

4.J HAZARDS AND HAZARDOUS MATERIALS

4.J.1 INTRODUCTION

This section considers the nature and range of foreseeable hazardous materials and physical hazards/impacts that would result from implementation of the proposed Downtown Inglewood and Fairview Heights TOD Plan. It identifies the ways that hazardous materials and other types of hazards could expose people and the environment to various health and safety risks during construction activities and operation of proposed land uses within the two planning areas.

This section also describes routine hazardous materials that are likely to be used, handled, or processed within the TOD Plan areas, and the potential for upset and accident conditions in which hazardous materials could be released. The impact analysis identifies ways in which hazardous materials might be routinely used, stored, handled, processed, or transported, and evaluates the extent to which existing and future populations could be exposed to hazardous materials. The potential for air safety hazards resulting from the proximity of the Downtown Inglewood and Fairview Heights TOD Plan areas to air traffic from the Los Angeles International Airport (LAX) is also evaluated in this section, along with an analysis of potential fire hazards and emergency response/access issues associated with proposed development within the TOD Plan areas.

Air emissions can also carry hazardous materials and create potential risks to human health and the environment. Sources of hazardous or toxic air emissions include, but are not limited to: industrial processes; vehicle use (diesel particulate emissions from exhaust); and proximity to existing or relocated sources of diesel or other toxic air emissions. Impacts related to toxic air contaminants, including the release of diesel particulate matter from construction truck trips and/or delivery truck trips (when the haul routes are located within one-quarter mile of an existing or proposed school) are identified in Section 4.F, *Air Quality*. Other safety hazards, such as earthquakes, are addressed in Section 4.L, *Geology, Soils, and Seismicity*. Flooding is addressed in Section 4.K, *Surface Water Hydrology and Water Quality*.

DEFINITIONS

Some of the key terms used in the management of hazardous materials and the context within which they apply to sites where contaminants have been identified in soil or groundwater are presented below.

- **Constituent of concern** or **contaminant of concern** is a hazardous material that has the potential to cause damage to human health or the environment, and create a “risk” to human health and the environment.
- **Exposure pathway** is the course a chemical or pollutant takes from the source to the organism exposed. A “complete” exposure pathway consists of four elements: chemical sources, migration routes (i.e., transport in the environment), an exposure point for contact (i.e., soil, air, or, water); and exposure routes.

- **Exposure route** is the way a chemical or pollutant enters the organism after contact. Four exposure routes are recognized in risk evaluation methods: ingestion, inhalation, dermal (skin and eye), and injection.
- An **extremely hazardous substance**, in the context of *Public Resources Code* Section 21151.4 pertaining to hazardous materials emissions near schools, refers to a material included on lists compiled pursuant to Section 25532 of the *California Health and Safety Code*, which incorporates regulated toxic and flammable substances under Section 112(r) of the federal *Clean Air Act* Table 3 of Section 112(r) lists those regulated substances pursuant to Section 25532(g)(2) of *California Health and Safety Code*.
- **Hazard** includes any condition, practice, or procedure that is or may be dangerous, harmful, or perilous to employees, property, neighbors, or the general public.
- A **hazardous material** is any material that, because of its quantity, concentration, or physical, or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or an administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment (*California Health and Safety Code*, Section 25501).
- A **hazardous materials release site** refers to any area, location, or facility where a hazardous material has been released or threatens to be released to the environment.
- A **hazardous waste** is a waste substance that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may either cause, or significantly contribute to an increase in mortality or an increase in serious illness, or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed (*California Health and Safety Code*, Section 25117).
- **Remedial action** or **remediation** refers to actions required by federal; state; or local laws, ordinances, or regulations necessary to prevent, minimize, or mitigate damage that may result from the release or threatened release of a hazardous material. These actions include site cleanup, monitoring, testing, and analysis of site conditions, site operation and maintenance, and placing conditions or restrictions on the land use of a site upon completion of remedial actions.

4.J.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

Federal and state laws require that hazardous materials be specially managed and that excavated soils having concentrations of contaminants that are higher than specified acceptable levels be specially managed, treated, transported, and/or disposed of as a hazardous waste. Title 22 of the California Code of Regulations Sections 66261.20–24 contains technical descriptions of characteristics that would cause a soil, once excavated and discarded, to be designated a hazardous waste. California regulations are compliant with federal regulations and, in most cases, are more stringent. State and federal regulations also set standards for allowable concentrations of contaminants in order to protect the public health from harmful concentrations of hazardous materials.

Numerous federal, state, and local regulations have been enacted to prevent or mitigate damage to public health and safety and the environment from the release or threatened release of hazardous substances into the environment or workplace, to protect human health and environmental resources from existing site contamination, and to protect human health and safety in relation to airport operations. Thus, implementation of proposed Downtown Inglewood and Fairview Heights TOD Plans and Zoning is subject to a range of federal, state, regional, and local plans, policies, and regulations, which are described below.

FEDERAL PLANS, POLICIES, AND REGULATIONS

Hazardous Materials Management

The primary federal agencies responsible for hazardous materials management include the U.S. Environmental Protection Agency (USEPA) and the U.S. Department of Labor Occupational Safety and Health Administration (OSHA).

Resource Conservation and Recovery Act of 1976

Federal hazardous waste regulations are generally promulgated under the Resource Conservation and Recovery Act (RCRA). Pursuant to RCRA, the USEPA regulates the generation, transportation, treatment, storage, and disposal of hazardous waste in a “cradle to grave” manner. RCRA was designed to protect human health and the environment, reduce/eliminate the generation of hazardous waste, and conserve energy and natural resources.

The Hazardous and Solid Waste Amendments of 1984 both expanded the scope of RCRA and increased the level of detail in many of its provisions, reaffirming the regulation from generation to disposal and to prohibiting the use of certain techniques for hazardous waste disposal. The USEPA has largely delegated responsibility for implementing the RCRA program to the State of California, which implements this program through the California Hazardous Waste Control Law.

RCRA regulates landfill siting, design, operation, and closure (including identifying liner and capping requirements) for licensed landfills. In California, RCRA landfill requirements are delegated to the California Department of Resources Recycling and Recovery (CalRecycle), which is discussed in detail below.

RCRA allows the U.S. EPA to oversee the closure and post-closure of landfills. Additionally, the federal Safe Drinking Water Act, 40 CFR Part 141 gives the USEPA the power to establish water quality standards and beneficial uses for waters from below- or above-ground sources of contamination. For the TOD Plan areas, water quality standards are administered by the Regional Water Quality Control Board (RWQCB).

RCRA also allows the USEPA to control risk to human health at contaminated sites. Vapor intrusion presents a significant risk to human populations overlying contaminated soil and groundwater and is considered when conducting human health risk assessments and developing Remedial Action Objectives.

Comprehensive Environmental Response, Compensation, and Liability Act and the Superfund Amendments and Reauthorization Act of 1986

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as “Superfund,” established prohibitions and requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. The Superfund Amendments and Reauthorization Act (SARA) amended CERCLA in 1986, stressing the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites, required Superfund actions to consider the standards and requirements found in other state and federal environmental laws and regulations; provided new enforcement authorities and settlement tools, increased state involvement in every phase of the Superfund program, increased the focus on human health problems posed by hazardous waste sites, encouraged greater citizen participation in making decisions on how sites should be cleaned up, and increased the size of the trust fund to \$8.5 billion. There are no Superfund sites within the TOD Planning areas (CERCLIS, 2016).

Emergency Planning and Community Right-to-Know Act of 1986

Through the Emergency Planning and Community Right-to-Know Act of 1986 (also known as Title III of Superfund), the USEPA also imposes requirements that hazardous materials are properly handled in order to prevent or mitigate risk to human or environmental health in the event of an accidental release.

Occupational Safety and Health Act of 1970

Federal and state occupational health and safety regulations also contain provisions regarding hazardous waste management through the Occupational Safety and Health Act of 1970 (amended), which is implemented by OSHA. Code 29 of Federal Regulations (29 CFR) requires special training of handlers of hazardous materials; notification to employees who work in the vicinity of hazardous materials; acquisition from the manufacturer of material safety data sheets (MSDS), which describe the proper use of hazardous materials; and training of employees to remediate any hazardous material accidental releases. OSHA regulates administration of 29 CFR.

OSHA also establishes standards regarding safe exposure limits for chemicals to which construction workers may be exposed. Safety and Health Regulations for Construction (29 CFR 1926.65 Appendix C) contains requirements for construction activities, which include occupational health and environmental controls to protect worker health and safety. The guidelines describe the health and safety plan(s) that must be developed and implemented during construction, including associated training, protective equipment, evacuation plans, chains of command, and emergency response procedures.

Due to the existence of hazardous materials in the vicinity of the TOD Plan areas, adherence to applicable hazard-specific OSHA standards would be required to maintain worker safety. For example, methane is regulated by OSHA under 29 CFR Part 1910.146 relative to worker exposure to a

“hazardous atmosphere” within confined spaces where the presence of flammable gas vapor or mist is in excess of 10 percent of the lower explosive limit. Title 49 of the CFR governs the manufacture of packaging and transport containers, packing and repacking, labeling, and the marking of hazardous material transport, and Title 42, Chapter 82 governs solid waste disposal and resource recovery.

Hazardous Materials Transportation Act

The transportation of hazardous materials is regulated by the Hazardous Materials Transportation Act (HMTA), which is administered by the Research and Special Programs Administration (RSPA) of the US Department of Transportation (USDOT). The Hazardous Materials Transportation Act provides USDOT with a broad mandate to regulate the transport of hazardous materials, with the purpose of adequately protecting the nation against risk to life and property, which is inherent in the commercial transportation of hazardous materials. The Hazardous Materials Transportation Act governs the safe transportation of hazardous materials by all modes, excluding bulk transportation by water. The Research and Special Programs Administration carries out these responsibilities by prescribing regulations and managing a user-funded grant program for planning and training grants for states and Indian tribes. USDOT regulations that govern the transportation of hazardous materials are applicable to any person who transports, ships, causes to be transported or shipped, or are involved in any way with the manufacture or testing of hazardous materials packaging or containers. USDOT regulations pertaining to the actual movement govern every aspect of the movement, including packaging, handling, labeling, marking, placarding, operational standards, and highway routing. Additionally, USDOT is responsible for developing curriculum to train for emergency response, and administers grants to states and Indian tribes for ensuring the proper training of emergency responders. Hazardous Materials Transportation Act was enacted in 1975 and was amended and reauthorized in 1990, 1994, and 2005.

STATE PLANS, POLICIES, AND REGULATIONS

Hazardous Materials Management

In the regulation of hazardous waste management, California law often mirrors or is more stringent than federal law. The California Environmental Protection Agency (CalEPA) and California Occupational Safety and Health Administration (CalOSHA) are the primary state agencies responsible for hazardous materials management. Additionally, the California Emergency Management Agency (CalEMA) administers the California Accidental Release Prevention (CalARP) program. The California Department of Toxic Substances Control (DTSC), which is a branch of CalEPA, regulates the generation, transportation, treatment, storage, and disposal hazardous waste, as well as the investigation and remediation of hazardous waste sites. The California DTSC program incorporates the provisions of both federal (RCRA) and state hazardous waste laws.

Hazardous Waste Control Act

The Hazardous Waste Control Act was passed in 1972 and established the California Hazardous Waste Control Program within the Department of Health Services. California’s hazardous waste regulatory

effort became the model for the federal Resource Conservation and Recovery Act (RCRA). California's program, however, was broader and more comprehensive than the federal system, regulating wastes and activities not covered by the federal program. California's Hazardous Waste Control Law was followed by emergency regulations in 1973 that clarified and defined the hazardous waste program, as follows:

- Included definitions of what was a waste and what was hazardous as well as what was necessary for appropriate handling, processing, and disposal of hazardous and extremely hazardous waste in a manner that would protect the public, livestock, and wildlife from hazards to health and safety.
- The early regulations also established a tracking system for the handling and transportation of hazardous waste from the point of waste generation to the point of ultimate disposition, as well as a system of fees to cover the costs of operating the hazardous waste management program.
- Advancing the newly developing awareness of hazardous waste management issues, the program established a technical reference center, for public and private use, dealing with all aspects of hazardous waste management.

California Government Code Section 65962.5 (a), Cortese List

The Hazardous Waste and Substance Sites (Cortese) List is a planning document used by the state, local agencies, and developers to comply with the CEQA requirements in providing information about the location of hazardous materials release sites. Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop at least annually an updated Cortese List. The Department of Toxic Substances Control is responsible for a portion of the information contained in the Cortese List. Other state and local government agencies are required to provide additional hazardous material release information for the Cortese List.

Hazardous Materials Business Plans

Article 1 of Chapter 6.95 of the California Health and Safety Code (Sections 25500–25520) requires that any business that handles, stores, or disposes of a hazardous substance at a given threshold quantity must prepare a hazardous materials business plan (HMBP). HMBPs are intended to minimize hazards to human health and the environment from fires, explosions, or an unplanned release of hazardous substances into air, soil, or surface water. The HMBP must be carried out immediately whenever a fire, explosion, or unplanned chemical release occurs. An HMBP includes three sections: (1) an inventory of hazardous materials, including a site map, which details their location; (2) an emergency response plan; and (3) an employee-training program. HMBPs serve as an aid to employers and employees in managing emergencies at a given facility. They also help better prepare emergency response personnel for handling a wide range of emergencies that might occur at the facility.

HMBPs are submitted to the Department of Environmental Health Hazardous Materials Division. The plans must be resubmitted, reviewed, revised, or amended as necessary every 3 years. The HMBP must also be amended within 30 days whenever there are changes in the amount or location of stored hazardous chemicals on a site. The Hazardous Materials Division conducts routine inspections at businesses required to submit business plans. The purpose of these inspections is to (1) ensure

compliance with existing laws and regulations concerning HMBP requirements, (2) identify existing safety hazards that could cause or contribute to an accidental spill or release, and (3) suggest preventative measures designed to minimize the risk of a spill or release of hazardous materials. After initial submission of an HMBP, the business must review and recertify the HMBP every year.

Risk Management Plans

Article 2 of Chapter 6.95 of the California Health and Safety Code (Sections 25531–25543.3) requires the owner or operator of a stationary source (non-transportation) with more than a threshold quantity of a regulated substance to prepare a risk management plan. The state statutes and regulations combine federal and state program requirements for the prevention of accidental releases of listed substances into the atmosphere, which is called the CalARP program. CalARP requires that a risk management plan include a hazard assessment program, an accidental release prevention program, and an emergency response plan. The risk management plan must be revised every 5 years or as necessary. Typical facilities or businesses that are required to prepare risk management plans include: ammonia refrigeration facilities, water treatment and wastewater treatment plants that handle chlorine gas and facilities that store flammable chemicals such as methane and propane.

Title 22 of the California Code of Regulations and Hazardous Waste Control Law, Chapter 6.5

The Department of Toxic Substances Control regulates the generation, transportation, treatment, storage, and disposal of hazardous waste under RCRA and the California Hazardous Waste Control Law. Both laws impose “cradle-to-grave” regulatory systems for handling hazardous waste in a manner that protects human health and the environment. CalEPA has delegated some of its authority under the Hazardous Waste Control Law to county health departments and other Certified Unified Program Agencies.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

In 1996, CalEPA adopted the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program). The Unified Program consolidates and coordinates the six state programs that regulate business and industry use, storage, handling, and disposal of hazardous materials and wastes. The County of Los Angeles Fire Department Health and Hazardous Materials Division provides the regulatory oversight for federal, state, and local laws and regulations related to hazardous materials use and disposal within the City of Inglewood. This County agency protects the public health and the environment from accidental releases and improper handling, storage, transportation, and disposal of hazardous materials and wastes through coordinated efforts of inspections, emergency response, enforcement, and site mitigation oversight. In addition, the County Fire Department Health and Hazardous Materials Division implements the following programs that are relevant to existing and the new uses that are proposed by the TOD Plan (County, 2016):

- Hazardous Materials Reporting and Response Planning (Hazardous Materials Disclosure)
- Uniform Fire Code Business Plan
- Hazardous Waste Generation and Onsite Treatment

- Accidental Release Prevention Program
- Above-ground Storage Tank Regulations
- Underground Storage Tank Regulations

Title 23 of the California Code of Regulations, Underground Storage Tank Act

The underground storage tank monitoring and response program is required under Chapter 6.7 of the California Health and Safety Code and Title 23 of the California Code of Regulations. The program was developed to ensure that the facilities meet regulatory requirements for design, monitoring, maintenance, and emergency response in operating or owning underground storage tanks. Health departments are the local administering agencies for this program.

Title 27 of the California Code of Regulations, Solid Waste

Title 27 of the California Code of Regulations contains a waste classification system that applies to solid wastes that cannot be discharged directly or indirectly to waters of the state and which therefore must be discharged to waste management sites for treatment, storage, or disposal. CalRecycle and its certified Local Enforcement Agency regulate the operation, inspection, permitting, and oversight of maintenance activities at active and closed solid waste management sites and operations.

California Human Health Screening Levels

The California Human Health Screening Levels (CHHSLs or “Chisels”) are concentrations of 54 hazardous chemicals in soil or soil gas that CalEPA considers to be below thresholds of concern for risks to human health. The CHHSLs were developed by the Office of Environmental Health Hazard Assessment on behalf of CalEPA. The CHHSLs were developed using standard exposure assumptions and chemical toxicity values published by the EPA and CalEPA. The CHHSLs can be used to screen sites for potential human health concerns where releases of hazardous chemicals to soils have occurred. Under most circumstances, the presence of a chemical in soil, soil gas, or indoor air at concentrations below the corresponding CHHSL can be assumed to not pose a significant health risk to people who may live or work at the site. There are separate CHHSLs for residential and commercial/industrial sites.

Senate Bill 1889, Accidental Release Prevention Law/CalARP

Senate Bill (SB) 1889 required California to implement a new federally mandated program governing the accidental airborne release of chemicals promulgated under Section 112 of the Clean Air Act. Effective January 1, 1997, CalARP replaced the previous California Risk Management and Prevention Program and incorporated the mandatory federal requirements. CalARP addresses facilities that contain specified hazardous materials, known as “regulated substances,” which if involved in an accidental release could result in adverse off-site consequences. CalARP defines regulated substances as chemicals that pose a threat to public health and safety or the environment because they are highly toxic, flammable, or explosive.

Occupational Safety

Title 8 – CalOSHA

CalOSHA administers federal occupational safety requirements and additional state requirements in accordance with California Code of Regulations Title 8. CalOSHA requires preparation of an Injury and Illness Prevention Program (IIPP), which is an employee safety program of inspections, procedures to correct unsafe conditions, employee training, and occupational safety communication. This program is administered via inspections by the local CalOSHA enforcement unit.

CalOSHA regulates lead exposure during construction activities under CCR Title 8, Section 1532.1, Lead, which establishes the rules and procedures for conducting demolition and construction activities such that worker exposure to lead contamination is minimized or avoided.

Compliance with CalOSHA regulations and associated programs would be required for the proposed TOD Plan due to the potential hazards posed by onsite construction activities and contamination from former uses.

Emergency Response to Hazardous Materials Incidents

California has developed an emergency response plan to coordinate emergency services provided by federal, state, and local government, and private agencies. The plan is administered by the California Emergency Management Agency and includes response to hazardous materials incidents. The California Emergency Management Agency coordinates the response of other agencies, including CalEPA, California Highway Patrol, California Department of Fish and Wildlife, Regional Water Quality Control Board, South Coast Air Quality Management District, County of Los Angeles Fire Department, and the Los Angeles County Health Department.

California Emergency Services Act

The California Emergency Services Act was adopted to establish the state's roles and responsibilities during human-made or natural emergencies that result in conditions of disaster and/or extreme peril to life, property, or the resources of the state. This act is intended to protect health and safety by preserving the lives and property of the people of the state.

California Natural Disaster Assistance Act

The California Natural Disaster Assistance Act provides financial aid to local agencies to assist in the permanent restoration of public real property, other than facilities used solely for recreational purposes, when such real property has been damaged or destroyed by a natural disaster. The California Natural Disaster Assistance Act is activated after the following occurs: (1) a local declaration of emergency; or (2) California Emergency Management Agency gives concurrence with the local declaration, or the governor issues a proclamation of a state emergency. Once the act is activated, local government is eligible for certain types of assistance, depending upon the specific declaration or proclamation issued.

State Fire Regulations

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The state fire marshal enforces these regulations and building standards in all state-owned buildings, state-occupied buildings, and state institutions throughout California.

California Fire Code (Chapter 33, Fire Safety During Construction and Demolition)

The California Fire Code Chapter 33 related to fire safety during construction and demolition prescribes safeguards to provide reasonable safety to life and property from fire during such operations. Specific safeguards related to oil-fired heaters, gas heaters, refueling, smoking, waste disposal, welding, electrical, flammable and combustible odors, water supply for fire protection, fire extinguishers, etc. Implementation of these safeguards are designed to reduce the potential of fire-related hazards during construction and demolition activities.

LOCAL PLANS, POLICIES, AND REGULATIONS

Los Angeles County Airport Land Use Plan

State Law requires the creation of Airport Land Use Commissions (ALUCs) within counties to coordinate planning for the areas surrounding public use airports. In Los Angeles County, the Regional Planning Commission has the responsibility for acting as the Airport Land Use Commission and for development of Airport Land Use Plans (ALUPs). The purpose of the ALUPs is to protect the public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to noise and safety hazards. In addition, the ALUC utilizes ALUPs to review proposed developments within the ALUC planning boundaries. The planning boundary of the ALUP is called the "airport influence area," which includes the extent of potential noise and safety impacts associated with airports (CALUP 2011). The TOD Plan areas are not located within any airport influence area, as further described below.

City of Inglewood General Plan

The City of Inglewood General Plan does not contain any Hazards or Hazardous Materials related policies that are relevant to the proposed TOD Plans.

City of Inglewood Multi-Hazard Mitigation Plan and Emergency Operation Plan

The City of Inglewood Multi-Hazard Mitigation Plan was developed by the City to reduce or eliminate long-term risk to human life and property from the hazards identified in **Table 4.J-1**. In addition, the City prepared an Emergency Response Plan to comply with the California Standardized Emergency Management System and the Federal Emergency Management Agency (FEMA) National Incident Management System. The plan includes information on the Emergency Operations Organization, the

roles and responsibilities of each City division, and includes operational checklists to guide response actions.

**TABLE 4.J-1
HAZARDS ADDRESSED IN THE INGLEWOOD MULTI-HAZARD MITIGATION PLAN**

Hazard	Historic Occurrence	Mitigation Potential	Likelihood of Occurrence		
			Low	Medium	High
Airplane crash	Yes	No		√	
Civil unrest	Yes	No		√	
Dan failure	No	Yes	√		
Earthquake	Yes	Yes			√
Flood/Winter Storm	No	Yes	√		
Hazmat Release	No	Yes			√
Human Threat Events/Terrorism	No	Yes			√
Hurricane wind/Storm surge	No	Yes	√		
Nuclear Incident	No	Yes	√		
Tornado	No	Yes	√		
Train Derailment	No	No		√	
Tsunami	No	Yes	√		
Wildfire	No	Yes	√		

Source: Inglewood Multi-Hazard Mitigation Plan

City of Inglewood Municipal Code

Chapter 6, Article 1 of the Inglewood Municipal Code adopts the Los Angeles County Fire Code as the Fire Code of the City of Inglewood. Additionally, Article 2, Sections 6-5 of the Inglewood Municipal Code designates the Los Angeles County Fire Department as the administering agency for the hazardous material inventory and emergency response program within the City of Inglewood, including the provisions of the California Hazardous Materials Release Response Plans and Inventory Law and other hazardous materials related regulations. These sections of the Municipal Code set forth requirements to ensure fire safety of new and reconstructed buildings within Inglewood.

4.J.3 ENVIRONMENTAL SETTING

HAZARDOUS MATERIALS

The TOD Plan areas are developed, urban in character, and include a variety of land uses, such as: commercial retail, offices, industrial manufacturing, public uses, and residential. Hazardous materials are routinely used, stored, and transported in most commercial/retail and office-based businesses, industrial facilities, medical facilities, and households. The Los Angeles County Fire Department Health Hazardous Materials Division maintains a list of registered hazardous waste transporters and

the types of wastes that are authorized to be transported. However, the general use, storage, and disposal of potentially hazardous materials that currently occur in the TOD Plan areas are typical of those commonly found in urban areas, and generally include cleaning and metal solvents, pesticides/herbicides, paints, fuels, oils, and lubricants.

Also, in urbanized, mixed-use areas, such as the TOD Plan areas, risks from hazards and hazardous materials are associated with historical land uses involving the use of hazardous materials for building construction (lead and asbestos) or for operation for uses such as auto repair shops, medical offices, dry cleaners, and photo processing centers. Many of the existing buildings in the TOD Plan areas were constructed from the 1920s through the 1980s. Based on their age, these older buildings may contain asbestos, lead-based paints (LBPs) and potentially toxic finishes, molds, and/or polychlorinated biphenyls (PCBs) that could be released during demolition or renovation activities. Typical hazardous materials of concern for existing older structures include:

- **Asbestos** is a mineral fiber that is carcinogenic and harmful to respiratory health, and is considered both a hazardous air pollutant and a human health hazard. Because of its fiber strength and heat resistance, it was widely used prior to the 1980s in California in a variety of building construction materials for insulation, fire-retardation, and friction and heat-resistant products, such as ducting insulation, wallboard, shingles, ceiling tiles, floor tiles, insulation, plaster, and floor backing. Thus, buildings constructed prior to 1980 could contain asbestos-containing materials. The risk to human health is from inhalation of airborne asbestos, which commonly occurs when asbestos-containing materials are disturbed during activities such as demolition and renovation. Due to the age of the buildings within the TOD Plan areas, it is likely that asbestos-containing materials are present.
- **Lead** is a recognized harmful environmental pollutant exposed through air, drinking water, food, soils, paint, and dust. Lead was widely used in paint, gasoline, water pipes, and many other products prior to 1977 when the U.S. Consumer Product Safety Commission banned the use of lead-based paint. Common methods of paint removal, such as sanding, scraping, and burning, create dust and the potential for lead to be absorbed into the body and pose a potential health risk. Since many of the structures located within the TOD Plan area were built prior to the federal regulations banning the use of lead-based paints (1977), it is likely to exist in structures constructed prior to 1977.
- **Polychlorinated Biphenyls (PCBs)** are synthetic chemicals that were manufactured for use in various industrial and commercial applications -- including oil in electrical and hydraulic equipment, and plasticizers in paints, plastics, and rubber products -- because of their non-flammability, chemical stability, high boiling point, and electrical insulation properties. When released into the environment, PCBs persist for many years, accumulate and concentrate in organisms. The USEPA has classified PCBs as probable human carcinogens. In 1979, the USEPA banned the use of PCBs in new electrical equipment and began a program to phase out PCB-containing equipment. Thus, older industrial areas within the TOD Plan areas could contain PCBs.

Additionally, soils and groundwater may be contaminated due to historical spills and leaking underground storage tanks. There are two known Leaking Underground Storage Tanks (LUSTs) in the TOD Plan areas identified by the State Water Resources Control Board GeoTracker, which are located at 720 Centinela Avenue (in the Fairview Heights TOD Plan area) and 317 Florence Avenue (in the Downtown TOD area) (Geotracker, 2016). These undergrad storage tanks are under continued site

assessment and remediation pursuant to the requirements of the State Water Resources Control Board (SWRCB). Per the California Department of Toxic Substances Control (DTSC) EnviroStor database there are no other contaminated state agency monitored properties (EnviroStor, 2016) or Superfund sites within the TOD Plan areas (CERCLIS, 2016).

TRANSPORT OF HAZARDOUS MATERIALS

The transport of hazardous materials through the City is regulated by the California Department of Transportation (Caltrans) and California Highway Patrol (CHP). As a regional transportation corridor, Interstate 405 (I-405) provides regional or sub-regional routes to Inglewood and may be routinely used for transport of hazardous materials. Truck routes (Florence Avenue, La Cienega, Century Boulevard) traverse the City where hazardous materials may also be routinely transported. In addition, within the TOD Plan areas there are large arterial streets where hazardous materials could be routinely transported, such as Manchester Boulevard, Florence Avenue, and La Brea Avenue.

EXISTING SCHOOLS

The public schools in and nearby the TOD Plan areas are listed in Table 4.J-2.

**TABLE 4.J-2
PUBLIC SCHOOLS WITHIN 0.25 MILES OF THE TOD PLAN AREAS**

School and Address	TOD Plan Area
Centinela Elementary School 1123 North Marlborough Avenue	Fairview Heights
Highland Elementary School 430 Venice Way	Downtown
Hudnall Elementary School 331 West Olive Street	Downtown
Kelso Elementary School 809 East Kelso Street	Downtown
Crozier Middle School 120 W Regent Street	Downtown
Inglewood High School 231 South Grevillea Avenue	Downtown
City Honors College Preparatory High School 120 W Regent Street	Downtown

EMERGENCY RESPONSE

The City of Inglewood has adopted a Multi-Hazard Mitigation Plan that was developed to reduce or eliminate long-term risks to human life and property from a variety of potential hazards. The City also has an Emergency Response Plan to comply with the California Standardized Emergency Management System and the Federal Emergency Management Agency (FEMA) National Incident Management System. The plan sets forth the City's planned response to emergency situations

including earthquake, fire, major rail and roadway accident, hazardous materials incident, civil disturbances, nuclear, and terrorist activities.

The Emergency Response Plan designates evacuation routes in the event of a large-scale hazard event, which includes Florence Avenue and La Brea Avenue, which traverse the TOD Plan areas; in addition to Crenshaw Boulevard, Imperial Highway, La Cienega Boulevard, I-405, and I-105 that traverse or are adjacent to other areas of the City of Inglewood (DWP, 2016).

4.J.4 SIGNIFICANCE CRITERIA

Criteria outlined in CEQA Guidelines were used to determine the level of significance of hazards and hazardous materials impacts. Appendix G of state CEQA Guidelines indicates that a project would have a significant effect if it were to:

- 4.J-1 Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials;
- 4.J-2 Create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment;
- 4.J-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within 0.25 mile of an existing or proposed school;
- 4.J-4 Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment;
- 4.J-5 Result in a safety hazard for people residing or working in the project area for a project located within an airport land use plan or, where such plan has not been adopted, be within 2 miles of a public airport use airport or public use airport;
- 4.J-6 Be located within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the project area;
- 4.J-7 Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan; or
- 4.J-8 Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

4.J.5 PROJECT IMPACTS AND MITIGATION MEASURES

Threshold 4.J-1: Significant hazards due to routine transport, use or disposal of hazardous materials.

Impact 4.J-1: Implementation of proposed Downtown Inglewood and Fairview Heights TOD Plan would not cause a significant hazard due to routine transport, use or disposal of hazardous materials. The resulting impact would be *less than significant*.

Methodology

Analysis in this impact discussion is focused on the use, disposal, transport, or management of hazardous or potentially hazardous materials resulting from development envisioned under the proposed TOD Plan. Disposal and transport, and the severity of potential hazards to people or property associated with the increased use, transport, and/or disposal of hazardous materials associated with implementation of the proposed TOD Plan is also analyzed. Additionally, this section addresses short-term construction impacts resulting from demolition of existing (usually older) structures, and operational impacts associated with the type of uses proposed and the materials that operation of these uses would entail.

In determining the level of significance, the analysis recognizes that all development under the proposed TOD Plan would be required to comply with relevant federal and state laws and regulations that are designed to ensure the safety of routine transport, use or disposal of hazardous materials.

Impact Assessment

Use and Generation of Hazardous Materials

CONSTRUCTION

Construction of site-specific development projects pursuant to the TOD Plan would use hazardous materials in the form of paints, solvents, glues, roofing materials, and other common construction materials containing potentially toxic substances. In addition, hazardous materials would be needed for fueling and servicing construction equipment on construction sites. These types of materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials is regulated by County of Los Angeles Fire Department Health and Hazardous Materials Division, who provides the regulatory oversight for federal, state, and local laws related to hazardous materials use and disposal within the City of Inglewood. Because site-specific construction projects will be required to comply with all applicable legal requirements for the use of hazardous material, impacts related to construction activities would be less than significant.

OPERATIONS

Implementation of the proposed TOD Plan would result in a maximum build out of 2,693 residential units, 235 hotel rooms, and 1,730,623 square feet of retail, office, institutional, and industrial uses, although the exact number and type of commercial and industrial uses (and associated processes and materials) that will move into the TOD Plan areas cannot be not known at this time. Industrial uses that would involve the transport, use, or disposal of large quantities of hazardous materials would not be permitted under the proposed zoning in the TOD Plan.

The proposed TOD Plan would allow a complementary mix of land uses that would be consistent with an urban mixed use neighborhood that includes residential, restaurant, retail, office, hotel, civic, and light industrial uses. These land uses would routinely use limited quantities of potentially hazardous materials consisting of typical household and maintenance products (e.g., paints, fuels, lubricants,

cleaning solvents, adhesives, sealers, pesticides/herbicides) that are common in urban areas and already occur in the TOD Plan areas. Compared to the current uses and levels of hazardous material generation within the TOD Plan areas, the future uses developed under the TOD Plan would not substantially increase the amount of hazardous materials and/or waste generated in the Plan areas, and implementation of the TOD Plan would not create new significant hazardous conditions or exacerbate existing hazardous conditions.

Additionally, individual businesses that use or store hazardous materials are subject to federal and state regulations regarding hazardous material use, storage, transportation, and disposal. As described above, the Los Angeles County Fire Department Health and Hazardous Materials Division provides regulatory oversight for federal, state, and local laws and regulations related to hazardous materials use and disposal within the City of Inglewood. Businesses handling or storing certain amounts of hazardous materials are required by the Fire Department to prepare a Hazardous Materials Business Plan and Risk Management Plan (per California Health and Safety Code Sections 25500–25543) that includes an inventory of hazardous materials stored on site, an emergency response plan, and procedures to be used in the event of a release of a hazardous material. As a result, implementation of the proposed TOD Plan would not result in a substantial increase in the use, generation, or risks related to the use and generation of hazardous materials, and impacts would be less than significant.

Transport and Disposal of Hazardous Materials

CONSTRUCTION

The proposed TOD Plan proposes infill development within an urban area, including redevelopment of older, potentially contaminated sites. Thus, during construction of future site-specific development projects pursuant to the TOD plan, hazardous materials in the form of paints, solvents, glues, roofing materials, and other common construction materials containing toxic substances would be transported to individual construction sites.

In addition, asbestos, lead, PCBs, or other hazardous materials could exist within buildings that would be demolished or remodeled under the proposed TOD Plan. Therefore, hazardous material surveys and abatement activities for buildings constructed prior to the 1980s would be required pursuant to the existing USDOT, DTSC, Title 27 of the California Code of Regulations, CalEPA, Cal/OSHA regulations, and Section 19827.5 of the California Health and Safety Code, which are described above. In addition, all PCBs, asbestos-containing materials, and lead based paints are required to be abated in accordance with SCAQMD, Cal/OSHA, and California Health and Safety Code requirements prior to demolition or renovation activities commence.

The asbestos, lead, PCBs, or other hazardous materials that may be encountered during demolition or construction activities would be transported and disposed of in compliance with all applicable regulations for the handling of such waste, including SCAQMD Rule 1403 (asbestos) and the California Code of Regulations. Additionally, appropriate documentation for hazardous waste that is transported in connection with activities at development sites (such as disposal of asbestos or building materials containing lead-based paint or PCBs) would be required by the City's Public Works Department prior to issuance of any demolition or construction permits (as required by federal, state, and city

regulations) to ensure compliance with the existing hazardous materials regulations described above. These requirements were developed to protect human health and the environment and compliance with these existing regulations would reduce impacts related to demolition, transport, and disposal of hazardous materials to a less-than-significant level.

OPERATIONS

The transport of potentially hazardous materials would continue to occur on streets in and adjacent to the TOD Plan areas, such as Florence Avenue, La Brea Avenue, and Manchester Boulevard, as well as on the regional freeway system. The proposed TOD Plan provides for an increase in commercial uses such as office and retail and could include establishments such as dry cleaners and gas stations; however, these types of uses do not typically involve the transport of high volumes of hazardous materials. Therefore, compared to the current uses and levels of hazardous material generation, it is unlikely that future uses developed under the TOD Plan would substantially increase the amount of hazardous materials and/or waste transported, or generated in, the TOD Plan area. In addition, I-405, I-105, and Imperial Highway are used for the transport of hazardous material generated from various areas in and outside of Los Angeles County. Because all new uses developed pursuant to the proposed TOD Plan would be required to comply with relevant federal and state laws and regulations for transportation of potentially hazardous materials that are designed to ensure the safety of routine transport of hazardous materials, implementation of the TOD Plan would not result in a substantial effect on the current use of the I-405, I-105, Imperial Highway, or any other roadway for transport of hazardous materials.

The transport of hazardous materials is subject to applicable federal and state regulations to reduce the risk of accidental spills, leaks, fire, or other hazardous conditions. Appropriate documentation for hazardous materials that are transported in connection with individual project site activities would be required for compliance with the existing hazardous materials regulations described above. The U.S. Department of Transportation Office of Hazardous Materials Safety prescribes strict regulations for the safe transportation of hazardous materials (Code of Federal Regulations Titles 40, 42, 45, and 49 and implemented by California Code of Regulations Titles 17, 19, 22, and 27), and compliance with applicable regulations as well as oversight by the appropriate federal, state, and local agencies would minimize the risk of hazardous materials exposure during transport. Therefore, the proposed TOD Plan would result in a less-than-significant impact with regard to the transport and disposal of hazardous materials.

Significance Conclusion for Impact 4.J-1

Because construction activities and operations of new uses resulting from the proposed TOD Plan would be required to comply with existing laws and regulations, impacts related due to routine transport, use, or disposal of hazardous materials would be less than significant, and no mitigation measures would be required.

Threshold 4.J-2:	Significant hazards due to reasonably foreseeable upset or accident conditions involving release of hazardous materials into the environment.
Impact 4.J-2:	Implementation of the proposed Downtown Inglewood and Fairview Heights TOD Plan would not cause a significant hazard due to a reasonably foreseeable upset or accident condition involving release of hazardous materials into the environment. The resulting impact would be <i>less than significant</i>.

Methodology

Analysis in this impact discussion is focused on the potential of a reasonably foreseeable upset or accident condition involving release of hazardous materials into the environment from development envisioned under the proposed TOD Plan. This section addresses short-term construction impacts resulting from demolition of existing (usually older) structures, as well as from disturbance of contaminated soils. In addition, the potential for risk of upset and the severity of consequences to people or property associated with the potential release of hazardous materials into the environment from operation of the proposed land uses that would be implemented by the TOD Plan is analyzed.

In determining the level of significance, the analysis recognizes that all development under the proposed TOD Plan would be required to comply with relevant federal and state laws and regulations that are designed to minimize the potential for upset or accident conditions, and to protect public health and safety from foreseeable upset or accident conditions involving release of hazardous materials into the environment.

Impact Assessment

CONSTRUCTION

While the routine use, storage, transport, and disposal of hazardous materials in accordance with applicable regulations during demolition, excavation, grading, and construction activities as discussed in Impact 4.J-1, above, would not pose health risks or result in significant impacts, improper use, storage, transportation and disposal of hazardous materials and wastes could result in accidental spills or releases, posing health risks to workers, the public, and the environment. Thus, implementation of the proposed TOD Plan could potentially result in the accidental release of hazardous materials. Construction workers and the public could be exposed to lead and asbestos that are present within structures undergoing demolition. Additionally, exposure to unanticipated hazardous substances could occur from currently unknown soil contamination that may be present from existing or past uses.

The use of Best Management Practices during construction implemented as part of a Stormwater Pollution Prevention Plan (SWPPP) as required by the National Pollution Discharge Elimination System General Construction Permit would minimize potential adverse effects to the general public and the environment. Construction contract specifications would include strict on-site handling rules

to keep construction and maintenance materials out of groundwater and soils. BMPs include, but are not limited to:

- Establishing a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Following manufacturers' recommendations on the use, storage, and disposal of chemical products used in construction;
- Avoiding overtopping construction equipment fuel tanks;
- Properly containing and removing grease and oils during routine maintenance of equipment; and
- Property disposing of discarded containers of fuels and other chemicals.

Buildings in the TOD Plan areas date back to the 1920s through the 1980s, a period when many structures were constructed with what are now recognized as hazardous building materials, such as lead and asbestos. Demolition or redevelopment of these older structures could result in the release of hazardous materials. However, asbestos abatement contractors must follow state regulations contained in California Code of Regulations Sections 1529, and 341.6 through 341.14 to ensure that asbestos removed during demolition or redevelopment of an existing building is transported and disposed of at an appropriate facility, such that risk of upset or accident conditions involving release of asbestos containing materials into the environment would be reduced to a less than significant level. The contractor and hauler of the material are required to file a Hazardous Waste Manifest which details the hauling of the material from the site and the disposal of it. Section 19827.5 of the California Health and Safety Code requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos.

Additionally, lead based materials may be located within existing structures in the TOD Plan area. The lead exposure guidelines provided by the U.S. Department of Housing and Urban Development provide regulations related to the handling and disposal of lead-based products. Federal regulations to manage and control exposure to lead-based paint are described in Code of Federal Regulations Title 29, Section 1926.62 and state regulations related to lead are provided in the California Code of Regulations Title 8 Section 1532.1. These regulations cover the demolition, removal, cleanup, transportation, storage and disposal of lead-containing material. The regulations outline the permissible exposure limit, protective measures, monitoring and compliance to ensure the safety of construction workers exposed to lead-based materials. Cal/OSHA's Lead in Construction Standard requires project proponents to develop and implement a lead compliance plan when lead-based paint would be disturbed during construction or demolition activities. The plan must describe activities that could emit lead, methods for complying with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. In addition, Cal/OSHA requires 24-hour notification if more than 100 square feet of lead-based paint would be disturbed. Adherence to the existing regulations would reduce potential hazards impacts related to lead and asbestos to a less than significant level.

In addition, grading and excavation of sites during construction of projects per the proposed TOD Plan may expose construction workers and the public to potentially unknown hazardous substances present in the soil. If any unidentified sources of contamination are encountered during grading or excavation, the handling and removal activities required could pose health and safety risks to workers and the public. Soil, water, or air contamination could cause various short-term or long-term adverse health effects in persons exposed to the hazardous substances.

Due to the long history of urban uses within the TOD Plan areas, it is also possible that old underground storage tanks (USTs) that were in use prior to permitting and record keeping requirements may be present within the TOD Plan areas. If an unidentified UST were to be uncovered or disturbed during construction activities, it could pose both health and safety risks, such as the exposure of workers, tank handling personnel, and the public to tank contents or vapors. Potential risks, if any, posed by USTs would be minimized by managing any uncovered tank pursuant to existing Los Angeles County standards as enforced and monitored by the County Department of Public Health/Environmental Health Division and DTSC, which would reduce potential hazards impacts related to unknown contamination or USTs to a less-than-significant level.

The extent to which groundwater may be affected, is very limited. As described in Section 4.L, Geology and Soils, groundwater depths in the TOD Plan area range from 40 to beyond 100 feet below the ground level. Thus, the depth to groundwater limits the potential of groundwater contamination. However, should groundwater contamination be identified, remediation activities would be required by the Los Angeles Regional Water Quality Control Board (LARWQCB) prior to the commencement of any new construction activities, which would reduce potential hazards impacts related to groundwater contamination to a less than significant level.

Overall, should construction activities be proposed for a site that may be contaminated due to previous uses, a site study and specific remediation and cleanup activities, would be required, if necessary, by the existing federal and state regulations, under the supervision of the DTSC before construction activities could begin. Implementation of construction activities of developments pursuant to the proposed TOD Plan would be done in compliance with existing agency regulations related to hazardous materials. As a result, potential impacts related to the reasonably foreseeable upset or accident conditions involving release of hazardous materials into the environment would be less than significant.

OPERATIONS

As described above, land use changes pursuant to the TOD plan would result in construction that would facilitate the removal of existing hazardous building materials that may be present, and would also cleanup potentially contaminated sites, thus reducing the potential for operation of new development to result in risk of upset or accidents that could release existing hazardous materials that are located on the project site into the environment.

In general, risks from hazards and hazardous materials would be adequately addressed through compliance with existing federal, state, and local regulations. Development under the proposed TOD Plan would involve a variety of land uses, and would include the use of and storage of common

hazardous materials such as paints, solvents, and cleaning products. Additionally, building mechanical systems and grounds and landscape maintenance could also use a variety of products formulated with hazardous materials, including fuels, cleaners, lubricants, adhesives, sealers, and pesticides/herbicides. The environmental and health effects of different chemicals are unique to each chemical and depend on the extent to which an individual is exposed. The extent and exposure of individuals to hazardous materials would be limited by the relatively small quantities of these materials that would be stored and used on individual project sites throughout the TOD Plan areas. Any business or facility which uses, generates, processes, produces, packages, treats, stores, emits, discharges, or disposes a hazardous material (or waste) is a handler and would require a hazardous materials handler permit and would be required to provide regular reporting to the California Environmental Reporting System (CERS).

Through future development under the proposed TOD Plan, hazardous materials could be stored within the TOD Plan area; however, the materials would generally be in the form of routinely used common chemicals. All hazardous materials would be used and stored in accordance with applicable regulations and such uses would be required to comply with federal and state laws to reduce the potential consequences of hazardous materials accidents. As a result, implementation of the proposed TOD Plan would not result in 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, and impacts would be less than significant.

Significance Conclusion for Impact 4.J-2

Impacts related to hazards due to reasonably foreseeable upset or accident conditions involving release of hazardous materials into the environment from implementation of the proposed TOD Plan would be less than significant, and no mitigation measures are required.

Threshold 4.J-3:	Hazardous emissions or handling of hazardous or acutely hazardous materials within 0.25 miles of an existing or proposed school.
Impact 4.J-3:	Implementation of proposed Downtown Inglewood and Fairview Heights TOD Plan could result in handling of hazardous or acutely hazardous materials within 0.25 miles of a school. However, compliance with applicable regulations would reduce this impact to <i>less than significant</i>.

Methodology

Analysis in this impact discussion is focused on the potential of the proposed TOD Plan to result in hazardous emissions or handling of hazardous or acutely hazardous materials within 0.25 miles of an existing or proposed school. In addition, the potential severity of consequences to people or property at school facilities in the event of a release of hazardous materials into the environment from operation of the proposed land uses that would be implemented by the TOD Plan is analyzed.

In determining the level of significance, the analysis recognizes that all development under the proposed TOD Plan would be required to comply with relevant federal and state laws and regulations

that are designed to minimize emission or release into the environment of hazardous or acutely hazardous materials, particularly within 0.25 miles of an existing or proposed school.

Impact Assessment

As described above, there are several public schools in the TOD Plan areas; including: Centinela Elementary School, Highland Elementary School, Hudnall Elementary School, Kelso Elementary School, Crozier Middle School, Inglewood High School, and City Honors College Preparatory High School.

Common hazardous materials would be used in the construction and operation of new development in the TOD Plan areas, including use of standard construction materials (e.g., paints, solvents, and adhesives), cleaning and other maintenance products, diesel and other fuels (used in construction and maintenance equipment and vehicles), and pesticides associated with landscaping around new developments. The TOD Plan provides for mixed urban land uses such as residential, retail commercial, institutional, public and light industrial; and does not include new land uses, such as large-scale industrial uses, that would result in hazardous emissions or are considered acutely hazardous.

Additionally, routine use, transport, and disposal of hazardous materials would occur with implementation of the TOD Plan; however, the types of uses that would emit or release hazardous or acutely hazardous materials into the environment are typically industrial manufacturing facilities, which are not proposed within the TOD Plan. In addition, all businesses that handle or transport hazardous materials (such as dry cleaners or automotive repair shops) would be required to comply with the provisions of the state and federal regulations for hazardous wastes, as described previously. The laws and regulations related to the generation of hazardous emissions and handling hazardous materials are intended to minimize potential health risks associated with their use or the accidental release of such substances. Compliance with existing regulations would minimize the risks associated with the exposure of sensitive receptors, including schools, to hazardous materials to a less-than-significant level. Therefore, future development under the proposed TOD Plan would result in a less-than-significant impact related to the emissions or handling of hazardous materials within the vicinity of schools.

Significance Conclusion for Impact 4.J-3

Although the proposed TOD Plan could place businesses with the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within 0.25 mile of an existing or proposed school, compliance with applicable laws and regulations would reduce impacts to less than significant.

Threshold 4.J-4: Location on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, could create a significant hazard to the public or the environment.

Impact 4.J-4: Implementation of the proposed Downtown Inglewood and Fairview Heights TOD Plan could result in development of a site that is included on a list of hazardous materials sites. However, compliance with existing regulations would reduce this potential impact to *less than significant*.

Methodology

The methodology used in this assessment includes review of database information to assess the potential presence of hazards and hazardous materials sites within the TOD Plan areas. The TOD Plan areas were evaluated for the presence of hazardous materials based on a review of the USEPA CERCLIS database, the DTSC EnviroStor database, and the Regional Water Quality Control (RWQCB) GeoTracker database. In addition, a Phase I Environmental Site Assessment Report (Leighton, 2012) that was prepared for numerous properties along the Metro line in the Downtown Inglewood area was reviewed for identification of existing contaminated properties.

To determine the level of significance in relation to this threshold, a determination was first made as to whether any sites that are included on a list of hazardous materials sites or contain unidentified/unknown contaminants are present within the Downtown or Fairview Heights TOD Plan areas. Next, the analysis for determining whether a significant impact occurs as the result of development on a site that is included on a list of hazardous materials sites or contain unidentified/unknown contaminants recognizes that all such development would be required to comply with relevant federal and state laws and regulations that are designed to remediate such sites so as to protect the public health.

Impact Assessment

As described above in the Existing Setting Section, there are two known LUSTs in the TOD Plan areas which are located at 720 Centinela Avenue (in the Fairview Heights Plan area) and 317 Florence Avenue (in the Downtown Plan area) (Geotracker, 2016) that are under continued site assessment and remediation pursuant to the requirements of the SWRCB. Because these LUST sites are undergoing remediation per the regulations and oversight of the SWRCB, they do not create a significant hazard to the public or the environment. Per the DTSC EnviroStor database there are no other contaminated state agency monitored properties or Superfund sites within the TOD Planning areas. However, due to long-term urban uses in the TOD Plan areas, historical releases of hazardous substances into the soil could have occurred and areas of contamination could be identified during implementation of the proposed TOD Plan.

As discussed under Impact 4.J-2, development of sites that have the potential for containing hazardous materials would be required to undergo remediation and cleanup activities under the supervision of the Los Angeles County Fire Department Hazardous Materials Division, DTSC, or LARWQCB, and before construction activities can begin. Consequently, if future development pursuant to the TOD Plan is located on a site that is included on a list of hazardous materials sites or is identified as having hazardous materials, existing remediation requirements from federal, state, regional, and local agencies would ensure that this impact would be reduced to a less-than-significant level.

Significance Conclusion for Impact 4.J-4

Impacts related to hazards due to development of a site that is included on a list of hazardous materials sites from implementation of the proposed TOD Plan would be less than significant.

Threshold 4.J-5: Safety hazards within an airport land use plan or within 2 miles of a public airport for which an airport land use plan has not been adopted.

Impact 4.J-5: A portion of the Downtown Inglewood TOD Plan would be within 2 miles of Los Angeles International Airport for which an airport land use plan has been adopted. However, *no impacts* related to airport hazards would occur.

Methodology

The first test in evaluating whether a significant impact would occur is to determine whether any portions of the Downtown Inglewood or Fairview Heights areas are within an airport land use plan or within 2 miles of a public airport for which an airport land use plan has not been adopted. Because all development pursuant to the proposed TOD Plan would not be located within a noise contour or airport influence area of any public airport facility that has an airport land use plan, and would also not be within 2 miles of a public airport for which an airport land use plan has not been adopted, further analysis related to the potential hazards related to public airports was unnecessary.

Impact Assessment

The southeastern most portion of the TOD Plan area is approximately 1.8 miles northeast of the Los Angeles International Airport (LAX) and the southernmost portion of the TOD Plan area is approximately 2.6 miles north of the Hawthorne Municipal Airport. The proposed TOD Plan areas are not within the noise contours (LAX, 2015) or airport influence areas of either airport facility (ALUC, 2016). As described above, the airport influence area delineates the extent of potential noise and safety impacts associated with airports. Because the TOD Plan areas are not within the airport influence area of either airport, new development within the proposed TOD Plan areas would not result in safety hazards related to a public airports.

Significance Conclusion for Impact 4.J-5

Impacts related to safety hazards within 2 miles of a public airport and/or within an airport land use plan would not occur from implementation of the proposed TOD Plan.

Threshold 4.J-6: Safety hazards in the vicinity of a private air strip.

Impact 4.J-6: Because there are no private air strips within 2 miles of the Downtown Inglewood or Fairview Heights planning areas, *no impact* would result.

Methodology

The first test in evaluating whether a significant impact would occur is to determine whether any private air strips were located within 2 miles of the Downtown Inglewood or Fairview Heights planning areas. Because there are no private airstrips within 2 miles of the TOD Plan area, further analysis related to the potential hazards related to private airstrips was unnecessary.

Impact Assessment

Because there are no private airstrips within 2 miles of the TOD Plan areas, no impacts related to private airstrips would occur.

Significance Conclusion for Impact 4.J-6

There are no private airstrips within 2 miles of either the Downtown or Fairview Heights TOD Plan areas. Therefore, no impacts would result.

Threshold 4.J-7:	Interfere with an adopted emergency response plan for emergency evacuation plan.
Impact 4.J-7:	Implementation of proposed Downtown Inglewood and Fairview Heights TOD Plan would not interfere with an adopted emergency response plan for emergency evacuation plan, and impacts would be less than significant.

Methodology

The following analysis determines whether the proposed TOD Plan would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan due to proposed site access or other configuration.

In determining the level of significance, the analysis assumes that if implementation of the TOD Plan would interfere with implementation of an adopted emergency plan, impede evacuation routes, or restrict access of emergency response personnel, impacts would be considered significant. Conversely, compliance with relevant laws and regulations related to emergency access or an evacuation plan would result in less-than-significant impacts.

Impact Assessment

CONSTRUCTION

Construction pursuant to the proposed TOD Plan would occur over a period of 20 years on discreet sites in various locations within the Downtown Inglewood and Fairview Heights planning areas. As discussed in greater detail in Section 4.E, *Traffic and Circulation*, although temporary lane and sidewalk closures immediately adjacent to site-specific development projects may be necessary for short durations, adequate emergency vehicle access throughout the TOD Plan area would be maintained at

all times as required by the Inglewood Police Department and Inglewood Fire Services Department (Los Angeles County Fire Department). All construction projects within the TOD Plan area must comply with the California Fire Code (Chapter 33, Fire Safety During Construction and Demolition), which includes requirements to provide for access for firefighting (Section 3310) and providing an approved temporary means of egress (Section 3311).

As part of the review and approval of site-specific development projects within the TOD Plan area, development plans will be reviewed by the City's police and fire agencies prior to construction to ensure that alternative route planning to facilitate the passage of people and vehicles through/around any temporary required road closures occurs and is implemented, if needed. Included in such plans would be provisions for any needed signage for detours, training of flagmen, and provision for staging areas for emergency vehicles responding to a call, as required by the City's police and fire agencies. Thus, emergency access in and out of construction sites, including evacuation routes for construction workers, would remain during the construction process.

OPERATIONS

As described above, the City of Inglewood has adopted a Multi-Hazard Mitigation Plan and an Emergency Response Plan that were developed to reduce or eliminate long-term risks to human life and property from a variety of potential hazards. The Emergency Response Plan designates evacuation routes that include: Florence Avenue and La Brea Avenue, Crenshaw Boulevard, Imperial Highway, La Cienega Boulevard, I-405, and I-105 in the City of Inglewood (DWP, 2016). Implementation of the TOD Plan would provide more direct access into the eastern portion of Vincent Park by extending Redondo Boulevard, which would enhance emergency access to that side of the park. Plan implementation would also expand and improve transit, pedestrian, and bicycle transportation modes, which would provide for various methods of evacuation in an emergency situation. In addition, the TOD Plan would develop neighborhood connectors that are intended to link various portions of the City, and provide additional evacuation routes and emergency access. Although the TOD Plan proposes closing a portion of Market Street, and other portions of Market Street would be closed periodically for community events, appropriate emergency access and evacuation routes would be required in the street closure design pursuant to the state fire regulations in the California Health and Safety Code Section 13000 et seq and the Inglewood Municipal Fire Code. In addition, the County Fire Department would review and approve the street closure design, which is standard City and Fire Department practice for any circulation changes. Therefore, implementation of the TOD Plan would not result in impeding evacuation routes or restricting access of emergency personnel, and impacts would be less than significant. In addition, the operational effect of the proposed TOD Plan would improve the existing evacuation facilities through the circulation improvements.

Future site-specific development projects occurring pursuant to the TOD Plan would be required to conform to applicable California Building Code and Uniform Fire Code standards, such as internal access and fire suppression facilities, which would be verified through the City's review process for each project to ensure that impairment of an emergency response plan or emergency evacuation plan would not occur. Therefore, implementation of the proposed TOD Plan would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

Significance Conclusion for Impact 4.J-7

The proposed TOD Plan would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

Threshold 4.J-8: Exposure of people to wildland fire risks.

Impact 4.J-8: Because there are no wildland areas within or near the Downtown Inglewood or Fairview Heights TOD Plan areas, *no impact* would result.

Methodology

The first test in evaluating whether a significant impact would occur is to determine whether any portions of the Downtown Inglewood or Fairview Heights areas were within or adjacent to a wildland area where a wildland/urban interface would exist.

Because the proposed TOD Plan areas are located within a developed urban environment where no wildland/urban interface exists, further analysis of wildland fire risks was determined not to be necessary.

Impact Assessment

Wildfire hazard areas are commonly identified in regions of the wildland/urban interface. However, the City of Inglewood is an entirely built-out urban community that is characterized (and surrounded) by a mix of residential, commercial, and industrial areas, and does not interface with any wildlands or an area classified as a Fire Hazard zone (CalFire, 2007). In addition, there are no specific areas in the City that are more vulnerable to fire than others (City, 2016). Therefore, impacts related to exposure of people to wildland fires would not occur.

Significance Conclusion for Impact 4.J-8

Because there are no wildland areas within or near the Downtown Inglewood or Fairview Heights TOD Plan areas, no impacts related to wildland fires would occur.

4.J.6 REFERENCES – HAZARDS AND HAZARDOUS MATERIALS

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