

## **IV. Environmental Impact Analysis**

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### **H. Hazards and Hazardous Materials**

#### **1. Introduction**

This section analyzes the potential for construction and operation of the Project to result in hazards and hazardous materials impacts. The analysis is largely based on the *Environmental Evaluation of Proposed MTA Transportation Communication Network (TCN) Program Sites-Fifty--Six (56) Locations in Los Angeles County* (Hazards Report) prepared for the Project by California Environmental, which is provided in Appendix Hof this Draft EIR.<sup>1</sup>

#### **2. Environmental Setting**

##### **a. Regulatory Framework**

Several plans, regulations, and programs include policies, requirements, and guidelines regarding hazards and hazardous materials at the federal, state, regional, and City of Los Angeles levels. As described below, these plans, guidelines, and laws include the following:

- Resource Conservation and Recovery Act
- Comprehensive Environmental Response, Compensation, and Liability Act
- Occupational Safety and Health Act of 1970
- Toxic Substances Control Act
- Hazardous Materials Transportation Act
- Research and Special Programs Administration
- Federal Emergency Management Act

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<sup>1</sup> *California Environmental, Environmental Evaluation of Proposed MTA Transportation Communication Network (TCN) Program Sites-Fifty--Six (56) Locations in Los Angeles County--Los Angeles, California, August 2022.*

- Disaster Mitigation Act of 2000
- Other Hazardous Materials Regulations
- California Hazardous Materials Release Response Plans and Inventory Law of 1985
- Hazardous Waste and Substances Sites
- Hazardous Waste Control Law
- License to Transport Hazardous Materials—California Vehicle Code, Section 32000.5 et seq.
- Underground Storage Tanks Program
- Lead Based Paint Regulations
- California Division of Occupational Safety and Health
- The Safe Drinking Water and Toxic Enforcement Act
- California Water Code
- Government Code Section 3229, Division (California Geologic Energy Management Division)
- California Fire Code
- Uniform Fire Code
- California Governor’s Office of Emergency Services
- Emergency Managed Mutual Aid System
- South Coast Air Quality Management District Rule 1113
- South Coast Air Quality Management District Rule 1166
- South Coast Air Quality Management District Rule 1403
- Los Angeles County Operational Area Emergency Response Plan
- Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan
- Certified Unified Program Agency
- Los Angeles Fire Code

- Los Angeles Municipal Code (Methane Zones and Methane Buffer Zones)
- Waste Discharge Requirements
- Emergency Management Department, Emergency Operations Organization, and Emergency Operation Center
- City of Los Angeles General Plan Conservation Element

### (1) Federal

#### *(a) Resource Conservation and Recovery Act*

The federal Resource Conservation and Recovery Act (RCRA) (42 United States Code [USC] Sections 6901–6992k), which amended and revised the Solid Waste Disposal Act, regulates the generation, transportation, treatment, storage, and disposal of hazardous waste. Under RCRA regulations, generators of hazardous waste must register and obtain a hazardous waste activity identification number. RCRA allows individual states to develop their own programs for the regulation of hazardous waste as long as they are at least as stringent as RCRA's.

Underground Storage Tanks (USTs) are regulated under Subtitle I of RCRA and its regulations, which establish construction standards for UST installations installed after December 22, 1988, as well as standards for upgrading existing USTs and associated piping. Since 1998, all non-conforming tanks were required to be either upgraded or closed.

#### *(b) Comprehensive Environmental Response, Compensation, and Liability Act*

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as “Superfund,” was enacted by Congress on December 11, 1980.<sup>2</sup> This law provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites, providing for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled the revision of the National Contingency Plan. The National Contingency Plan provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also establishes the National Priorities List, which is a list of

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<sup>2</sup> USEPA, *Superfund CERCLA Overview*, [www.epa.gov/superfund/superfund-cercla-overview](http://www.epa.gov/superfund/superfund-cercla-overview), accessed May 25, 2022.

contaminated sites warranting further investigation by the EPA. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.<sup>3</sup>

*(c) Occupational Safety and Health Act of 1970*

The Occupational Safety and Health Act of 1970, which is implemented by the federal Occupational Safety and Health Administration (OSHA), contains provisions with respect to hazardous materials handling. OSHA was created to assure safe and healthful working conditions by setting and enforcing standards and by providing training, outreach, education, and assistance. OSHA provides standards for general industry and construction industry on hazardous waste operations and emergency response. OSHA requirements, as set forth in 29 Code of Federal Regulations (CFR) Section 1910, et. seq., are designed to promote worker safety, worker training, and a worker's right-to-know. The U.S. Department of Labor has delegated the authority to administer OSHA regulations to the State of California. The California OSHA program (Cal/OSHA) (codified in the California Code of Regulations [CCR], Title 8, or 8 CCR generally and in the Labor Code secs. 6300–6719) is administered and enforced by the Division of Occupational Safety and Health (DOSH). Cal/OSHA is very similar to the OSHA program. Among other provisions, Cal/OSHA requires employers to implement a comprehensive, written Injury and Illness Prevention Program (IIPP) for potential workplace hazards, including those associated with hazardous materials.

In addition, pursuant to OSHA, a developer that undertakes a construction project that involves the handling of contaminated site conditions must prepare and implement a Health and Safety Plan (HASP) that sets forth the measures that would be undertaken to protect those that may be affected by the construction project. While a HASP is prepared and implemented pursuant to OSHA, the HASP is not subject to regulatory review and approval, although a HASP is typically appended to a Soil Management Plan if this document is required by the Certified Unified Program Agency (CUPA), which is the City of Los Angeles Fire Department (LAFD) with regard to the Project Site. The HASP, if required, would be prepared in accordance with the most current OSHA regulations, including 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response and 29 CFR 1926, Construction Industry Standards, as well as other applicable federal, State, and local laws and regulations.

*(d) Toxic Substances Control Act*

In 1976, the federal Toxic Substances Control Act (TSCA) (15 USC Sections 2601–2671) established a system of evaluation in order to identify chemicals which may pose

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<sup>3</sup> USEPA, *Summary of the Comprehensive Environmental Response, Compensation, and Liability Act (Superfund)*, [www.epa.gov/laws-regulations/summary-comprehensive-environmental-response-compensation-and-liability-act](http://www.epa.gov/laws-regulations/summary-comprehensive-environmental-response-compensation-and-liability-act), accessed May 25, 2022.

hazards. TSCA is enforced by the United States Environmental Protection Agency (USEPA) through inspections of places in which ACMs are manufactured, processed, and stored and through the assessment of administrative and civil penalties and fines, as well as injunctions against violators. TSCA establishes a process by which public exposure to hazards may be reduced through manufacturing, distribution, use and disposal restrictions or labeling of products. Polychlorinated Biphenyls (PCB)s are hazardous materials regulated by the USEPA under TSCA. These regulations ban the manufacture of PCBs although the continued use of existing PCB-containing equipment is allowed. PCBs were formerly used in such applications as hydraulic fluids, plasticizers, adhesives, fire retardants, and electrical transformers, among others. TSCA also contains provisions controlling the continued use and disposal of existing PCB-containing equipment. The disposal of PCB wastes is also regulated by TSCA (40 CFR 761), which contains life cycle provisions similar to those in RCRA. In addition to TSCA, provisions relating to PCBs are contained in the Hazardous Waste Control Law (HWCL), which lists PCBs as hazardous waste.

Under TSCA, the USEPA has enacted strict requirements on the use, handling, and disposal of asbestos-containing materials (ACMs). These regulations include the phasing out of friable asbestos and ACMs in new construction materials beginning in 1979. In 1989, the USEPA banned most uses of asbestos in the country. Although most of the ban was overturned in 1991, the current banned product categories include corrugated paper, rollboard, commercial paper, specialty paper, flooring felt, and any new uses. TSCA also establishes USEPA's Lead Abatement Program regulations, which provide a framework for lead abatement, risk assessment, and inspections. Those performing these services are required to be trained and certified by USEPA.

*(e) Hazardous Materials Transportation Act*

The U.S. Department of Transportation (USDOT) prescribes strict regulations for the safe transportation of hazardous materials, including requirements for hazardous waste containers and licensed haulers who transport hazardous waste on public roads. The Secretary of the Department of Transportation receives the authority to regulate the transportation of hazardous materials from the Hazardous Materials Transportation Act (HMTA), as amended and codified in 49 USC Section 5101 et seq. The Secretary of Transportation is authorized to issue regulations to implement the requirements of 49 USC. The Pipeline and Hazardous Materials Safety Administration (PHMSA),<sup>4</sup> formerly the Research and Special Provisions Administration, was delegated the responsibility to write the hazardous materials regulations, which are contained in 49 CFR 100–180.<sup>5</sup> 49 CFR, which

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<sup>4</sup> USDOT, *Pipeline and Hazardous Materials Safety Administration, Federal Hazardous Materials Transportation Law: An Overview*.

<sup>5</sup> *Federal Register, Code of Federal Regulations 49, Parts 100 to 185, Revised as of October 1, 2010.*

contains the regulations set forth by the HMTA, specifies requirements and regulations with respect to the transport of hazardous materials. It requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Under the HMTA, the Secretary of Transportation “may authorize any officer, employee, or agent to enter upon, inspect, and examine, at reasonable times and in a reasonable manner, the records and properties of persons to the extent such records and properties relate to: (1) the manufacture, fabrication, marking, maintenance, reconditioning, repair, testing, or distribution of packages or containers for use by any “person” in the transportation of hazardous materials in commerce; or (2) the transportation or shipment by any “person” of hazardous materials in commerce.”

*(f) Research and Special Programs Administration*

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

*(g) Federal Emergency Management Act*

Federal Emergency Management Act (FEMA) was established in 1979 via executive order and is an independent agency of the federal government. In March 2003, FEMA became part of the U.S. Department of Homeland Security with the mission to lead the effort in preparing the nation for all hazards and effectively manage federal response and recovery efforts following any national incident.<sup>6</sup> FEMA also initiates proactive mitigation activities, trains first responders, and manages the National Flood Insurance Program and the U.S. Fire Administration.

*(h) Disaster Mitigation Act of 2000*

Disaster Mitigation Act (42 USC Section 5121) provides the legal basis for FEMA mitigation planning requirements for State, local, and Indian Tribal governments as a

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<sup>6</sup> FEMA, *History of FEMA*, [www.fema.gov/about/history](http://www.fema.gov/about/history), accessed May 25, 2022.

condition of mitigation grant assistance. It amends the Robert T. Stafford Disaster Relief Act of 1988 (42 USC Sections 5121-5207) by repealing the previous mitigation planning provisions and replacing them with a new set of requirements that emphasize the need and creates incentives for state, Tribal, and local agencies to closely coordinate mitigation planning and implementation efforts. This Act reinforces the importance of pre-disaster infrastructure mitigation planning to reduce disaster losses nationwide and the streamlining of the administration of federal disaster relief and programs to promote mitigation activities. Some of the major provisions of this Act include:

- Funding pre-disaster mitigation activities;
- Developing experimental multi-hazard maps to better understand risk;
- Establishing state and local government infrastructure mitigation planning requirements;
- Defining how states can assume more responsibility in managing the Hazard Mitigation Grant Program (HMGP); and
- Adjusting ways in which management costs for projects are funded.

## (2) State

### *(a) State Policies and Regulations*

The primary state agencies with jurisdiction over hazardous chemical materials management are California Environmental Protection Agency's (CalEPA's) Department of Toxic and Substance Control (DTSC) and the Regional Water Quality Control Boards (RWQCBs). Other state agencies involved in hazardous materials management include Cal/OSHA and the State Office of Emergency Services (Cal OES).

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

The storage of hazardous materials in USTs is regulated by the State Water Resources Control Board (SWRCB), which delegates authority to the RWQCB on the regional level, and typically to the local fire department on the local level.

The Cal/OSHA program is administered and enforced by the DOSH. Cal/OSHA is very similar to the federal OSHA program. For example, both programs contain rules and procedures related to exposure to hazardous materials during demolition and construction activities. In addition, Cal/OSHA requires employers to implement a comprehensive, written IIPP. An IIPP is an employee safety program for potential workplace hazards, including those associated with hazardous materials.

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

*(b) California Hazardous Materials Release Response Plans and Inventory  
Law of 1985*

The Business Plan Act requires preparation of Hazardous Materials Business Plans and disclosure of hazardous materials inventories, including an inventory of hazardous materials handled, plans showing where hazardous materials are stored, an emergency response plan, and provisions for employee training in safety and emergency response procedures for businesses that handle, store, or transport hazardous materials in amounts exceeding specified minimums (California Health and Safety Code [HSC], Division 20, Chapter 6.95, Article 1). Statewide, DTSC has primary regulatory responsibility for management of hazardous materials, with delegation of authority to local jurisdictions that enter into agreements with the state. Local agencies are responsible for administering these regulations.

Several state agencies regulate the transportation and use of hazardous materials to minimize potential risks to public health and safety, including CalEPA and the Cal OES. The California Highway Patrol (CHP) and the California Department of Transportation (Caltrans) enforce regulations specifically related to the transport of hazardous materials. Together, these agencies determine container types used and license hazardous waste haulers for hazardous waste transportation on public roadways.

*(c) Hazardous Waste and Substances Sites*

Government Code Section 65962.5, amended in 1992, requires the CalEPA to develop and update annually the Hazardous Waste and Substances Sites (Cortese List), which is a list of hazardous waste sites and other contaminated sites. The Cortese List is a planning document used by the State, local agencies, and developers to comply with California Environmental Quality Act (CEQA) requirements pertaining to providing information about the location of hazardous materials release sites. While the Cortese List is no longer maintained as a single list, the following databases provide information that meet the Cortese List requirements:

1. List of Hazardous Waste and Substances sites from the DTSC Envirostor database (HSC Sections 25220, 25242, 25356, and 116395);
2. List of open and active leaking underground storage tank (LUST) Sites by County and Fiscal Year from the SWRCB GeoTracker database (HSC Section 25295);
3. List of solid waste disposal sites identified by the SWRCB with waste constituents above hazardous waste levels outside the waste management unit (Water Code Section 13273[e] and 14 CCR Section 18051);
4. List of “active” Cease and Desist Orders and Cleanup and Abatement Orders from the SWRCB (California Water Code [CWC] Sections 13301 and 13304); and
5. List of hazardous waste facilities subject to corrective action pursuant to HSC Section 25187.5, identified by the DTSC.

*(d) Hazardous Waste Control Law*

The Hazardous Waste Control Law (HWCL) empowers DTSC to administer the state’s hazardous waste program and implement the federal program in California. CCR Titles 22 and 23 address hazardous materials and wastes. Title 22 defines, categorizes, and lists hazardous materials and wastes. Title 23 addresses public health and safety issues related to hazardous materials and wastes and specifies disposal options.

*(e) License to Transport Hazardous Materials—California Vehicle Code, Section 32000.5 et seq.*

Caltrans regulates hazardous materials transportation on all interstate roads. Within California, the State agencies with primary responsibility for enforcing federal and State regulations and for responding to transportation emergencies are the CHP and Caltrans. Together, federal and State agencies determine driver-training requirements, load labeling procedures, and container specifications for vehicles transporting hazardous materials.

*(f) Underground Storage Tanks Program*

The State regulates USTs through a program pursuant to HSC, Division 20, Chapter 6.7, and CCR Title 23, Division 3, Chapter 16 and Chapter 18. The State's UST program regulations include among others, permitting USTs, installation of leak detection systems and/or monitoring of USTs for leakage, UST closure requirements, release reporting/corrective action, and enforcement. Oversight of the statewide UST program is assigned to the SWRCB which has delegated authority to the RWQCB and typically on the local level, to the fire department. The LAFD administers and enforces federal and state laws and local ordinances for USTs at the Project Site. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LAFD Inspectors. If a release affecting groundwater is documented, the project file is transferred to the appropriate RWQCB for oversight.

*(g) Lead-Based Paint Regulations*

Lead-based paint (LBP) is defined as any paint, varnish, stain, or other applied coating that has a 1 milligram per square centimeter ( $\text{mg}/\text{cm}^2$ ) (5,000 microgram per gram [ $\mu\text{g}/\text{g}$ ] or 0.5 percent by weight) or more of lead. The US Consumer Product Safety Commission (16 CFR 1303) banned paint containing more than 0.06 percent lead for residential use in 1978. Buildings built before 1978 are much more likely to have LBP.

The demolition of buildings containing LBPs is subject to a comprehensive set of California regulatory requirements that are designed to assure the safe handling and disposal of these materials. Cal/OSHA has established limits of exposure to lead contained in dusts and fumes, which provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead, particularly since demolition workers are at greatest risk of adverse exposure. Lead-contaminated debris and other wastes must also be managed and disposed of in accordance with applicable provisions of the California HSC.

*(h) California Division of Occupational Safety and Health*

Cal/OSHA is responsible for developing and enforcing workplace safety standards and ensuring worker safety in the handling and use of hazardous materials (8 CCR, Section 1529). Among other requirements, Cal/OSHA requires entities handling specified amounts of certain hazardous chemicals to prepare injury and illness prevention plans and chemical hygiene plans and provides specific regulations to limit exposure of construction workers to lead. OSHA applies to this Project because contractors will be required to comply with its handling and use requirements that would increase worker safety and reduce the possibility of spills, and to prepare an emergency response plan to respond to accidental spills.

*(i) The Safe Drinking Water and Toxic Enforcement Act*

The Safe Drinking Water and Toxic Enforcement Act (HSC Section 25249.5, et seq.), Proposition 65, lists chemicals and substances believed to have the potential to cause cancer or deleterious reproductive effects in humans. It also restricts the discharges of listed chemicals into known drinking water sources above the regulatory levels of concern, requires public notification of any unauthorized discharge of hazardous waste, and requires that a clear and understandable warning be given prior to a known and intentional exposure to a listed substance.

*(j) California Water Code*

The CWC authorizes the SWRCB to implement provisions of the Clean Water Act, including the authority to regulate waste disposal and require cleanup of discharges of hazardous materials and other pollutants. In regards to construction dewatering discharge analysis and treatment, groundwater may be encountered during deeper excavations for the subterranean parking structure, building foundations, or other subterranean building components. Under the CWC, discharges of any such groundwater to surface waters, or any point sources hydrologically connected to surface waters, such as storm drains, is prohibited unless conducted in compliance with a Waste Discharge Requirement (WDR) permit. In addition to the CWC, these permits implement and are in compliance with the federal Clean Water Act's National Pollutant Discharge Elimination System (NPDES) program. In accordance with these legal requirements, dewatering, treatment, and disposal of groundwater encountered during construction activities would be conducted in accordance with the Los Angeles RWQCB's (LARWQCB's) Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, pursuant to adopted Order No. R4-2018-0125, or any other appropriate WDR permit identified by the LARWQCB.<sup>7</sup> Compliance with an appropriate WDR permit would include monitoring, treatment if appropriate, and proper disposal of any encountered groundwater in accordance with applicable water quality standards. If, for example, extracted groundwater contains Total Petroleum Hydrocarbons (TPH) or other petroleum breakdown compounds in concentrations exceeding water quality standards, compliance with legal requirements would mandate treatment to meet published state water quality standards prior to discharge into a storm drain system.

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<sup>7</sup> *Los Angeles Regional Water Quality Control Board, Order No. R4-2018-0125, Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, adopted September 13, 2018.*

*(k) Government Code Section 3229, Division 3 (California Geologic Energy Management Division)*

In compliance with Section 3229, Division 3 of the California Public Resources Code, before commencing any work to abandon any well, the owner or operator shall request approval from the California Geologic Energy Management Division (CalGEM), formerly the Division of Oil, Gas, and Geothermal Resources (DOGGR), via a written notice of intention to abandon the well.

*(l) California Fire Code, Title 24, Part 9, Chapters 33, 50 and 57*

The 2019 California Fire Code (CFC), written by the California Building Standards Commission, is based on the 2018 International Fire Code (IFC). The IFC is a model code that regulates minimum fire safety requirements for new and existing buildings, facilities, storage and processes. The IFC addresses fire prevention, fire protection, life safety, and safe storage and use of hazardous materials in new and existing buildings, facilities, and processes.

The CFC, Chapter 9 of Title 24 of the CCR, was created by the California Building Standards Commission based on the IFC and is updated every three years. The overall purpose of the CFC is to establish the minimum requirements to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. Chapter 49 of the CFC contains minimum standards for development in the wildland–urban interface and fire hazard areas. The CFC also provides regulations and guidance for local agencies in the development and enforcement of fire safety standards.

*(m) Uniform Fire Code*

The Uniform Fire Code (UFC), Article 80 (UFC Section 80.103 as adopted by the State Fire Marshal pursuant to HSC Section 13143.9), includes specific requirements for the safe storage and handling of hazardous materials. These requirements are intended to reduce the potential for a release of hazardous materials and for mixing of incompatible chemicals, and specify the following specific design features to reduce the potential for a release of hazardous materials that could affect public health or the environment:

- Separation of incompatible materials with a noncombustible partition;
- Spill control in all storage, handling, and dispensing areas; and
- Separate secondary containment for each chemical storage system. The secondary containment must hold the entire contents of the tank, plus the volume

of water needed to supply the fire suppression system for a period of 20 minutes in the event of catastrophic spill.

*(n) California Governor's Office of Emergency Services*

In 2009, the State of California passed legislation creating the Cal OES and authorized it to prepare a Standard Emergency Management System (SEMS) program (Title 19 CCR Section 2401 et seq.), which sets forth measures by which a jurisdiction should handle emergency disasters. In California, SEMS provides the mechanism by which local governments request assistance. Non-compliance with SEMS could result in the state withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster. Cal OES coordinates the state's preparation for, prevention of, and response to major disasters, such as fires, floods, earthquakes and terrorist attacks. During an emergency, Cal OES serves as the lead state agency for emergency management in the state. It also serves as the lead agency for mobilizing the state's resources and obtaining federal resources. Cal OES coordinates the state response to major emergencies in support of local government. The primary responsibility for emergency management resides with the local government. Local jurisdictions first use their own resources and, as they are exhausted, obtain more from neighboring cities and special districts, the county in which they are located, and other counties throughout the state through the statewide mutual aid system (see discussion of Mutual Aid Agreements, below). Cal OES maintains oversight of the state's mutual aid system.

*(o) Emergency Managed Mutual Aid System*

Cal OES developed the Emergency Managed Mutual Aid (EMMA) System in response to the 1994 Northridge Earthquake. The EMMA System coordinates emergency response and recovery efforts along the coastal, inland, and southern regions of California. The purpose of EMMA is to provide emergency management personnel and technical specialists to afflicted jurisdictions in support of disaster operations during emergency events. Objectives of the EMMA Plan is to provide a system to coordinate and mobilize assigned personnel, formal requests, assignment, training and demobilization of assigned personnel; establish structure to maintain the EMMA Plan and its procedures; provide the coordination of training for EMMA resources, including SEMS training, coursework, exercises, and disaster response procedures; and to promote professionalism in emergency management and response. The EMMA Plan was updated in November 2012 and supersedes the 1997 EMMA Plan and November 2001 EMMA Guidance.

### (3) Regional

#### *(a) South Coast Air Quality Management District Rule 1113*

South Coast Air Quality Management District (SCAQMD) Rule 1166, Architectural Coating, requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce Volatile Organic Compound (VOC) emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

#### *(b) South Coast Air Quality Management District Rule 1166*

SCAQMD Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil, requires that an approved mitigation plan be obtained from SCAQMD prior to commencing any of the following activities: (1) the excavation of an underground storage tank or piping which has stored volatile organic compounds (VOCs); (2) the excavation or grading of soil containing VOC material including gasoline, diesel, crude oil, lubricant, waste oil, adhesive, paint, stain, solvent, resin, monomer, and/or any other material containing VOCs; (3) the handling or storage of VOC-contaminated soil [soil which registers >50 parts per million (ppm) or greater using an organic vapor analyzer (OVA) calibrated with hexane] at or from an excavation or grading site; and (4) the treatment of VOC-contaminated soil at a facility. This rule sets requirements to control the emission of VOCs from excavating, grading, handling and treating VOC-contaminated soil as a result of leakage from storage or transfer operations, accidental spillage, or other deposition.

#### *(c) South Coast Air Quality Management District Rule 1403*

SCAQMD Rule 1403, Asbestos Emissions from Renovation/Demolition Activities, regulates asbestos as a toxic material and controls the emissions of asbestos from demolition and renovation activities by specifying agency notifications, appropriate removal procedures, and handling and clean up procedures. Rule 1403 applies to owners and operators involved in the demolition or renovation of structures with ACMs, asbestos storage facilities, and waste disposal sites.

#### *(d) Los Angeles County Operational Area Emergency Response Plan*

The County of Los Angeles developed the Emergency Response Plan (ERP) to ensure the most effective allocation of resources for the maximum benefit and protection of the public in time of emergency. The ERP does not address normal day-to-day emergencies or the well-established and routine procedures used in coping with them. Instead, the operational concepts reflected in this plan focus on potential large-scale disasters like extraordinary emergency situations associated with natural and man-made disasters and technological incidents which can generate unique situations requiring an unusual or

extraordinary emergency response. The purpose of the plan is to incorporate and coordinate all facilities and personnel of the County government, along with the jurisdictional resources of the cities and special districts within the County, into an efficient Operational Area organization capable of responding to any emergency using a Standard Emergency Management System, mutual aid and other appropriate response procedures. The goal of the plan is to take effective life-safety measures and reduce property loss, provide for the rapid resumption of impacted businesses and community services, and provide accurate documentation and records required for cost-recovery.

*(e) Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan*

In Los Angeles County, the Regional Planning Commission has the responsibility for acting as the Airport Land Use Commission (ALUC) and for coordinating the airport planning of public agencies within the county. ALUC coordinates planning for the areas surrounding public use airports. The Los Angeles County Airport Land Use Plan (dually titled Comprehensive Land Use Plan) provides for the orderly expansion of Los Angeles County's public use airports and the area surrounding them. It is intended to provide for the adoption of land use measures that will minimize the public's exposure to excessive noise and safety hazards. In formulating this plan, the Los Angeles County ALUC has established provisions for safety, noise insulation, and the regulation of building height within areas adjacent to each of the public airports in the County.

**(4) Local**

*(a) Certified Unified Program Agency*

The primary local agency with responsibility for implementing federal and state laws and regulations pertaining to hazardous materials management is the Los Angeles County Health Department, Environmental Health Division. The Los Angeles County Health Department is the CUPA for the County of Los Angeles. A CUPA is a local agency that has been certified by CalEPA to implement the six state environmental programs within the local agency's jurisdiction. This program was established under the amendments to the California HSC made by Senate Bill 1082 in 1994. The six consolidated programs are:

- Hazardous Materials Release Response Plan and Inventory (Business Plans);
- California Accidental Release Prevention (CalARP);
- Hazardous Waste (including Tiered Permitting);
- USTs;
- ASTs (Spill Prevention Control and Countermeasures [SPCC] requirements); and

- UFC Article 80 Hazardous Material Management Program (HMMP) and Hazardous Material Identification System (HMIS).

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

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

In addition, the LAFD, in their role as the CUPA, also oversees and addresses issues relating to the presence and handling of contaminated soils. Any such hazardous materials that may be encountered would be managed (using tools, such as a Soil Management Plan [SMP]) in accordance with all relevant and applicable federal, State, and local laws and regulations that pertain to the use, storage, transportation and disposal of hazardous materials and waste. The SMP, if required, would describe the methodology to identify and manage (reuse or off-site disposal) contaminated soil during soil excavation and/or construction. The SMP would also provide protocols for confirmation sampling, segregation and stockpiling, profiling, backfilling, disposal, guidelines for imported soil, and backfill. The SMP would also describe the methodology to manage underground features that may be encountered during construction. In addition, the LAFD may consult with other agencies (e.g., DTSC and the LARWQCB) if the nature of the contamination warrants the involvement of these agencies.

*(b) Los Angeles Fire Code*

At the local level, the LAFD monitors the storage of hazardous materials for compliance with local requirements. The LAFD also administers the Fire Life Safety Plan Check and Fire Life Safety Inspections interpreting and enforcing applicable standards of the

Fire Code, Title 19, Uniform Building Code, City, and National codes concerning new construction and remodeling. As part of the Fire Life Safety Plan Check and Fire Life Safety Inspections, businesses that store hazardous waste or hazardous materials in amounts exceeding the thresholds noted above are subject to review.

Section 91.7109.2 of the Los Angeles Municipal Code (LAMC) requires LAFD notification when an abandoned oil well is encountered during construction activities and requires that any abandoned oil well not in compliance with existing regulations be re-abandoned in accordance with applicable rules and regulations of CalGEM.

*(c) Los Angeles Municipal Code (Methane Zones and Methane Buffer Zones)*

LAMC Chapter IX, Article 1, Division 71, Section 91.7103, also known as the Los Angeles Methane Seepage Regulations, establishes requirements for buildings and paved areas located in methane zones and methane buffer zones. Requirements for new construction within such zones include methane gas sampling and, depending on the detected concentrations of methane and gas pressure at the site, application of design remedies for reducing potential methane impacts. The required methane mitigation systems are based on the site Design Level, with more involved mitigation systems required at the higher Site Design Levels. The required methane mitigation systems are designed so that when properly implemented, they reduce methane-related risks to a less than significant level.

*(d) Waste Discharge Requirements*

Effective on December 28, 2012, the LARWQCB adopted Order No. R4-2012-0175, NPDES Permit No. CAS004001, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges into the Coastal Watersheds of Los Angeles County. The permit establishes new performance criteria for new development and redevelopment projects in the coastal watersheds of Los Angeles County (with the exception of the city of Long Beach). Storm water and non-storm water discharges consist of surface runoff generated from various land uses, which are conveyed via the municipal separate storm sewer system and ultimately discharged into surface waters throughout the region (“storm water” discharges are those that originate from precipitation events, while “non-storm water” discharges are all those that are transmitted through an MS4 Storm Water Permit and originate from precipitation events). Discharges of stormwater and non-storm water from the MS4s, or storm drain systems, in the Coastal Watersheds of Los Angeles County convey pollutants to surface waters throughout the Los Angeles Region. Non-storm water discharges through an MS4 in the Los Angeles Region are prohibited unless authorized under an individual or general NPDES permit; these discharges are regulated by the Los Angeles County NPDES Permit, issued pursuant to Clean Water Act (CWA) Section 402.

Coverage under a general NPDES permit such as the Los Angeles County permit can be achieved through development and implementation of a project-specific SWPPP.

*(e) Emergency Management Department, Emergency Operations Organization, and Emergency Operation Center*

The City of Los Angeles Emergency Management Department (EMD) is comprised of four divisions and two units including administrative services division, communications division, community emergency management division, operations division, planning unit, and training exercise unit. The EMD works with City departments, municipalities and with community-based organizations to ensure that the City and its residents have the resources and information they need to prepare, respond, and recover from emergencies, disasters and significant events. The Emergency Operations Organization (EOO) is the operational department responsible for the City's emergency preparations (planning, training and mitigation), response and recovery operations. The EOO centralizes command and information coordination to enable its unified chain-of-command to operate efficiently and effectively in managing the City's resources.

The Emergency Operation Center (EOC) is the focal point for coordination of the City's emergency planning, training, response and recovery efforts. EOC processes follow the National All-Hazards approach to major disasters such as fires, floods, earthquakes, acts of terrorism and large-scale events in the City that require involvement by multiple City departments.

*(f) General Plan Conservation Element*

The City of Los Angeles General Plan includes a Conservation Element adopted in September 2001. Policies relevant to hazards and hazardous materials are shown in Table IV.H-1 on page IV.H-19.

## **b. Existing Conditions**

### **(1) Site Location Setting**

As discussed in Section II, Project Description, of this Draft EIR, the 56 Site Locations would be located adjacent to freeways and major roadways on Metro-owned properties. A portion of the Site Locations contain existing static displays. The majority of the Site Locations are located on vacant land with limited vegetation and are generally inaccessible to the public. The majority of the proposed Site Locations are used primarily for Metro operations, which include rail corridors, stations, parking, bus depots, and equipment lots. Refer to Figures II-1 through II-3 of Section II, Project Description, of this Draft EIR, for the regional location of the Site Locations. Also refer to Figures Section II-1 through III-15 of

**Table IV.H-1  
Conservation Element—Resource Management (Fossil Library): Petroleum (Oil and Gas)**

Policy 1	Continue to encourage energy conservation and petroleum product reuse.
Policy 3	Continue to protect neighborhoods from potential accidents and subsidence associated with drilling, extraction and transport operations, consistent with California Department of Conservation, Division of Oil and Gas <sup>a</sup> requirements.
<p><sup>a</sup> As noted above, DOGGR is now known as CalGEM. Source: City of Los Angeles, 1996 and 2001.</p>	

Section III, Environmental Setting, of this Draft EIR, for aerial photographs of each of the Site Locations that show proximity to surrounding uses.

## (2) Hazardous Materials Database Search

As discussed in detail in the Hazards Report, Site Locations FF-9 and NFF-18 are listed as being within a property that is listed on a hazardous materials database search. Specifically, Site Locations FF-9 and NFF-18 are listed on the LARWQCB LUST list. A discussion with regard to the presence of the Site Locations on this database is provided in the impact analysis below.

## (3) Existing Soil and Groundwater Conditions

The primary Chemicals of Concern (COCs) likely to be encountered at all Site Locations include Total Petroleum Hydrocarbons as Gasoline (TPHg), Total Petroleum Hydrocarbons as Diesel (TPHd), Total Petroleum Hydrocarbons as Oil (TPHo), arsenic, lead, chromium and polynuclear aromatic hydrocarbons (PAHs). Additionally, of the 56 Site Locations, 19 are also known to within an area that contains solvent hydrocarbons (primarily Perchloroethylene [PCE]/TCE[Tetrachloroethylene] and breakdown by-products) and gasoline. Lastly, two Site Locations may contain or be located adjacent to on-site oil wells (Site Locations FF-4 and NFF-21) and two Site Locations may contain or be located adjacent to on-site USTs (NFF-3 and NFF-18). A discussion with regard to these soil and groundwater conditions is provided in the impact analysis below.

## (4) Asbestos-Containing Materials

Asbestos is a naturally occurring mineral made up of microscopic fibers. Asbestos has unique qualities which include its strength; resistance to fire and chemical corrosion; poor conduction of heat, noise, and electricity; and low cost. Asbestos was widely used in the building industry starting in the late 1800s and up until the late 1970s for a variety of uses, including acoustic and thermal insulation and fireproofing, and is often found in ceiling and floor tiles, linoleum, pipes, structural beams, and asphalt. Despite its useful qualities,

asbestos becomes a hazard if the fibers separate and become airborne. Inhalation of airborne asbestos fibers can cause lung diseases. Any building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could contain asbestos or ACMs. ACMs may be present in the approximately 200 static displays (at minimum) to be taken down as part of the Project. A discussion with regard to ACMs is provided in the impact analysis below.

### (5) Lead-Based Paint

Lead is a naturally occurring element and heavy metal that was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments, and drying agents from the early 1950s to 1972, when the Consumer Products Safety Commission specified limits on lead content in such products. While adults can be affected by excessive exposure to lead, the primary concern is the adverse health effects on children. The most common paths of lead exposure in humans are through ingestion and inhalation. LBP is of concern both as a source of exposure and as a major contributor to lead in interior dust and exterior soil. LBP may be present in the approximately 200 static displays (at minimum) to be taken down as part of the Project. A discussion with regard to LBP is provided in the impact analysis below.

## 3. Project Impacts

### a. Thresholds of Significance

#### (1) State CEQA Guidelines Appendix G

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

***Threshold (a): Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;***

***Threshold (b): Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;***

***Threshold (c): Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;***

***Threshold (d): Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment;***

**Threshold (e):** *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 (f):** *Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan;*

**Threshold (g):** *Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.*

For this analysis, the Appendix G Thresholds listed above are relied upon.

## **b. Methodology**

To evaluate potential impacts relative to hazards and hazardous materials, the Environmental Evaluation of Proposed MTA Transportation Communication Network (TCN) Program Sites-Fifty--Six (56) Locations in Los Angeles County (Hazards Report) was prepared by California Environmental and is provided in Appendix H of this Draft EIR. The analysis of the potential impacts regarding hazards and hazardous material was based on a review of regulatory agency records, regulatory databases, building permit records on file with the City of Los Angeles Department of Building and Safety (LADBS), United States Geologic Survey (USGS) topographic maps, the City of Los Angeles Zone Information and Map Access System (ZIMAS) database, Los Angeles County Landfill Maps, and historical imagery available from Google Earth.<sup>8</sup> In addition, California Environmental assumed the anticipated depth of excavation for each Site Location to be approximately 50 feet below ground surface for FF structures or approximately 20 feet bgs for NFF structures.

Based on the information reviewed from the sources listed above, California Environmental assessed the potential to encounter contaminated soil or groundwater, USTs, or oil wells within the anticipated depth of excavation for each TCN Structure and subsequently categorized each Site Location as either low risk or high risk. California Environmental considered a Site Location to be low risk if (1) there is no evidence of significant soil contamination at a concentration that would present an immediate health and safety concern, primarily for workers, though low concentrations of the primary COCs may be present in shallow soil due to the urban and predominantly industrial nature of the proposed locations; (2) groundwater is anticipated to be deeper than the proposed future foundation elements; (3) there were no potential subsurface hazards, such as USTs or oil wells,

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<sup>8</sup> *Due to differing methodologies utilized between consultants, the estimated depth to groundwater described in this section may differ from that described in Section IV.F, Geology and Soils, of this Draft EIR. Such differences do not affect the significance conclusions in this section.*

identified on or within close proximity to the particular Site Location; and (4) no evidence was obtained to suggest toxic or ignitable vapors would be present (at concentrations that would require worker protection) during excavation activities at the Site Locations. California Environmental considered a Site Location to be high risk if one or more of the following conditions exist: (1) a potentially dangerous substructure(s), such as USTs or oil wells, are present on or within close proximity to the site; (2) there is a likely presence of elevated concentrations of COCs that would typically include TPHv (Total Petroleum Hydrocarbons—volatile)/TPHg, PAHs, lead, arsenic, and VOCs; (3) the likely presence of significantly impacted groundwater shallower than the depth of the foundational element, such as a pile; and/or (4) the likely presence of toxic or ignitable vapors (above concentrations requiring worker protection) during drilling excavation of future foundations.

### **c. Project Design Features**

No Project Design Features related to hazards and hazardous materials are proposed as part of the Project.

### **d. Analysis of Project Impacts**

***Threshold (a): Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, included as Appendix A of this Draft EIR, during construction of the Project, including take down of existing static displays and installation of the TCN Structures, hazardous materials, such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and cleaners, could be routinely used. While some hazardous materials used during construction could require disposal, such activity would occur only during the construction activities and would cease upon installation of the TCN Structure or completion of take down of an existing display. In addition, all potentially hazardous materials to be used during construction would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. Construction of the Project would also comply with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials. The transport, use, and storage of hazardous materials during future construction would be required to comply with all applicable State and federal laws, such as the HMTA, RCRA, the California Hazardous Materials Release Response Plans and Inventory Law of 1985, and 22 CCR set forth above. Consequently, Project construction activities would not create a significant hazard to the public or the environment through the use of hazardous materials during construction.

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used for maintenance of TCN Structures, including cleaning products. Such use would be consistent with that currently occurring within the vicinity of the Site Locations. In addition, all hazardous materials used at the Site Locations during operation would be used, stored, and disposed of in accordance with all applicable federal, state and local requirements including those set forth above.

**As such, as determined in the Initial Study, with compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated with the routine transport, use, or disposal of hazardous materials during construction and operation of the Project would be less than significant, and no further analysis is required.**

***Threshold (b): Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;***

(1) Impact Analysis

*(a) Construction*

*(i) Soil and Groundwater Contamination, Oil Wells, and USTs*

(1) Freeway Facing TCN Structures

*(a) FF-1—101 N Lanes at Union Station*

As discussed in detail in the Hazards Report, Site Location FF-1 is not a listed impacted property. However, Site Location FF-1 is adjacent to a long-term historical railroad ROW, which may contain impacted groundwater. In addition, the depth to groundwater at Site Location FF-1 is estimated to be 36 feet bgs, and the anticipated depth of excavation for the sign pole may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-1 as high risk for the potential to encounter contaminated soil and groundwater during construction. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measures HAZ-MM-1 and HAZ-MM-2 are proposed below.**

*(b) FF-2—101 South Lanes at Center Street*

As discussed in detail in the Hazards Report, Site Location FF-2 is not a listed impacted property, but there are several listed impacted properties within 1,000 feet. The vicinity of Site Location FF-2 had a release from an underground storage tank that was remediated, but residual contamination remains. The property is also adjacent to the nearby Manufactured Gas Plant (MGP) remediation zone, under the jurisdiction of the DTSC.

Regional soil and groundwater contamination exist on-site and nearby areas. Furthermore, the depth to groundwater at Site Location FF-2 is estimated to be 40 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-2 as high risk for the potential to encounter contaminated soil and groundwater during construction. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measures HAZ-MM-1 and HAZ-MM-2 are proposed below.**

(c) FF-3—U.S. 101 N Lanes at Keller Street

As discussed in detail in the Hazards Report, Site Location FF-3 is not a listed impacted property, but there is a listed impacted property within 1,000 feet. Although the nearby Sector B of the former MGP site received DTSC closure for near-surface soil, the DTSC Partial Site Certification for Soil Letter from October 10, 2007 indicates that groundwater is contaminated with petroleum hydrocarbons, poly-nuclear aromatic compounds, VOCs, vinyl chloride, metals, and cyanide. Furthermore, the depth to groundwater at Site Location FF-3 is estimated to be 31 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-3 as high risk for the potential to encounter contaminated soil and groundwater during construction. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measures HAZ-MM-1 and HAZ-MM-2 are proposed below.**

(d) FF-4—U.S. 101 South Lanes at Beaudry Street

As discussed in detail in the Hazards Report, Site Location FF-4 is not a listed impacted property, and there are no listed impacted sites within 1,000 feet. Additionally, the depth to groundwater at Site Location FF-4 is estimated to be 31 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **Notwithstanding, California Environmental designated Site Location FF-4 as high risk due to the presence of an oil well within 180 feet of the Site Location FF-4, which would require a geophysical survey prior to excavation activities to assess for the presence of an on-site oil well. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measures HAZ-MM-1 through HAZ-MM-3 are proposed below.**

(e) FF-5—US 101 North Lanes, Northwest of Lankershim Boulevard

As discussed in detail in the Hazards Report, Site Location FF-5 is not a listed impacted property, but there are several listed impacted properties within 1,000 feet. Furthermore, the depth to groundwater at Site Location FF-5 is estimated to be 12 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California**

**Environmental designated Site Location FF-5 as high risk for the potential to encounter contaminated soil and groundwater during construction. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measures HAZ-MM-1 and HAZ-MM-2 are proposed below.**

(f) FF-6—I-5 South Lanes at North Avenue 19

As discussed in detail in the Hazards Report, Site Location FF-6 is not a listed impacted property but is located on a long-term railroad ROW nearby a former chrome plating facility. Additionally, the depth to groundwater at Site Location FF-6 is estimated to be 40 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-6 as high risk for the potential to encounter contaminated soil and groundwater during construction. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measures HAZ-MM-1 and HAZ-MM-2 are proposed below.**

(g) FF-7—I-5 North Lanes at San Fernando Road

As discussed in detail in the Hazards Report, Site Location FF-7 is not a listed impacted property, but an impacted property is located within 1,000 feet. Additionally, the depth to groundwater at Site Location FF-7 is estimated to be 50 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. However, the impacted property is located to the east and groundwater flows to the south. **As such, potentially contaminated groundwater is not anticipated to flow in the direction of the Site Location, and California Environmental designated Site Location FF-7 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(h) FF-8—I-5 South Lanes and Exit Ramp to I-10

As discussed in detail in the Hazards Report, Site Location FF-8 is not a listed impacted property, but an impacted property is located within 1,000 feet. Additionally, the depth to groundwater at Site Location FF-8 is estimated to be 13 feet bgs and the anticipated depth of excavation may be as deep as 50 feet. However, the impacted property within 1,000 feet poses a low threat to groundwater per a remediation report completed by URS and the subsequent determination of LARWQCB that the case meets the criteria of a low threat. **As such, California Environmental designated Site Location FF-8 as low risk for the potential to encounter contaminated soil and groundwater during construction.**

**Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

**(i) FF-9—I-10 West Lanes (Bus Yard)**

As discussed in detail in the Hazards Report, the area of Site Location FF-9 is a listed impacted site due to releases from petroleum USTs, which resulted in groundwater that is impacted with petroleum hydrocarbons. Specifically, the address that includes Site Location FF-9 is listed on the RWQCB LUST list. The location of the UST leak is at the Metro Division 10 Maintenance Yard at 742 N Mission Road and is approximately 1,000 feet to the east of Site Location FF-9. This LUST case was closed by the LARWQCB in July 2013. Minor impacts to groundwater were found near the UST location in 2012. Additionally, the depth to groundwater at Site Location FF-9 is estimated to be 13 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. However, groundwater flows to the north, away from Site Location FF-9. **As such, California Environmental designated Site Location FF-9 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

**(j) FF-10—I-10 West Lanes and Entrance Ramp from I-5**

As discussed in detail in the Hazards Report, Site Location FF-10 is not a listed impacted property and there are no listed impacted sites within 1,000 feet. Furthermore, the depth to groundwater at Site Location FF-10 is estimated to be 197 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-10 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

**(k) FF-11—I-10 East Lanes and Exit Ramp to SR-60 and I-5**

As discussed in detail in the Hazards Report, Site Location FF-11 is not a listed impacted property, and there are no listed impacted sites within 1,000 feet. Furthermore, the depth to groundwater at Site Location FF-11 is estimated to be 132 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California**

**Environmental designated Site Location FF-11 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

**(l) FF-12—I-10 West Lanes at Griffin Avenue and East 16th Street**

As discussed in detail in the Hazards Report, Site Location FF-12 is not a listed impacted property, but there is a listed impacted property within 1,000 feet. However, the depth to groundwater at Site Location FF-12 is estimated to be 243 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-12 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

**(m) FF-13—SR-2 South Lanes Northeast of Casitas Avenue.**

As discussed in detail in the Hazards Report, Site Location FF-13 is not a listed impacted property. However, there are several sites listed within 1,000 feet, and the regional groundwater is known to be impacted with solvents. Additionally, the depth to groundwater at Site Location FF-13 is estimated to be 45 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-13 as high risk for the potential to encounter contaminated soil and groundwater during construction. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measures HAZ-MM-1 and HAZ-MM-2 are proposed below.**

**(n) FF-14—SR-2 North Lanes Northeast of Casitas Avenue**

As discussed in detail in the Hazards Report, Site Location FF-14 is not a listed impacted property, but there are several listed impacted sites within 1,000 feet. Additionally, the depth to groundwater at Site Location FF-14 is estimated to be 45 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-14 as high risk for the potential to encounter contaminated soil and groundwater during construction. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measures HAZ-MM-1 and HAZ-MM-2 are proposed below.**

(o) FF-15—SR-170 South Lanes at Raymer Street

As discussed in detail in the Hazards Report, Site Location FF-15 is not a listed impacted property, but there is a listed impacted site within 1,000 feet. However, the depth to groundwater at Site Location FF-15 is estimated to be 275 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-15 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(p) FF-16—SR-170 North Lanes North of Sherman Way

As discussed in detail in the Hazards Report, Site Location FF-16 is not a listed impacted property, but there is a listed impacted property within 1,000 feet: the Hewitt Landfill. However, the depth to groundwater at Site Location FF-16 is estimated to be 225 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. In addition, a methane control system is installed and operational on the adjacent landfill. **As such, California Environmental designated Site Location FF-16 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(q) FF-17—I-5 North Lanes South of Tuxford Street

As discussed in detail in the Hazards Report, Site Location FF-17 is not a listed impacted property, and there are no listed impacted sites within 1,000 feet. Furthermore, the depth to groundwater at Site Location FF-17 is estimated to be 322 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-17 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(r) FF-18—South Lanes South of Tuxford Street

As discussed in detail in the Hazards Report, Site Location FF-18 is not a listed impacted property, but numerous impacted properties are located within 1,000 feet. However, the depth to groundwater at Site Location FF-18 is estimated to be 510 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-18 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(s) FF-19—SR-118 East of San Fernando Road

As discussed in detail in the Hazards Report, Site Location FF-19 is not a listed impacted property, but there are several listed impacted properties within 1,000 feet. However, the depth to groundwater at Site Location FF-19 is estimated to be 68 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-19 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(t) FF-20—SR-118 East of San Fernando Road

As discussed in detail in the Hazards Report, Site Location FF-20 is not a listed impacted property, but there are several listed impacted properties within 1,000 feet. However, the depth to groundwater at Site Location FF-20 is estimated to be 65-75 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-20 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(u) FF-21—I-110 South Lanes at Exposition Blvd.

As discussed in detail in the Hazards Report, Site Location FF-21 is not a listed impacted property, and there are no listed impacted sites within 1,000 feet. Furthermore, the

depth to groundwater at Site Location FF-21 is estimated to be 212 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-21 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(v) FF-22—I-5 North Lanes at San Fernando Road

As discussed in detail in the Hazards Report, Site Location FF-22 is not a listed impacted property. In addition, although the depth to groundwater at Site Location FF-22 is estimated to be 30 feet bgs and the anticipated depth of excavation may be as deep as 50 feet, there are no listed impacted properties within 1,000 feet. **As such, California Environmental designated Site Location FF-22 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(w) FF-23—110 North Lanes at Exposition Blvd.

As discussed in detail in the Hazards Report, Site Location FF-23 is not a listed impacted property and there are no listed impacted sites within 1,000 feet. Furthermore, the depth to groundwater at Site Location FF-23 is estimated to be 212 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-23 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(x) FF-24—I-5 South Lanes at San Fernando Road and Sepulveda Blvd.

As discussed in detail in the Hazards Report, Site Location FF-24 is not a listed impacted property. In addition, although the depth to groundwater at Site Location FF-24 is estimated to be 30 feet bgs and the anticipated depth of excavation may be as deep as 50 feet, there are no listed impacted properties within 1,000 feet. **As such, California Environmental designated Site Location FF-24 as low risk for the potential to**

**encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

*(y) FF-25—I-405 South Lanes at Victory Blvd.*

As discussed in detail in the Hazards Report, Site Location FF-25 is not a listed impacted property, and there are no listed impacted sites within 1,000 feet. Furthermore, the depth to groundwater at Site Location FF-25 is estimated to be 140 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-25 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

*(z) FF-26—I-405 North Lanes at Exposition Blvd.*

As discussed in detail in the Hazards Report, Site Location FF-26 is not a listed impacted property, but there is a listed impacted property within 1,000 feet. However, the depth to groundwater at Site Location FF-26 is estimated to be 106 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-26 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

*(aa) FF-27—I-405 South Lanes at Exposition Blvd.*

As discussed in detail in the Hazards Report, Site Location FF-27 is not a listed impacted property, and there are no listed impacted sites within 1,000 feet. Furthermore, the depth to groundwater at Site Location FF-27 is estimated to be 55 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-27 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release**

of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.

(bb) FF-28—I-10 W at Robertson Blvd.

As discussed in detail in the Hazards Report, Site Location FF-28 is a listed impacted property, and there is a listed impacted property within 1,000 feet. Additionally, the depth to groundwater at Site Location FF-28 is estimated to be 41 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. However, there is no evidence of groundwater contamination from the listed sites. **As such, California Environmental designated Site Location FF-28 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(cc) FF-29—SR-90 East at Culver Blvd.

As discussed in detail in the Hazards Report, Site Location FF-29 is not a listed impacted property, but there is a listed impacted property within 1,000 feet. Additionally, the depth to groundwater at Site Location FF-29 is estimated to be 12 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-29 as high risk for the potential to encounter contaminated soil and groundwater during construction. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measures HAZ-MM-1 and HAZ-MM-2 are proposed below.**

(dd) FF-30—SR-90 West at Culver Blvd.

As discussed in detail in the Hazards Report, Site Location FF-30 is not a listed impacted property, but there is a listed impacted property within 1,000 feet. Additionally, the depth to groundwater at Site Location FF-30 is estimated to be 12 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-29 as high risk for the potential to encounter contaminated soil and groundwater during construction. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measures HAZ-MM-1 and HAZ-MM-2 are proposed below.**

(ee) FF-31—I-105 West Lanes at Aviation Blvd.

As discussed in detail in the Hazards Report, Site Location FF-31 is not a listed impacted property, but there is a listed impacted property within 1,000 feet. However, the depth to groundwater at Site Location FF-31 is estimated to be 85 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-31 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(ff) FF-32—I-105 West Lanes at Aviation Blvd.

As discussed in detail in the Hazards Report, Site Location FF-32 is not a listed impacted property, but there is a listed impacted property within 1,000 feet. However, the depth to groundwater at Site Location FF-32 is estimated to be 85 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-32 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(gg) FF-33—I-110 South Lanes at Slauson Avenue

As discussed in detail in the Hazards Report, Site Location FF-33 is a listed impacted property, and there is a listed impacted property within 1,000 feet. However, the property has been remediated and is not a soil contamination risk to the site. In addition, the depth to groundwater at Site Location FF-33 is estimated to be 200 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-33 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(hh) FF-34—I-110 North Lanes at Slauson Avenue

As discussed in detail in the Hazards Report, Site Location FF-34 is a listed impacted property. Additionally, there are several listed impacted properties within 1,000 feet of the site. However, the soil has been remediated at Site Location FF-34, the depth to groundwater is estimated to be 105 feet bgs, and the anticipated depth of excavation may be as deep as 50 feet. **As such, California Environmental designated Site Location FF-34 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(2) Non-Freeway Facing TCN Structures

(a) NFF-1—Northeast corner of Vermont Avenue and Sunset Blvd.

As discussed in detail in the Hazards Report, Site Location NFF-01 is not a listed impacted property, but there is a listed impacted property within 1,000 feet. Additionally, the depth to groundwater at Site Location NFF-1 is estimated to be 25-44 feet bgs, and the anticipated depth of excavation would be approximately 30 feet. **California Environmental designated Site Location NFF-1 as high risk for the potential to encounter contaminated soil and groundwater during construction due to the presence of TPHg contamination in the groundwater likely from nearby impacted properties.. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measures HAZ-MM-1 and HAZ-MM-2 are proposed below.**

(b) NFF-2—Spring Street Bridge, 326 feet North of Aurora Street

As discussed in detail in the Hazards Report, Site Location NFF-02 is not a listed impacted property, but there are two listed impacted properties within 1,000 feet. During construction, the proposed excavation would likely encounter impacted groundwater as the depth to groundwater is estimated at 33 feet, and the anticipated depth to excavation would be approximately 30 feet. **As such, California Environmental designated Site Location NFF-2 as high risk for the potential to encounter contaminated soil and groundwater during construction due to the presence of vinyl chloride contamination in the groundwater from nearby impacted properties. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measures HAZ-MM-1 and HAZ-MM-2 are proposed below.**

(c) NFF-3—Northwest corner of Lankershim Blvd. and Chandler Blvd.

Site Location NFF-3 is not a listed impacted property, but there is a listed impacted property within 1,000 feet. The depth to groundwater at Site Location NFF-3 is estimated to be 155 feet bgs, and the anticipated depth of excavation would be approximately 30 feet. **Although the estimated depth to groundwater is lower than the estimated depth of excavation, California Environmental designated Site Location NFF-3 as high risk for the potential to encounter unanticipated USTs during construction due to the presence of gas station USTs nearby. As such, a geophysical survey would be required prior to excavation activities to assess for the presence of USTs on-site. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measures HAZ-MM-1 through HAZ-MM-3 are proposed below.**

(d) NFF-4—Northwest corner of Lankershim Blvd. and Universal Hollywood Drive

As discussed in detail in the Hazards Report, Site Location NFF-4 is not a listed impacted property, but there are two listed impacted properties within 1,000 feet. However, the depth to groundwater at Site Location NFF-4 is estimated to be 40 feet bgs, and the anticipated depth of excavation would be approximately 30 feet. **As such, California Environmental designated Site Location NFF-4 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(e) NFF-5—Southwest corner of Lankershim Blvd. and Universal Hollywood Drive

As discussed in detail in the Hazards Report, Site Location NFF-5 is not a listed impacted property, but there is a listed impacted property within 1,000 feet. However, the depth to groundwater at Site Location NFF-5 is estimated to be 40 feet bgs, and the anticipated depth of excavation would be approximately 30 feet. **As such, California Environmental designated Site Location NFF-5 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(f) NFF-6—Southwest corner of 4th Street and Hill Street.

As discussed in detail in the Hazards Report, Site Location NFF-6 is not a listed impacted property, but there is a listed impacted property within 1,000 feet. However, the depth to groundwater at Site Location NFF-6 is estimated to be 63 feet bgs, and the anticipated depth of excavation would be approximately 30 feet. **As such, California Environmental designated Site Location NFF-6 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(g) NFF-7—Venice Blvd. West of Robertson Blvd.

As discussed in detail in the Hazards Report, Site Location NFF-7 is not a listed impacted property, but there are listed impacted sites within 1,000 feet. The depth to groundwater at Site Location NFF-7 is estimated to be 25-40 feet bgs, and the anticipated depth of excavation would be approximately 30 feet. Although the proposed excavation would likely encounter groundwater, groundwater does not flow from these impacted sites in the direction of Site Location NFF-7. **As such, California Environmental designated Site Location NFF-7 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(h) NFF-8—Alameda Street and Commercial Street

As discussed in detail in the Hazards Report, Site Location NFF-8 is a listed impacted property, and there is a listed impacted property within 1,000 feet, which is underlain by soil and groundwater contaminated with TPH. Additionally, the depth to groundwater at Site Location NFF-8 is estimated to be 31 feet bgs, and the anticipated depth of excavation would be approximately 30 feet. **As such, California Environmental designated Site Location NFF-8 as high risk for the potential to encounter contaminated soil and groundwater during construction due to the known contamination of groundwater beneath the adjacent site.. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measures HAZ-MM-1 and HAZ-MM-2 are proposed below.**

(i) NFF-9—Northeast corner of Van Nuys Blvd. and Orange Line Bus line

As discussed in detail in the Hazards Report, Site Location NFF-9 is not a listed impacted property, but there is a listed impacted property within 1,000 feet. However, the depth to groundwater at Site Location NFF-9 is estimated to be 231 feet bgs, and the anticipated depth of excavation would be approximately 30 feet. **As such, California Environmental designated Site Location NFF-9 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(j) NFF-10—Southeast corner of Sepulveda Blvd. and Erwin Street

As discussed in detail in the Hazards Report, Site Location NFF-10 is not a listed impacted property, and there are no listed impacted sites within 1,000 feet. Furthermore, the depth to groundwater at Site Location NFF-10 is estimated to be 70 feet bgs, and the anticipated depth of excavation would be approximately 30 feet. **As such, California Environmental designated Site Location NFF-10 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(k) NFF-11—Southwest of Crenshaw Blvd, 175 feet South of 67th Street

As discussed in detail in the Hazards Report, Site Location NFF-11 is not a listed impacted property, but there is a listed impacted property within 1,000 feet. However, the depth to groundwater at Site Location NFF-11 is estimated to be 72 feet bgs, and the anticipated depth of excavation would be approximately 30 feet. **As such, California Environmental designated Site Location NFF-11 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(l) NFF-12—Southeast corner of Crenshaw Blvd. and Exposition Blvd.

As discussed in detail in the Hazards Report, Site Location NFF-12 is not a listed impacted property, but there are several listed impacted properties within 1,000 feet. Furthermore, the depth to groundwater at Site Location NFF-12 is estimated to be 23 feet bgs, and the anticipated depth of excavation would be approximately 30 feet. **As such, California Environmental designated Site Location NFF-12 as high risk for the potential to encounter contaminated soil and groundwater during construction. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measures HAZ-MM-1 and HAZ-MM-2 are proposed below.**

(m) NFF-13—Southeast Corner of East Cesar Chavez Avenue and North Vignes Street.

As discussed in detail in the Hazards Report, Site Location NFF-13 is not a listed impacted property, but there are several listed impacted properties within 1,000 feet. Furthermore, the depth to groundwater at Site Location NFF-13 is estimated to be 28-32 feet bgs, and the anticipated depth of excavation would be approximately 30 feet. **As such, California Environmental designated Site Location NFF-13 as high risk for the potential to encounter contaminated soil and groundwater during construction due to the known contamination of groundwater beneath the adjacent site. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measures HAZ-MM-1 and HAZ-MM-2 are proposed below.**

(n) NFF-14—Pico Blvd. and Exposition Blvd., South of Rail

As discussed in detail in the Hazards Report, Site Location NFF-14 is not a listed impacted property, but there are two listed impacted properties within 1,000 feet. However, the depth to groundwater at Site Location NFF-14 is estimated to be 55 feet bgs, and the anticipated depth of excavation would be approximately 30 feet. **As such, California Environmental designated Site Location NFF-14 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(o) NFF-15—Pico Blvd, 445 ft. West of Sawtelle Blvd.

As discussed in detail in the Hazards Report, Site Location NFF-15 is not a listed impacted property, but there is a listed impacted property within 1,000 feet. However, the

depth to groundwater at Site Location NFF-15 is estimated to be 55 feet bgs, and the anticipated depth of excavation would be approximately 30 feet. **As such, California Environmental designated Site Location NFF-15 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(p) NFF-16—Southeast corner of South-Central Avenue and East 1st Street

As discussed in detail in the Hazards Report, Site Location NFF-16 is not a listed impacted property, but there is a listed impacted property within 1,000 feet. Further, the depth to groundwater at Site Location NFF-16 is estimated to be 27 feet bgs, and the anticipated depth of excavation would be approximately 30 feet. **However, California Environmental designated Site Location NFF-16 as low risk for the potential to encounter contaminated soil and groundwater during construction as the nearby listed impacted property does not pose a threat to groundwater at the Site Location. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(q) NFF-17—Century Blvd., 152 ft West of Aviation Blvd.

As discussed in detail in the Hazards Report, Site Location NFF-17 is not a listed impacted property, and there are no listed impacted sites within 1,000 feet. Furthermore, the depth to groundwater at Site Location NFF-17 is estimated to be 95 feet bgs and the anticipated depth of excavation would be approximately 30 feet. **As such, California Environmental designated Site Location NFF-17 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(r) NFF-18—Southwest Aviation Blvd. and South of Arbor Vitae Street

As discussed in detail in the Hazards Report, Site Location NFF-18 is a listed impacted property, and there are several listed impacted properties within 1,000 feet. Monitoring wells are located on the property, and fuel is present in the groundwater. The depth to groundwater at Site Location NFF-18 is estimated to be 82 feet bgs, and the

anticipated depth of excavation would be approximately 30 feet. **Although the estimated depth to groundwater is lower than the estimated depth of excavation, California Environmental designated Site Location NFF-18 as high risk for the potential to encounter unanticipated USTs during construction due to the possibility of a UST located on the property as indicated on the LAFD inactive UST inventory and the presence of the property on the LARWQCB LUST list. As such, a geophysical survey would be required prior to excavation activities to assess for the presence of USTs on-site. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measures HAZ-MM-1 through HAZ-MM-3 are proposed below.**

(s) NFF-19—Northwest corner of Vermont Avenue and Beverly Blvd.

As discussed in detail in the Hazards Report, Site Location NFF-19 is listed as a possible service station in 1922, and there is a listed impacted property within 1,000 feet. The site was redeveloped within the last 20 years as the Metro Vermont/Beverly station. Additionally, there are several listed impacted properties within 1,000 feet resulting in TPHg in groundwater. Furthermore, the depth to groundwater at Site Location NFF-19 is estimated to be 15 to 25 feet bgs, and the anticipated depth of excavation would be approximately 30 feet. **As such, California Environmental designated Site Location NFF-19 as high risk for the potential to encounter contaminated soil and groundwater during construction. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measures HAZ-MM-1 and HAZ-MM-2 are proposed below.**

(t) NFF-20—Southwest corner of Santa Monica Blvd. and Vermont Avenue

As discussed in detail in the Hazards Report, Site Location NFF-20 is not a listed impacted property, but there is a listed impacted property within 1,000 feet. Furthermore, the depth to groundwater at Site Location NFF-20 is estimated to be 15 feet bgs and the anticipated depth of excavation would be approximately 30 feet. However, the listed property has resulted in *de minimis* concentrations of gasoline fuel constituents in the groundwater, and the case associated with it was closed in 2014. **As such, California Environmental designated Site Location NFF-20 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measure HAZ-MM-1 is proposed below.**

(u) NFF-21—South of 4th Street 210 ft East of South Santa Fe Avenue

As discussed in detail in the Hazards Report, Site Location NFF-21 is not a listed impacted property, and there are no listed impacted properties within 1,000 feet. Additionally, the depth to groundwater at Site Location NFF-21 is estimated to be 61 feet bgs, and the anticipated depth of excavation would be approximately 30 feet. **Although the estimated depth to groundwater is lower than the estimated depth of excavation, California Environmental designated Site Location NFF-21 as high risk due to the presence of an oil well located within 220 feet of the Site Location. As such, a geophysical survey would be required prior to excavation activities to assess for the presence of an on-site oil well. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measures HAZ-MM-1 through HAZ-MM-3 are proposed below.**

(v) NFF-22—Northwest corner of East 7th Street and South Alameda

As discussed in detail in the Hazards Report, Site Location NFF 22 is not a listed impacted property, but there is a listed impacted property within 1,000 feet. However, the depth to groundwater at Site Location NFF 22 is estimated to be 123 feet bgs, and the anticipated depth of excavation would be approximately 30 feet. **As such, California Environmental designated Site Location NFF-22 as low risk for the potential to encounter contaminated soil and groundwater during construction. Notwithstanding, low concentrations of the primary COCs described above may be present in shallow soil due to the urban nature of the location. Therefore, impacts related to the release of hazardous materials into the environment would be potentially significant. Accordingly, Mitigation Measures HAZ-MM-1 is proposed below.**

(3) Summary and Conclusion

As discussed above, impacts related to the release of hazardous materials into the environment would be potentially significant. The primary COCs likely to be encountered at all sites include TPHg, TPHd, TPHo, arsenic, lead, chromium and PAHs. A Soil Management Plan (SMP)/Health and Safety Plan (HASp) will be implemented for all Site Locations during construction activities, as provided below in Mitigation Measure HAZ-MM-1. In addition, 19 of the 54 Site Locations were identified as high risk and may contain solvent hydrocarbons (primarily PCE/TCE and breakdown by-products) and gasoline in addition to the primary COCs listed above. As such, all high risk sites will undergo preliminary soil and groundwater sampling, as provided below in Mitigation Measure HAZ-MM-2. Furthermore, as provided below in Mitigation Measure HAZ-MM-3, detailed geophysical evaluations are required for four Site Locations (FF-4, NFF-3, NFF-18, and NFF-21) due to the proximity of suspect oil wells and the possibility of USTs on the parcels.

*(ii) Methane Gas*

As shown in Table IV.H-2 on page IV.H-43, several Site Locations are located in a designated methane zone or a methane buffer zone, as mapped by the City. The methane zone covers extensive areas of Southern California and is typically related to subsurface methane gas produced from naturally occurring petroleum fields. The Project would comply with all applicable regulations with regard to methane. For example, as previously discussed, requirements for new construction within such zones include methane gas sampling and, depending on the detected concentrations of methane and gas pressure at the site, application of design remedies for reducing potential methane impacts. The required methane mitigation systems are based on the Site Design Level, with more involved mitigation systems required at the higher Site Design Levels, and are designed so that when properly implemented, they reduce methane-related risks to a less than significant level. **As such, with regulatory compliance, the Project would not exacerbate the risk of upset and accident conditions associated with methane. Therefore, impacts related to methane would be less than significant.**

*(iii) Asbestos-Containing Materials*

As discussed above, ACMs may be present in the approximately 200 static displays (at minimum) to be taken down as part of the Project. The Project would comply with all applicable regulatory measures with regard to ACMs. For example, SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities), requires the completion of a comprehensive asbestos survey prior to demolition, subject to approval by LADBS. If ACMs are found within a display, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable federal, state, and local regulations. With compliance with applicable regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment.

**As such, with regulatory compliance, the Project would not exacerbate the risk of upset and accident conditions associated with ACMs. Therefore, impacts related to ACMs would be less than significant.**

*(iv) Lead-Based Paint*

As discussed above, LBP may be present in the approximately 200 static displays (at minimum) to be taken down as part of the Project. The Project would comply with all applicable regulatory measures with regard to LBP. For example, the static displays would be sampled for LBP prior to demolition. In the event that LBP is found within areas proposed for demolition, suspect materials would be managed in accordance with applicable procedural requirements and regulations for the proper removal and disposal of LBP, in

**Table IV.H-2  
Site Locations Within Methane Zones**

<b>Site Location</b>	<b>Methane Zone</b>
FF-2	Buffer Zone
FF-3	Buffer Zone
FF-4	Methane Zone
FF-6	Methane Buffer Zone
FF-9	Methane Buffer Zone
FF-11	Methane Buffer Zone
FF-15	Methane Buffer Zone
FF-16	Methane Zone
FF-19	Methane Zone
FF-20	Methane Zone
FF-29	Methane Zone
FF-30	Methane Zone
NFF-8	Methane Buffer Zone
NFF-10	Methane Buffer Zone
NFF-16	Methane Zone
NFF-19	Methane Buffer Zone
NFF-21	Methane Zone
<hr/> <i>Source: California Environmental, 2022.</i>	

accordance with federal, state, and local regulations. Example procedural requirements include the use of respiratory protection devices while handling lead-containing materials, and certification of all consultants and contractors conducting activities involving LBP or lead hazards. With compliance with applicable regulations and requirements, Project construction activities would not expose people to a substantial risk resulting from the release of LBP into the environment. **As such, with regulatory compliance, the Project would not exacerbate the risk of upset and accident conditions associated with LBPs. Therefore, impacts related to LBP would be less than significant.**

*(b) Operation*

As discussed above, operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used for maintenance of TCN Structures, including cleaning products. Such use would be consistent with that currently occurring within the vicinity of the Site Locations. In addition, all hazardous materials used at the Site Locations during operation would be used, stored, and disposed of in accordance with all applicable federal, state and local requirements. **Therefore, impacts related to the release of hazardous materials during operation would be less than significant.**

## (2) Mitigation Measures

The following mitigation measures are proposed to address Project impacts related to the potential release of hazardous materials into the environment during construction:

### **Mitigation Measure HAZ-MM-1 (All Site Locations):** Soil Management Plan (SMP)—

The Project Applicant shall implement an SMP, which shall be submitted to the Metro Capital Engineering Group and/or City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities. The Site Locations shall be subject to the general protocols described in the SMP regarding prudent precautions and general observations and evaluations of soil conditions to be implemented throughout grading, excavation, or other soil disturbance activities on the Site Locations.

The protocols in the SMP shall include, but not be limited to, the following:

- Special precautions shall be taken to manage soils that will be disturbed during Project earthwork activities in areas containing Chemicals of Concern (COCs) above screening levels (SLs).
- The following requirements and precautionary actions shall be implemented when disturbing soil at the Site Locations: no soil disturbance or excavation activities shall occur without a Project-specific Health and Safety Plan (HASP). Any soil that is disturbed, excavated, or trenched due to on-site construction activities shall be handled in accordance with applicable local, state, and federal regulations. Prior to the re-use of the excavated soil or the disposal of any soil from the Site Locations, the requirements and guidelines in the SMP shall be implemented. The General Contractor shall conduct, or have its designated subcontractor conduct, visual screening of soil during activities that include soil disturbance. If the General Contractor or subcontractor(s) encounter any soil that is stained or odorous (Suspect Soil), the General Contractor and subcontractor(s) shall immediately stop work and take measures to not further disturb the soils (e.g., cover suspect soil with plastic sheeting) and inform the Metro's representative and the environmental monitor. The environmental monitor, an experienced professional trained in the practice of the evaluation and screening of soil for potential impacts working under the direction of a licensed Geologist or Engineer, shall be identified by Metro prior to the beginning of work.
- Prior to excavation activities, the General Contractor or designated subcontractor shall establish specific areas for stockpiling Suspect Soil, should it be encountered, to control contact by workers and

dispersal into the environment, per the provisions provided in the SMP.

- The General Contractor shall ensure that on-site construction personnel comply with all applicable federal, state, and local regulations, as well as the State of California Construction Safety Orders (Title 8). Additionally, if Suspect Soil is expected to be encountered, personnel working in that area shall comply with California Occupational Safety and Health Administration regulations specified in CCR Title 8, Section 5192. The General Contractor shall prepare a Project-specific HASP. It is the responsibility of the General Contractor to review available information regarding Site Location conditions, including the SMP, and potential health and safety concerns in the planned area of work. The HASP should specify COC action levels for construction workers and appropriate levels of personal protective equipment (PPE), as well as monitoring criteria for increasing the level of PPE. The General Contractor and each subcontractor shall require its employees who may directly contact Suspect Soil to perform all activities in accordance with the General Contractor and subcontractor's HASP. If Suspect Soil is encountered, to minimize the exposure of other workers to potential contaminants on the Site Location, the General Contractor or designated subcontractor may erect temporary fencing around excavation areas with appropriate signage as necessary to restrict access and to warn unauthorized on-site personnel not to enter the fenced area.
- The General Contractor shall implement the following measures as provided in the SMP to protect human health and the environment during construction activities involving contact with soils at the Site Location: decontamination of construction and transportation equipment; dust control measures; storm water pollution controls and best management practices; and proper procedures for the handling, storage, sampling, transport and disposal of waste and debris.
- The excavated soil should be screened using a calibrated hand-held PID to test for VOCs and methane as necessary.
- In the event volatile organic compound (VOC)-contaminated soil is encountered during excavation on-site, a South Coast Air Quality Management District (SCAQMD) Rule 1166 permit shall be obtained before resuming excavation. Rule 1166 defines VOC-contaminated soil as a soil which registers a concentration of 50 ppm or greater of VOCs as measured before suppression materials have been applied and at a distance of no more than three inches from the surface of the excavated soil with an organic vapor analyzer calibrated with hexane. Notifications, monitoring, and reporting related to the SCAQMD Rule 1166 permit shall be the responsibility of the General

Contractor. Protection of on-site construction workers shall be accomplished by the development and implementation of the HASP.

- Known below-grade structures at the Site Locations (i.e., storm water infrastructure) shall be removed from the ground or cleaned, backfilled, and left in place as appropriate during grading and excavation. If unknown below-grade structures are encountered during Site Location excavation, the General Contractor shall promptly notify the Metro's representative the same day the structure is discovered. Based on an evaluation of the unknown below-grade structure by the appropriate professional (e.g., environmental monitor, geotechnical engineer), Metro shall address the below-grade structure in accordance with applicable laws and regulations.
- A geophysical investigation shall be conducted at the Site Locations to clear the construction area of buried utilities

**Mitigation Measure HAZ-MM-2 (Site Locations FF-1, FF-2, FF-3, FF-4, FF-5, FF-6, FF-13, FF-14, FF-29, FF-30, NFF-1, NFF-2, NFF-3, NFF-8, NFF-12, NFF-13, NFF-18, NFF-19, and NFF-21):** Soil/vapor sampling and testing of soil samples shall be obtained during the site location-specific, design-level geologic and geotechnical investigation. Results of the testing would be submitted and approved by the Metro Capital Engineering Group and/or the Los Angeles Department of Building and Safety (LADBS).

**Mitigation Measure HAZ-MM-3 (Site Locations FF-4, NFF-3, NFF-18, and NFF-21):** A geophysical investigation shall be conducted to clear the construction area of buried utilities and to identify buried substructures, specifically oil wells and USTS. Results of the geophysical investigation shall be submitted to and approved by the Metro Capital Engineering Group and/or LADBS.

### (3) Level of Significance After Mitigation

Based on the above, with implementation of Mitigation Measures HAZ-MM-1 through HAZ-MM-3, the Project would not exacerbate the risk of upset and accident conditions associated with the release of hazardous materials into the environment. Therefore, impacts associated with this threshold would be less than significant with mitigation.

***Threshold (c): Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;***

The Project would involve construction of TCN Structures and takedown of existing static displays on a variety of locations on Metro property within the City, some of which would be within 0.25 mile of a school. These include Site Locations FF-4, FF-13, FF-14,

FF-23, NFF-3 and NFF-14. Although the Project would involve the use of hazardous materials common to urban construction projects and TCN Structure operations, as discussed above, all activities involving the handling, use, storage, transport, and disposal of hazardous materials and wastes would occur in compliance with applicable federal, state, and local requirements. In addition, as discussed above for Threshold (b), in the event that construction activities uncover hazardous conditions that have the potential to result in risk of upset, Mitigation Measures HAZ-MM-1 through HAZ-MM-3 would be implemented, which would reduce such impacts to less than significant levels. **As such, with compliance with applicable regulations and requirements and Mitigation Measures HAZ-MM-1 through HAZ-MM-3, the Project would not create a significant hazard to nearby schools. Therefore, impacts regarding potential emissions or the handling of hazardous materials and wastes within 0.25 mile of an existing school would be less than significant with mitigation.**

***Threshold (d): Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment;***

### (1) Impact Analysis

As previously discussed, Government Code Section 65962.5 requires the CalEPA to develop and update annually the Hazardous Waste and Substances Sites (Cortese) List, which is a list of hazardous waste sites and other contaminated sites. While the Cortese List is no longer maintained as a single list, several databases provide information that meet the Cortese List requirements, including the LAFD LUST, LARWQCB LUST, LARWQCB Geotracker, and DTSC Envirostor databases.

Site Location FF-9 is located on the LARWQCB LUST list due to leaking underground petroleum storage tanks in association with the Metro Division 10 Maintenance Yard, approximately 1,000 feet to the east of Site Location FF-9. This LUST case was closed by the LARWQCB in July 2013. Minor impacts to groundwater were found near the UST location in 2012. However, groundwater flows to the north away from Site Location FF-9. Therefore, Site Location FF-9 has not been substantially impacted by the identified release. Site Location NFF-18 is listed on the LARWQCB LUST facility list due to the presence of fuel in the groundwater associated with the former site of King Delivery. Refer to the discussion provided above under Threshold (b) with regard to the risk designations for each of these sites.

Although no current violations and no active regulatory cases were identified for the Site Locations, based on the analyses above, **the Project may create a significant hazard to the public or the environment caused in whole or in part from the Project's**

**exacerbation of existing environmental conditions. Therefore, impacts with respect to this threshold would be potentially significant. Refer to and Mitigation Measures HAZ-MM-1 through HAZ-MM-3 above under Threshold (b).**

## (2) Mitigation Measures

Please refer to Mitigation Measures HAZ-MM-1 through HAZ-MM-3 provided above under Threshold (b).

## (3) Level of Significance After Mitigation

With the implementation of Mitigation Measures HAZ-MM-1 through HAZ-MM-3 impacts with respect to this threshold would be reduced to less than significant levels.

***Threshold (e): 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;***

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, included as Appendix A of this Draft EIR, the Project would involve construction of TCN Structures and takedown of existing static displays on a variety of locations on Metro property within the City, some of which would be within the vicinity of the Los Angeles International Airport (LAX), Santa Monica Airport, Hollywood Burbank Airport, and Whiteman Airport. However, the Project does not include any occupiable structures that would result in the permanent exposure of people to a safety hazard related to proximity to an airport. While construction workers may be exposed to intermittent airport-related noise for those Site Locations within two miles of an airport, such noise levels would be intermittent and limited to the short duration of construction activities. **As such, as determined in the Initial Study, the Project would not have the potential to exacerbate current environmental conditions that would result in a safety hazard or excessive noise for people residing or working in the area of the Site Locations. Therefore, no impacts relative to Threshold (e) would occur. No further analysis is required.**

***Threshold (f): Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan;***

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, included as Appendix A of this Draft EIR, the Project would involve construction of TCN Structures and takedown of existing static displays on a variety of locations on Metro property within the City and would, therefore, be

located near several disaster routes designated by the City's Safety Element. While it is expected that the majority of construction activities for the Project would be confined to the immediate vicinity of the Site Locations, limited offsite construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, Project development construction would not result in interference with adopted emergency response or evacuation plans because temporary construction barricades or other obstructions that could impede emergency access would be subject to the City's permitting process, which requires a traffic control plan subject to City review and approval. As part of the traffic control plan, both directions of travel would continue to be maintained. Development and implementation of these plans for all construction activity would minimize potential impacts associated with the impairment or physically interference with adopted emergency response or evacuation procedures.

With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Site Locations or surrounding area as set forth in California Vehicle Code (CVC) 21806(a)(1). Therefore, with compliance with applicable regulatory requirements, the Project would not impede emergency access within the Site Locations or vicinity that could cause an impediment along City designated disaster routes such that the Project would impair the implementation of the City's emergency response plan. Furthermore, one of the primary benefits of the TCN Program is to enhance communication during emergency events.

**As such, as determined in the Initial Study, the Project would not cause an impediment along the City's designated disaster routes or impair implementation of the City's emergency response plan. Impacts related to the implementation of the City's emergency response plan would be less than significant, and no further analysis is required.**

***Threshold (g): Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.***

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and evaluated in the Initial Study prepared for the Project, included as Appendix A of this Draft EIR, the proposed TCN structures are located in urbanized areas. The majority of the Site Locations are located on vacant land with limited vegetation and are generally inaccessible to the public. In addition, the Project would not involve the construction of occupiable structures or attract people to the areas of improvement. **As such, as determined in the Initial Study, the Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore, no impact with respect to Threshold (g) would occur. No further analysis is required.**

## e. Cumulative Impacts

### (1) Impact Analysis

Development of the Project in combination with the related projects has the potential to increase the risk of an accidental release of hazardous materials. Each of the related projects would require evaluation for potential threats to public safety, including those associated with the use, storage, and/or disposal of hazardous materials, ACMs, LBP, PCBs, and oil and gas and would be required to comply with all applicable local, state, and federal laws, rules and regulations, as discussed above for the Project. Because environmental safety issues are largely site-specific, this evaluation would occur on a case-by-case basis for each individual project affected, in conjunction with development proposals on these properties. Furthermore, the Project would implement Mitigation Measures HAZ-MM-1 through HAZ-MM-3 that would reduce the Project's potential hazards impacts to less than significant levels. **Therefore, with full compliance with all applicable local, state, and federal laws, rules and regulations, as well as implementation of the mitigation measures specific to the Project and site-specific recommendations for the related projects and Project, significant cumulative impacts related to hazards and hazardous materials would not occur. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.**

### (2) Mitigation Measures

Please refer to Mitigation Measures HAZ-MM-1 through HAZ-MM-3 provided above under Threshold (b).

### (3) Level of Significance After Mitigation

Cumulative impacts related to hazards and hazardous materials would be less than significant with implementation of Mitigation Measures HAZ-MM-1 through HAZ-MM-3 provided above.