
IV. ENVIRONMENTAL IMPACT ANALYSIS

D. HAZARDOUS MATERIALS/RISK OF UPSET

This section describes the environmental setting of the Project related to soil, soil gas, and groundwater conditions and provides an assessment of environmental and cumulative impacts, mitigation measures, and the level of significance after mitigation measures are implemented.

ENVIRONMENTAL SETTING

A Phase I Environmental Site Assessment and Limited Compliance Assessment (“the Phase I ESA”) (Appendix D-2) was prepared for the Hollywood Park Racetrack and Casino located at 1050 South Prairie Avenue in Inglewood, California (the “Property”) in 2005, by ENVIRON International Corporation.¹ The tasks completed as part of the Phase I ESA included a site reconnaissance, a review of available records regarding environmental compliance in the possession of the Project Applicant’s predecessor, a review of previous site assessment reports², and a review of existing records on file with certain public agencies including the California Regional Water Quality Control Board, Los Angeles Region (“RWQCB”).

As part of the Project Applicant’s environmental due diligence when it purchased the property, Erler & Kalinowski, Inc. (“EKI”) performed a general review of environmental documents, available records regarding history and use of the Property, and the Phase I ESA prepared by ENVIRON. In June and July 2005, EKI conducted focused screening-level subsurface investigations at the Property to evaluate subsurface environmental conditions and to screen for the presence of chemicals of potential concern (“COPCs”) in soil, soil gas, and groundwater in selected areas on the Property that were identified during the Phase I ESA process.³

On behalf of the Project Applicant, EKI submitted to the RWQCB an Application for Oversight Agency Selection, dated 21 July 2006⁴ seeking designation of an environmental regulatory agency to provide oversight of soil management and redevelopment of the Property in accordance with the *Memorandum of Agreement Between the Department of Toxic Substances Control and the State Water Resources Control*

¹ *Environ 2005 a. Phase I Environmental Site Assessment and Limited Compliance Assessment, Hollywood Park, Inglewood, California, ENVIRON International Corporation, 11 April 2005.*

² *D&M, 1999 b. Phase I Environmental Site Assessment and Limited Environmental Compliance Assessment, Hollywood Park Racetrack, 1050 South Prairie Avenue, Inglewood, California, by Dames & Moore, 10 August 1999.*

³ *EKI, 2006 b. Property-Wide Subsurface Investigation Report and Soil Vapor Extraction Work Plan for Former Dry Cleaning Area, Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue, Inglewood, California, Erler & Kalinowski, Inc., 30 October 2006.*

⁴ *EKI 2006 a. Application for Oversight Agency Selection, Hollywood Park, 1050 South Prairie Avenue, Inglewood, California, Erler & Kalinowski, Inc., 21 July 2006.*

Board and the Regional Water Quality Control Boards and the California Environmental Protection Agency for the Oversight and Investigation and Cleanup Activities of Brownfields Sites, dated 1 March 2005 (“MOA”).⁵ The RWQCB was selected, in accordance with the established MOA procedures, as the environmental regulatory oversight agency for the Proposed Project.⁶

A Soil Management Plan (“SMP”) (Appendix D-1), summarizing prior screening-level subsurface investigations, was prepared by EKI to address localized areas found to contain or suspected to contain chemicals of potential concern on the Property. The SMP has been submitted to the RWQCB and approved in subsequent correspondence with the RWQCB.^{7,8} The SMP will be implemented as part of the overall development Project under RWQCB oversight. As described in the SMP, areas where COPCs are encountered during the Project at the Property will be investigated, and concentrations of COPCs determined to be above the Property-specific criteria will be remediated in accordance with the SMP approved by the RWQCB prior to or during Property grading, as described below.

The vast majority of the Property has no indications of historical land uses that would have resulted in releases of COPCs to soil and is believed to be un-impacted. A few, relatively localized areas of the Property were identified where chemicals in soil or soil gas were detected at concentrations above the Property-specific environmental criteria listed in the SMP.⁹ In the SMP, EKI categorized these areas of potential concern on the Property with respect to subsurface soil and soil gas conditions as follows:

Areas Currently Being Addressed Under Regulatory Agency Oversight or Previously Closed

- (1) Areas currently being addressed with regulatory oversight:
 - (A) Former Dry Cleaning Area;

⁵ *DTSC 2005 a. Memorandum of Agreement Between the Department of Toxic Substances Control and the State Water Resources Control Board and the Regional Water Quality Control Boards and the California Environmental Protection Agency for the Oversight and Investigation and Cleanup Activities of Brownfields Sites, 1 March 2005.*

⁶ *RWQCB 2006. Spills, Leaks, Investigations, and Cleanups (SLIC) Oversight Cost Reimbursement Account – Hollywood Park Racetrack at 1050 South Prairie Avenue, Inglewood, California 90305 (SLIC No. 1207), California Regional Water Quality Control Board, Los Angeles Region, 8 September 2006.*

⁷ *Soil Management Plan, Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue, Inglewood, California, Erler & Kalinowski, Inc., 3 July 2007.*

⁸ *RWQCB 2008. Conditional Approval of Work Plan for Installation of Groundwater Monitoring Wells and Work Plan for Proposed Soil Sampling in Western and Southern Parking Lot Areas – Hollywood Park and Casino, 1050 South Prairie Avenue, Inglewood, California (Site ID No. 2040271, SLIC No. 1207), California Regional Water Quality Control Board, Los Angeles Region, 13 August 2008.*

⁹ *Soil Management Plan, Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue, Inglewood, California, Erler & Kalinowski, Inc., 3 July 2007.*

- (B) Former Cypress Fee Site Groundwater Plumes (originating off-site).
- (2) Areas further evaluated and addressed by Hollywood Park Land Company:
 - (A) Methane and Benzene in Soil Vapor Samples near Buried Natural Gas Lines;
 - (B) Former Storm Water Sediment Area.
- (3) Areas previously closed by a regulatory agency:
 - (A) Former Diesel Storage Tank for Emergency Generator.

Areas to be Addressed Prior to or During Property Grading as Part of the Proposed Project

- (1) Current Vehicle Maintenance Area;
- (2) Former Track Maintenance Area;
- (3) Former Potrero Oil Field Areas (Former Oil Wells and Oil Field Impoundment Area);
- (4) Print Room.

Miscellaneous Areas to be Addressed During Demolition as Part of the Proposed Project

- (1) Main Track Infield Pond;
- (2) Buried Asbestos Containing Pipe;
- (3) Asbestos Containing Materials and Lead-Based Paint in Structures.

Each of the areas identified above is a localized area of the Project Site that would be addressed prior to or during soil grading activities on the Property as described in the SMP. The Project Site, including the areas listed above, would be subject to the general environmental risk management protocols described in the SMP regarding prudent precautions and general observations and evaluations of soil conditions to be implemented throughout earthwork, grading, excavation, or other soil disturbance activities on the Property. The SMP requires the preparedness of the earthwork and grading contractors to respond to potentially contaminated materials, if any are encountered during the Project.

Approval of the SMP by the RWQCB and the Proposed Groundwater Quality Investigation and Soil Screening Sampling

In December 2007, the RWQCB conditionally approved the SMP but asked for additional information on certain site conditions including, among other issues, the anticipated quality of the fill used during the original development of the site, arsenic levels found in certain soil samples, and further site assessment

work, including a groundwater quality assessment for the Property and a soil screening sampling plan for certain areas of the Property including the large parking lot.

On April 24, 2008, the Project Applicant submitted a Technical Report and Work Plan (“April 2008 Technical Report and Work Plan”) prepared by EKI in response to the December 2007 conditional approval of the SMP. That 2008 Technical Report and Work Plan responded to the December 2007 RWQCB requests that were the conditional approval of the SMP. In the 2008 Technical Report and Work Plan EKI addressed the RWQCB’s request for additional information on the quality of the fill used during the original development of the site, concluding that the fill had come from other locations on site, as opposed to off site, and therefore did not pose any risk of historic contamination. In addition, EKI analyzed the levels of arsenic found in certain soil samples taken from the Property and confirmed that the majority of the arsenic levels found at the site represented naturally occurring levels of arsenic similar to those found in soils throughout the State of California. The SMP provides a program to address arsenic levels in soil that are discovered during redevelopment and that exceed the naturally occurring levels.

The April 2008 Technical Report and Work Plan also provided a detailed summary of the regional groundwater quality based upon groundwater sampling results from groundwater monitoring wells both on and off the Property. The summary concluded that there are low levels of various chemicals, including nitrate, perchlorate, tetrachloroethene (“PCE”), and total petroleum hydrocarbons (“TPH”) in the groundwater surrounding the Property. EKI concluded that the ubiquitous and low levels of these chemicals in the regional groundwater are consistent with historical industrial, commercial and agricultural uses of the surrounding communities and do not pose risks to the current property uses or future redevelopment. The Work Plan proposed the placement of four groundwater monitoring wells primarily on the western and southern boundaries of the Property in response to the December 2007 request from the RWQCB. Those proposed groundwater monitoring wells will be used to sample groundwater quality for screening purposes and to confirm the groundwater flow gradient and direction along the western and southern boundaries of the Property. There are already groundwater monitoring wells near the northeastern boundary of the Property that are operated by Chevron-Texaco, discussed further below.

The April 2008 Technical Report and Work Plan also proposed taking sixteen shallow soil samples for soil quality screening purposes in the parking lot area in response to the December 2007 request from the RWQCB. These soil samples will be analyzed for various constituents to confirm the overall quality of the shallow soils on the Property.

In response to the April 2008 Technical Report and Work Plan, in letters dated August 13 and 22, 2008, the RWQCB approved the work plans for installation of groundwater monitoring wells and soil sampling in the western and southern parking lot areas provided certain conditions are strictly met, including (i) installing at least four more groundwater monitoring wells near the Grandstand Building, at the Former Dry Cleaning Area, in the Former Maintenance Area and in the northern sections of the main racetrack infield area, east of the Townsite fault, and (ii) conducting quarterly groundwater monitoring at least four

quarters to adequately assess groundwater gradient and/or plume changes beneath the Property. The August 22, 2008 letter includes deadlines for completing the additional reports and activities requested.

The process of approval of the April 2008 Technical Report and Work Plan is ongoing and there may be additional changes made to the work plan during this process. However, it is anticipated that the substantive issues raised in the August 13 and 22, 2008 letters will be resolved and a final work plan will be approved.

Except where noted otherwise, this Section is based upon a comprehensive review of the following site-specific investigations, including analysis and conclusions contained therein:

- Phase I Environmental Site Assessment and Limited Compliance Assessment, Hollywood Park, Inglewood, California, prepared by ENVIRON International Corporation, 11 April 2005;
- Property-Wide Subsurface Investigation Report And Soil Vapor Extraction Work Plan For Former Dry Cleaning Area, Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue, Inglewood, California, prepared by EKI, 30 October 2006;
- Soil Management Plan, Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue, Inglewood, California, prepared by EKI, dated 3 July 2007; and
- Technical Report and Work Plan, prepared by EKI and dated 24 April 2008 (EKI, 2008).

The Phase I ESA and the SMP are incorporated into Appendix D-1 and D-2, respectively, of this Draft EIR. Due to the size of the document, the 30 October 2006 report and the 24 April 2008 Technical Report and Work Plan prepared by EKI are available as references, but are not included in the Appendix.

Existing Project Site

The Property was developed as a racetrack in 1938. Currently, it is developed with two main structures: the Racetrack Grandstand and the Pavilion/Casino. (See Figure II-3, Existing Site Plan, in Section II. Project Description.) The Racetrack Grandstand is an approximately 594,000 square foot building which houses 200 general offices, a maintenance department, print shop, laundry, television department, and two gift shops. There are also several concession stands including two full-service restaurants, five kitchens, and approximately 50 bar areas. The second main structure on the Project Site is the Pavilion/Casino, a six-story, approximately 400,000 square foot building. This building houses a casino, restaurants, sports bar, health club, and area for parties and banquets. Existing facilities and structures associated with ongoing racetrack operations include the Main Racetrack, which is a one and one-eighth mile horse racing track, a Training Track, 18 barns suitable for stabling 2,000 horses, an equine hospital, and 10 small buildings that house repair and maintenance facilities for the Racetrack's fleet of tractors, trucks, buses, and other support equipment. The front of the Grandstand building is landscaped and includes a paddock area where horses can be viewed before each race. Large paved surface parking lots front along both

Prairie Avenue and Century Boulevard, extending the length of the property frontage along these two streets.

The general topography of Hollywood Park is relatively flat with a slight slope from north to south. The race track facilities are raised slightly on building pads and to the east an escarpment borders Darby Memorial Park. Existing landscaping at Hollywood Park includes mature palm trees surrounding the Grandstand and Casino buildings and landscaping around the patron entrance to the racetrack and paddock area. The Project Site consists of landscaping and eucalyptus trees located throughout the parking areas and behind the Main Racetrack. The Hollywood Park property line along Century Boulevard and Prairie Avenue is planted with a combination of pine trees, shrubs, and groundcover.

Historical Uses of Project Site

The Phase I ESA included a review of historical photographs and maps, as well as information provided by personal interview to determine the historical uses on the Project site. Based on this review, the Phase I ESA indicated that prior to 1938, the Property was undeveloped land, the western portion of the Project site was used for agriculture (row crops), and several rural roads crossed the property.

The northern and eastern portions of the Project site were used for oil production including exploratory wells, oil producing wells, and related facilities.^{10,11} These previous oil production operations are located within the mapped boundaries of the former Potrero Oil Field (See Figure IV.D-1, Former Oil Field and Oil and Gas Well Location Map). Historically, six oil wells were drilled on the Property at locations within and outside the boundary of this former oil field. Of the six, three are abandoned former oil producing/exploratory wells, and three are identified as plugged and abandoned/dry. These former oil producing and exploratory wells remain on the site. Other oil field related facilities were historically located on the Project site, including a possible former oil field impoundment area near the northwest corner of the Training Track.

In 1938, the site was developed as a horse racing track. The original racetrack facility reportedly included the Grandstand Building, a training track, stable areas, and maintenance facilities. A maintenance shop, including a vehicle repair facility, was reported to be located on the Property from the late 1930s to the mid 1980s. The Pavilion Building was constructed in 1984, and the Casino Building was constructed in

¹⁰ EKI, 2006 b. *Property-Wide Subsurface Investigation Report and Soil Vapor Extraction Work Plan for Former Dry Cleaning Area, Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue, Inglewood, California, Erler & Kalinowski, Inc., 30 October 2006.*

¹¹ *Environ 2005 a. Phase I Environmental Site Assessment and Limited Compliance Assessment, Hollywood Park, Inglewood, California, ENVIRON International Corporation, 11 April 2005.*

1995.¹² In 2005, the current owner of the property purchased the Property and is continuing the existing commercial Hollywood Park Racetrack and Casino operations on the Project site.¹³

Existing Surrounding Properties

The area surrounding the Project site is dominated by commercial-recreational, urban residential, commercial, and light industrial uses, as described in Section II, Project Description. To the north, the Property is bounded by paved parking areas, including a fenced-off area previously used for oil extraction, and the former Cypress Fee Site (which included a former oil field and gasoline manufacturing plant).¹⁴

The former Cypress Fee Site has been redeveloped and is now the Renaissance residential site, redeveloped by Watt Communities. Darby Memorial Park abuts the Project site in the northeast corner. The Forum, previously known as the Great Western Forum, is located just north of West 90th Street at Prairie Avenue. This sports arena is approximately 100-feet tall and can hold approximately 18,000 people for concerts and services. Since professional sports teams such as the Los Angeles Kings, the Los Angeles Lakers, and the Sparks have moved out of the Forum, the site has continued to be used for large concerts and weekly church services.¹⁵

Just beyond West 90th street and east of the Forum are Carlton Square and Briarwood, two gated residential communities. Older two-story residential uses are located immediately east of the Project site. A commercial retail center is located immediately south of the Project, including Home Depot, Staples, and Target, as well as numerous other commercial retail uses. One- and two-story commercial retail and restaurant uses are located immediately south of the Project site across Century Boulevard. Generalized land uses along Century Boulevard include highway oriented commercial, airport-related warehouse distributions, older low-rise apartment structures and several vacant properties. Immediately to the west of the Project site across Prairie Avenue are one- and two-story commercial retail and restaurant uses. Older multi-family residential uses lie to the west, beyond Prairie Avenue.

To the northwest is Kelso Elementary School, located at the intersection of Kelso and Prairie Avenues. Centinela Hospital lies approximately 0.25 miles to the west of the Project site at 555 East Hardy Street, between South Myrtle and Flower Streets.

¹² *Ibid.*

¹³ *Ibid.*

¹⁴ *DOGGR 2003. Map 123, California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, 14 November 2003, and HartCrowser 2003a. Phase I Environmental Site Assessment, Former Texaco Cypress Fee Facility and Inglewood Gasoline Company Property, Inglewood, California, HartCrowser, 5 March 2003.*

¹⁵ *City of Inglewood General Plan Update Technical Background Report, 2006.*

Historical Uses of Surrounding Properties

As described above, the Renaissance residential development located adjacent to, and directly north of the Property was formerly the Texaco Cypress Fee site, which was part of the former Potrero Oil Field and was used for oil production from approximately the 1920s through the 1980s (see Figure IV.D-1). The Cypress Fee site was used for various oil field-related activities including petroleum extraction, storage, and separation by Getty Oil, Chevron, and Texaco for approximately 60 years, between approximately 1930 and 1985. The site was, at one time, improved with 18 oil well production sites, associated oil storage tanks, buried and aboveground pipelines, four oil field impoundment areas, the Inglewood Gasoline Plant, a tank battery area where natural gas tanks, compressors, and separators were stored and operated, and four oil sumps. By 1985, all oil and gas related infrastructure had been removed, including 18 documented oil wells, which were abandoned in accordance with the then-current State of California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (“DOGGR”) requirements.¹⁶ Gasoline and oil impacted soils associated with this historical land use were remediated to the satisfaction of the RWQCB^{17,18} consistent with its Waste Discharge Requirement Order (WDR 88-049),¹⁹ which was rescinded on 22 April 1999 (RWQCB 2001). The RWQCB still oversees impacts to groundwater from the former Cypress Fee site as discussed below.

Gasoline and oil impacted groundwater remediation efforts for the former Cypress Fee site have required ongoing groundwater monitoring in the southwestern corner of the former Cypress Fee site, where the adjacent, off-site former Inglewood Gasoline Plant was located (RWQCB, 1988), and in down gradient areas on the Property^{20,21} (see below regarding information on local groundwater conditions). Groundwater monitoring wells were first installed to monitor contamination at the former Cypress Fee site as a requirement of WDR 88-049 (RWQCB, 1988), and the RWQCB required groundwater monitoring to continue in accordance with monitoring program CI No. 6820 after closure was issued for the completion of soil remediation. In 1991, the RWQCB required Texaco (now Chevron) to design a

¹⁶ HartCrowser 2003b. *Subsurface Investigation Report, Former Texaco Cypress Fee Facility and Inglewood Gasoline Company Property, Inglewood, California, HartCrowser, 4 April 2003.*

¹⁷ RWQCB 2001. *Results of Soil Vapor Extraction Testing, Groundwater Monitoring, and Sampling, and Request for Site Closure – Texaco Cypress Fee, Inglewood, California (File No. 100.315); SLIC #084, California Regional Water Quality Control Board, Los Angeles Region, 25 April 2001.*

¹⁸ RWQCB 2003b. *No Further Action for Soil – Texaco Cypress Fee, 3000 90th Street, Inglewood, California (SLIC No. 084, Site ID 2040200), California Regional Water Quality Control Board, Los Angeles Region, 14 October 2003.*

¹⁹ RWQCB 1988. *Waste Discharge Requirements – Land Treatment Project at Texaco, Inc. Cypress Fee Oil Field, Inglewood, (File No. 87-14; CI 6820), California Regional Water Quality Control Board, Los Angeles Region, 4 May 1988.*

²⁰ BBL, 2003a. *Groundwater Investigation Work Plan, Cypress Fee Property, Inglewood, California, Blasland, Bouck & Lee, Inc., 14 November 2003.*

²¹ Arcadis BBL, 2007. *2006 Annual Groundwater Monitoring Report, Cypress Fee Property, Inglewood, California, Arcadis/BBL, 24 January 2007.*

groundwater remediation program,²² and groundwater remediation was performed from 1995 through January 1998. Order WDR 88-049 was rescinded on 22 April 1999; however, the RWQCB has required submittal of subsequent work plans for groundwater investigation, monitoring, and sampling in 1999 and 2003.^{23,24} Between 1992 and March 2005 (BBL, 2006²⁵), seven groundwater monitoring wells were installed by Chevron, at the request of the RWQCB, on the Hollywood Park Property (see Figure IV.D-2, Groundwater Sampling Locations), and all of the monitoring wells on the former Cypress Fee site were abandoned prior to the Watt development. The seven monitoring wells on the Hollywood Park Property are currently used by Chevron for monitoring of benzene and tertiary butyl alcohol (“TBA”) plumes that are migrating in groundwater from the former Cypress Fee site onto the Property. Groundwater monitoring of these wells is performed on a semi-annual basis by consultants for Chevron (formerly Texaco), in accordance with the 2003 groundwater investigation work plan, and results are reported to the RWQCB.

In December 2006, the depth to groundwater in these seven monitoring wells ranged from approximately 162 to 174 feet below the ground surface (bgs). According to the RWQCB, the current remedial plan for these Cypress Fee site petroleum constituent plumes in groundwater is monitored natural attenuation (i.e., no active remediation is currently in place nor is active remediation expected to be required by the RWQCB in the near future). The Chevron monitoring wells on the Property may require abandonment prior to general Property grading as part of the Project. The RWQCB will make a determination in the future as to whether continued monitoring is necessary.

The groundwater monitoring wells are owned by Chevron, are not in public service, are covered with steel lids and are only used for groundwater sampling and monitoring purposes contracted by Chevron. Groundwater pumping for potable or non-potable uses is not occurring at the Project site, and there is no known current access by the public to groundwater below the Project Site.

Database Review of Project Site and Surrounding Properties

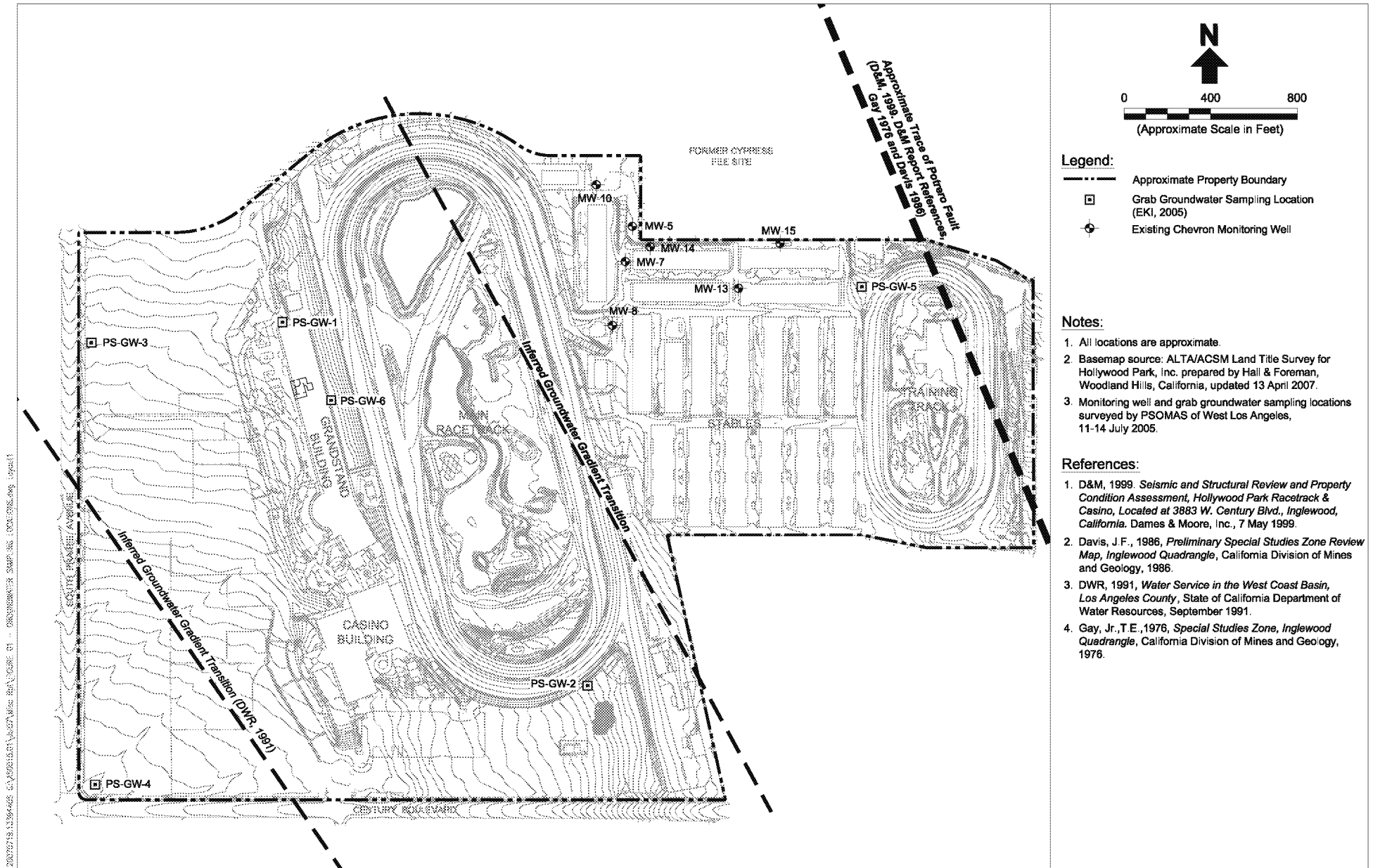
The Phase I ESA (ENVIRON, 2005a) included a database search of hazardous material sites that are listed on current federal, State, and local environmental regulatory agency databases. As a part of this search, the Phase I ESA identified several database listings for sites located within the American Society

²² Earth Tech, 1991. *Scope of Work for Design of a Groundwater Remediation Program, Inglewood, California, The Earth Technology Corporation, 8 February 1991.*

²³ AET, 1999. *Workplan for Groundwater Monitoring and Sampling, Texaco E&P Cypress Fee Facility, Inglewood, California, Applied Environmental Technologies, Inc., 1 June 1999.*

²⁴ RWQCB, 2003a. *Semi-Annual Groundwater Monitoring – Texaco Cypress Fee, 3000 90th Street, Inglewood, California (SLIC No. 084, Site ID 2040200), California Regional Water Quality Control Board, Los Angeles Region, 17 September 2003.*

²⁵ BBL, 2006. *2005 Annual Groundwater Monitoring Report, Cypress Fee Property, Inglewood, California, Blasland, Bouck & Lee, Inc., 23 January 2006.*



Source: Erler & Kalinowski, Inc., July 2007.

for Testing and Materials (“ASTM”) designated search radius (i.e., generally one, one-half, or one-quarter mile radius) of the Project site, discussed below (see Phase I ESA in Appendix D-1).

Other than the former Cypress Fee site, which was specifically discussed in the Phase I ESA, ENVIRON concluded that none of the off-site properties included in the databases listed above were determined likely to impact soil or groundwater conditions on the Property or to pose a significant hazard or risk to future occupants residing or working on the Project Site.

The EKI Technical Report and Work Plan, referenced above, included a more detailed review of the surrounding property uses and focused on a number of gasoline service stations and a car wash that operate or were operated on properties near the Property and that have had recorded leaks of petroleum products, in some cases to groundwater. While none of those sites appears to have experienced a release of petroleum products that would have any significant or material impact on the groundwater quality under the Property, the four groundwater monitoring wells discussed in the Work Plan will assist in making that evaluation.

Sensitive Receptors

Appendix G to the State CEQA Guidelines considers a significant impact to occur if a proposed project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼- mile of an existing or proposed school. Furthermore, the South Coast Air Quality Management District (“SCAQMD”) generally considers the following land uses to be sensitive receptors with respect to air quality impacts: long-term health care facilities; rehabilitation centers; convalescent centers; retirement homes; residences; schools; playgrounds; child care centers; and athletic facilities.²⁶ Therefore, for purposes of this analysis, the following land uses surrounding the Project Site are identified as sensitive receptors with respect to hazardous material exposure:²⁷

- Sensitive Receptor No. 1 – William H. Kelso Elementary School (approximately 1,300 feet northwest);
- Sensitive Receptor No. 2 – Carlton Square and Briarwood, gated residential communities across 90th Street (approximately 950 feet north);
- Sensitive Receptor No. 3 – Renaissance residential townhomes, immediately adjacent (approximately 20 feet north);

²⁶ South Coast Air Quality Management District, *Air Quality Analysis Guidance Handbook*, Figure 4-2, July 1999.

²⁷ All distances reflect the distance from the sensitive receptor to the closest point of the Project Site boundary.

- Sensitive Receptor No. 4 – Darby Memorial Park/Martin Luther King Community Center, immediately adjacent (approximately 120 feet northeast);
- Sensitive Receptor No. 5 – Residential, immediately adjacent (approximately 100 feet east);
- Sensitive Receptor No. 6 – Lockhaven School, across Century Blvd. (approximately 1,300 feet southwest);
- Sensitive Receptor No. 7 – Centinela Hospital, across Prairie Avenue (approximately 1,000 feet west);
- Sensitive Receptor No. 8 – Holy Trinity Child Care Center, across Crenshaw Blvd. (approximately 1,000 feet east);
- Sensitive Receptor No. 9 – K. Anthony Middle School, across Prairie Ave (approximately 100 feet to the west);
- Sensitive Receptor No. 10 – Morningside High School, south of property, (approximately 1,200 feet to the south).

Other than the residential, school, day care, and hospital uses discussed above within ¼ mile of the Proposed Project, there are no other sensitive receptors in the immediate project vicinity. It should be noted that while there are additional Inglewood School District schools proximate to the Project site, they are all located greater than ¼ mile from the Project site.

Soils and Hydrology

The Project Site's average topographic elevation ranges approximately (north to south) from 150 feet above mean sea level (msl) in the Stables Area, to 121 feet above msl in the Main Track Area, to 106 feet above msl in the Parking Area. The average elevation change across the Project site (north to south) is 43 feet. These data generally agree with those reported in Section IV.C, Geology/Soils, with regard to average site elevations.²⁸ The Project site and surrounding properties are generally topographically flat with a slight southwesterly slope.

The Property is located in the Rosecrans Hills physiographic region of Los Angeles County. The shallow sediments that underlie the Property consist of the Pleistocene Lakewood Formation. Regionally, these

²⁸ *The location of soil borings for the preparation of the Geotechnical Report discussed in the Geology/Soils Section of this Draft EIR were not identical to the location of soil borings for the environmental site investigations as presented in this Section of the Draft EIR. Thus, the average site elevation data reported in this Section of the Draft EIR are not identical to the average site elevation data reported in the Geology/Soils Section.*

sediments are comprised of sand, silt, silty sand, and sandy clay with occasional gravel lenses. Sediments observed by EKI during soil and groundwater sampling at the Property were generally consistent with descriptions of the Lakewood Formation. Generally, fill material up to 15 feet thick was observed to be underlain by sand, silty sand, sandy silt, and clayey sand that were generally encountered to depths of 70 to 90 feet bgs. Below 70 to 90 feet bgs, well-graded sand, gravelly sand, sandy clay, and minor gravel were encountered to maximum drilling depths of 180 feet bgs. However, EKI's soil characterizations for the Property are intended only for purposes of environmental assessment and are not intended for geotechnical purposes.

Published historical records suggest that one fault zone currently crosses the Property. The Potrero Fault is a well-mapped fault zone that crosses the northeastern portion of the Property in the vicinity of the Training Track. The Inglewood (Townsite) trace that is reported to cross the southwestern portion of the Property,^{29,30,31} together with the Potrero Fault may be influencing groundwater conditions (e.g., groundwater depth and gradient) in different areas of the Property. These conditions are described here with regard to their potential influence on groundwater only; the significance of these conditions with regard to seismic activity is evaluated in Section IV.C, Geology /Soils.

The Property is located within the West Coast Groundwater Basin.³² During groundwater investigations by EKI and others on the Property, groundwater was encountered at depths ranging from approximately 70 feet bgs in the southwestern corner of the Property to approximately 115 to 180 feet bgs in the remainder of the Property. In general, depth to groundwater across the Property is approximately 100 feet or greater, except in the southwestern corner.

Local topography lends itself to the pattern of shallower groundwater in the southwest and deeper groundwater in the northeast given the general rise in surface topography across the Project site from the southwest to the northeast.

Identified Impacts to Soil and Groundwater by COPCs from Project Site

The SMP prepared for the Project Site addresses the potential for chemicals of potential concern to be present in soil and soil vapor at the Property from past or present activities on the Property and describes

²⁹ Davis, 1986. *Preliminary Special Studies Zone Review Map, Inglewood Quadrangle, California Division of Mines and Geology*, by J.F. Davis, 1986.

³⁰ Gay, 1976. *Special Studies Zone, Inglewood Quadrangle, California Division of Mines and Geology*, by T.E. Gay Jr., 1976.

³¹ Geomatrix, 2007. *Clarification of Points on Final Report – Geologic Investigation of the Potrero Fault for Hollywood Park (Inglewood, CA), Project No. 10834, November 2005, dated 5 July 2007.*

³² WRD 2001. *Regional Groundwater Monitoring Report, Central and West Coast Basins, Los Angeles County, California, Water Year 1999-2000, Water Replenishment District of Southern California, February 2001.*

procedures and protocols for environmental risk management that will occur during planned redevelopment activities at the Project Site. The SMP presents selected Property-specific environmental risk-based criteria for soil and soil gas (see Table 1 in the SMP found in Appendix D-1). These Property-specific, numerical soil and soil gas criteria have been selected for use during implementation of the SMP at the Property based on consideration of:

- Published screening criteria for protection of human health and groundwater quality that are (a) generally applied for initial evaluation of analytical data to facilitate rapid, preliminary decisions regarding the potential need for remediation for protection of human health and groundwater quality, as described above, and (b) determined by the respective regulatory agencies to be protective of human health for unrestricted residential land use at a lifetime incremental cancer risk of 10^{-6} or less (i.e., 1 in a million) and a hazard index (“HI”) of 1 or less for non-carcinogenic health risks for each COPC;
- Potentially exposed populations given the currently planned land uses of the Property; and
- Potentially complete exposure pathways that are relevant to the potentially exposed populations.

Thus, the criteria provided in the SMP are considered protective of human health and the environment for planned land uses of the Property. Comparable criteria for commercial land uses, for use if determined to be appropriate in consultation with the RWQCB, are also provided in the SMP.

During the environmental due diligence process conducted by EKI between 2005 and 2007 on behalf of Hollywood Park Land Company (HPLC), EKI identified localized areas of potential environmental concern on the Property and performed subsurface investigations to evaluate the potential presence of COPCs in soil and soil gas. Based on the available data and as described in the SMP, the following areas are now categorized as follows.

Areas Addressed Under Regulatory Agency Oversight or Previously Closed

1. Areas currently being addressed with regulatory oversight:

Former Dry Cleaning Area - The Former Dry Cleaning Area is located inside the northern end of the Grandstand Building. Dry cleaning operations reportedly were discontinued in approximately 1999, and the duration of dry cleaning operations at Hollywood Park is unknown, according to Hollywood Park personnel. Tetrachloroethene (also known as perchloroethene – or PCE) was detected in soil and soil gas at concentrations above the Property-specific criteria. The Property owner is currently working with the RWQCB to implement soil vapor extraction (“SVE”) remediation in this area to remove the PCE from

soil and soil gas.³³ In a letter dated August 20, 2008, the RWQCB approved the work plan for the SVE rebound testing and confirmation of soil sampling in the Former Dry Cleaning Area subject to certain conditions such as including additional intermediate and lateral confirmation soil sample locations to assess the remaining PCE soil contaminations in the areas that are distant from SVE well locations, and advancing an initial soil confirmation boring to the water table in the identified PCE source area to determine the vertical extent of PCE soil contamination. The Project Applicant will continue to discuss these items with RWQCB staff as rebound testing and confirmation of soil sampling in the Former Dry Cleaning Area progresses. Remediation of soil and soil gas is expected to be complete, and PCE concentrations are expected to be largely remediated to the Property-specific soil and soil gas criteria with RWQCB oversight before any construction at the site would begin. Any residual PCE occurrences in soil, soil gas, or groundwater would be addressed under RWQCB oversight following demolition of the Grandstand Building or otherwise during development.

Former Cypress Fee Site Groundwater Plumes (originating off-site) – According to RWQCB staff, the current remedial plan for these Cypress Fee site petroleum constituent plumes in groundwater is monitored natural attenuation (i.e., no active remediation is currently in place nor is active remediation expected to be required by the RWQCB in the near future). The Chevron monitoring wells on the Property may require abandonment prior to general Property grading as part of redevelopment. Replacement of any of the Chevron monitoring wells will be dependent on the completed development (i.e., access for placement of new monitoring wells in public or non-intrusive areas of the Project) and specific monitoring or well design requirements, if any, from the RWQCB.

As described in the “Historical Uses of Surrounding Properties” section, groundwater migrating onto the Project site from the former Cypress Fee site is impacted with benzene and TBA, which are considered volatile organic compounds (“VOCs”). During the focused screening-level subsurface investigations at the Property conducted by EKI in June and July 2005, and further sampling in April 2007, several shallow soil gas samples (i.e., at 7 feet bgs) were collected directly above and in the vicinity of these Cypress Fee site groundwater plumes. These data indicated that benzene and TBA are not migrating upward from the groundwater table into shallow soil gas at concentrations above the Property-specific soil gas criteria provided in the SMP. Benzene was detected at concentrations above the Property-specific soil gas criteria in two shallow soil gas samples in the general vicinity of the Cypress Fee benzene plume and outside the specific “Areas to be Addressed Prior to or during Project Grading” discussed below; however, detection of benzene at these two locations is potentially related to natural gas line leaks (discussed in the paragraph below). In accordance with the SMP, confirmation soil gas samples will be collected at these two locations following Project grading activities.

³³ RWQCB, 2007. *Conditional Approval of Soil Vapor Extraction Work Plan – Former Dry Cleaning Area in Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue, Inglewood, California (Site ID No. 2040271, SLIC No. 1207)*, California Regional Water Quality Control Board, Los Angeles Region, 8 May 2007.

2. Areas to be further evaluated and addressed as part of project implementation:

Methane and Benzene in Soil Vapor Samples near Buried Natural Gas Lines – In 2005, methane and benzene were detected in certain soil gas samples collected in the eastern portion of the stable area, near the locations of suspected leaking buried natural gas lines. Samples of gas collected directly from the natural gas pipeline by ENVIRON on 19 August 2005 confirmed that natural gas conveyed in these lines contained benzene in concentrations of up to 58 µg/L.

In 2006 and 2007, Hollywood Park personnel repaired the natural gas lines. In follow-up soil gas samples collected during April 2007, methane gas was detected in soil gas at PS-SGM-52 up to 24,000 parts per million by volume (“ppmv”), above the DTSC hazard level of 5,000 ppmv, and at the PS-SGM-51 location up to 2,000 ppmv, above the DTSC screening level of 1,000 ppmv. Benzene was detected at two sampled locations, SG-4 (0.17 µg/L) and PS-SGM-27 (0.13 µg/L), at concentrations above the Property-specific soil gas criterion listed in the SMP. The PS-SGM-51, PS-SGM-52, and SG-4 sample locations are in areas where ongoing natural gas pipeline leaks are still suspected. Thus, the presence of methane and benzene in soil gas at these sampling locations may be related to ongoing natural gas pipeline leaks in these areas. The source for the benzene in soil gas at the PS-SGM-27 location is not known, but may also result from buried natural gas pipeline leaks. Little is known about utility lines that may be present at the PS-SGM-27 location because this sampling point is on the edge of the northern Property boundary.

Prior to or during Property grading, the existing buried natural gas lines will be removed from the ground and disconnected, purged, or abandoned in place as permitted by Project redevelopment plans. The discontinuation of natural gas service to these pipelines during demolition and grading should be effective at reducing the concentrations of methane and benzene detected in soil gas in these areas. Following completion of Property grading, soil gas samples will be collected from prior sample locations SG-4 and PS-SGM-27, in accordance with the protocols described in the SMP, to confirm benzene concentrations in soil gas at these locations are below the Property-specific soil gas criterion listed in the SMP.

Former Storm Water Sediment Area - Storm water discharges at Hollywood Park are currently permitted under National Pollutant Discharge Elimination System (“NPDES”) Permit No. CA0064211, Order No. R4-2006-0062, and Monitoring and Reporting Program No. CI-8100, adopted by the RWQCB on 13 July 2006. In 2001, as part of the storm water system upgrades required by RWQCB, two buried Jensen boxes (storm water sediment traps) were installed as part of the permitted, upgraded storm water management system. Since installation of these boxes, until late 2005, sediments collected in the boxes were removed periodically by Hollywood Park personnel and deposited in shallow pits dug in the ground northeast of the Training Track. This area was identified as the Storm Water Sediment Area in EKI’s 30 October 2006 report.³⁴ Methane gas was detected in soil gas samples collected in 2005 in this area at a maximum

³⁴ EKI, 2006 b. *Property-Wide Subsurface Investigation Report and Soil Vapor Extraction Work Plan for Former Dry Cleaning Area, Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue, Inglewood, California, Erler & Kalinowski, Inc., 30 October 2006.*

concentration of 460,000 ppmv. The presence of methane gas appeared to be the result of decomposition of buried organic materials (i.e., storm water sediments) in that area.

In 2007, HPLC voluntarily excavated approximately 1,750 tons (estimated 1,100 cubic yards) of buried storm water sediments and soil from the former Storm Water Sediment Area and disposed of these materials at an off-site facility. Confirmation soil samples did not contain chemical concentrations above the Property-specific soil criteria listed in the SMP. The results of analyses of the eight soil confirmation samples indicate that the buried storm water sediments in the former Storm Water Sediment Area were adequately removed. Methane gas was detected at a maximum post-excavation concentration of 600 ppmv (PS-SGM-65), thereby confirming that methane gas concentrations in the former Storm Water Sediment Area were reduced below levels of concern following the excavation in this area.

3. Areas previously closed by a regulatory agency:

Former Diesel Storage Tank for Emergency Generator - the Casino Building at the Property is equipped with emergency generators that provide backup power. Beginning in 1984, the generators were fueled by a 6,000 gallon, single-walled, fiberglass underground storage tank ("UST") for diesel fuel located south of the Casino Building. In February 2007, the diesel fuel UST and associated piping were removed by the Property owner under oversight from the Los Angeles County Fire Department ("LAFD"), the Environmental Programs Division of the Los Angeles County Department of Public Works ("LADPW"), the City of Inglewood Division of Building and Safety, and SCAQMD. Seven post-excavation confirmation soil samples were collected during the UST removal at the direction of a LADPW inspector (Clean Fuels, 2007). Diesel-range petroleum hydrocarbons were detected in the soil sample collected below the locations of the former UST and associated piping at a maximum concentration of 49 milligrams per kilogram ("mg/kg"), which is below the Property-specific soil criterion listed in the SMP. No VOCs; benzene, toluene, ethylbenzene, and xylenes ("BTEX") compounds; or fuel oxygenates were detected in any of the soil samples analyzed. A closure report was submitted to the LADPW (Clean Fuels, 2007). LADPW issued a closure certification letter to HPLC, dated 14 June 2007, stating that all closure requirements have been completed and no further action is required at this time, based on LADPW's review. Thus, no further response actions are planned regarding the former UST in this area, other than implementation of general SMP protocols during the Project as needed.

Areas to be Addressed Prior to or During Project Grading

Current Vehicle Maintenance Area - the Current Vehicle Maintenance Area, located southeast of the Main Track (see Figure II-3 in Section II, Project Description), has been in use by Hollywood Park since approximately 1984. Chemicals reportedly used and stored at this facility include fuel in below ground tanks, new and used oil storage, and miscellaneous solvent storage (i.e., degreasers, water-based parts washers). Vehicle maintenance and repairs are performed in service bays located along the eastern side of the building. A hazardous waste storage area and an above-ground waste oil storage tank ("AST") are located on the south side of the maintenance building. To support ongoing racetrack operations, the Current Vehicle Maintenance Area currently utilizes an 8,000-gallon diesel fuel UST and a 5,000-gallon

gasoline UST located below the small fuel pump island south of the Current Vehicle Maintenance Area building. Soil samples collected in this area by EKI did not contain chemicals above the Property-specific criteria listed in the SMP. Soil gas samples collected at two locations in the service bays and one location near the hazardous waste storage area contained benzene and PCE, respectively, at concentrations above their Property-specific soil gas criteria (EKI, 2007). Following shut down of current operations at the Property, the two USTs would be removed and closed in accordance with LAPDW, LAFD, City of Inglewood, and SCAQMD requirements. Impacted soil, if encountered during the UST removal process, will be managed in accordance with applicable laws and regulations as needed to obtain closure of the USTs from the LADPW. During the Project, this area will be managed as described in the SMP.

Former Track Maintenance Area - a track maintenance area previously existed in the area that is currently within the southern portion of the infield of the Main Track; a grassy area with no visible signs of the former structures. The Former Track Maintenance Area reportedly was used for equipment and vehicle maintenance and repair, and at least one fuel UST may have formerly existed in this area, based on available historical drawings (i.e., Sanborn fire insurance maps). There is no record of the existence or closure of this UST in regulatory agency files reviewed by EKI; thus, the status of this reported fuel UST is unknown. Soil samples collected in this area did not contain chemicals above the Property-specific criteria listed in the SMP. Two soil gas samples collected in this area contained PCE above the Property-specific soil gas criterion listed in the SMP. During the Project, this area would be managed as described in the SMP.

Former Potrero Oil Field Areas (Former Oil Wells and Oil Field Impoundment Area) - The northern and eastern portions of the Property were part of a larger former oil production field defined by DOGGR as the Potrero Oil Field. DOGGR identifies a total of six former oil wells or exploratory wells (of which three of the latter did not produce oil) on the Property. Of these six locations, DOGGR file information shows three former oil producing wells in the northeastern portion of the Property within the former Potrero Oil Field. These three wells are known as: Chevron USA Inc., Hardy Community 2; Texaco Producing Inc., Pacific Southwest 1; and Texaco Producing Inc., Turf 2. DOGGR also identifies three former oil well locations labeled “plugged and abandoned - dry hole”; these are: Chevron USA, Inc., Hardy Community 3; Chevron USA, Inc., Potter & Smith 1; and Union Oil Co. of California, Lennox E.H. 1.

During March and April 2007, the Property owner located, excavated, and surveyed the wellhead of the former Lennox E.H. 1 oil well located in the southwestern corner of the Property (see Figure IV.D-1). As part of Property development (i.e., following shut down and demolition of current HP facilities and prior to general Property grading), each of the five remaining oil wells would be located. All six wells of the former oil wellheads would be assessed for the presence of petroleum hydrocarbon residuals in soil and for methane gas, and, if deemed necessary in accordance with current DOGGR guidance and inspections by DOGGR staff, well re-abandonment will be performed. Former oil wells that are expected to be covered with new buildings as part of the Project would require appropriate protective measures, e.g.,

vent cones placed over the wellhead, in accordance with requirements specified by DOGGR and City of Inglewood based on the encountered conditions at each wellhead.

Based on the review of available historical Property use information, an apparent oil field-related, former impoundment area (i.e., potentially used for the collection of oil, wastewater, and/or drilling fluids from former producing wells in this area) existed near the northwestern entrance to the Training Track (see Figure IV.D-1). However, in 2005, soil samples collected in this area did not contain chemicals above the Property-specific criteria listed in the SMP, except for one sample. One soil sample (PS-SB-8-4.5) at a depth of 4.5 feet bgs contained arsenic at a concentration of 18.7 mg/kg, which is slightly above the Property-specific soil criterion of 15 mg/kg. Benzene was also detected in one soil gas sample (PS-SGM-48) from this area above the Property-specific soil gas criterion listed in the SMP. During the Project, this area will be managed as described in the SMP.

Print Room - The Print Room, located adjacent to Tunnel 4 in the Grandstand Building, has been used for decades for in-house printing of materials, race programs, and photo processing. Soil samples collected in this area did not contain chemicals above the Property-specific criteria listed in the SMP other than one sample. A soil sample collected below the floor in an area of visible floor surface staining (PS-SG-2) contained arsenic at a concentration of 21.6 mg/kg, which is above the Property-specific soil criterion of 15 mg/kg listed in the SMP. Soil gas samples from this area did not contain chemicals above the Property-specific criteria listed in the SMP. During the Project, this area will be managed as described in the SMP.

Miscellaneous Areas to be Addressed During Demolition

Main Track Infield Pond - The existing ponds in the Main Track infield are part of the storm water management system currently permitted under NPDES Permit No. CA0064211, Order No. R4-2006-0062, and Monitoring and Reporting Program No. CI-8100, adopted by the RWQCB on 13 July 2006. The Property owner does not plan to use the pond water during demolition or grading operations (i.e., pond water will not be used for dust control). Water present in these ponds will be managed and discharged in accordance with the existing NPDES permit for the Property. Organic materials may be present in any sludge or sediments found at the bottom of the current infield pond, and the pond sediments and lining materials will be removed and disposed at an appropriately permitted off-site facility prior to general Property grading in accordance with the protocols described in the SMP for off-site disposal. According to the preliminary grading plan and land use plan, the pond area would be filled with up to 25 feet of fill material within the former infield pond area to achieve the design grade prior to development for residential land use.

Asbestos Containing Materials in Structures – Asbestos-containing materials (ACM) are materials that contain asbestos, a naturally-occurring fibrous mineral that has been mined for its useful thermal properties and tensile strength. ACM is generally defined as either friable or non-friable. ACM is defined as any material containing more than one percent asbestos. Friable ACM is more likely to produce airborne fibers than non-friable ACM, and can be crumpled, pulverized, or reduced to powder by

hand pressure. Non-friable ACM is defined as any material containing one percent or more asbestos that cannot be crumpled, pulverized, or reduced to powder by hand pressure. When left intact and undisturbed, ACM does not pose a health risk to building occupants. Potential for human exposure only occurs when ACM becomes damaged or actively worked (e.g., drilled, sanded, scraped, etc.) to the extent that asbestos fibers become airborne and can be inhaled. These airborne asbestos fibers are carcinogenic and can cause lung disease.³⁵

The principal federal government agencies regulating asbestos are the Occupational Safety and Health Administration (OSHA) and the United States Environmental Protection Agency (USEPA). The age of a building is directly related to its potential for containing elevated levels of ACM. Generally, all untested materials are presumed to contain asbestos in buildings constructed prior to 1981. The USEPA recommends a proactive in-place management program be implemented wherever undamaged ACM are found in a building. The U.S. EPA recommends that damaged ACM be removed, repaired, encapsulated, or enclosed. Prior to demolition activities, the USEPA recommends that all ACM be removed.³⁶

Asbestos-containing building materials are present on the Property, as reported in a Phase I report prepared in 1999 by Dames & Moore, the Phase I report prepared by ENVIRON, and the Limited Asbestos and Lead Materials Survey Report prepared for the Property by Citadel Environmental Services, Inc.³⁷ ACM in Property structures will be addressed as part of the Project work by demolition and abatement contractors, in accordance with laws and regulations and City of Inglewood requirements.

Asbestos Cement Pipe

According to Hollywood Park personnel, buried asbestos cement (“AC”) or “transite” pipe may be located below grade in the Stable Area of the property. The locations of the AC pipe are not specifically known. If AC pipe is encountered during property demolition, grading, over-excavating or earthworks operations, it will be managed as described in the SMP.

Lead-Based Paint in Structures

Lead-based paint (LBP), which can result in lead poisoning when consumed or inhaled, was widely used in the past to coat and decorate buildings. Lead poisoning can cause anemia and damage to the brain and nervous system, particularly in children. Like ACM, LBP generally does not pose a health risk to building occupants when left undisturbed; however, deterioration, damage, or disturbance can result in hazardous exposure. In 1978, the use of LBP was federally banned by the Consumer Product Safety

³⁵ U.S. Environmental Protection Agency, <http://www.epa.gov/asbestos/pubs/ashome.html>, July 2007.

³⁶ *Ibid.*

³⁷ *Limited Asbestos and Lead Materials Survey Report, Hollywood Park, 1050 South Prairie Avenue, Inglewood, California, Citadel Environmental Services, Inc., 13 January 2006.*

Commission. Therefore, only buildings built before 1978 are presumed to contain LBP, as well as buildings built shortly thereafter, as the phase-out of LBP was gradual.³⁸

LBP is present on the Property, as reported in a Phase I report prepared in 1999 by Dames & Moore, the Phase I report prepared by ENVIRON in 2005, and the Limited Asbestos and Lead Materials Survey Report prepared for the Property by Citadel Environmental Services, Inc.³⁹ LBP in Property structures would be addressed as part of the work by demolition and abatement contractors, in accordance with laws and regulations and City of Inglewood requirements.

Status of RWQCB Evaluation of Certain Areas to be Addressed

As stated above, in response to the April 2008 Technical Report and Work Plan, in letters dated August 13 and 22, 2008, the RWQCB approved the work plans for installation of groundwater monitoring wells and soil sampling in the western and southern parking lot areas provided certain conditions are strictly met, including (i) installing at least four more groundwater monitoring wells near the Grandstand Building, at the former dry cleaning area, in the former maintenance area and in the northern sections of the main racetrack infield area, east of the Townsite fault, and (ii) conducting quarterly groundwater monitoring at least four quarters to adequately assess groundwater gradient and/or plume changes beneath the Property. Since the process of approval is ongoing, additional changes to work plan may be adopted, including revising requests for additional work, reports and surveys.

Identified Impacts to Soil and Groundwater by COPCs from Surrounding Properties

Seven groundwater monitoring wells located on the Hollywood Park Property, primarily in the eastern area of the Property, are currently used by Chevron for monitoring of benzene and TBA plumes that are migrating in groundwater from the former Cypress Fee site onto the Property. This groundwater contamination is described further in the "Historical Uses of Surrounding Properties" section above.

The Project Applicant has proposed an additional four groundwater monitoring wells to be located on the Hollywood Park Property primarily in the western and southern portions of the Property for the purpose of confirming groundwater quality and flow direction in those locations. The proposed groundwater monitoring wells are further described above in the section entitled Approval of the SMP by the RWQCB and the Proposed Groundwater Quality Investigation and Soil Screening Sampling. The four groundwater monitoring wells will allow for groundwater quality sampling. In approving the April 2008 Technical Work Plan, the RWQCB conditioned its approval on requiring the installation of at least four additional groundwater monitoring wells near the Grandstand Building, at the former dry cleaning area, in

³⁸ U.S. Environmental Protection Agency, <http://www.epa.gov/lead/>, July 2007.

³⁹ Citadel, 2006. *Limited Asbestos and Lead Materials Survey Report, Hollywood Park, 1050 South Prairie Avenue, Inglewood, California, Citadel Environmental Services, Inc., 13 January 2006.*

the former maintenance area and in the northern sections of the main racetrack infield area, east of the Townsite fault.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, a significant impact with regard to hazards and hazardous materials would occur if the Project were to result in any of the following conditions:

- (a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- (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;
- (c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- (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;
- (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, result in a safety hazard for people residing or working in the project area;
- (f) For a project located within the vicinity of a private airport strip, result in a safety hazard for people residing or working in the project area;
- (g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and
- (h) 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 residence are intermixed with wildlands.

Impacts Determined to be Less Than Significant

With respect to threshold (h), the Project site is not located within proximity to open space, brush, or forested properties and is not susceptible to wildland fire hazards. With respect to threshold (f), the project is not located within the vicinity of a private airport strip and is pose a safety hazard for people

residing or working in the project area. Therefore, no further analysis of these topics is required. Topics (a) through (e) and (g) are discussed below.

Project Impacts

Following is a discussion of the Project's impacts during construction and operation with respect to hazardous materials and risk of upset. Specific areas that are discussed include routine transport, use, and disposal of hazardous materials; accidental release of hazardous materials; hazardous emissions and acutely hazardous materials/substances handling proximate to schools; listed hazardous materials sites; public airport safety hazard; and, emergency response plans.

Construction

Implementation of the Proposed Project would require demolition of most of the existing Hollywood Park Racetrack facilities and associated structures on the Project Site. The two racetrack infield lakes currently existing on the Project Site will be removed and recreated on the Project Site as an integral component of the Specific Plan for the Proposed Project (see Section II, Project Description for a detailed description of the Project). Water present in these ponds will be managed and discharged in accordance with the existing NPDES permit for the Property, and the pond sediments and lining materials will be removed and disposed at an appropriately permitted off-site facility prior to general Property grading in accordance with the protocols described in the SMP.

Routine Transport, Use, or Disposal of Potentially Hazardous Materials

During implementation of the SMP and during the demolition of existing structures and grading/excavation phases, the Project may involve the routine transport and disposal of potentially hazardous materials, including asbestos containing materials, lead-based paint, debris containing these materials, and potentially hazardous materials identified in the Phase I ESA as associated with daily operation of the Hollywood Park facility (i.e., lubricants, oils, hydraulic fluids, various degreasers, x-ray equipment and photographic chemicals (including fixer/replenisher and developer), janitorial supplies, paints and paint-related products, hypochlorite solution, inks and isopropyl alcohol, a silver recovery unit in the equine hospital, a potential polychlorinated biphenyl ("PCB")-containing electrical transformer, waste oil, spent solvents, and oily rags. Materials to be appropriately managed in accordance with the SMP include soils containing COPCs at concentrations above the environmental criteria for the Project from areas known, suspected or found to contain COPCs during implementation of the SMP as part of the Project (see below). Furthermore, during the construction phase, the Proposed Project is anticipated to require the routine transport, use, and disposal of cleaning solvents, fuels, and other hazardous materials commonly associated with construction projects. All hazardous materials encountered or used during demolition, grading/excavation, and construction activities would be handled in accordance with all applicable local, State, and federal regulations, which include requirements for disposal of hazardous materials at a facility licensed to accept such waste, based on its waste classification and the waste acceptance criteria of the permitted disposal facilities. As compliance with existing regulations is mandatory for all development projects, adherence to all applicable rules and regulations would reduce

potentially significant impacts with respect to routine transport, use, and disposal of hazardous materials during construction to less than significant levels.

Accidental Release of Hazardous Materials

As described in the SMP and summarized above, there are four areas at the Project site that will be addressed prior to, or during, grading with RWQCB oversight and approval, and three general areas at the Project site that will be addressed during demolition. These seven areas are discussed below.

Areas to be Addressed Prior to or During Property Grading

- (1) Current Vehicle Maintenance Area
- (2) Former Track Maintenance Area
- (3) Former Potrero Oil Field Areas (Former Oil Wells and Oil Field Impoundment Area)
- (4) Print Room

Within these four areas, hazardous materials were detected in soil gas and soil at concentrations above the Property-specific criteria defined in the SMP, as described above. Remediation of these small, localized areas of soil impact will be performed prior to or during Property grading, likely by excavation and off-site disposal of soil identified to contain COPCs above the criteria. Air monitoring in accordance with SCAQMD requirements will be performed during excavation of these areas, as described in the SMP. The SMP also contains protocols to require various contractor's plans, e.g., dust control plans, storm water pollution prevention plans, and stockpile management and testing plans, when needed. Confirmation soil and/or soil gas sampling will be conducted as described in the SMP to document that post-construction conditions meet the Property-specific soil and soil gas criteria summarized in the SMP. These four areas will be addressed as part of the Project with oversight and approval from the RWQCB. Accidental releases of hazardous materials associated with these activities could occur during transportation of soil off site, as described in the "Routine Transport, Use, or Disposal of Potentially Hazardous Materials" paragraph above. Remaining fuel USTs used during Hollywood Park operations will be emptied and removed in accordance with the closure requirements of local agencies, including LAFD, LADPW, SCAQMD, and City of Inglewood.

Miscellaneous Areas to be Addressed during Demolition

- (1) Main Track Infield Pond
- (2) Buried Asbestos Containing Pipe
- (3) Asbestos Containing Materials and Lead-Based Paint in Structures

These materials will be removed during the demolition phase of the Project, as described above. Accidental releases of hazardous materials associated with these activities could occur during their transportation off site, as described in the “*Routine Transport, Use, or Disposal of Potentially Hazardous Materials*” paragraph above.

Sensitive Receptors, Including Schools

The Project Site is located near the William H. Kelso Elementary School (approximately 1,300 feet to the northwest); Residential across 90th Street, to the north (approximately 950 feet to the north); Renaissance residential community (approximately 20 feet to the north); Darby Memorial Park/Martin Luther King Community Center (approximately 120 feet to the northeast); Residential to the east (approximately 100 feet); Lockhaven School (approximately 1,300 feet southwest across Century Blvd.); Centinela Hospital (approximately 1,200 feet west, across Prairie Avenue); Holy Trinity Child Care Center (approximately 1,000 feet east); K. Anthony Middle School (approximately 100 feet to the west across Prairie Avenue), Morningside High School (approximately 1,200 feet to the south), and the Proposed School (on the civic site within the Proposed Project)⁴⁰ identified as sensitive receptors with respect to hazardous materials.

As such, prior to mitigation, the Project could result in a potentially significant impact related to exposure of nearby students and neighbors to accidental release of the following hazardous material during demolition, excavation, and construction activities: ACM, LBP, contents of underground storage tanks, soil containing COPCs above Property-specific criteria defined in the SMP, and natural gas, if not properly managed. With the implementation of the mitigation measures described in the SMP and summarized at the end of this Section, risks associated with accidental release of these hazardous materials during construction would be reduced to less than significant levels and such materials would not be expected to endanger sensitive receptors in the project vicinity. In addition, the transport of potentially hazardous materials off-site would be conducted in accordance with all applicable laws and regulations to ensure the health and safety of the general public as well as any sensitive receptors along the haul route, resulting in a less than significant impact.

Listed Hazardous Materials Sites

As discussed above, the Project Site address is listed on one or more government regulatory database (see Appendix D-2 for a full list of databases and sites). The Phase I ESA described ENVIRON’s review and assessment of these listings, which were further reviewed by EKI.

Potentially hazardous chemicals such as fuels, paints, solvents and oils historically used during Hollywood Park operations on the Property will be removed from the Project site during the demolition phase of the Project, along with ACM and LBP, as required, prior to demolition of structures, as

⁴⁰ For the purpose of analyzing the impacts to Hazardous Materials/Risk of Upset, the 4-acre civic site is assumed to be a school since it could result in more impacts than a library.

described above. Areas to be addressed prior to or during Property grading, as described in the SMP, are summarized above.

Emergency Response Plans

The Proposed Project is located along Century Boulevard, a designated evacuation route in the City of Inglewood.⁴¹ Development of the Project Site may require temporary and/or partial street closures along Century Boulevard due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans involving the use of Century Boulevard, and they would be conducted in accordance with the City's permitting process. In addition, adjacent collector/local streets could be used to access Century Boulevard on either side of a temporary and/or partial street closure. Therefore, the Project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant. (See Section IV.K.2, Fire Protection Services.)

Aircraft Overflight

The Project is located within 2 miles of Los Angeles International Airport. Portions of the Project Site are located within the designated airport influence area for LAX. As discussed in Section IV.I, Land Use, the Proposed Project would be developed in accordance with the development guidelines of the applicable Airport Land Use Plan and would not negatively impact safe air navigation. Therefore, the Proposed Project would not result in a safety hazard for people residing or working in the project area.

Operation

Routine Transport, Use, or Disposal of Potentially Hazardous Materials

Under the Project, only minor quantities of potentially hazardous materials will be stored or used on the Property as part of the planned residential, commercial, civic, and recreational land uses; no industrial land uses are planned. For example, cleaning solvents would be used in association with janitorial cleaning and maintenance in the proposed retail and restaurant space, as well as maintenance/landscaping and daily household activities in the proposed residences. As such, no substantial quantities of hazardous materials would be used, transported, or disposed of in conjunction with the routine day-to-day operations of the Proposed Project. Any potential storage of fuels (e.g., for a commercial operation) will comply with current laws and regulations. Those limited quantities of hazardous materials that would be used would be handled, transported, and disposed in accordance with all applicable local, State, and federal regulations. Therefore, impacts related to routine transport, use, and disposal of hazardous materials during operation would be less than significant.

⁴¹ City of Inglewood General Plan Safety Element, July 1995.

Accidental Release of Hazardous Materials

As described in the “Routine Transport, Use, or Disposal of Potentially Hazardous Materials” paragraph above, only minor quantities of potentially hazardous materials commonly associated with commercial and residential uses are expected to be stored or used on the Property as part of the completed Project. No industrial operations are planned, and no substantial quantities of hazardous materials would be used, transported, or disposed of in conjunction with the routine day-to-day operations of the Project once completed. Therefore, accidental releases of hazardous materials, such as janitorial or household chemicals, could occur, but such releases would be minor. As such, potential impacts to the accidental release of hazardous materials would be less than significant.

Listed Hazardous Materials Sites

As described in the SMP, following completion of the activities described above in accordance with the approved SMP, no known areas of the Property should exist that contain COPCs in soil or soil gas at concentrations above their respective Property-specific soil or soil gas criteria listed in the SMP. As such, it is expected that areas where soil and soil gas concentrations meet the criteria for residential land use listed in the SMP would be acceptable for unrestricted land use and potentially significant impacts would be reduced to less than significant levels.

Sensitive Receptors, Including Schools

The Project Site is located adjacent to and in the immediate vicinity of residences and schools that have been identified as sensitive receptors with respect to potential releases of hazardous materials. Implementation of the SMP as part of the Project prior to, and during, site grading and earthwork as part of construction of the Project will reduce the threat of release of identified COPCs in soil to less than significant levels. As discussed above, operation of the Project once constructed would involve the use of solvents typically associated with the cleaning and maintenance of retail and restaurant areas, as well as the maintenance/landscaping and daily household activities in residences. As such, no substantial quantities of hazardous materials would be used, transported or disposed of in conjunction with the routine day-to-day operations of the Proposed Project and such materials would not be expected to endanger sensitive receptors in the project vicinity. Therefore, impacts would be less than significant.

In the event that development of the Civic Site component of the Proposed Project includes a school site, the Inglewood School District (ISD) would be responsible for conducting due diligence tasks/reports necessary to ensure suitability of the site for use as a public school. At that future time, the ISD would be responsible for coordinating with DTSC for all appropriate environmental clearances and approvals for the intended school site, including but not limited to site closure letters, as applicable. Therefore, any potential impacts associated with the risk of exposure of a school site to potentially hazardous materials would be reduced to less-than-significant levels.

Land Use Equivalency Program

The Land Use Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

The exchange of office/commercial, retail, hotel and/or residential uses would occur at relatively limited locations within the Project Site. Furthermore, under the Land Use Equivalency Program, there would be no substantial variation in the Project's Circulation Plan, building pad elevations, or the depth of excavation. Potential changes in land use under the Land Use Equivalency program would therefore have no substantial effect on the proposed construction activities and their associated impacts because only the use is changing. Specifically, the site characterization and associated remediation required for Project development would be the same under the Land Use Equivalency Program as well as the potential risk of exposure to safety and health hazards. Very minor variations regarding foundation types or in the preparation of landscaping areas could occur, however, such variations would be within the range of construction procedures anticipated to occur with the Proposed Project. In addition, development under the Land Use Equivalency Program would not cause or exacerbate any hazardous material/risk of upset impacts that would occur under the Proposed Project.

All Project Design Features and/or recommended mitigation measures to minimize safety/risk of upset impacts under the Proposed Project would be implemented, as appropriate, under the Land Use Equivalency Program. Implementation of the Land Use Equivalency program would therefore not expose people or structures to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Consequently, with implementation of applicable mitigation measures, hazardous materials/risk of upset impacts attributable to the Land Use Equivalency Program, as in the case with the Proposed Project, would be less than significant.

CUMULATIVE IMPACTS

Development of the Proposed Project in combination with the related projects identified in Section III, Related Projects, would not have the potential to increase the risk for accidental release of hazardous materials. The Related Projects identified in Section III include a list of all past, present, and probable future projects that are located within an approximate 2-mile radius of the Project Site and are thus considered capable of producing related or cumulative impacts with respect to hazardous environmental conditions. Each of the related projects would require evaluation for potential threats to public safety, including those associated with the accidental release of hazardous materials into the environment during construction and operation, emergency response, transport/use/disposal of hazardous materials, and hazards to sensitive receptors (including schools). Because hazardous materials and risk of upset conditions are largely site-specific, this would occur on a case-by-case basis for each individual project affected, in conjunction with development proposals on these properties. Implementation of the recommended Mitigation Measures D-1 through D-8 would reduce the Proposed Project's potential impacts associated with the accidental release of hazardous materials during construction and operation as well as emergency response to less-than-significant levels, such that the Proposed Project would not

combine with any of the related project to cause a cumulatively significant impact. Further, each related project would be required to follow local, State, and federal laws regarding hazardous materials and other hazards. Therefore, with compliance with local, State, and federal laws pertaining to hazards and hazardous materials, cumulative impacts would be less than significant.

PROJECT DESIGN FEATURES

No specific PDFs have been proposed with respect to hazardous materials/risk of upset impacts.

MITIGATION MEASURES

- MM D-1. The Project Applicant shall implement the RWQCB-approved SMP environmental risk management protocols under RWQCB oversight during the Project.
- MM D-2. COPCs encountered at the Property in soil and soil gas during the Project and implementation of the SMP shall be investigated, and concentrations of COPCs determined to be above the Property-specific criteria listed in the SMP will be remediated as part of the Project in accordance with the SMP approved by the RWQCB.
- MM D-3. Groundwater is not expected to be encountered during work activities associated with the Project. Groundwater on the Property, if discovered during the Project to contain COPCs, will be addressed as required by RWQCB.
- MM D-4. Former oil and gas wells at the Property shall be located, inspected, and reabandoned, if necessary, as required by DOGGR consistent with proximate land use.
- MM D-5. Prior to the issuance of the building demolition permit by City of Inglewood, the Project Applicant will submit to the City of Inglewood proof of certification from its selected contractor showing qualification to handle asbestos and lead-based paint. Proper removal and remediation actions will be undertaken in conformance with the regulations of the South Coast Air Quality Management District and the State of California, Division of Occupational Health and Safety.
- MM D-6. Any COPC-containing soil stockpiled at the Project site shall be stored in accordance with the SMP approved by the RWQCB and in such a manner that underlying soils are not cross-contaminated. This could be accomplished by the use of plastic sheeting placed under and on top of the stockpiled materials, or other suitable methods. The management, treatment, or disposal of such material shall comply with all federal, state, and local regulations related to hazardous waste, as applicable. All stockpiled materials shall be protected in order to prevent materials from being washed into storm drains, in accordance with the Project storm water pollution prevention plan (“SWPPP”).

MM D-7. Handling and removal of hazardous materials will comply with federal, state and local regulations, which include requirements for disposal of hazardous materials at facilities licensed to accept such waste.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Following implementation of the mitigation measures described above during development, environmental conditions at the Property will meet environmental criteria appropriate for the established land uses in accordance with the SMP approved by the RWQCB. Therefore, potential impacts associated with exposure to potentially hazardous materials would be less than significant.

With respect to threshold question (a), the Proposed Project has the potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. During construction, all hazardous materials encountered or used during demolition, grading/excavation, and other construction activities would be handled in accordance with all applicable local, State, and federal regulations. With respect to operation of the Proposed Project, only minor quantities of potentially hazardous materials will be stored or used on the Property as part of the planned residential, commercial and recreational land uses, and as such, no substantial quantities of hazardous materials would be used, transported, or disposed of in conjunction with the routine day-to-day operations of the Proposed Project. Implementation of MM D-7 would reduce this potential hazard to a level that is less than significant.

With respect to threshold question (b), the Proposed Project has the potential to 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. During construction, this impact will be addressed through the SMP, with RWQCB oversight. During operation of the Proposed Project, only minor quantities of potentially hazardous materials commonly associated with commercial and residential uses are expected to be stored or used on the Property as part of the completed Project. No industrial operations are planned, and no substantial quantities of hazardous materials would be used, transported, or disposed of in conjunction with the routine day-to-day operations of the Project once completed. Implementation of MM D-1 through MM D-7 would reduce this potential hazard to a level that is less than significant.

With respect to threshold question (c), the Proposed Project has the potential to 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 Site is located adjacent to and in the immediate vicinity of residences and schools that have been identified as sensitive receptors with respect to potential releases of hazardous materials. With the implementation of the mitigation measures described in the SMP, risks associated with accidental release of these hazardous materials during construction would not be expected to endanger sensitive receptors in the project vicinity. In addition, the transport of potentially hazardous materials off site would be conducted in accordance with all applicable laws and regulations to ensure the health and safety of the general public as well as any sensitive receptors along the haul route. Operation

of the Project once constructed would involve the use of solvents typically associated with the cleaning and maintenance of retail and restaurant areas, as well as the maintenance/landscaping and daily household activities in residences and as such, no substantial quantities of hazardous materials would be used, transported or disposed of in conjunction with the routine day-to-day operations of the Proposed Project and such materials would not be expected to endanger sensitive receptors in the project vicinity. Implementation of MM D-2 and MM D-4 will reduce the threat of release of identified COPCs in soil to less than significant levels.

With respect to threshold question (d), the environmental due diligence process conducted by EKI between 2005 and 2007 identified localized areas of potential environmental concern on the Property in soil and soil gas. Following completion of the activities described above in accordance with the SMP and MM D-1 through MM D-7, potentially significant hazards associated with exposure to localized areas of potential environmental concern would be mitigated to less than significant levels.

With respect to threshold question (e), the Proposed Project would be developed in accordance with the development guidelines of the applicable Airport Land Use Plan and would not negatively impact safe air navigation. Therefore, impacts associated with air navigation safety would be less than significant prior to mitigation and no mitigation measures are required.

With respect to threshold question (g), the Proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Any temporary or partial street closures along Century Boulevard due to construction activities would be conducted in accordance with the City's permitting process. Therefore impacts would be less than significant prior to mitigation and no mitigation measures are required.