

5.0 ENVIRONMENTAL IMPACT ANALYSIS

4. HAZARDS AND HAZARDOUS MATERIALS

1. INTRODUCTION

This section of the Supplemental Environmental Impact Report (SEIR) analyzes the Modified Project's impacts with respect to hazards and hazardous materials, as compared to the impacts identified in the State-certified EIR for the 2017 Project. The analysis is based on the following technical reports: *Technical Memorandum: Entrada South and Valencia Commerce Center—Hazards* (Hazards Tech Memo) dated October 19, 2023, and prepared by Catalyst Environmental Solutions (Catalyst), included in **Appendix 5.4a** of this SEIR; *Entrada South, Newhall Ranch Phase I Environmental Site Assessment* (Entrada South Phase I ESA) and *Valencia Commerce Center Phase I Environmental Site Assessment* (VCC Phase I ESA), prepared in March 2022 (revised April 2022) and November 2021, respectively, by ENGEO Incorporated (collectively, the Modified Project Phase I ESAs), which are included as **Appendices 5.4b** and **5.4c**, respectively; *Limited Phase II Environmental Site Assessment* (VCC Phase II ESA) dated November 2021, prepared by ENGEO Incorporated, included in **Appendix 5.4d**; and *Remedial Action Plan and Soil Management Plan for Entrada South Development Area* (Entrada South RAP/SMP) (April 2022) and *Valencia Commerce Center Site Management Plan* (VCC SMP) (November 2021), respectively, included as **Appendices 5.4e** and **5.4f**, of this SEIR.

Hazardous materials are defined as substances with certain chemical and physical properties that can pose a substantial present or future hazard to human health or the environment if improperly handled, stored, disposed, or otherwise managed. If improperly handled, hazardous materials can result in public health hazards through human contact with contaminated soils, surface waters, or groundwater, or through airborne releases in vapors, fumes, or dust.

With regard to other hazards such as flooding and fire hazards, please refer to **Section 5.5**, Hydrology and Water Quality—Hydrology, and **Section 5.14**, Wildfire, respectively, of this SEIR. With regard to geotechnical hazards, please refer to **Section 7**, Geology and Soils, of the Initial Study, included as **Appendix 1** of this SEIR.

2. ENVIRONMENTAL SETTING

a. Regulatory Setting

(1) Federal, State, Regional, and County Regulations

A variety of federal, state, regional, and County of Los Angeles (County) regulations govern the use, storage, management, treatment, and disposal of hazardous materials and hazardous waste. **Table 5.4-1**, Hazardous Materials Regulatory Setting, beginning on page 5.4-3, summarizes the laws, codes, and requirements that regulate the types of hazardous materials addressed herein, and identifies the government agencies charged with their administration and enforcement.

(2) Additional County Regulations

The County of Los Angeles Fire Department (County Fire Department) regulates hazardous waste management through its Health Hazardous Materials Division (HHMD). There are three County fire stations (known as Haz Mat Stations) that handle hazardous materials incidents, including Fire Station No. 76, which is located in Valencia and serves the Valley, including the Modified Project Site. Emergency response to accidents associated with hazardous materials is generally undertaken by the County Fire Department and its HHMD, pursuant to the Los Angeles County Fire/Health Haz Mat Administering Agency Plan. In addition, the HHMD implements a UST compliance program, and the County Fire Department's Site Mitigation Unit (LACFD-SMU) oversees remediation of contaminated properties as the Certified Unified Program Agency (CUPA). The transport of hazardous materials and explosives through the Valley on state highways and freeways is regulated by the California Department of Transportation (Caltrans). Lastly, in 2022, the County passed Ordinance No. 2023-0004 amending Title 22 of the County Code to prohibit new oil wells and production facilities, designate existing oil wells and production facilities as nonconforming due to use, and establish consistent regulations for existing oil wells and production facilities over the established amortization period.

(a) County of Los Angeles General Plan

As discussed in more detail in **Section 5.7**, Land Use and Planning, of this SEIR, the Los Angeles County General Plan 2035 (General Plan) directs future growth and development in the County's unincorporated areas and establishes goals, policies, and objectives that pertain to the entire County. This General Plan reflects changing demographics, growth, and infrastructure conditions in the County. The General Plan includes a Safety Element that sets policy for hazardous materials management with the stated goal of effective County emergency response management capabilities. Relevant policies focus on the review of proposed development projects involving the use or storage of hazardous materials and the safe transportation of hazardous materials.

**Table 5.4-1
Hazardous Materials Regulatory Setting**

Issue Area and Relevant Legislation	Applicable Agency
Hazardous Materials Use, Storage, and Management	
<p><u>Federal/State Occupational Safety and Health Act (California Code of Regulations [CCR] Title 8 Section 3203)</u></p> <p>These laws require special training of handlers of hazardous materials, notification to employees who work in the vicinity of hazardous materials, acquisition from the manufacturer of material safety data sheets which describe the proper use of hazardous materials, and training of employees to remediate any hazardous material accidental releases. The California Division of Occupational Safety and Health (Cal/OSHA) also requires preparation of an Injury and Illness Prevention Program, which is an employee safety program of inspections, procedures to correct unsafe conditions, employee training, and occupational safety communication.</p>	Cal/OSHA
<p><u>Emergency Planning and Community Right-to-Know Act (Title III of the Federal Superfund Amendments and Reauthorization Act)</u></p> <p>This 1986 federal law established nationwide reporting and planning requirements for businesses that handle or store certain hazardous materials. The four programs created under the Act include planning for emergency response, reporting hazardous materials inventories, reporting leaks and spills, and annually reporting the total releases of specified toxic chemicals. The other three programs overlap with the requirements of California's Waters Bill and La Follette Bill, as discussed below.</p>	U.S. Environmental Protection Agency (USEPA)
<p><u>Waters Bill of 1985 (Business Emergency Plan/Hazardous Materials Business Plan)</u></p> <p>This State law requires facilities that meet minimum hazardous materials use/storage thresholds to file a Business Emergency Plan (referred to by the County Fire Department as Hazardous Materials Business Plans [Haz Mat Business Plan]), which includes a complete inventory of the hazardous materials used and stored on a site. Employee training and emergency response plans and procedures for the accidental release of hazardous materials are also included in a Haz Mat Business Plan. These provisions are also required under the Emergency Planning and Community Right-to-Know Act, and are administered through maintenance of a Haz Mat Business Plan.</p>	County Fire Department
<p><u>La Follette Bill of 1986 (Risk Management Plan)</u></p> <p>This state law requires preparation of a Risk Management Plan for commercial operations that use hazardous materials at defined thresholds. The Risk Management Plan must include management, engineering, and safety studies; and plans for physical improvements to minimize accidental hazardous materials releases.</p>	County Fire Department
<p><u>Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) (Senate Bill [SB] 1082, 1994)</u></p> <p>The Unified Program consolidates and coordinates the six state programs that regulate business and industry use, storage, handling, and disposal of hazardous materials and wastes. The regulatory responsibility of hazardous</p>	County Fire Department

Table 5.4-1 (Continued)
Hazardous Materials Regulatory Setting

Issue Area and Relevant Legislation	Applicable Agency
<p>waste in the Modified Project vicinity belongs primarily to the County Fire Department. The County Fire Department's Health Hazardous Materials Division (HHMD) has authority as the CUPA in the Santa Clarita Valley (Valley). In this role, the HHMD directly administers programs related to waste generation, hazardous materials inventories, and risk management. The County Department of Public Works, Environmental Programs Division is a Participating Agency for the CUPA and permits and inspects underground storage tanks (USTs) within the County's unincorporated areas. The Los Angeles County Fire Department's Site Mitigation Unit (LACFD-SMU) implements the remediation provisions of the UST program and oversees the remediation of historic contamination.</p>	
<p><u>Assembly Bill (AB) 304, 2021</u></p> <p>AB 304 facilitates oversight of contamination cleanup activities by local officers when not overseen by the California Department of Toxic Substances Control (DTSC) or a Regional Water Quality Control Board (RWQCB). The law requires local officers to provide written notification and information to DTSC and the appropriate RWQCB before entering into a remedial action agreement and sets requirements for such agreements. The LACFD-SMU serves as the local officer for subject activities within the County.</p>	<p align="center">DTSC, Los Angeles Regional Water Quality Control Board (LARWQCB), LACFD-SMU</p>
<p><u>Los Angeles County Fire Code (County Fire Code)</u></p> <p>The County Fire Code (County Code, Title 32) regulates the type, configuration, and quantity of hazardous materials that may be stored within structures or in outdoor areas. The County Fire Code is administered through regular site inspections and the issuance of notices of violation in cases of noncompliance.</p> <p>The California Fire Code is Chapter 9 of CCR Title 24. It is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The California Fire Code regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The California Fire Code and the California Building Code use a hazard classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separations from property lines and specialized equipment. To ensure that these safety measures are met, the California Fire Code employs a permit system based on hazard classification.</p>	<p align="center">County Fire Department</p>
<p><u>Underground Storage of Hazardous Materials Ordinance (County Code Title 11, Section 11.72.010)</u></p> <p>The purpose of this County Code section is the protection of health, life, resources, and property, as well as the prevention of short- and long-term health hazards or environmental degradation through the prevention and control of unauthorized discharges of hazardous materials from underground storage tanks.^a</p>	<p align="center">County Public Works</p>

Table 5.4-1 (Continued)
Hazardous Materials Regulatory Setting

Issue Area and Relevant Legislation	Applicable Agency
<p><u><i>Safe Drinking Water and Toxics Enforcement Act (Proposition 65)</i></u></p> <p>This state law requires certain businesses that use hazardous materials, or certain buildings that contain hazardous materials, to post a public notice of any accidental hazardous materials releases or other known risk of exposure to materials known to the State of California to cause cancer or reproductive toxicity. This law also prohibits such businesses from releases into the environment at levels above identified risk levels.</p>	County Department of Health Services
Hazardous Waste	
<p><u><i>Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)</i></u></p> <p>The purpose of CERCLA is to identify and clean up chemically contaminated sites that pose a significant threat to human health and the environment. The Hazard Ranking System is used to determine whether a site should be placed on the National Priorities List for cleanup activities.</p>	USEPA
<p><u><i>Hazardous Materials Transportation Act</i></u></p> <p>The federal Hazardous Materials Transportation Act is the statutory basis for the extensive body of regulations aimed at ensuring the safe transport of hazardous materials on water, rail, highways, through air, or in pipelines. It includes provisions for material classification, packaging, marking, labeling, placarding, and shipping documentation.</p>	U.S. Department of Transportation
<p><u><i>Federal/State Occupational Safety and Health Act</i></u></p> <p>The federal Occupational Safety and Health Act (OSH Act) regulations contain worker safety provisions with respect to hazardous waste management operations and emergency responses involving hazardous wastes. The hazardous waste provisions of the OSH Act are contained in the Hazardous Waste Operations and Emergency Response Standard. See also the discussion of state safety requirements under Hazardous Materials Use, Storage, and Management, above.</p>	Cal/OSHA
<p><u><i>Resource Conservation and Recovery Act (RCRA) and California Hazardous Waste Control Law</i></u></p> <p>These federal and state laws regulate the generation, transportation, treatment, storage, and disposal of hazardous waste by large-quantity generators (1,000 kilograms [kg]/month or more) through comprehensive life cycle or cradle to grave tracking requirements. Tracking requirements include maintaining inspection logs of hazardous waste storage locations, records of quantities being generated and stored, and manifests of pick-ups and deliveries to licensed treatment/storage/disposal facilities. RCRA also identifies standards for treatment, storage, and disposal. Both RCRA and the Hazardous Waste Control Law require the preparation of hazardous waste forms by hazardous waste generators for submittal to DTSC, which identifies the nature and quantity of the hazardous waste being generated, along with the storage/treatment/disposal techniques being used. This requirement is administered through the filing of biennial reports with the DTSC.</p> <p>As a division of the California Environmental Protection Agency (CalEPA),</p>	DTSC, California Division of Occupational Safety and Health, County Department of Health Services, County Fire Department

**Table 5.4-1 (Continued)
Hazardous Materials Regulatory Setting**

Issue Area and Relevant Legislation	Applicable Agency
<p>DTSC regulates hazardous waste and contamination cleanup under the authority of RCRA, the Hazardous Substance Account Act (California Health and Safety Code, Division 20, Chapter 6.8), and the Hazardous Waste Control Law (CCR Title 22, Division 4.5). Under RCRA, DTSC has the authority to implement permitting, inspection, compliance, and corrective action programs to ensure hazardous waste management activities follow state and federal requirements.</p> <p>The Hazardous Waste Control Law also establishes criteria for the reuse and recycling of hazardous wastes used or reused as raw materials. This state law exceeds federal requirements by mandating source-reduction planning and a much broader requirement for permitting facilities that treat hazardous waste. It also regulates a number of types of wastes and waste management activities that are not covered by federal law with RCRA.</p>	
<p><u>California Code of Regulations</u></p> <p>Most state regulations and requirements that apply to hazardous waste are spelled out in CCR Title 22, Division 4.5. Title 22 contains detailed compliance requirements for hazardous waste generators, transporters, and treatment, storage, and disposal facilities. Because California is a fully authorized state according to RCRA, most RCRA regulations (i.e., those contained in 40 Code of Federal Regulations [CFR] 260 <i>et seq.</i>) have been duplicated and integrated into Title 22. As with the Hazardous Control Law, Title 22 also regulates a wider range of waste types and waste management activities than do the RCRA regulations. To aid the regulated community, the State compiled hazardous materials, waste, and toxics-related regulations contained in CCR Titles 3, 8, 13, 17, 19, 22, 23, 24, and 27 into one consolidated CCR Title 26, entitled Toxics. However, the California hazardous waste regulations are still referred to commonly as Title 22.</p>	<p>Various state agencies (CalEPA, DTSC, Health Services, Transportation, etc.)</p>
<p><u>Tanner Act (AB 2948)</u></p> <p>The Tanner Act governs the preparation of hazardous waste management plans and the siting of hazardous waste facilities in the State. The act also mandates that each county prepare a Hazardous Waste Management Plan for DTSC approval.</p>	<p>DTSC</p>
<p><u>Hazardous Waste Source Reduction and Management Review Act of 1989 (SB 14)</u></p> <p>This state law requires generators of 12,000 kg or more per year of typical/operational hazardous waste, or 12 kg or more per year of extremely hazardous waste to evaluate their waste streams every four years and select and implement viable source reductions alternatives. This act does not apply to non-typical hazardous waste such as asbestos and polychlorinated biphenyls (PCBs), which are discussed further below.</p>	<p>DTSC</p>
<p><u>Los Angeles County Hazardous Waste Management Plan</u></p> <p>The County's Hazardous Waste Management Plan describes existing and future hazardous waste conditions, needed off-site management facilities, and recommended action programs on a Countywide basis. The plan also establishes siting criteria for the development of needed off-site hazardous</p>	<p>County Public Works</p>

Table 5.4-1 (Continued)
Hazardous Materials Regulatory Setting

Issue Area and Relevant Legislation	Applicable Agency
waste management facilities and identifies general geographic areas where the siting criteria might be met.	
<p><u>County Fire Code</u></p> <p>The County Fire Code regulates hazardous waste storage facilities through regular site inspections. The LACFD-SMU is a CUPA overseeing assessment and remediation of contaminated properties. Discussion of the County Fire Code is also provided under Hazardous Materials Use, Storage, and Management, above.</p>	County Fire Department
Asbestos and Lead-Based Paint	
<p><u>Toxic Substances Control Act of 1976</u></p> <p>This federal law phased out the use of asbestos and asbestos-containing materials (ACMs) in new building materials and established requirements for the use, handling, and disposal of ACMs. New disposal standards for lead-based paint wastes are set forth in Section 402(a)(1) of the act.</p>	USEPA
<p><u>Federal/State Occupational Safety and Health Act</u></p> <p>This law regulates asbestos and lead-based paint as they relate to employee safety through a set of notification and corrective action requirements, warning signs and labels, controlled access, use of protective equipment, demolition/renovation procedures, housekeeping controls, training, and, in certain cases, air monitoring and medical surveillance to reduce potential exposure. This legislation also requires contractors involved in asbestos- and lead-based paint surveys and removal to be certified by the Cal/OSHA. Lead exposure during construction activities is regulated by the federal OSH Act Lead Standard under 29 CFR 1926.62. See also the discussion of the OSH Act and the Cal/OSHA under Hazardous Materials Use, Storage, and Management, above.</p>	Cal/OSHA
<p><u>California Hazardous Waste Control Law</u></p> <p>This state law lists asbestos as hazardous waste and is managed through the Cal/OSHA Asbestos and Carcinogen Unit. See also the discussion under Hazardous Waste, above.</p>	Cal/OSHA and DTSC
<p><u>South Coast Air Quality Management District (SCAQMD) Rule 1403</u></p> <p>This regional rule regulates asbestos as a toxic material and controls the emission of asbestos from demolition/renovation through requirements for surveying structures for ACMs; procedures for the removal, handling, storage, and disposal of ACMs; and standard record-keeping.</p>	SCAQMD
Polychlorinated Biphenyls	
<p><u>Toxic Substances Control Act of 1976</u></p> <p>This federal law bans the manufacture of PCBs, and controls the use, remediation and disposal of existing PCB-containing building materials, soils, and equipment.</p>	USEPA

**Table 5.4-1 (Continued)
Hazardous Materials Regulatory Setting**

Issue Area and Relevant Legislation	Applicable Agency
<p><u>California Hazardous Waste Control Law</u></p> <p>The California Hazardous Waste Control Law lists PCBs as hazardous waste, which is managed by the Department of Toxic Substances Control and EPA Region 9. See also the discussion under Hazardous Waste, above.</p>	DTSC
Underground and Aboveground Storage Tanks	
<p><u>Resource Conservation and Recovery Act, Subtitle I</u></p> <p>This federal law authorizes the USEPA to issue regulations for new USTs, as well as standards for upgrading existing USTs, corrosion protection, spill and overflow protection, on-site practices and record-keeping, UST closure standards, and financial responsibility. The state UST laws incorporate federal requirements, as discussed below. See also the discussion under Hazardous Waste, above.</p>	USEPA
<p><u>California Code of Regulations and California Health and Safety Code</u></p> <p>The state UST program is set forth in these regulations, which incorporate the requirements of RCRA, Subtitle I, and set registration and permitting requirements, construction/operational standards, closure requirements, licensing requirements for UST contractors, financial responsibility requirements, release reporting/corrective action requirements, and enforcement. The state UST program also requires the installation of leak detection systems and/or monitoring of USTs. Since 1998, all tanks have been required to include corrosion protection, leak detection, and spill/overflow devices.</p>	County Fire Department HHMD for operational compliance; LACFD-SMU and LARWQCB for cleanup activities
<p><u>Aboveground Petroleum Storage Act</u></p> <p>This state law regulates aboveground storage tanks (ASTs) with a storage capacity of 10,000 gallons or more of specified petroleum products via oil pollution prevention and response requirements under the federal Clean Water Act. The program requires the preparation of a Spill Prevention Control and Countermeasure Plan, the filing of biennial reports with the LARWQCB, and notification of the State Office of Emergency Services for certain spills or releases of 42 gallons or more of petroleum.</p>	LARWQCB
<p><u>County Requirements</u></p> <p>The County Fire Department requires, among other things, that all liquid hazardous material ASTs have secondary containment measures and conform to seismic zone 4 requirements.</p>	County Fire Department
Oil Wells and Methane Gas	
<p><u>Los Angeles County Building Code, Section 110.4</u></p> <p>Subject to certain limited exceptions, Section 110.4 of the 2023 County Building Code requires that permits shall not be issued for new buildings or enclosed structures, additions, or conversions of a building or structure to habitable or occupiable space regulated by the County Code on, adjacent to, or within 300 feet of active, abandoned, or idle oil or gas well(s), unless designed according to recommendations contained in a report prepared by a registered design professional, such as a licensed civil engineer or a licensed</p>	County Public Works

Table 5.4-1 (Continued)
Hazardous Materials Regulatory Setting

Issue Area and Relevant Legislation	Applicable Agency
<p>petroleum engineer, to evaluate whether such wells are being properly operated or maintained, or are abandoned. No permits shall be issued until documentation of proper operation, maintenance, abandonment, or re-abandonment is submitted to, and approved by, the Building Official.</p> <p>Consistent with guidance from the DTSC, the Los Angeles County Department of Public Works defines a methane gas hazard to be indicated by soil gas concentrations greater than 5,000 parts per million by volume methane, and provides types of mitigation for structures constructed over areas with methane in soil gas greater than 5,000 parts per million by volume.^b</p>	
<p><u>Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (SB 1082)</u></p> <p>In the case of remediation regulations pertaining to oil wells, DTSC delegates authority to the CUPA, as a result of exclusions granted to oil operations, especially when the threat to groundwater quality is limited. The LACFD-SMU has been delegated CUPA authority for remediation from DTSC, in coordination with the LARWQCB.</p>	LACFD-SMU
<p><u>California Code of Regulations Title 14, Division 2</u></p> <p>CalGEM^c regulates the underground storage of natural gas and the development of oil and gas wells. The California Public Utilities Commission regulates the above-ground infrastructure. The State requires gas storage fields to be closely monitored by facility operators to ensure their safe operation and make certain no damage to health, property, or natural resources occurs. The State also conducts quarterly and annual site inspections for technical and safety purposes.</p>	CalGEM, California Public Utilities Commission
<p><u>Public Resources Code Section 3200, et seq.</u></p> <p>The state Public Resources Code regulates the permitting, establishment, completion, and abandonment/re-abandonment of gas and oil wells. CalGEM is the state agency with primary responsibility for the enforcement of these regulations. CalGEM is also the state agency that administers the Construction Site Plan Review Program to assist local permitting agencies in identifying and reviewing the status of oil or gas wells located near or beneath proposed structures.</p>	CalGEM
<p><u>Oil Wells and Production Facilities (Ordinance 2023-0004)</u></p> <p>In 2022, the County passed Ordinance No. 2023-0004 amending Title 22 of the County Code to prohibit new oil wells and production facilities, designate existing oil wells and production facilities as nonconforming due to use, and establish consistent regulations for existing oil wells and production facilities over the established amortization period.</p>	County Public Works
<p>Agricultural Lands</p>	
<p><u>California Food and Agriculture Code</u></p> <p>Under this state law, the California Department of Food and Agriculture regulates pesticide sales and use in California by registering and classifying</p>	California Department of Food and Agriculture

**Table 5.4-1 (Continued)
Hazardous Materials Regulatory Setting**

Issue Area and Relevant Legislation	Applicable Agency
pesticides, licensing professional agricultural pest control operations, and monitoring pesticide residues in food samples. Section 12972 requires pesticide applications to be confined to their target and avoid contamination of non-target populations and applies penalties (including civil penalties and license revocation) if violations occur.	
Electrical Transmission Lines	
<p><u>Limits for Schools Near the Edge of Easements</u></p> <p>In consultation with the State Department of Health Services and electric power companies, the State Board of Education has established the following limits for locating any part of a school site property line near the edge of easements for high-voltage power transmission lines:^d</p> <ul style="list-style-type: none"> • 100 feet from the edge of an easement for a 50–133 kilovolt (kV) line • 150 feet from the edge of an easement for a 220–230 kV line • 350 feet from the edge of an easement for a 500–550 kV line 	State Department of Health Services
Evacuation Access	
<p><u>County Subdivision Access Design Standards, Title 21, Chapter 21.24</u></p> <p>The Los Angeles County Code contains specific requirements related to secondary evacuation access for subdivisions.</p>	County Fire Department
<p>^a Los Angeles County Code, Title 11, Section 11.72.010, <i>Underground Storage of Hazardous Materials Ordinance</i>.</p> <p>^b <i>Gas Hazard Mitigation Policy and Standards, Los Angeles County Department of Public Works Policy, Procedures, and Guidelines</i> document, effective January 1, 2020.</p> <p>^c <i>Effective January 1, 2020, California’s regulatory entity for oil, gas, and geothermal production, previously known as the California Division of Oil, Gas and Geothermal Resources (DOGGR), is now CalGEM.</i></p> <p>^d <i>California Department of Education, School Facilities Planning Division, School Site Section and Approval Guide, Updated in 2006, www.cde.ca.gov/ls/fa/sf/schoolsiteguide.asp, accessed February 27, 2024.</i></p> <p>Source: Eyestone Environmental, 2024.</p>	

The General Plan policy consistency analysis provided in **Section 5.7**, Land Use and Planning.

(b) Santa Clarita Valley Area Plan: One Valley One Vision 2012

As discussed in greater detail in **Section 5.7**, Land Use and Planning, of this SEIR, the Santa Clarita Valley Area Plan: One Valley One Vision 2012 (Area Plan), serves as a long-term guide for development in the Santa Clarita Valley Planning Area (Valley Planning Area) over a 20-year planning period. The Area Plan ensures consistency between the

General Plans of the County and the City of Santa Clarita (City) in order to achieve common goals. Within the Area Plan, the Safety Element addresses issues relating to hazards and hazardous materials.

The Area Plan identifies the most likely scenarios for a hazardous materials release or spill in the Valley Planning Area as involving either the transportation of materials by railroad or truck, the use of hazardous materials at a business, or illegal dumping of hazardous wastes.¹ Hazardous materials are transported to and through the Valley by vehicles using Interstate 5 (I-5) and State Routes 14 and 126 (SR-14 and SR-126, respectively), as well as by the Union Pacific Railroad.

The Area Plan policy consistency analysis provided in **Section 5.7**, Land Use and Planning, of this SEIR.

b. Existing and Historic Conditions

The following discussion is based upon the Hazards Tech Memo included as **Appendix 5.4a** of this SEIR, which is in turn based on the Entrada South Phase I ESA, VCC Phase I ESA, and VCC Phase II ESA, included as **Appendices 5.4b**, **5.4c**, and **5.4d** of this SEIR, respectively.

(1) Entrada South Planning Area

(a) Current and Historic Uses

As shown in **Figure 3-4**, Aerial Photo of the Entrada South Planning Area, in **Section 3.0**, Project Description, of this SEIR, the Entrada South Planning Area consists of approximately 382 acres located west of I-5 and The Old Road and predominantly south of Six Flags Magic Mountain theme park (Six Flags Magic Mountain). Adjoining properties include Six Flags Magic Mountain to the north, the approved Mission Village development to the west, which is under construction, a Chevron gas station to the northeast, and the existing Westridge community to the south.

The site is located in the abandoned Castaic Junction Oil/Gas Field, and the western half of the property was historically used for oil/gas production starting in the 1950s. Numerous wells, tanks, pipelines, buildings, and other oil field features were historically located throughout the Castaic Junction Oil/Gas Field. There are 11 oil/ gas wells (enumerated as Newhall Land & Farming [NLF] #01, Magic Mountain [MM] #01, NLF #31,

¹ Santa Clarita Valley Area Plan Update: One Valley One Vision 2012, Chapter 5: Safety Element, p. 206.

NLF #35, NLF #36, NLF #37, NLF #38, NLF #43, NLF #44, NLF #47, and NLF #51) located within the Entrada South Planning Area that were plugged and abandoned between 1976 and 2001. In connection with the plugging and abandonments, CalGEM determined its requirements were fulfilled.

Two oil wells, NLF #31 and #35, were adjusted after 2019.² (The remaining wells are anticipated to be adjusted during remedial grading in accordance with the regulatory requirements described above and Mitigation Measure RMDP/SCP-PH-1.)

Today the Entrada South Planning Area is generally comprised of vacant land, some agricultural uses, the 11 plugged and abandoned oil wells, and associated dirt access roads. In addition, the southern boundary of the Entrada South Planning Area is developed with Southern California Edison (SCE) electric transmission lines and towers, and a SoCalGas 34-inch, high-pressure natural gas transmission pipeline traverses the southernmost portion of the Entrada South Planning Area from east to west.

Separate from the Modified Project, the northern and western portions of the Entrada South Planning Area have recently undergone extensive geotechnical remedial grading associated with construction of the approved extensions of Magic Mountain Parkway and Commerce Center Drive as part of the neighboring Mission Village development, currently under construction. These areas currently contain one inactive temporary fuel station and associated storage tanks, a water quality control basin, soil borrow sites, portable toilets, vehicle equipment, and related materials, all of which are subject to best management practices (BMPs) in accordance with an approved stormwater pollution prevention plan (SWPPP).

The Entrada South Planning Area ranges in elevation from approximately 1,000 feet above mean sea level (AMSL) in the northeast to approximately 1,400 feet AMSL to the southwest. Well data from three state water wells located between 0.21 and 0.70 mile from the property indicate that groundwater in the area between 2005 and 2019 measured from 42 to 78 feet below ground surface (bgs).

A reconnaissance survey of the Entrada South Planning Area and immediate vicinity was conducted as part of the Entrada South Phase I ESA. The property was evaluated for hazardous materials storage, superficial staining or discoloration, debris, stressed vegetation, or other conditions that may be indicative of potential sources of soil or groundwater contamination. The property was also checked for evidence of fill/ventilation

² As used in this context, adjustment means adjusting the elevation of the existing well top plate relative to the design grade, consistent with approved development grading plans.

pipes, ground subsidence, or other evidence of existing or preexisting underground storage tanks. Several recognized environmental conditions (RECs) and historical RECs (HRECs) were identified, as discussed below in the impact analysis.

(b) Hazardous Materials Database Search

To identify hazardous materials uses or incidents within the Modified Project area, a review of relevant government databases was conducted by Environmental Data Resources, Inc. in connection with preparation of the Entrada South Phase I ESA. Environmental Data Resources, Inc. searches federal, tribal, state, and local databases to provide the most recent information regarding hazardous materials sites within the Project vicinity. The database search results are summarized below and included as Appendix A to the Entrada South Phase I ESA.

The underground injection control (UIC) database lists three wells, NLF #36, #47, and #51, which are located within the Entrada South Planning Area. Records indicate that these three abandoned wells were utilized as waterflood wells. An additional well located on-site, NLF #44, was also utilized as an injection/waterflood well but is not listed in the UIC database.

Refer to the Entrada South Phase I ESA for a list of nearby (off-site) properties that appear on various databases. As indicated in the Entrada South Phase I ESA, based on the distances to the identified database sites, regional topographic gradient, and the findings, it is unlikely that the listed database sites would pose an environmental risk to the Entrada South Planning Area.

(2) VCC Planning Area

(a) Current and Historic Uses

As shown in **Figure 3-5**, Aerial Photo of the VCC Planning Area, in **Section 3.0**, Project Description, of this SEIR, the VCC Planning Area consists of approximately 334 acres of an undeveloped portion of the partially completed VCC industrial park/commercial center located west of I-5 and north of SR-126. The site is bisected by Hasley Creek and Castaic Creek. Surrounding uses include existing single-family residential and industrial uses to the north; existing industrial uses to the east; the proposed Entrada North community to the south across SR-126; and the previously developed portion of VCC to the west.

The property consists of mostly vacant land with seasonal drainages. The southern and northeastern portions of the property contain agricultural and long-term vehicle storage uses, respectively. Power lines bisect the northern portion of the property in an east-west

direction. There are two plugged and abandoned oil/gas wells, Wells #B-1 and #D-2, associated with the abandoned Castaic Junction Oil/Gas Field, which extends into the southwestern portion of the property. The two wells are listed on the CalGEM website as plugged and abandoned in reports issued May 22, 1951, and April 30, 1958, respectively. The reports indicate that neither of the wells encountered commercial quantities of petroleum during oil exploration and were plugged and abandoned as dry holes. In the vicinity (but outside) of the VCC Planning Area there is sewer pump lift station along Commerce Center Drive. The VCC Planning area includes a water well within the eastern portion and stockpiles of construction debris in the central portion. The surrounding area contains oil/gas wells associated with the abandoned Castaic Junction Oil/Gas Field to the south and the Honor Rancho Oil/Gas Field to the north-northeast.

The VCC Planning Area ranges in elevation from approximately 980 to approximately 1,200 feet AMSL. Well data from one on-site well and four wells within one mile of the property indicate that groundwater in the area ranges in depth from 8 to 79 feet bgs.

A reconnaissance survey of the VCC Planning Area and immediate vicinity was conducted as part of the VCC Phase I ESA. The property was evaluated for hazardous materials storage, superficial staining or discoloration, debris, stressed vegetation, or other conditions that may be indicative of potential sources of soil or groundwater contamination. The property was also checked for evidence of fill/ventilation pipes, ground subsidence, or other evidence of existing or preexisting underground storage tanks. The site reconnaissance did not find physical evidence of soil, soil gas, or groundwater impairments associated with the current and past uses of the property. According to the VCC Phase I ESA, no RECs, HRECs, or controlled RECs were identified on-site.

(b) Phase II Investigation

The northwest and southeast portions of the VCC Planning Area were historically used for agriculture prior to the 1980s. ENGEO performed a Phase II environmental site assessment of the northwestern portion of the site to assess for potential agricultural impacts. Ten composite samples were analyzed for organochlorine pesticides (OCPs), and 10 discrete samples were analyzed for arsenic and lead. Based on the laboratory results, the reported concentrations do not pose a risk to human health or the environment.

(c) Hazardous Materials Database Search

A review of relevant government databases was conducted by Environmental Data Resources, Inc. in order to identify hazardous materials uses or incidents within the VCC Planning Area as part of preparation of the VCC Phase I ESA. The database search results are summarized below and included as Appendix A to the VCC Phase I ESA.

A facility within the VCC Planning Area referred to as Exxon B1 and Chevron D2 are listed in the California Integrated Water Quality System (CIWQS) and National Pollutant Discharge Elimination System (NPDES) databases. The CIWQS is used by the State and Regional Water Quality Control Boards to track information about places of environmental interest and to manage permits and other enforcement activities. The CIWQS listing is associated with a SWPPP related to the reabandonment of certain oil wells . The SWPPP was active from 2014 through 2016.

Refer to the VCC Phase I ESA for a list of nearby (off-site) properties that appear on various databases. As indicated in the VCC Phase I ESA, based on the distances to the identified database sites, regional topographic gradient, and the database findings, it is unlikely that the listed database sites would pose an environmental risk to the VCC Planning Area.

3. SUMMARY OF IMPACTS FOR THE 2017 PROJECT

Section 4.17, Hazards, Hazardous Materials, and Public Safety, of the State-certified EIR analyzed impacts related to hazards and hazardous materials resulting from the development of the Entrada South and VCC Planning Areas. More specifically, the State-certified EIR analyzed the potential for significant impacts where development would occur in the following locations: (1) adjacent to historic and continuing oil and natural gas production; (2) in proximity to high-voltage electrical transmission lines; (3) in proximity to high-pressure gas lines; (4) adjacent to SR-126 and I-5, upon which hazardous materials are transported; (5) in proximity to Chiquita Canyon Landfill; (6) within the Castaic/Forebay Reservoir dam inundation area; (7) adjacent to ongoing agricultural operations/pesticide use; and (8) areas subject to wildland fire risk. Based on former oil production activities within portions of both the Entrada South and VCC Planning Areas, the State-certified EIR found that a number of former oil well sites exist on-site, and despite past remediation activities, residual soil contamination exist in some areas. In addition, ACMs, lead-based paint, and PCBs may be present within existing structures on-site. As previously indicated, other existing facilities on-site include high-voltage electric transmission lines and towers owned by SCE, a high-pressure gas transmission pipeline owned by SoCalGas, and other gas lines, groundwater monitoring wells, and water wells.

a. Entrada South Planning Area

The State-certified EIR concluded that Project-level and cumulative impacts relative to the following issues would be significant for development within the Entrada South Planning Area: hazards related to the routine use, transport, and disposal of hazardous materials; reasonably foreseeable upset and accident conditions; hazardous emissions or the handling of hazardous materials within 0.25 mile of a school; and wildland fires. Implementation of Mitigation Measures RMDP/SCP-PH-1 through RMDP/SCP-PH-14

would reduce these impacts to a less than significant level. All other hazards impacts were determined to be less than significant.

b. VCC Planning Area

The State-certified EIR concluded that Project-level and cumulative impacts relative to the following issues would be significant for development in the VCC Planning Area: hazards related to the routine use, transport, and disposal of hazardous materials; reasonably foreseeable upset and accident conditions; hazardous emissions or the handling of hazardous materials within 0.25 mile of a school; and wildland fires. Implementation of Mitigation Measures RMDP/SCP-PH-1 through RMDP/SCP-PH-14 would reduce these impacts to a less than significant level. The County of Los Angeles also adopted Mitigation Measures VCC-PH-1 and VCC-PH-2 to minimize hazards-related impacts within the VCC Planning Area as part of its original 1991 approval of the VCC Project. All other hazards impacts were determined to be less than significant.

4. REGULATORY REQUIREMENTS AND PROJECT DESIGN FEATURES

In addition to the applicable regulations listed in **Table 5.4-1**, Hazardous Materials Regulatory Setting, the following regulatory compliance measures shall be implemented as part of the Modified Project:

- During Modified Project grading, all groundwater monitoring wells or other water wells not intended for future use shall be abandoned according to applicable federal, state, regional, and local regulations, specifically in accordance with the California Department of Water Resources' Bulletin 74-81 and supplemental Bulletin 74-90.
- If a school is ultimately developed within the Entrada South Planning Area, the final school location shall comply with the California State Board of Education requirement that schools not be sited within: 100 feet from the edge of the right-of-way of 100 to 110 kV lines; 150 feet from 220 to 230 kV lines; and 350 feet from 500 to 550 kV lines. In addition, the school shall not be sited within an electric transmission line restricted zone. (Refer to Mitigation Measure RMDP/SCP-PH-4 for further details regarding school siting.)
- Prior to the issuance of building permits and in accordance with the provisions of County Code, Title 11, Division 4, the Department of Public Works shall review and approve permits for underground hazardous materials storage facilities (i.e., USTs) if constructed or installed within the Modified Project Site.
- Prior to initiation of building construction activities, the Modified Project Applicant shall prepare and implement a Spill Prevention Plan, per CFR Title 40, Section 112. The Spill Prevention Plan shall detail reporting requirements, cleanup

processes, appropriate use and storage of hazardous materials (such as the use of proper container types and storage requirements), and waste containment and disposal. The plan shall include specific measures and performance standards to adequately mitigate any releases. The plan shall be submitted to the HHMD for review and approval prior to the start of any Modified Project-related construction.

- No structures are proposed within the SCE or SoCalGas easements along the southern boundary of the Entrada South Planning Area. However, a segment of the existing 34-inch natural gas transmission line that traverses a drainage referred to as Unnamed Canyon 2 would be vertically relocated in conjunction with development of the Modified Project. Activities associated with these relocations would comply with SoCalGas' standard requirements for pipeline relocation and replacement, and relocation may be implemented by SoCalGas.

No specific project design features (PDFs) are proposed with respect to hazards and hazardous materials. However, as detailed in **Section 5.9**, Transportation, of this SEIR, Project Design Feature PDF-HM-1 calls for preparation and implementation of a Construction Traffic Management Plan to ensure safe traffic operations and emergency access during construction. The Modified Project also includes an internal circulation system designed for the safe movement of Modified Project residents, employees, and visitors. A site-wide emergency evacuation and response plan would be prepared in accordance with regulatory requirements, as discussed in **Section 5.14**, Wildfire, of this SEIR.

5. THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the CEQA Guidelines and other relevant criteria, the Los Angeles County Department of Regional Planning has determined that a project would have a significant impact related to hazards and hazardous materials based on the following criteria:

- Threshold 5.4-1:** Would the Project create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?
- Threshold 5.4-2:** Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?
- Threshold 5.4-3:** Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?

Threshold 5.4-4: Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Threshold 5.4-5: 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 or excessive noise for people residing or working in the project area?

Threshold 5.4-6: Would the Project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

Threshold 5.4-7: Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving fires, because the project is located:

- i) within a high fire hazard area with inadequate access?
- ii) within an area with inadequate water and pressure to meet fire flow standards?
- iii) within proximity to land uses that have the potential for dangerous fire hazard?

Threshold 5.4-8: Does the proposed use constitute a potentially dangerous fire hazard?

As evaluated in the Initial Study (see **Appendix 1** of this SEIR), the Modified Project would not result in new or more severe significant impacts than the 2017 Project with respect to: (1) location on a site that is included on a list of hazardous materials sites per Threshold 5.4-4; (2) location within an airport land use plan or within two miles of a public airport or public use airport per Threshold 5.4-5; and (3) impairing implementation of, or physically interfering with, an adopted emergency response plan or emergency evacuation plan per Threshold 5.4-6. Accordingly, the Initial Study analysis concluded no further analysis of these issues is required. Please refer to the Initial Study for discussion related to Thresholds 5.4-4, 5.4-5, and 5.4-6. Thus, no further analysis of these issues is necessary or provided herein.

Fire hazards (e.g., Thresholds 5.4-7 and 5.4-8) are addressed in **Section 5.14, Wildfire**, of this SEIR.

6. ENVIRONMENTAL IMPACTS OF THE MODIFIED PROJECT

a. Methodology

To evaluate environmental impacts relative to hazards and hazardous materials, the Modified Project Phase I ESAs were prepared by ENGEO Incorporated, as provided in **Appendices 5.4b** and **5.4c** of this SEIR. Preparation of the Modified Project Phase I ESAs included: a review of previous environmental reports prepared for the Modified Project Site (e.g., both the Entrada South and VCC Planning Areas); a review of publicly available and practicably reviewable standard local, state, tribal, and federal environmental record sources; a review of publicly available and practicably reviewable standard historical sources, aerial photographs, fire insurance maps and physical setting sources; and a reconnaissance of the sites to review past site use and current conditions (including checking for the storage, use, production, or disposal of hazardous or potentially hazardous materials). The Modified Project Phase I ESAs were prepared in general conformance with the scope and limitations of ASTM E1527-13 and the standards and practices of the All Appropriate Inquiry—Final Rule (40 CFR Part 312).

The objective of the Modified Project Phase I ESAs is to identify RECs associated with the Modified Project Site. A REC is the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to a release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.

ENGEO also prepared the Entrada South RAP/SMP, included as **Appendix 5.4e** of the SEIR, and the VCC SMP, included as **Appendix 5.4f**, to address unanticipated discoveries of contaminated material during earthwork activities. The Entrada South RAP/SMP and VCC SMP are based the current performance and cleanup standards contained in the LACFD-SMU–approved remedial plan and soil management plan that have been implemented for the Castaic Junction remediation associated with the Mission Village development (referred to herein as the Castaic Junction Mission Village RP and Castaic Junction Mission Village SMP, respectively).

b. Project Impacts

Threshold 5.4-1: Would the Project create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?

Threshold 5.4-3: Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?

Modified Project impacts with respect to Thresholds 5.4-1 and 5.4-3 are addressed in the following combined analysis since these criteria relate to the use and emission of hazardous materials associated with the proposed development. The nearest sensitive receptors to the Entrada South Planning Area are the residential uses in the Westridge community located approximately 700 feet to the south, while the nearest sensitive receptors to the VCC Planning Area are the Live Oak residential development and school (Live Oak Elementary) approximately 60 feet and 600 feet, respectively, to the north. Refer to **Section 5.1**, Air Quality, of this SEIR for a discussion of potentially hazardous air emissions during construction and operation. As discussed therein, the Modified Project would not result in any new or substantially more severe significant impacts related to construction-related and operational health risks as compared to the 2017 Project.

(1) Entrada South and VCC Planning Areas³

(a) Construction

The Modified Project would result in a net reduction of 3,187 square feet of total development in comparison to the State-certified EIR. Prior to and/or during Modified Project construction, all existing above-ground hazardous materials and hazardous materials storage containers would be removed and disposed of in accordance with applicable federal, state, regional, and local requirements. During on-site grading and construction activities, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners would be used, handled, and/or stored on-site. Given the similarities between the Modified Project and the 2017 Project relative to the types of land uses to be developed and the amount and nature of construction, the types and volumes of such hazardous materials would be similar as well. Like the 2017 Project, the Modified Project would involve the routine use, handling, storage, transport, and disposal of these materials which could create a significant hazard to the public or the environment. Additionally, on-site construction activities would have the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of sensitive land uses (e.g., uses with populations containing asthmatics, children, and the elderly). Similar to the 2017 Project, if a release of hazardous emissions or materials were to occur this would constitute a significant impact.

As with the 2017 Project, implementation of the applicable, previously adopted mitigation measures from the State-certified EIR (refer to Subsection 8.a, Previously Approved Mitigation from the State-Certified EIR, below), specifically Mitigation Measures RMDP/SCP-PH-8, RMDP/SCP-PH-9, and RMDP/SCP-PH-12, as well as adherence to all

³ *Where impacts associated with both planning areas are similar or identical, the analysis has been combined to reduce redundancy.*

applicable regulatory compliance measures, would ensure impacts associated with the routine use, handling, storage, transport, and disposal of hazardous materials, as well as any potential hazardous emissions generated during construction would be reduced to a less than significant level. In particular, hazardous wastes would be conveyed to licensed treatment, disposal, and resource recovery facilities, as required (refer to **Section 5.13, Utilities and Service Systems—Solid Waste**, of this SEIR for further discussion of waste disposal requirements). Therefore, with implementation of Mitigation Measures RMDP/SCP-PH-8, RMDP/SCP-PH-9, and RMDP/SCP-PH-12, as well as adherence to all applicable regulatory compliance measures, the Modified Project would not result in any new or substantially more severe significant impacts related to construction-related hazards or hazardous materials as compared to those identified in the State-certified EIR for the 2017 Project.

(b) Operation

The Modified Project would reduce the total number of residential units constructed in Entrada South by 151 units (i.e., 1,725 units reduced to 1,574 units and 3,235,100 square feet of residential to 2,951,913 square feet of residential) and increase the non-residential square footage by 280,000 square feet (i.e., 450,000 square feet increased to 730,000 square feet), resulting in a net reduction of 3,187 square feet of total development in comparison to the 2017 Project evaluated in the State-certified EIR. Modified Project operations, like the 2017 Project, would involve the limited use of potentially hazardous materials typical of those used in residential and commercial developments, light industrial/business park uses, schools, and parks, including cleaning agents, paints, pesticides, and other materials used for landscaping. Given the similarities between the Modified Project and the 2017 Project relative to the types and floor area of land uses to be developed, the types and volumes of such hazardous materials would be similar as well. As with 2017 Project, the routine use, handling, storage, transport, and disposal of these materials could expose people and the environment to hazardous materials and increase the potential for hazardous materials releases, resulting in a significant impact if such a release were to occur.

However, all hazardous materials within the Modified Project Site would be acquired, handled, used, stored, transported, and disposed of in accordance with manufacturers' instructions and in compliance with all applicable federal, state, regional, and local requirements, including the regulatory compliance measures discussed above. Most hazardous substances used on-site would be stored in small containers intended for residential and commercial use. In general, these substances would be stored above ground in appropriate containers and, where necessary, within appropriate enclosures, subject to relevant permitting requirements. Impacts would be comparable to those of the 2017 Project. Accordingly, the Modified Project would not result in any new or substantially

more severe significant impacts compared to those identified in the State-certified EIR with respect to this topic.

With regard to hazardous waste, the Modified Project's uses are not anticipated to generate 12,000 kg or more per year of typical operational hazardous waste or 12 kg or more per year of extremely hazardous waste, and thus would not be subject to the requirements of SB 14. As with the 2017 Project, any minor hazardous wastes would be conveyed to licensed treatment, disposal, and resource recovery facilities, as required, and/or would be collected and handled as part of the County's household hazardous waste management program (refer to **Section 5.13**, Utilities and Service Systems—Solid Waste, of this SEIR for further discussion of waste disposal requirements). Further, the Modified Project would include an emergency response plan per regulatory requirements which would facilitate emergency response and evacuation of the Modified Project Site in the event of a hazardous materials release. Mitigation Measure RMDP/SCP-PH-7 further requires the provision of secondary evacuation access in compliance with County Code requirements. Therefore, the hazards-related operational impacts of the Modified Project associated with both the routine transport, storage, production, use, or disposal of hazardous materials and wastes, and with hazardous materials emissions within 0.25 mile of sensitive uses, would be less than significant. Such impacts would be comparable to those of the 2017 Project. Therefore, with implementation of Mitigation Measure RMDP/SCP-PH-7, as well as adherence to all applicable regulatory compliance measures, the Modified Project would not result in any new or substantially more severe significant impacts related to operation-related hazards or hazardous materials as compared to those identified in the State-certified EIR for the 2017 Project.

(2) Conclusion

As indicated above, with implementation of all applicable previously adopted mitigation (refer to Subsection 8, Mitigation Measures, below) as well as adherence to all applicable regulatory compliance measures, the Modified Project would not result any new or substantially more severe significant impacts associated with the routine transport, storage, production, use, or disposal of hazardous materials or hazardous emissions within 0.25 mile of sensitive land uses. This conclusion is consistent with that presented in the State-certified EIR for the 2017 Project, which similarly determined that hazards associated with the above issues would be less than significant after mitigation. Furthermore, the Modified Project would not result in any greater use or emissions of hazards materials during construction or operation than the 2017 Project and would adhere to the same applicable regulatory requirements. Therefore, with implementation of mitigation measures and regulatory compliance measures, the Modified Project would not result in any new or more severe significant impacts related to hazards, or hazardous materials, substances, or wastes as compared to those identified in the State-certified EIR for the 2017 Project..

Threshold 5.4-2: Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?

(1) Entrada South Planning Area

The Modified Project does not involve changes that would change the State-certified EIR impact conclusion as to the 2017 Project with respect to the reasonably foreseeable upset and accident condition involving the release of hazardous materials or waste into the environment for the Entrada South Planning Area.

Consistent with the State-certified EIR, which found there may be unknown and/or undocumented site contamination, the Entrada South Phase I ESA identified six RECs and five HRECs, as summarized below and detailed in the Entrada South Phase I ESA.

The following features are considered RECs:

- An undocumented pit associated with well NLF MM #01 has unknown fill material.
- Documentation is needed for soil sampling and the extent of soil impacts associated with remediation of the former sumps and well pads on-site.
- Further testing is needed in the location of three soil vapor samples with VOC concentrations exceeding California Human Health Screening Levels (CHHSL) based on a 2013 soil vapor survey.
- Remnant drilling mud and sumps may exist on-site.
- Remnant oil stains, asphaltic sands, and tar mats may be present beneath surficial soil.
- Confirmation soil sampling for Tank Battery #8, which was remediated during past oil field decommissioning, is needed.

The following features are considered HRECs:

- The 11 abandoned oil/gas wells on-site associated with the Castaic Junction Oil/Gas Field were plugged and abandoned.⁴ Four oil-well identifier plates (for NLF #01, MM #01, NLF #31 and NLF #35) are missing or inaccessible.
- Pyrotechnic debris was observed during previous environmental investigations in the northern portion of the site. Soil samples did not exceed regulatory thresholds, and the debris was addressed under the Castaic Junction Mission Village RP and SMP.
- Hazardous materials and pesticides have been observed to be used in the Six Flags Magic Mountain Theme Park nursery, formerly located in the northwestern portion of the Property. Based on aerial photographs, the nursery was demolished sometime between August 2014 and May 2015, and the area has since been graded as part of the neighboring Mission Village development and addressed as part of the neighboring Mission Village Development Remediation Plan and Soil Management Plan.
- One AST was documented in previous environmental investigations north of Magic Mountain Parkway but was not observed during preparation of the Entrada South Phase I ESA.
- Three temporary fuel stations (TFS) are located on the site and were used to support earthwork activity at the neighboring Mission Village project. These facilities were permitted through LACFD. Two former TFS were decommissioned and removed (no tanks remain), and soil samples confirmed that that no residual contamination is present. The third TFS has been decommissioned but tanks are still present on-site.

With regard to ACMs, lead-based paint, and PCBs, although building material surveys were not conducted as part of the assessment, the Entrada South Phase I ESA indicated it is unlikely that such materials are present on-site, particularly since there are no existing structures. Further, during the site reconnaissance, no potential PCB-containing equipment, including transformers, was observed.

As indicated in the Entrada South Phase I ESA, the recommendations provided within the Entrada South RAP/SMP -will sufficiently address the RECs and HRECs identified above. In addition, as with the 2017 Project, implementation of the applicable, previously adopted mitigation measures from the State-certified EIR (refer to Subsection 8.a, Previously Approved Mitigation from the State-certified EIR, below) and compliance with applicable regulatory requirements would mitigate any impacts associated with the

⁴ As described herein, in connection with the plugging and abandonments, CalGEM determined its requirements were fulfilled.

identified environmental conditions. Specifically, Mitigation Measures RMDP/SCP-PH-1 and RMDP/SCP-PH-5, implementation of the Entrada South RAP per Mitigation Measures RMDP/SCP-PH-1, and compliance with Section 110.4 of the 2023 County Building Code would address the past oil field use of the property, including associated former sumps, tank batteries, well pads, and remnant drilling mud, as well as potential subsurface methane gas.

Consistent with guidance from the DTSC, the Los Angeles County Mitigation Measures RMDP/SCP-PH-11 and RMDP/SCP-PH-12, which call for development and implementation of the RAP and SMP, would also address the identified oil staining, asphaltic sands, tar mats, and pyrotechnic debris. As previously discussed, the past use of hazardous materials and pesticides in the former Six Flags Magic Mountain nursery were addressed as part of the Castaic Junction Mission Village RP and SMP.

ENGEO prepared the Entrada South RAP to address any unanticipated discovery of impacted soils during grading and development of the Entrada South Planning Area. Prior to the commencement of grading, the LACFD-SMU will review the existing site investigations, as well as the Entrada South RAP/SMP, and issue a Letter of Clearance indicating that the Applicant may obtain a grading permit. With respect to any currently unknown areas of concern, the Entrada South SMP provides performance standards that the Applicant must meet when grading activities are conducted at the Modified Project Site, including identification and remediation of unanticipated discoveries of hydrocarbon-impacted soil. Pursuant to the Entrada South SMP, the Applicant must notify LACFD-SMU if significant, previously unknown, conditions are encountered. These plans were prepared to meet CUPA requirements to address contamination. Based on the performance standards identified in the Entrada South RAP/SMP, the Applicant may be required to implement remediation activities by the LACFD-SMU and/or per the Site Mitigation Guidance Document and SCAQMD Rule 1166.

The Entrada South RAP identifies the following areas of potential concern specific to the Entrada South Planning Area as requiring remediation:

- **Abandoned Oil Wells:** The 11 documented oil and gas wells on the site have been plugged and abandoned. In connection with the plugging and abandonments, CalGEM determined its requirements were fulfilled.⁵ All oil wells within the site, both known wells and any wells encountered during grading, will be assessed and managed in accordance with Mitigation Measure RMDP/SCP-PH-1. As the Modified Project does not involve any changes from the 2017

⁵ *Hazards Tech Memo, Exhibit 1. Refer to Appendix 5.4a of this SEIR.*

Project relevant to the oil wells, Mitigation Measure RMDP/SCP-PH-1 would adequately mitigate related impacts.

- Previous Soil Gas Samples: Two soil gas samples collected in 2013, samples E-SV01 and E-SV08, exhibited elevated concentrations of benzene. Additionally, each area exhibited stained soil. Subsequently, further assessment and remediation was recommended for these areas. The Modified Project does not involve any changes from the 2017 Project that would substantially increase potential impacts associated with benzene exposure.

The Entrada South RAP would ensure these areas of concern would be sufficiently addressed and meet the established remedial action objectives developed to protect future occupants and groundwater. The Entrada South RAP requires all removal actions to be consistent with applicable regulations and that any necessary permits are obtained from appropriate agencies (e.g., SCAQMD). The Entrada South RAP also establishes an excavation methodology, control measures, soil management requirements, and sampling and reporting protocols. Implementation of the Entrada South RAP would ensure impacts associated with the identified areas of potential concern would be reduced to a less than significant level.

The Entrada South SMP has been developed consistent with the requirements of Mitigation Measure RMDP/SCP-PH-12 and will be implemented in case of an unanticipated discovery of potentially impacted soil during mass grading and development. In the event that impacted soils are encountered, the Entrada South SMP prescribes soil remediation/reuse performance standards consistent with the current cleanup goals applied to the nearby Mission Village development, which is under the oversight of the LACFD-SMU. These performance standards include: (1) excavating contaminated soil and transporting to an approved off-site disposal facility (three listed facilities include Soil Safe, Chiquita Landfill, and Simi Valley Landfill & Recycling Center); or (2) reusing soil on-site as fill material if the soil meets site cleanup criteria). At the conclusion of grading and the implementation of the Entrada SMP, a cumulative or individual Site Closure Report(s) would be submitted to the LACFD-SMU (or other agency having jurisdiction, as appropriate). The Site Closure Report(s) would constitute a request(s) for the finding of no further action for the Modified Project Site (or specific portions thereof) by the LACFD-SMU (or other agency having jurisdiction, as appropriate). Accordingly, the Entrada South SMP would ensure that any unanticipated discovery of potentially impacted soil during mass grading and development would be remediated to a less than significant level.

As stated above, the Modified Project would reduce the total number of residential units constructed in Entrada South by 151 units (i.e., 1,725 units reduced to 1,574 units and 3,235,100 square feet of residential to 2,951,913 square feet of residential) and increase the non-residential square footage by 280,000 square feet (i.e., 450,000 square

feet increased to 730,000 square feet), resulting in a net reduction of 3,187 square feet of total development in comparison to the 2017 Project evaluated in the State-certified EIR. Therefore, as under the 2017 Project, development of the Entrada South Planning Area under the Modified Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment after mitigation, and impacts would be less than significant with mitigation. Accordingly, the Modified Project would not result in any new or substantially more severe significant impacts related to hazards or hazardous materials as compared to those identified in the State-certified EIR for the 2017 Project.

(2) VCC Planning Area

The VCC Phase I ESA did not identify any conditions that require cleanup within the VCC Planning Area. Additionally, the Phase II testing of historical agricultural areas of the site did not identify any hazardous concentrations that pose a risk to human health or the environment. With regard to ACMs, lead-based paint, and PCBs, although building material surveys were not conducted as part of the assessment, the VCC Phase I ESA indicated that it is unlikely such materials are present within the existing structures on-site given their age. Further, during the site reconnaissance, no potential PCB-containing equipment was observed. However, ACMs may be present in the concrete and brick debris stockpiles observed on-site. If present, they would be addressed as specified in the Toxic Substances Control Act, as summarized in **Table 5.4-1**, Hazardous Materials Regulatory Setting.

As previously indicated, there are two plugged and abandoned oil/gas wells (Wells #B-1 and #D-2) that are considered dry holes. All oil wells within the site, both known wells and any unanticipated wells encountered during grading, would be assessed and managed in accordance with Mitigation Measure RMDP/SCP-PH-1. As the Modified Project does not involve any changes from the 2017 Project relevant to the oil wells, Mitigation Measure RMDP/SCP-PH-1 would adequately mitigate related impacts.

The VCC SMP has been developed consistent with the requirements of Mitigation Measure RMDP/SCP-PH-12 and would be implemented in case of an unanticipated discovery of potentially impacted soil during mass grading and development. Prior to the commencement of grading, the LACFD-SMU will review the existing site investigations, as well as the VCC SMP, and issue a Letter of Clearance indicating that the Applicant may obtain a grading permit as part of their review. With respect to any currently unknown areas of concern, the VCC SMP provides performance standards that the Applicant must meet when grading activities are conducted at the Modified Project Site, including identification and remediation of unanticipated discoveries of hydrocarbon-impacted soil. These performance standards include: (1) excavating contaminated soil and transporting

to an approved off-site disposal facility (three listed facilities include Soil Safe, Chiquita Landfill, and Simi Valley Landfill & Recycling Center); or (2) reusing soil on-site as fill material if the soil meets site cleanup criteria). Pursuant to the VCC SMP, the Applicant must notify LACFD-SMU if significant, previously unknown, conditions are encountered. Based on the performance standards identified in the VCC SMP, the Applicant may be required to implement remediation activities by the LACFD-SMU and/or per SCAQMD Rule 1166.

At the conclusion of grading and implementation of the VCC SMP, a cumulative or individual Site Closure Report(s) would be submitted to the LACFD-SMU (or other agency having have jurisdiction, as appropriate). The Site Closure Report(s) would constitute a request(s) for the finding of no further action for the Modified Project Site (or specific portions thereof) by the LACFD-SMU (or other agency having have jurisdiction, as appropriate).

Therefore, as under the 2017 Project, development of the VCC Planning Area under the Modified Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment after mitigation, and impacts would be less than significant with mitigation. Accordingly, the Modified Project would not result in any new or substantially more severe significant impacts related to hazards or hazardous materials as compared to those identified in the State-certified EIR for the 2017 Project.

(3) Conclusion

The Modified Project does not involve changes that would change the State-certified EIR impact conclusion as to the 2017 Project with respect to the reasonably foreseeable upset and accident condition involving the release of hazardous materials or waste into the environment. As discussed above, like the 2017 Project, the Modified Project may result in reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment, which, if a release were to occur, constitutes a significant impact. However, as also stated above, with implementation of all applicable previously adopted mitigation (refer to Subsection 8, Mitigation Measures, below), impacts would be less than significant. This conclusion is consistent with that presented in the State-certified EIR for the 2017 Project, which similarly determined that hazards associated with the above issue would be less than significant after mitigation. Furthermore, the Modified Project would not disturb more area than the 2017 Project and, when compared with the 2017 Project, would not release any more hazardous materials or waste into the environment through the disturbance of on-site soils or any related existing hazardous conditions than the 2017 Project. Specifically, the Modified Project would slightly change the ratio of residential to non-residential units, resulting in a net reduction of 3,187 square feet of total development in comparison to the State-certified EIR. Like the 2017 Project,

the Modified Project would adhere to applicable regulatory requirements. Finally, the Modified Project would also implement the remediation plans prepared as directed in the State-certified EIR, including the Entrada South RAP/SMP and the VCC SMP (refer to **Appendices 5.4e** and **5.4f** of the SEIR). As such, the Modified Project would not result in any new or substantially more severe significant impacts related to hazards or hazardous materials as compared to those identified in the State-certified EIR for the 2017 Project.

7. CUMULATIVE IMPACTS

Cumulative growth through 2032 (i.e., the Modified Project buildout year) within the Project vicinity as identified in Section 4.2, Cumulative Impacts Methodology, of this SEIR, will increase the use, storage, and transport of hazardous materials; the risk of upset or accident conditions involving a release of hazardous materials; and other potential safety hazards and health risks. Impacts associated with hazards and hazardous materials are typically site-specific and do not cumulatively affect off-site areas. As with the 2017 Project and the Modified Project Applicant, the proponents of the related projects and all other future development projects in the area would be required to evaluate potential threats to public safety and comply with applicable regulatory requirements to the extent applicable (e.g., as relevant, regarding the use, storage, and/or disposal of hazardous materials; oil wells and pipelines; ACMs, lead-based paint, and PCBs; storage tanks; methane zones; septic tanks; and other related hazards). Numerous regulatory processes are in place to ensure the timely clean up, treatment, or abatement of existing hazardous conditions or contamination. As the regulatory requirements are intended to minimize risks associated with hazards and hazardous materials, upon compliance, cumulative impacts with respect to hazards and hazardous materials may be less than significant, with appropriate mitigation imposed as needed to ensure such impacts are reduced to less than significant levels.

Through regulatory compliance and implementation of the mitigation measures listed below, like the 2017 Project, Modified Project impacts with regard to hazards, hazardous materials, and any related health and safety risks would not be cumulatively considerable. Furthermore, the modifications associated with the Modified Project would not substantially increase cumulative impacts related to hazards and hazardous materials compared to the 2017 Project. Therefore, the Modified Project would not result in any new or substantially more severe significant cumulative impacts related to hazards or hazardous materials as compared to those identified in the State-certified EIR for the 2017 Project.

8. MITIGATION MEASURES

A complete list of mitigation measures to be implemented under the Modified Project is provided in the Mitigation Monitoring and Reporting Program in **Appendix 2** of this SEIR. Previously adopted mitigation measures that are not applicable to the Modified Project or

that require no further action as part of the Modified Project (generally because the measure has already been completed or would be achieved or exceeded through compliance with current regulatory requirements) are detailed in **Appendix 3** of this SEIR. As a result, the measures enumerated below may not be sequential.

a. Previously Approved Mitigation from the State-certified EIR

The following mitigation measures from the State-certified EIR are applicable to the Modified Project to address impacts related to hazards and hazardous materials. Where appropriate, italicized parentheticals are used to provide additional information and clarification regarding the implementation of a particular measure's requirements.

RMDP/SCP-PH-1: During the earthwork phase of construction, all known abandoned oil wells located beneath the Project site shall be exposed to allow DOGGR to examine the well heads, assess any potential for methane, and determine if re-abandonment of any wells will be required. Additionally, any unknown (i.e., wildcat) wells encountered during earthwork shall also be subject to investigation and potential re-abandonment requirements of DOGGR as described below:

- File Notice of Intent to re-abandon well;
- Excavate and expose several feet of well casing;
- Perform hot tap—a method of drilling a hole into the casing under control in order to deal with possible pressure;
- Install a wellhead and blow out prevention equipment;
- Move drill rig into place and drill out any surface cement plug or any other cement plug to reach a minimum clean-out as required by DOGGR;
- Place cement plugs of varying lengths as required by DOGGR;
- All portions of well not plugged with cement are to be filled with inert mud fluid having a density of 70 pounds per cubic foot and a gel strength of 25 pounds per 100 square feet;
- Move out drill rig;
- Cut off casing at least five feet below final finished grade;
- Weld a steel plate on top of the wellhead;
- Backfill and compact excavation and clean up location;
- Survey the center point of the buried well using GPS instrumentation;

- Place a permanent survey mark at the surface, demarcating a buried, abandoned oil well; and
- Submit the re-abandonment record to DOGGR within 60 days upon completion of work.

Additionally, proposed development plans shall be evaluated by means of the Construction-Site Plan Review Program and comply with setbacks from oil and gas wells as determined by DOGGR. Recommendations by DOGGR regarding abandonment procedures shall be incorporated into the final development plans for the Project, if applicable.

(Note that DOGGR is now referred to as the California Geologic Energy Management Division or CalGEM.)

RMDP/SCP-PH-4: All final school locations are to comply with the California State Board of Education requirement that no schools be sited within 100 feet from the edge of the right-of-way of 100 to 110 kV lines; 150 feet from 220 to 230 kV lines; and 350 feet from 500 to 550 kV lines.

(This mitigation measure applies only to the elementary school potentially located in the central portion of the Entrada South Planning Area.)

RMDP/SCP-PH-6: All activities associated with pipeline relocation, grading in the vicinity of gas mains, and development with the SCGC easements would be conducted in conformance with the requirements of SCGC. These requirements would be explicitly defined by SCGC prior to implementation of the Newhall Ranch Specific Plan.

(SCGC refers to the Southern California Gas Company, or SoCalGas. No structures are proposed within the SoCalGas easements along the southern boundary of the Entrada South Planning Area. Nonetheless, this measure would apply to any pipeline relocation and nearby grading.)

RMDP/SCP-PH-7: All development of the Newhall Ranch Specific Plan site and the VCC and Entrada planning areas shall be in compliance the provisions of Los Angeles County Code, title 21, chapter 21.24, for secondary evacuation access.

RMDP/SCP-PH-8: To reduce potentially hazardous conditions and minimize the impacts from handling potentially hazardous materials, the owner shall include the following in its construction contract documents prior to the initiation of construction activities:

- The Contractor(s) shall enforce strict on-site handling rules to keep construction and maintenance materials out of receiving waters and storm drains per the County's NPDES guidelines and as outlined in the Stormwater Pollution and Prevention Plan; and

- The Contractor(s) shall prepare a Health and Safety Plan. The plan shall include measures to be taken in the event of an accidental spill.

In addition, the Contractor(s) shall store all reserve fuel supplies only within the confines of a designated construction staging area, refuel equipment only within the designated construction staging area, and regularly inspect all construction equipment for leaks.

RMDP/SCP-PH-10: Prior to initiation of construction activities, the applicant shall prepare a Chemical Inventory for construction and maintenance of the Project. The Chemical Inventory shall be submitted to the Los Angeles County Fire Department Health Hazardous Materials Division for evaluation to determine whether a Hazardous Materials Business Plan is required. If a Hazardous Materials Business Plan is required, the plan shall address handling and potential releases of hazardous materials from the sites. It shall also include: (1) an inventory of all hazardous material and waste handled on site; (2) emergency response plans; (3) procedures in the event of a reportable or threatened release of a hazardous material; and (4) safety procedure training for all employees in the event of a release or threatened release of a hazardous material.

RMDP/SCP-PH-11: In the event that previously unidentified, obvious, or suspected hazardous materials, contamination, debris, or other features or materials that could present a threat to human health or the environment are discovered during construction, construction activities shall cease immediately until the affected area is evaluated by a qualified professional. A remediation plan shall be developed in consultation with the appropriate regulatory authorities and the remediation identified shall be completed. Work shall not resume in the affected area until appropriate actions have been implemented in accordance with the remediation plan. The remediation action plan shall include the following:

- Remediation goals and cleanup criteria that could include, but are not necessarily limited to, excavation and on-site treatment, excavation and off-site treatment, and/or removal of contaminated soil and/or groundwater;
- A detailed description of the access points and haul-out routes for remedial activities; remediation methods and procedures; mitigation of dust; minimization or avoidance of disturbance to sensitive ecosystems; and verification soil sampling and analysis. Included in the discussion shall be information on disposal sites, transport and disposal methods, as well as recordkeeping methods for documenting remediation, regulatory compliance, and health and safety programs for on-site workers; and

- Removal of oil development equipment and debris.

*(The remedial action plan for the Entrada South Planning Area [the ES RAP] is included as **Appendix 5.4e** of the SEIR and has been incorporated into the analysis. A remedial action plan is not required for the VCC Planning Area.)*

RMDP/SCP-PH-12: A Soil Management Plan for the residential development envelopes and recreational construction areas shall be developed and implemented, as appropriate. The objective of the Soil Management Plan is to provide guidance for the proper handling, on-site management, and disposal of impacted soil that may be encountered during construction activities (i.e., excavation and grading). The plan shall include practices that are consistent with the California Division of Occupational Safety and Health regulations, California Code of Regulations, title 8, as well as Certified Unified Program Agency remediation standards that are protective of the planned use. Appropriately trained professionals will be on site during preparation, grading, and related earthwork activities to monitor soil conditions encountered. In order to confirm the absence or presence of hazardous substances associated with former land use, a sampling strategy shall be implemented. The sampling strategy shall include procedures regarding logging/sampling and laboratory analyses.

The Soil Management Plan will outline guidelines for the following:

- Identifying impacted soil;
- Assessing impacted soil;
- Soil excavation;
- Impacted soil storage;
- Verification sampling; and
- Impacted soil characterization and disposal.

In the event that potentially contaminated soils are encountered within the footprint of construction, soils will be tested and stockpiled. The Certified Unified Program Agency will determine whether further assessment is warranted. The Certified Unified Program Agency shall determine and oversee the handling and disposal of impacted soils.

*(Soil management plans for the Entrada South Planning Area [the ES SMP] and the VCC Planning Area (VCC SMP), included as **Appendix 5.4e** and **Appendix 5.4f** of the SEIR, respectively, have been prepared consistent with Mitigation Measure RMDP/SCP-PH-12.)*

RMDP/SCP-PH-13: All potential buyers or tenants of property in the vicinity of SCGC transmission lines are to be made aware of the line's presence

in order to assure that no permanent construction or grading occurs over, or within the vicinity of, the high-pressure gas mains.

RMDP/SCP-PH-14: At the time of final subdivision maps permitting construction in development areas that are adjacent to Open Area and the High Country SMAs, a Wildfire Fuel Modification plan shall be prepared in accordance with the fuel modification ordinance standards in effect at that time and shall be submitted for approval to the Los Angeles County Fire Department. The Wildfire Fuel Modification plan shall depict a fuel modification zone, the size of which shall be consistent with the Los Angeles County fuel modification ordinance requirements. Within the zone, tree pruning, removal of dead plant material and weed and grass cutting shall take place as required by the fuel modification ordinance. The Wildfire Fuel Modification plan shall include the following construction period requirements: (a) a fire watch during welding operations; (b) spark arresters on all equipment or vehicles operating in a high fire hazard area; (c) designated smoking and non-smoking areas; and (d) water availability pursuant to the Los Angeles County Fire Department requirements. The fuel modification zone will not extend onto any spineflower preserve.

b. Previously Approved Mitigation from the VCC EIR

Mitigation Measures VCC-PH-1 and VCC-PH-2 were previously adopted by the County for the VCC Planning Area as part of the County-certified VCC EIR. However, these measures are no longer applicable to the Modified Project and are no longer necessary to mitigate impacts to less than significant levels. Both measures have been superseded by regulatory compliance. See **Appendix 3** of this SEIR for additional information.

c. Proposed Mitigation for the Modified Project

No additional mitigation measures are required for the Modified Project.

9. LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of the applicable, previously adopted mitigation measures from the State-certified EIR (refer to Subsection 8.a, Previously Approved Mitigation from the State-certified EIR, above), which collectively would ensure that any hazardous conditions or contamination within the Entrada South and VCC Planning Areas are addressed such that they would not pose a significant hazard to the public or environment, the hazards and hazardous materials impacts of the Modified Project would be reduced to a less than significant level. This determination is consistent with that set forth in the State-certified EIR for the 2017 Project. Therefore, the Modified Project would not result in any new or

substantially more severe significant impacts related to hazards and hazardous materials have been identified, as compared to those identified for the 2017 Project in the State-certified EIR.