in a Methane Zone or Methane Buffer Zone must comply with the requirements of LAMC Sections 91.7103 and 91.7104 and the Methane Mitigation Standards established by the Superintendent of Building. The Methane Mitigation Standards identify installation procedures, design parameters and test protocols for the methane gas mitigation system. As established under LAMC Section 91.106.4.1, LADBS has the authority to withhold permits on projects located within a Methane Zone or Methane Buffer Zone. Building permits may be issued upon submittal of detailed plans that show adequate protection against flammable gas incursion by providing the installation of suitable methane mitigation and monitoring systems.

Section 91.7109.2 of the LAMC requires LAFD notification when an abandoned oil well is encountered during construction activities, and requires that any abandoned oil well not in compliance with existing regulations be re-abandoned in accordance with applicable rules and regulations of the California Division of Oil, Gas, and Geothermal Resources (DOGGR).

Los Angeles Fire Department (LAFD). The LAFD monitors the storage of hazardous materials in the City for compliance with local requirements. Specifically, businesses and facilities which store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the California Health and Safety Code are required to file an Accidental Risk Prevention Program with the LAFD. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. The LAFD also has delegated authority to administer and enforce Federal and State laws and local ordinances for USTs. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LAFD Inspectors.

Los Angeles Fire Code. Chapter V, Article 7 of the LAMC contains the Los Angeles Fire Code. The purpose of the Fire Code is to prescribe laws for the safeguarding of life and property from fire, explosion, panic, or other hazardous conditions that may arise in the use or occupancy of buildings, structures, or premises and other laws that may be the duty of LAFD to enforce.

EXISTING SETTING

HAZARDOUS MATERIALS

The term “hazardous material” can have varying definitions for different regulatory programs. For the purpose of the Proposed Project, the term “hazardous materials” refers to both hazardous materials and hazardous waste. The California Health and Safety Code Section 25501 defines hazardous materials as follows:⁴

“Hazardous material means any material that because of its quantity, concentrations, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include but are not limited to hazardous substances, hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or environment.”

⁴California Health and Safety Code, Section 25501

A material is hazardous if it exhibits one or more of the following characteristics: ignitability, corrosivity, reactivity, and toxicity.⁵

Soil and groundwater can become contaminated by hazardous material releases in a variety of ways, including permitted or illicit use and accidental or intentional disposal or spillage. Before the 1980s, most land disposal of chemicals was unregulated, with the result that numerous industrial properties and public landfills became dumping grounds for unwanted chemicals. The largest and most contaminated of these sites became Superfund sites, so named for their eligibility to receive cleanup money from a federal fund established under CERCLA. The NPL is the list of national priorities among the known releases or threatened releases of hazardous substances, pollutants, or contaminants throughout the United States and its territories. The NPL is intended primarily to guide the USEPA in determining which sites warrant further investigation. Sites are added to the NPL following a hazard ranking system.

Numerous smaller properties have been designated as contaminated sites. Often these are gas station sites where leaking USTs were upgraded under a federal requirement in the late 1980s. Another category of sites which may have some overlap with the types already mentioned is “brownfields” – previously used, often abandoned, sites that because of actual or suspected contamination are undeveloped or underused. Both the USEPA and DTSC maintain lists of known brownfields sites. These sites are often difficult to inventory due to their owners’ reluctance to publically label their property as potentially contaminated.

Asbestos-containing materials (ACMs) were widely used in structures built between 1945 and 1978. Common ACMs include vinyl flooring and associated mastic, wallboard and associate joint compound, plaster, stucco, acoustic ceiling spray, ceiling tiles, heating system components, and roofing materials. Commercial/industrial structures are affected by asbestos regulations if damage occurs or if remodeling, renovation, or demolition activities disturb ACMs. Lead-based paint (LBP) was primarily used during the same time period. Commercial/industrial structures are affected by lead-based paint regulations if the paint is in a deteriorated condition or if remodeling, renovation, or demolition activities disturb LBP surfaces.

PCBs are mixtures of up to 209 individual chlorinated compounds. There are no known natural sources of PCBs. PCBs have been used as coolants and lubricants in transformers, capacitors, and other electrical equipment because they do not burn easily and are good insulators. The manufacture of PCBs was stopped in the United States in 1977 because of evidence that they build up in the environment and can cause harmful health effects. Products made before 1977 that may contain PCBs include old fluorescent lighting fixtures and electrical devices containing PCB capacitors, and old microscope and hydraulic oils.

TRANSPORT, USE, AND DISPOSAL

The use of hazardous materials is typically associated with industrial land uses. Activities, such as manufacturing, plating, cleaning, refining, and finishing, frequently involve chemicals that are considered hazardous when accidentally released into the environment. Industrial land uses are primarily located in the western portion of the ECTNP Area north of the Expo LRT Line around the Bundy and Sepulveda Stations and surrounding the Culver City Station.

To a lesser extent, hazardous materials may also be used by various commercial enterprises as well as residential uses. Dry cleaners, in particular, use cleaning agents considered to be hazardous materials. Hardware stores typically stock paints and solvents, as well as fertilizers, herbicides and pesticides; swimming pool supply stores stock acids, algaecides, and caustic agents. In fact, most commercial business occasionally use commonly available cleaning supplies which, when used in accordance with manufacturers’ recommendations, are considered safe by the State of California, but when not handled properly can be considered hazardous. Private residences also use and store commonly available cleaning materials, paints, solvents, swimming pool and spa chemicals, as well as fertilizers, herbicides, and pesticides.

⁵Title 22, California Code of Regulations, Division 4.5, Chapter 11, Article 3, Section 66261.20-66261.24.

If improperly handled, hazardous materials can result in public health hazards through human contact with contaminated soils or groundwater, or through airborne releases in vapors, fumes, or dust. There is also the potential for accidental or unauthorized releases of hazardous materials that would pose a public health concern. The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, state and local regulations. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous waste transporters are required to complete and carry a hazardous waste manifest (which is a set of forms, reports, and procedures designed to seamlessly track hazardous waste). Most transportation of hazardous materials within the ECTNP Area and the surrounding area is via trucks along highways, such as I-10, and major thoroughfares, such as Venice, Washington and Jefferson Boulevards. Two railroad rights-of-way, currently owned by the Los Angeles County Metropolitan Transportation Authority (Metro), extend through the ECTNP Area. The abandoned Southern Pacific alignment was developed as part of the Expo LRT Line.

HAZARDOUS MATERIALS SITES

As previously discussed, hazardous materials are found throughout the ECTNP Area in a multitude of forms and quantities. The locations where such materials are used, stored, treated and/or disposed comes to the attention of regulatory agencies through various means including licensing and permitting, enforcement actions, anonymous tips, and so forth. In some cases, businesses that use hazardous materials in quantities greater than certain established thresholds are required to file business plans with the LAFD. Other businesses that engage in the transport, storage, treatment, or disposal of hazardous materials are required to maintain detailed records of all their hazardous materials-related activities. To the extent possible, locations of these businesses and operations are recorded in several database lists maintained by various local, state, and federal regulatory agencies.

Federal, state, local, tribal and proprietary environmental databases were searched to determine the environmental regulatory status of the properties within the search area, including the Project Area and an approximate one-mile buffer around the Project Area. **Table 4.6-2** provides a summary of the number of recorded hazardous material sites within the search area. The database information represents a general indicator of the amount of possible hazardous material sites in the search area.

TABLE 4.6-2: NUMBER OF IDENTIFIED HAZARDOUS MATERIAL SITES WITHIN THE SEARCH AREA		
Database	Description	Number of Sites /a/
FEDERAL RECORDS		
Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)	The U.S. Environmental Protection Agency (USEPA) uses this database to track activities conducted under the Superfund program.	6
Comprehensive Environmental Response, Compensation-No Further Remedial Action Planned Report (CERC-NFRAP)	This database contains information pertaining to sites that have been removed from the CERCLIS database.	30
Resource Conservation and Recovery Act (RCRA), Treatment, Storage and/or Disposal Facility (TSD)	This database includes sites, which generate, transport, store, treat, and/or dispose of hazardous waste.	1
RCRA Information System – Large-Quantity Generator (RCRA-LQG)	This database includes sites that generate, transport, store, treat, and/or dispose of hazardous waste.	17
RCRA Information System – Small-Quantity Generator (RCRA-SQG)	This database includes sites that generate, transport, store, treat, and/or dispose of hazardous waste.	162
RCRA Information System- Conditionally Exempt Small Quantity Generators (RCRA-CESEQ)	This database includes sites that generate less than 100 kg of hazardous waste.	3
RCRA Information System – Non-Generator (RCRA NonGen/NLR)	This database includes selective information on sites that generate, transport, store, treat and/or dispose of hazardous waste. Non-Generators do not presently generate hazardous waste.	21

TABLE 4.6-2: NUMBER OF IDENTIFIED HAZARDOUS MATERIAL SITES WITHIN THE SEARCH AREA

Database	Description	Number of Sites /a/
Emergency Response Notification System (ERNS)	This database includes sites of reported releases of oil or hazardous substances to the air, soil and/or water.	16
Hazardous Material Information Resource System (HMIRS)	This database is the central repository for Material Safety Data Sheets for the U.S. Government military services and civil agencies.	1
Toxic Release Inventory System (TRIS)	This database is the USEPA's database on all sites that have or may be prone to toxic material releases.	3
Federal Toxics Tracking System (FTTS)	This database includes a list of pesticide enforcement actions and compliance activities.	2
Historical Federal Toxics Tracking System	This database includes a list of historical pesticide enforcement actions and compliance activities.	2
Facility Index System (FINDS)	FINDS is facility information and "pointers" to other sources of information that contain more detail (e.g., RCRA Info, CERCLIS).	215
Aerometric Information Retrieval System (US AIRS)	This database contains compliance data on air pollution point sources regulated by the USEPA and/or state and local air regulatory agencies.	1
STATE AND LOCAL RECORDS		
Department of Health Services Site-Specific Expenditure Plan (BOND EXP PLAN)	The Department of Health Services developed a site-specific expenditure plan as the basis for an appropriation of Hazardous Substance Cleanup Bond Act funds.	1
State School Evaluation Program	This category contains proposed and existing school sites that are being evaluated by Department of Toxic Substance Control (DTSC) for possible hazardous materials contamination.	7
Solid Waste Facilities/Landfill Sites (SWF/LF)	This data comes from the Integrated Waste Management Board's Solid Waste Information database.	6
Waste Management Unit Database System (WMUDS/SWAT)	This data is used for program tracking and inventory of waste management units	6
California Water Resources Control Board Waste Discharge Systems (WDS)	The WDS database lists Regional Water Quality Control Board (RWQCB) sites that have been issued waste discharge requirements	13
National Pollutant Discharge Elimination System (NPDES)	This database contains a listing of NPDES permits.	15
Underground Control Injection Wells (UIC)	This database contains listings of underground control injection wells.	11
DTSC Hazardous Waste and Substances Sites (Cortese)	Cortese is a database maintained by the DTSC used by State, local agencies and developers to comply with CEQA requirements in providing information about the location of hazardous material release sites.	1
HIST Cortese	HIST Cortese is the historical listing of the Cortese sites.	80
SWRCY Recycling Facilities	This database contains a listing of recycling facilities.	2
Leaking Underground Storage Tanks (UST)	This database is a listing of reported leaking UST incidents.	137
Facility Inventory Database (FID UST)	This database is a listing of active and inactive UST locations.	139
Spills, Leaks, Investigations, and Cleanups (SLIC)	This database is a listing of unauthorized discharges from spills and leaks, other than from USTs.	45
Underground Storage Tanks (USTs)	This database is a listing of Registered USTs.	62
Historical Underground Storage Tanks (HIST UST)	This database is the historical listing of UST sites from State Water Resources Control Board (SWRCB).	109
NY Manifest	This is a document that lists and tracks hazardous waste from the generator through transporters to a TSD facility.	2
UST Statewide Environmental Evaluation and Planning System	This database is a listing from SWRCB that is no longer maintained or updated.	179
California Hazardous Material Incident Report System	This database is a listing of reported hazardous material incidents (i.e., accidental releases or spills).	27
Above Ground Storage Tank	This database provides a listing of USTs that are permitted within the State.	2

TABLE 4.6-2: NUMBER OF IDENTIFIED HAZARDOUS MATERIAL SITES WITHIN THE SEARCH AREA		
Database	Description	Number of Sites /a/
Notify 65 Proposition 65 Notification records	Notify 65 records contain facility notifications about any release that could impact drinking water and thereby expose the public to a potential health risk. The data come from the SWRCB's Proposition 65 database.	2
CA DEED: Recorded Land Use Restrictions	This includes recorded land use restrictions that DTSC uses to protect the public from unsafe exposure to hazardous substances and wastes.	2
CA VCP	This is a listing of low threat level properties with either confirmed or unconfirmed releases and the project proponents have requested DTSC oversee investigation and/or cleanup activities.	8
CA Drycleaners	Drycleaners is a list of drycleaner facilities with USEPA ID numbers.	21
CA WIP: Well Investigation Program	This is a well investigation program case.	1
CA ENF: Water Board Enforcement Actions	This is a listing of Water Board Enforcement Actions	8
CA CDL	This is a listing of drug lab locations.	3
CA Response	This identifies confirmed released sites where DTSC is involved in remediation.	2
CA HAZNET	This data is extracted from copies of hazardous waste manifests received each year by the DTSC.	606
CA EMI	This includes toxics and criteria pollutant emissions data collected by the CARB.	148
CA ENVIROSTAR	The DTSC's Site Mitigation and Brownfield's Reuse Program database identifies sites that have known contamination or sites for which there may be reasons to investigate further.	43
CA HWP	This includes detailed information on permitted hazardous waste facilities and corrective action tracked in Envirostar.	1
EDR PROPRIETARY RECORDS		
EDR US Hist Auto Stat	This falls within EDR's High Risk Historical Records category.	302
EDR US Hist Cleaners	This falls within EDR's High Risk Historical Records category	119
/a/ Most of the listed sites are included on more than one database, resulting in numerous overlaps (redundancies) in the listing. SOURCE: Environmental Data Resources, Inc., EDR Data Map Area Study for the Exposition Corridor Transit Neighborhood Plan, September 30, 2013.		

Figure 4.6-1 identifies properties within the search area that may pose potential hazards. The search area includes the Project Area plus an approximately one-mile buffer around the Project Area.

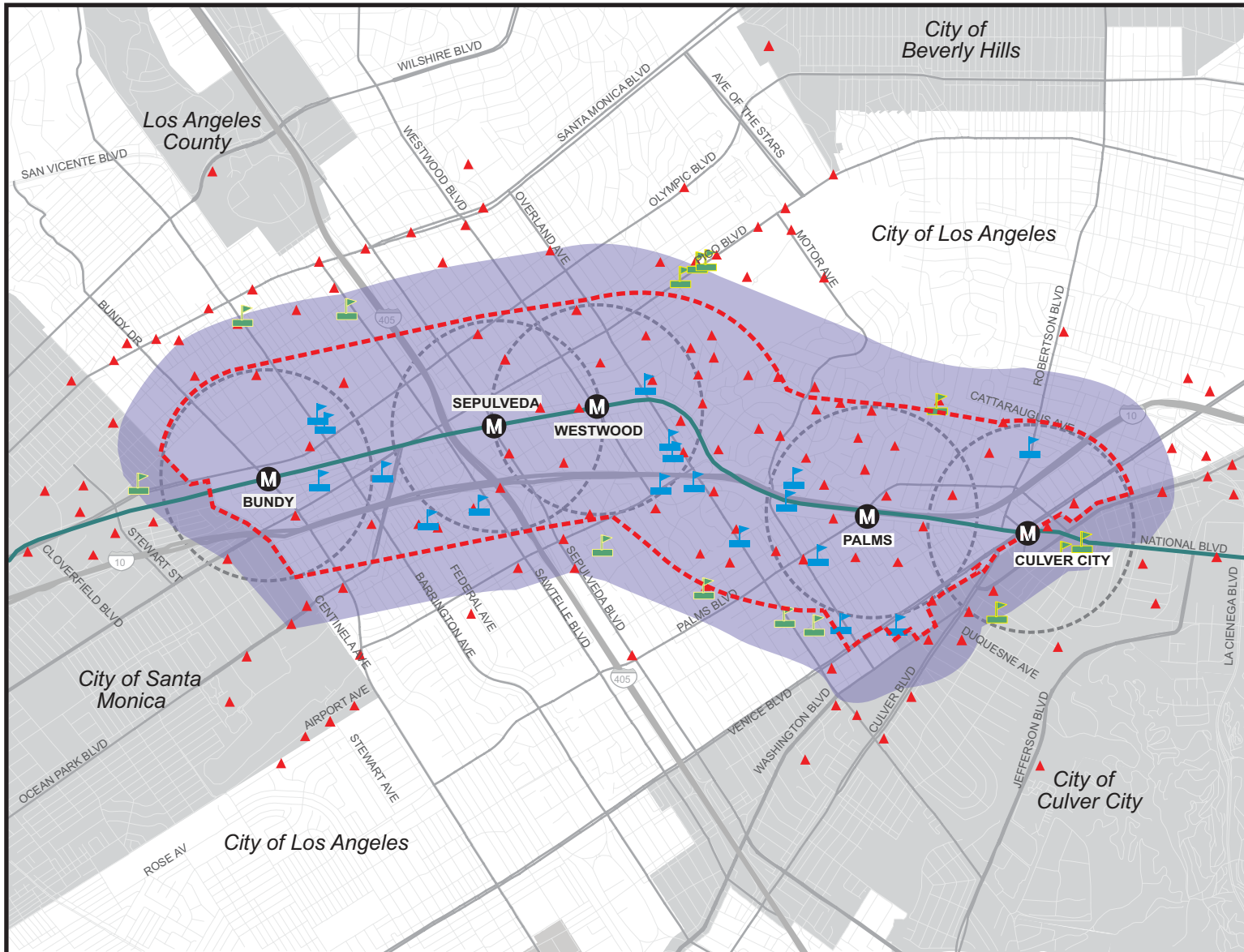
METHANE GAS

Methane gas is produced by anaerobic decay of organic matter deep under the Earth's surface and is the major component of natural gas, about 87 percent by volume.⁶ In common usage, deposits rich in natural gas (i.e., methane) are called natural gas fields. At room temperature and standard pressure, methane is a colorless, odorless gas. While not toxic, it is highly flammable and may form explosive mixtures with air. Methane is also an asphyxiant and may displace oxygen in an enclosed space. The concentrations at which flammable or explosive mixtures form are much lower than the concentration at which asphyxiation risk is significant. Because natural gas is lighter than water, it tends to rise from its sources until it either seeps to the surface or is trapped by a non-permeable layer of rock. When structures are built on or near landfills or naturally occurring natural gas fields, methane gas can penetrate the buildings' interiors and expose occupants to significant levels of methane.

⁶Anaerobic Decay is the process by which microorganisms break down biodegradable material in the absence of oxygen.

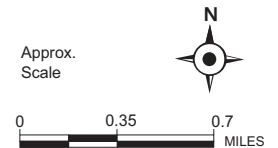
Exposition Corridor Transit Neighborhood Plan

Figure 4.6-1 Potential Hazard Sites and Schools in the Area



LEGEND:

- - - ECTNP Boundary
- Expo LRT
- M** Light Rail Station
- 0.5-Mile Radius
- ▲ Identified Potential Hazard Sites
- School Within Study Area
- School Within 0.25-Mile Buffer from Study Area
- 0.25-Mile Buffer from Study Area
- Jurisdictional Boundary



A project partially funded by the Los Angeles County Metropolitan Transportation Authority.



Methane Zones and Methane Buffer Zones in the ECTNP Area are shown in **Figure 4.6-2**. Generally, parcels within the Methane Zone are subject to more restrictive mitigation requirements, while parcels within the Methane Buffer Zone are subject to less restrictive mitigation requirements, though requirements are site-specific and can vary. As shown, a very small portion of the ECTNP Area is located within a Methane buffer zone. This includes the north central, northeastern, and southeastern portions of the ECTNP Area.

SCHOOLS

An analysis of hazardous materials in relation to schools is required as part of the CEQA Guidelines. As shown in **Figure 4.6-2**, there are over 30 schools, including public schools that serve the Project Area (15 public schools identified in Table 4.11-9 in Section 4.11, Public Services) and other schools that are located within a quarter mile of the Project Area.

AIRPORT HAZARDS

Santa Monica Airport and Los Angeles International Airport (LAX) are the two closest airports to the ECTNP Area. Santa Monica Airport, located at 2828 Donald Douglas Loop N in the City of Santa Monica, is located less than two miles south of the western portion of the ECTNP Area. The Federal Aviation Administration (FAA) and the City of Santa Monica plan to maintain airport operations through 2028, after which the City may discontinue its use as an airport.⁷

LAX, located at One World Way, is located more than 10 miles south of the ECTNP Area. The ECTNP Area is not located within the Los Angeles County Airport Land Use Commission (ALUC) planning boundaries of either airport.⁸

EMERGENCY RESPONSE PLANS

Rescue and provision of medical care to victims of fires and other emergencies are the responsibilities of the LAFD. However, because the ECTNP Area adjoins other jurisdictions (the Cities of Culver City and Santa Monica), the City of Los Angeles has several joint-use agreements with other jurisdictions for cooperative response and management of fires and other emergency incidences. Under such agreements, the first respondents would usually be the nearest fire or police units, regardless of jurisdictional boundaries. Key to a successful rapid response is the LAFD's goal of maintaining adequate response distances from any given fire outbreak to the closest fire station. See Section 4.11, Public Services, for further discussion of LAFD.

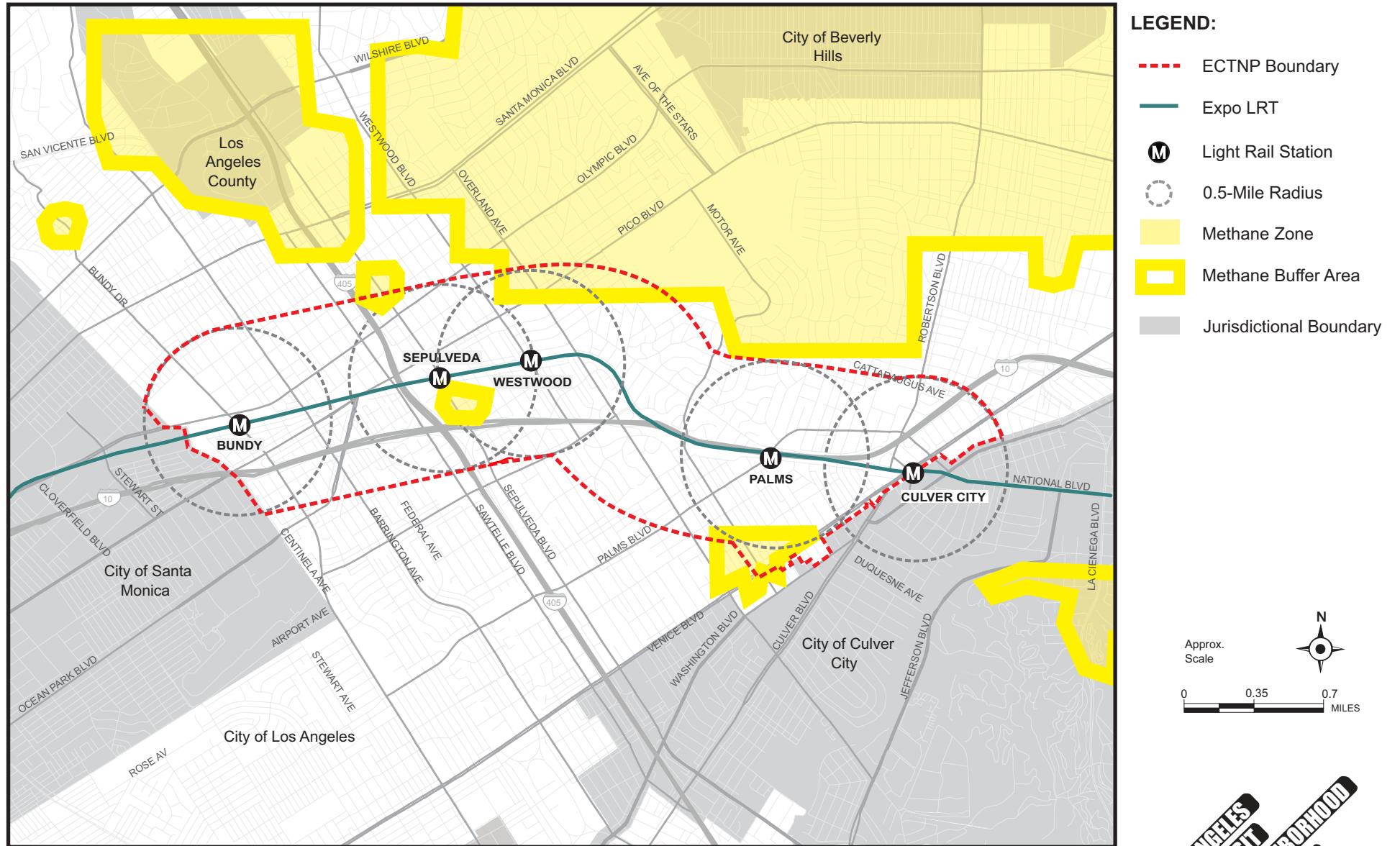
WILDLAND FIRE

Brush fires continue to be a major threat to life and property throughout the region due to unique fuel, terrain, and climatic conditions. The hazard is especially great when the dry "Santa Ana" winds arrive, usually in the fall and winter seasons. The ECTNP Area is not located in a hilly or mountainous portion of the city. The ECTNP Area is not located in an area identified as a wildland fire hazard area, according to Exhibit D Selected Wildfire Hazard Areas of the Safety Element.⁹

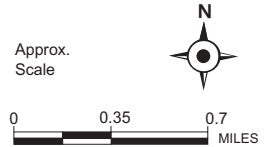
⁷FAA, *Press Release – FAA Reaches Settlement Agreement with City of Santa Monica*, January 28, 2017, https://www.faa.gov/news/press_releases/news_story.cfm?newsId=21394, accessed February 28, 2017.

⁸Los Angeles County Airport Land Use Commission-*Los Angeles International Airport Map, Santa Monica Airport Map*, http://planning.lacounty.gov/assets/upl/project/aluc_airport-santa-monica.pdf
http://planning.lacounty.gov/assets/upl/project/aluc_airport-lax.pdf, accessed March 1, 2017.

⁹City of Los Angeles General Plan *Safety Element. Exhibit D- Selected Wildfire Hazard Areas*, April 1996.



- LEGEND:**
- - - ECTNP Boundary
 - Expo LRT
 - M Light Rail Station
 - 0.5-Mile Radius
 - Methane Zone
 - Methane Buffer Area
 - Jurisdictional Boundary



A project partially funded by the Los Angeles County Metropolitan Transportation Authority.



THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the CEQA Guidelines, the Proposed Project would have a significant impact related to hazards and hazardous materials if it would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- 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;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- 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;
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area;
- For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area;
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or
- Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are adjacent to urbanized areas or where residences are intermixed with wildlands.

CITY OF LOS ANGELES CEQA THRESHOLDS GUIDELINES

In addition, based on the criteria set forth in the 2006 Los Angeles CEQA Thresholds Guide (Thresholds Guide), the determination of significance shall be made on a case-by-case basis, considering the following factors:

For impacts related to risk of upset/emergency preparedness:

- The regulatory framework for the risk of upset/emergency preparedness;
- The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance;
- The degree to which the project may require a new, or interfere with an existing emergency response evacuation plan, and the severity of consequences; and
- The degree to which the project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance.

For impacts related to human health hazards:

- The regulatory framework for the health hazard;
- The probable frequency and severity of consequences to people from exposure to the health hazard; and
- The degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.

METHODOLOGY

The Thresholds Guide sets forth guidance for the determination of significance for impacts from hazards and hazardous materials. The guidance is generally based on the CEQA Guidelines Appendix G, and provides specific criteria to be considered when making a significance determination. For purposes of this analysis, the CEQA Guidelines Appendix G criteria are used.

Analysis in this section focuses on the use, disposal, transport, or management of hazardous or potentially hazardous materials resulting from development or redevelopment envisioned under the Proposed Project. Disposal options, the probability for risk of upset, and the severity of consequences to people or property associated with the increased use, handling, transport, and/or disposal of hazardous materials associated with implementation of the Proposed Project are also analyzed. This section also addresses short-term construction impacts resulting from demolition of existing (usually older) structures, as well as from disturbance of contaminated soils. Operational impacts would generally be associated with the type of uses proposed and the materials that operation of these uses would entail. In determining the level of significance, the analysis assumes that any development under the Proposed Project would comply with relevant federal and state laws and regulations, as well as the LAMC.

This discussion of hazards and hazardous materials addresses impacts within the entire Project Area. No distinction is made between areas of change and areas within the Project Area, where zoning controls would not change, because potential impacts related to hazards and hazardous materials are generally site-specific and not based on whether future development projects are located within or outside of the change areas.

IMPACTS

The Proposed Project would establish a Specific Plan and initiate zone changes, General Plan amendments, and introduce development and urban design standards. The Proposed Project would also involve new streetscape plans and parking strategies that together enhance the pedestrian experience, promote transit ridership, and encourage a variety of mobility options. The ECTNP would guide future development by specifying the type of uses, densities, intensities, and design standards and guidelines that would be permitted. The Proposed Project encourages new development at transit station areas with the goal of promoting transit ridership and creating an active, mixed-use environment in the station areas. Zone Changes and General Plan amendments would not occur on every parcel within the Project Area; changes would only occur within specific “areas of proposed change,” also known as “Subareas” in the Proposed Plan. Future development projects within the ECTNP Area would be required to comply with applicable regulatory requirements pertaining to hazardous materials during construction and operation.

Individual businesses are subject to intensive regulatory review as part of the permit and approval process, as well as being subject to a myriad of regulations regarding hazardous material use, storage, transportation and disposal. This regulatory review and regulatory compliance review ensures that adjacent populations are protected from unusual hazards from such uses. While the Proposed Project may encourage greater redevelopment of older potentially contaminated sites, they are subject to the federal, state, and local policies and guidelines mentioned above.

IMPACT 4.6-1 WOULD IMPLEMENTATION OF THE PROPOSED PROJECT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS? COMPLIANCE WITH EXISTING LOCAL, STATE, AND FEDERAL REGULATIONS WOULD ENSURE THIS IMPACT REMAINS LESS THAN SIGNIFICANT.

Industrial facilities tend to store, use, and generate larger quantities of hazardous materials and wastes than other types of land uses. As described in Chapter 3.0, Project Description, the Proposed Project would introduce four new zones, three of which are job-generating zones with a Hybrid Industrial land use designation. The zone changes to these new zones would occur on land currently zoned for traditional industrial and manufacturing uses at the Bundy Station (89.4 acres), Sepulveda Station (33.2 acres), Culver City Station (22.2 acres), and Palms Station (5.3 acres). The proposed zones would limit the types of industrial uses allowed to those tailored towards 21st century clean-tech/high-tech industries, such as research and development, media, and digital technology. Light manufacturing and assembly uses associated with these industries would also be allowed.

The Proposed Project may result in an increase of industrial land uses by up to approximately 370,000 square feet in the areas of proposed change or Subareas.¹⁰ This would increase the risk of hazardous material accidents during use, transport, and disposal. However, individual facilities that use or store large quantities of hazardous materials on-site are required to comply with numerous federal, state, and local regulations that address hazardous materials use, transport, storage and disposal, including the Resource Conservation and Recovery Act (RCRA), Title 22, the Hazardous Waste Control Law, Hazardous Materials Transportation Act, and Hazardous Materials Business Plans. In addition, a majority of the industrial land use located within the Project Area would be light industrial and light manufacturing uses, which do not involve the use of hazardous materials.

Asbestos-containing materials (ACMs) and lead-based paint (LBP) were widely used in structures built between 1945 and 1978 and PCBs in structures built or renovated between 1950 and 1979. It is reasonable to assume that these materials would be encountered during rehabilitation and demolition of some of these structures. However, removal of these materials is also well regulated. Prior to any rehabilitation or demolition activities involving structures within the time periods identified above, any development project within the Project Area will be required to retain a Certified Asbestos Consultant to determine the presence of asbestos and ACMs in compliance with Cal/OSHA requirements and a state-certified Lead Inspector/Assessor to conduct LBP testing in compliance with Title 17 of the CCR. If asbestos and/or LBPs are discovered, a licensed asbestos and/or LBP/materials abatement contractor is required to be retained to safely remove ACM in accordance with Cal/OSHA regulations and SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities) and/or lead-based paint in accordance with USEPA's Lead Abatement Program regulations under the TSCA. Similarly, prior to any rehabilitation or demolition activities for any development project within the Project Area, inspections for PCB-containing electrical features will be required. In California, USEPA enforces the federal regulations for PCB disposal and storage (under the TSCA), and DTSC administers and enforces the state's additional requirements for PCB hazardous waste (under RCRA). Mandatory compliance with Title 40 of the CFR and Title 22 of the CCR would ensure that proper procedures are followed to minimize potential exposure to significant health hazards associated with PCBs. Therefore, with implementation of all applicable local, state, and federal regulations, the Proposed Project would result in less than significant impacts related to the use, transport, and disposal of hazardous materials.

¹⁰City of Los Angeles Department of City Planning, as part of preparation of the Water Supply Assessment, LADWP, *Water Supply Assessment for the Exposition Corridor Transit Neighborhood Plans (Proposed Project)*, February 6, 2014.

MITIGATION MEASURES

Impacts related to the use, transport, and disposal of hazardous materials would be less than significant under the Proposed Project. No mitigation measures are required.

SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Impacts related to the use, transport, and disposal of hazardous materials were determined to be less than significant without mitigation.

IMPACT 4.6-2 WOULD IMPLEMENTATION OF THE PROPOSED PROJECT 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? COMPLIANCE WITH EXISTING REGULATIONS WOULD ENSURE THIS IMPACT REMAINS LESS THAN SIGNIFICANT.

As mentioned above, the Proposed Project encourages targeted redevelopment within the ECTNP Area. Elements such as rezoning around transit stations would encourage the construction of new buildings. The demolition of existing buildings on these sites could release hazardous materials into the environment. However, all demolition and construction within the ECTNP Area would be required to comply with all local, state, and federal regulations.

New buildings would replace older structures that may have been built prior to the most recent building codes and regulations. Therefore, the proposed zone changes would reduce the risk of exposure to hazardous materials for those occupying buildings in the area as a result of accidents that can occur, as current building codes and regulations require development projects to adhere to the seismic design requirements of the California Building Code (CBC) and the Los Angeles Building Code (LABC) to ensure new buildings are designed to withstand seismic events through modern construction techniques and minimize damage to structures or infrastructure that could result in the accidental release of hazardous materials into the environment.

As shown in **Figure 4.6-2**, Methane Buffer Zones occur in the north-central, northeastern, and southeastern portions of the ECTNP Area. However, as previously discussed, any new construction would be required to comply with the California Department of Conservation, Division of Oil and Gas requirements, the SCAQMD regulations, the City of Los Angeles Methane Ordinance, and LAMC Section 91.7102 regarding methane gas. Therefore, impacts related to methane gas would be reduced to less than significant.

Businesses are required to comply with health and safety, and environmental protection laws and regulations, which require businesses handling or storing certain amounts of hazardous materials to prepare a hazardous materials business plan that includes an inventory of hazardous materials used or stored on-site, and procedures to be used in the event of a significant or threatening significant release of a hazardous material. The hazardous materials plan must include a Material Safety Data Sheet (MSDS) for each hazardous material used or stored on-site. To accomplish this, and to otherwise provide a safe and healthy environment, businesses that use hazardous materials must implement health and safety policies and procedures. In addition, future projects within the ECTNP Area will be required to complete all applicable environmental review processes and to conform with environmental regulations related to new construction and hazardous materials storage, use and transport. Existing hazardous materials regulations would minimize the potential for exposure to adverse health or safety effects. Therefore, the Proposed Project would result in less than significant impacts related to upset and accident conditions.

MITIGATION MEASURES

Impacts related to upset and accident conditions involving the release of hazardous materials would be less than significant under the Proposed Project. No mitigation measures are required.

SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Impacts related to upset and accident conditions were determined to be less than significant without mitigation.

IMPACT 4.6-3 WOULD IMPLEMENTATION OF THE PROPOSED PROJECT RESULT IN HAZARDOUS EMISSIONS OR THE HANDLING OF ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN A QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL, CREATING A RISK TO HUMAN HEALTH FROM SUCH ACTIVITIES? COMPLIANCE WITH EXISTING REGULATIONS WOULD ENSURE THIS IMPACT REMAINS LESS THAN SIGNIFICANT.

As shown in **Figure 4.6-1**, there are over 30 schools, including public schools that serve the Project Area (the 15 public schools identified in Table 4.11-9 in Section 4.11, Public Services) and other schools that are located within a quarter mile of the Project Area. Construction activities would involve the utilization of diesel powered trucks and equipment, which result in diesel emissions that have been determined to be a health hazard. These impacts are discussed in Section 4.2, Air Quality.

Individual projects developed as part of the ECTNP would be required to comply with federal, state, and local hazardous materials regulations. Compliance with all applicable local, state, and federal laws and regulations, as described in the Regulatory Framework, would regulate, control, or respond to hazardous waste, transport, store, disposal, and clean-up in order to ensure that hazardous materials do not pose a significant risk to nearby receptors. Therefore, the Proposed Project would result in less than significant impacts related to schools.

MITIGATION MEASURES

Impacts related to handling hazardous materials within a quarter mile of a school would be less than significant under the Proposed Project. No mitigation measures are required.

SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Impacts related to schools were determined to be less than significant without mitigation.

IMPACT 4.6-4 WOULD IMPLEMENTATION OF THE PROPOSED PROJECT BE LOCATED ON A SITE THAT IS INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITES COMPILED PURSUANT TO GOVERNMENT CODE SECTION 65962.5 AND, AS A RESULT, COULD DEVELOPMENT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT? THIS IMPACT IS LESS THAN SIGNIFICANT WITH MITIGATION.

As described above and summarized in **Table 4.6-2**, the EDR record search (**Appendix D**) conducted for the Proposed Project identified numerous sites, including, but not limited to, cleanup sites and permitted underground UST facilities within the ECTNP Area. **Figure 4.6-1** shows all identified sites within the Project Area; of these sites, ten are located within the areas of proposed change, where zoning would change under the Proposed Project. Although some of these sites either have been cleaned up or are in the process of being cleaned up, the potential remains for USTs or contaminated soils to be uncovered or encountered during construction activities. Future development on a site identified as previously occupied by hazardous materials generating facility would have the potential to create a significant hazard to the public or the

environment unless an environmental site assessment is conducted to determine potential risks and to ensure appropriate remediation is implemented. Therefore, the Proposed Project could result in a significant impact related to hazardous materials sites.

MITIGATION MEASURES

HM1 The City shall require that future development that involves new construction and soil disturbance document that the site is not on any government list of sites containing hazardous waste or hazardous materials (including lists prepared pursuant to Government Code, section 65962.5). A report setting forth the results of this database search (e.g. historical environmental reports prepared by Enviroscan, EDR, or similar firms) shall be provided to the City. If the report indicates the project site, or property within one-quarter mile of the project site has the potential to be contaminated with hazardous waste or hazardous materials for any reason, a Phase I Environmental Site Assessment (ESA) shall be prepared. The Phase I assessment shall be prepared by an appropriately qualified individual (with experience in the identification and mitigation of hazardous materials and wastes) in accordance with state standards and guidelines to evaluate whether the site or the surrounding area is contaminated from the past or current uses including storage, use, transport, generation, and disposal of toxic and hazardous waste or materials. Depending on the results of this study, further investigation and remediation may be required in accordance with local, state, and federal regulations and policies. Any further study found necessary by an appropriately qualified individual or relevant federal, state, or local agency shall be performed prior to project approval or made a condition of project approval. Prior to the Department of Building and Safety's issuance of any permits that allow for grading or construction on the project sites that were on a government list or within one-quarter mile of a site on a government list, the appropriately qualified individual or relevant agency shall provide written confirmation to the City that any necessary remediation has been completed to the satisfaction of the lead agency responsible for cleanup including confirmation that required site remediation was completed consistent with the relevant federal, state, or local requirements.

SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Implementation of Mitigation Measure **HM1** would reduce the impacts related to development on or near an identified hazardous materials site, which could have the potential to create a significant hazard to the public or the environment, to less than significant.

IMPACT 4.6-5 WOULD IMPLEMENTATION OF THE PROPOSED PROJECT RESULT IN A SAFETY HAZARD FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA NEAR A PUBLIC AIRPORT? THIS IMPACT IS LESS THAN SIGNIFICANT.

Santa Monica Airport is located less than two miles south of the western portion of the ECTNP Area, while LAX is located more than 10 miles south of the ECTNP Area. The FAA and the City of Santa Monica plan to maintain airport operations through 2028, after which the City may discontinue its use as an airport.¹¹ The ECTNP Area is not located within the ALUC planning boundaries of either airport. Implementation of the Proposed Project could allow for increased height at the areas of proposed change. Due to the distance from Santa Monica Airport and LAX, even this increased height would not interfere with flight patterns. Compliance with applicable airport safety procedures would be followed by development proposed for the western portion of the ECTNP Area to ensure that development would not result in a safety hazard or be exposed to safety hazard related to the operation of the Santa Monica Airport. Therefore, the Proposed Project would result in less than significant impacts related to airport hazards.

¹¹FAA, *Press Release – FAA Reaches Settlement Agreement with City of Santa Monica*, January 28, 2017, https://www.faa.gov/news/press_releases/news_story.cfm?newsId=21394, accessed February 28, 2017.

MITIGATION MEASURES

Impacts related to airport hazards would be less than significant under the Proposed Project. No mitigation measures are required.

SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Impacts related to airport hazards were determined to be less than significant without mitigation.

IMPACT 4.6-6 WOULD IMPLEMENTATION OF THE PROPOSED PROJECT RESULT IN A SAFETY HAZARD FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA NEAR A PRIVATE AIRSTRIP? AS NO PRIVATE AIRSTRIPS ARE LOCATED IN THE PROJECT VICINITY, NO IMPACT WOULD OCCUR.

There are no private airstrips located in the vicinity of the ECTNP Area. In addition, the ECTNP Area is not located within a designated airport hazard area. Therefore, implementation of the Proposed Project would not result in an airstrip-related safety hazard for people residing or working in the ECTNP Area. Accordingly, no impact related to hazards associated with the operation of a private airstrip would occur.

MITIGATION MEASURES

No impacts related to airstrip hazards would occur under the Proposed Project. No mitigation measures are required.

SIGNIFICANCE OF IMPACTS AFTER MITIGATION

No impacts related to airstrip hazards would occur.

IMPACT 4.6-7 WOULD IMPLEMENTATION OF THE PROPOSED PROJECT IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN? COMPLIANCE WITH EXISTING LOCAL, STATE, AND FEDERAL REGULATIONS WOULD ENSURE THAT THIS IMPACT REMAINS LESS THAN SIGNIFICANT.

The Proposed Project would not impair implementation of, or physically interfere with, the State Emergency Plan or the Los Angeles County Operational Area Emergency Response Plan.¹² Although the Proposed Project would include new land uses and zoning, any future development would be required to comply with county and local emergency response plans. The City of Los Angeles Department of Transportation and LAFD would be responsible for ensuring that the Proposed Project (including proposed land uses) does not impair or physically interfere with an adopted emergency response or evacuation plan. This would be accomplished in a number of ways, including ensuring that the land uses developed under the Proposed Project include adequate access and escape routes (clearly marked and delineated) and residents and patrons of on-site businesses are aware of emergency evacuation plans in the event of a major emergency/catastrophe.

As discussed in Section 4.11, Public Services, designated emergency evacuation and disaster routes within the Project Area would be maintained with the Proposed Project. In addition, local policies, such as the City's General Plan Safety Element Policies 1.1.1, 1.1.2, 1.1.3, 2.1.1, and 3.1.1 provide procedures for coordination among City agencies and other jurisdictions to provide mutual assistance in the event of an emergency or natural disaster and establishment of disaster recovery programs.¹³ Compliance with these policies would help minimize the potential impact of interference with the County's emergency response plan. Therefore, the Proposed Project would result in less than significant impacts related to emergency response plans.

¹²County of Los Angeles Office of Emergency Management, *Operational Area Emergency Response Plan*, February 1998.

¹³City of Los Angeles General Plan *Safety Element*, April 1996.

MITIGATION MEASURES

Impacts related to emergency response plans would be less than significant under the Proposed Project. No mitigation measures are required.

SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Impacts related to emergency response plans were determined to be less than significant without mitigation.

IMPACT 4.6-8 WOULD IMPLEMENTATION OF THE PROPOSED PROJECT EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY, OR DEATH INVOLVING WILDLAND FIRES, INCLUDING WHERE WILDLANDS ARE ADJACENT TO URBANIZED AREAS OR WHERE RESIDENCES ARE INTERMIXED WITH WILDLANDS? AS NO WILDLAND FIRE HAZARD AREAS EXIST WITHIN THE ECTNP AREA, NO IMPACT WOULD OCCUR.

The ECTNP Area is located in a highly-urbanized portion of the City of Los Angeles and is not located in an area identified as a wildland fire hazard area according to Exhibit D, Selected Wildfire Hazard Areas of the Safety Element.¹⁴ Construction of the Proposed Project would not result in impacts to wildland fires and would not place residences in areas prone to wildfires. Therefore, the Proposed Project would result in no impacts related to wildland fire.

MITIGATION MEASURES

No impacts related to wildland fires would occur under the Proposed Project. No mitigation measures are required.

SIGNIFICANCE OF IMPACTS AFTER MITIGATION

No impacts related to wildland fires would occur.

¹⁴City of Los Angeles General Plan Safety Element. Exhibit D- Selected Wildfire Hazard Areas, April 1996.