

3.8 Hazards and Hazardous Materials

This section of the Environmental Impact Report (EIR) describes and evaluates potential impacts related to hazards and hazardous materials that could result from implementation of the Proposed Project. The section contains: (1) a description of the existing land uses of the Project Site and surrounding areas as they pertain to hazardous materials use; (2) a description of the hazards associated with the Project Site and vicinity; and (3) an analysis of the potential impacts related to hazards and hazardous materials associated with the implementation of the Proposed Project, as well as identification of potentially feasible measures that could mitigate significant impacts.

Comments received in response to the NOP for the EIR regarding hazards and hazardous materials can be found in Appendix B. Any applicable issues and concerns regarding potential impacts related to hazards and hazardous materials as a result of implementation of the Project are analyzed within this section.

The analysis of hazardous materials included in this section was developed based on publicly available information from the State Water Resources Control Board (SWRCB), California Department of Toxic Substances Control (DTSC), and California Department of Forestry and Fire Protection (CAL FIRE). In addition, a -site specific technical memorandum by EKI Environment & Water, Incorporated (EKI), peer reviewed by ESA, provides information regarding the potential presence of contamination in subsurface materials on the Project Site (see Appendix X)¹ was considered. The EKI report does not include the Well Relocation Site and therefore, data regarding the potential for contamination in subsurface materials is based on a database search conducted by GeoSearch in accordance with ASTM E 1527-13 (see Appendix X).²

This section also addresses the potential of creating both temporary and permanent hazards to the navigable airspace associated with airports in the vicinity of the Project Site. Current information from each of the potentially impacted airports was obtained in order to re-evaluate the obstruction evaluation and airspace analysis technical memorandum prepared by Capitol Airspace Group (CAG) for the Proposed Project and peer reviewed by ESA (see Appendix X).³

3.8.1 Environmental Setting

The study area for evaluation of hazards and hazardous materials impacts includes the Project Site along with immediately adjacent areas. ~~The analysis focuses on the immediately adjacent area. Relative to hazardous materials, the area beyond the immediately adjacent area (greater than within 0.25 miles from of the Project Site boundaryboundaries) is not considered as highly,~~

¹ EKI Environment & Water Incorporated (EKI), 2017. *Project Condor Investigations*, Technical Memorandum, November 3, 2017.

² GeoSearch, *Preliminary Radius Report*, December 27, 2018.

³ Capitol Airspace Group (CAG), 2017. *Project Condor Obstruction Evaluation & Airspace Analysis*, Technical Memorandum, September 13, 2017.

- Estimation of potential chemical uptake.

Hazardous Building Materials Associated with Demolition and Renovation

Because of the age of some buildings and structures within the Project Site, the potential exists for the structures to contain hazardous building materials. Older buildings and structures can contain building materials that include hazardous components such as lead-based paint (LBP), asbestos-containing materials (ACMs), mercury, and polychlorinated biphenyls (PCBs).

Among its numerous uses and sources, lead can be found in paint, water pipes, solder in plumbing systems, and in soils around buildings and structures painted with LBP. Old peeling paint can contaminate near surface soil, and exposure to residual lead can have adverse health effects especially in children. LBP was phased out in the United States beginning with the passage of the Lead-Based Paint Poisoning Prevention Act in 1971. Prior to the US Environmental Protection Agency (US EPA) ban in 1978, LBP was commonly used on interior and exterior surfaces of buildings. Structures built prior to 1978 may have LBP and some paints manufactured after 1978 for industrial or marine uses legally contain more than 0.06 percent lead. Exposure to lead can result in the accumulation of lead in the blood, soft tissues, and bones. Children are particularly susceptible to potential lead-related health problems because it is easily absorbed into developing systems and organs.

Asbestos, a naturally-occurring fibrous material, was used as a fireproofing and insulating agent in building construction before such uses were terminated due to liability concerns in the late 1970s. From 1973 through 1990, several laws were passed banning the manufacture and use of ACM.⁴ Some materials are still allowed to contain asbestos. The demolition of structures with ACM can result in airborne fibers. Inhalation of the tiny asbestos fibers can lead to lung disease. Structures that predate 1981 and structural materials installed before 1981 are presumed to potentially contain asbestos. Because it was widely used prior to the discovery of its health effects, asbestos can be found in a variety of building materials and components such as insulation, walls and ceilings, floor tiles, and pipe insulation. Friable (easily crumbled) materials are particularly hazardous because inhalation of airborne fibers is the primary mode of asbestos entry into the body. Non-friable asbestos is generally bound to other materials such that it does not become airborne under normal conditions. Non-friable asbestos and encapsulated friable asbestos do not pose substantial health risks. Asbestos exposure is a human respiratory hazard. Asbestos-related health problems include lung cancer and asbestosis. Any activity that involves cutting, grinding, or drilling during building renovation or demolition or relocation of underground utilities could release friable asbestos fibers unless proper precautions are taken. Inhalation of airborne fibers is the primary mode of asbestos entry into the body, making friable materials the greatest potential health risk.

⁴ US Environmental Protection Agency, 2018 *Federal Bans on Asbestos*. Available: <https://www.epa.gov/asbestos/us-federal-bans-asbestos>. Last Updated August 9, 2018. Accessed November 14, 2018.

Spent fluorescent light tubes commonly contain mercury vapors. In February 2004, regulations took effect in California that classified all fluorescent lamps and tubes as hazardous waste. When these lamps or tubes are broken, mercury is released to the environment. Mercury can be absorbed through the lungs into the bloodstream, and can be washed by rain water into waterways. Mercury switches may also be present in some buildings. A mercury switch (also known as a mercury tilt switch) is a switch which opens and closes an electrical circuit through a small amount of liquid mercury.

PCBs are organic oils that were formerly used primarily as insulators in many types of electrical equipment such as transformers and capacitors. After PCBs were determined to be carcinogenic in the mid-to-late 1970s, the US EPA banned PCB use in most new equipment and began a program to phase out certain existing PCB-containing equipment.⁵ Fluorescent lighting ballasts manufactured after January 1, 1978, do not contain PCBs and are required to have a label clearly stating that PCBs are not present in the unit. PCBs are highly persistent in the environment, and exposure to PCBs has been demonstrated to cause cancer, as well as a variety of other adverse health effects on the immune system, reproductive system, nervous system, and endocrine system.

Soil and Groundwater Contamination

Many commercial and light industrial businesses, as well as some agricultural practices, use materials and generate wastes that are considered hazardous by federal and state standards. Such businesses and practices, which include automobile service, industrial manufacturing, and dry cleaners, are required to contain, manage, and transport their hazardous materials in conformance with established state regulations to ensure hazardous materials are not released to the environment to become a health hazard.

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However, some historical and current uses on properties within and near the Project Site have resulted in contamination of the surface soil and groundwater through leaking underground tanks or surface spills of hazardous materials and petroleum. Most of these sites are under regulatory assessment and remediation orders.

Underground storage tanks (USTs), in particular, are a common contamination source in urban areas, and are also found on sites historically used for agriculture. Until the mid-1980s, most USTs were made of single-walled bare steel, which can corrode over time and result in leakage. Faulty installation or maintenance procedures can also lead to UST leakage, as well as to potential releases associated with spills. Recently revised UST regulations have significantly reduced the incidents of leakage and consequential soil and groundwater contamination from new UST systems. However, there are still some older UST systems that remain in service, and many sites contaminated by leaking USTs in the past are still under investigation and undergoing clean-

⁵ US Environmental Protection Agency, 2018 *Policy and Guidance for Polychlorinated Biphenyl (PCBs)*. Available: <https://www.epa.gov/pcbs/policy-and-guidance-polychlorinated-biphenyl-pcbs>. Last Updated April 25, 2017. Accessed November 14, 2018.

up. Similarly, spills resulting from poor maintenance or improper installation associated with aboveground storage tanks (ASTs) can result in localized, shallow soil contamination. USTs installed prior to the mid-1980s that have leaked, as well as improperly installed USTs and ASTs that have resulted in fuel spills, can present contamination issues.

Dry cleaning operations are also commonly a cause of soil and groundwater contamination due to past loose practices in the handling of the dry cleaning products (also referred to as solvents) that include volatile organic compounds (VOCs) that are known to be hazardous to human health and the environment. Dry cleaning solvents generally consist of tetrachloroethylene (PCE) and trichloroethylene (TCE) which have a high solubility factor making them easily transmitted in groundwater to offsite locations. Contamination from PCE, TCE, its degradation products (including vinyl chloride) and other chlorinated compounds can be very difficult to remove from the environment, especially once they reach groundwater.

Project Site

Arena Site

The majority of the Arena Site is currently vacant land that is owned by the City or Successor Agency, with some vacant land owned by private parties. developed parcels on the Arena Site are owned by private parties and used with 12 parcels owned by other parties that are used for commercial, motel, manufacturing, and warehouse land uses. In addition, the Arena Site includes a parcel containing an existing City water supply well and associated infrastructure. Historically, the Project Site was predominantly occupied by single-family residential properties and vacant/agricultural land uses starting in approximately 1923.⁶ Based on historical aerial photographs, from 1928 to 1947, the land uses continued as residential with possible apartment development in the eastern portion of the site by 1947. In 1952 there is/was evidence of a mobile home/trailer park. An automobile service station was also developed in the northwestern corner of the Arena Site by 1952, and operated until the 1970s, when it was demolished and replaced by a fast food restaurant. More apartments and/or hotels are indicated in photographs from 1963 and continued as such during the time period of 1977 to 1994. By 2002, structures on the eastern and southern portions of the Arena Site were/had been demolished and those portions were vacant. The Arena Site is relatively level with an elevation of approximately 89 feet above mean sea level and a slight topographic gradient towards the south-southwest.

West Parking and Transportation Hub Site

The two surface parking lots that are part of the proposed West Parking and Transportation Hub Site are currently consists of both currently vacant, unpaved lots; however, they/these lots have a history of land uses that include residential and commercial properties. Prior to residential development that began in the 1920s and 1930s, the parking sites on this site were/was likely used for agriculture. According to review of aerial photographs, residential land uses continued throughout

⁶ EKI Environment & Water Incorporated (EKI), 2017. *Project Condor Investigations*. Technical Memorandum, November 3, 2017, p7.

the period from the 1930s up until 2013, although some residences had begun to be demolished by the early 2000s. Some commercial/retail uses along West Century Boulevard ~~show up~~ [existed? were introduced?] in the period between 1977 and 1983. By 2013, the northern ~~surface parking lot~~ portion of the site was completely cleared, and the southern portion of the site was completely cleared in 2013 and the southern lot in 2002.⁷

East Parking and Hotel Site

The East Parking and Hotel Site ~~is currently an~~ comprises five undeveloped vacant, unpaved lots but has a history of residential land uses. Initially this site was developed with single family residences and small-scale agricultural properties in the 1920s and 1930s, then later uses included a trailer park. ~~and~~ All buildings were demolished in 1989. Similar to the surrounding area, the site is relatively level.

Well Relocation Site

The Well Relocation Site is also vacant and unpaved with no improvements other than fencing around the perimeter of the site. According to a review of permit records, Sanborn maps, and historic aerial photographs, the two parcels that make up this site were developed with residential uses as early as 1924.⁸ Agricultural uses may have occurred prior to the 1920s. By 1962, the Well Relocation Site was subdivided and the larger parcel redeveloped with an apartment complex which was then demolished sometime between 1994 and 2003. The smaller parcel was used for residential land uses up until demolition sometime between 2012 and 2014.

Database Search Project Site

The EKI technical memorandum included a database search of the Project Site and surrounding vicinity that was completed by EDR.⁹ The results of the database search by EDR included the following (see **Figure 3.8-1**):

Arena Site

- The property at 3900 West 102nd Street is listed as “Various City Properties” in the National Pollutant Discharge Elimination System (NPDES) database for discharges associated with demolition and construction activities. This database listing is not an indication of any release or violation.
- The ~~property existing City water well site~~ at 3901 West 102nd Street is listed as “Well No. 6” in the SWRCB Enforcement Action and SWRCB Waste Discharge System (WDS) databases, and appears to include a city-owned water supply or monitoring ~~well~~. This database listing is not an indication of any release or violation.

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⁷ EKI Environment & Water Incorporated (EKI), 2017. *Project Condor Investigations*. Technical Memorandum, November 3, 2017, p. 5.

⁸ ESA, *Well Relocation Site – Historic Uses*, Technical Memorandum, December 28, 2018. Note, the Well Relocation Site was not included as part of the EKI technical memorandum.

⁹ EKI Environment & Water Incorporated (EKI), 2017. *Project Condor Investigations*. Technical Memorandum, November 3, 2017, p. 17.

- The property at 10220 South Prairie Avenue is listed as “E & M German Car Repair” in the 1990-1992 historical EDR auto databases. Based on other data sources that were reviewed as part of the EKI technical memorandum, this address was determined to be erroneous, and the auto repair facility is associated with the 10223 South Prairie Avenue property to the west, across South Prairie Avenue (discussed further below under “Surrounding Areas”).
- The property at 3901 West 102nd Street is listed as “Inglewood Redevelopment Agency” in the DTSC Hazardous Waste Manifest (HAZNET) database, and reported disposal of 33 tons of asbestos-containing waste to a landfill. This database listing is not an indication of any release or violation.
- The property at 3822 West Century Boulevard is listed as “Omega Carpet & Uphl Stm Cleani” in the EDR historical cleaner database in 1992; dry cleaners often used solvents such as tetrachloroethene (PCE) or trichloroethene (TCE). Dry cleaning operations that used solvents have commonly released solvents to the subsurface and because of their solubility can easily be dispersed by groundwater. Laboratory analysis of Total Volatile Organic (VOCs) compounds is the method used to identify whether there is a release of solvents to the subsurface. This listing is an indication that a potential release could have occurred at this location based on the land use.
- The property at 3901 West 102nd Street is listed as “Well No. INA 2NA 4 & 6” in the Facility Index System (“FINDS”) database as a water supply well or wells. This database listing is not an indication of any release or violation.

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West Parking and Transportation Hub Site

The database search did not include any addresses that appeared to coincide with ~~the surface~~ parking lots at the West Parking and Transportation Hub Site.

East Parking and Hotel Site

The database search did not include any addresses that appeared to coincide with the East Parking and Hotel Site.

Well Relocation Site

The database search from the EKI report did not include any addresses that appeared to coincide with the Well Relocation Site. However, a separate database search conducted specifically for this site, included the Well Relocation Site as part of the Hazardous Waste Tanner Summary (HWTS) database records of hazardous waste manifests from the DTSC during 1993-2016.¹⁰ The site name associated with this listing is the Inglewood Redevelopment Agency. Record of a

¹⁰ GeoSearch, *Preliminary Radius Report*, December 27, 2018, p. 18.

hazardous waste manifest is an indication that hazardous waste was transported from this site and is not necessarily an indication of any release at the site.

Figure 3.8-1 – Database Search Results

Surrounding Area

The Project Site is located in a developed urban area with land uses surrounding the site consisting of a mixture of commercial, entertainment, industrial, and residential. Industrial land uses include warehouse, manufacturing facilities and automobile service stations, while commercial uses include hotels, retail, and restaurants.

Notably, to the north of the Arena Site is the location of the former Hollywood Park Racetrack and Casino property which is currently undergoing redevelopment. Prior to the racetrack, the property was used for agricultural purposes. The racetrack opened in 1938 and the casino was added in 1994. Portions of the racetrack were also used for automobile fueling and maintenance, dry cleaning, wastewater treatment, and a veterinary hospital.¹¹ Prior to the horse racetrack use, the northeastern portion of the property was part of an oilfield where petroleum hydrocarbons have been detected.

According to the EKI technical memorandum, three areas were identified where previous investigations have indicated the presence of chemicals of concern in the subsurface.¹² These areas included the former dry cleaner, the Cypress Fee site groundwater plume, and elevated methane in shallow soil gas at two locations on the racetrack property. In 2008, as part of an earlier separate evaluation, EKI installed four groundwater monitoring wells on the racetrack property and monitored them for four quarters. Groundwater flow direction was highly variable and the water quality results indicated that chemicals of concern detected were part of regional plumes associated with widespread past agricultural land uses. However, there were no chemical uses on the property that were known to have migrated to the Project Site.¹³

Other surrounding properties identified in the EKI technical memorandum include the following sites which reported chemical use and/or releases that are upgradient or adjacent to the Project Site:

- LA Custom Finish Inc., 3738 West Century Boulevard, between the Arena Site and East Parking and Hotel Site along West Century Boulevard. This property is listed with use of unspecified solvent and organic mixtures, and is reportedly a painting business. This listing is an indication that a potential release could have occurred at this location based on the land use.
- Coatings Composites, 10105 South Doty Avenue, between the Arena Site and East Parking and Hotel Site. This property is listed as a hazardous waste generator of organic and inorganic chemicals, laboratory wastes, and solvents with no reports of releases.

¹¹ EKI Environment & Water Incorporated (EKI), 2017. *Project Condor Investigations*, Technical Memorandum, November 3, 2017, p 18.

¹² EKI Environment & Water Incorporated (EKI), 2017. *Project Condor Investigations*, Technical Memorandum, November 3, 2017, p. 18.

¹³ EKI Environment & Water Incorporated (EKI), 2017. *Project Condor Investigations*, Technical Memorandum, November 3, 2017, p. 19.

Despite no reported releases, the land use would indicate a potential for a release to have occurred.

- Emmanuel Perfect Auto, 3742 West Century Boulevard, Suite 4, between the Arena Site and East Parking and Hotel Site. This property is listed as an automotive repair shop in 1995-1996, and could have used total petroleum (TPH)-containing compounds and solvents. This listing is an indication that a potential release could have occurred at this location based on the land use.
- Corner Express, 3750 West Century Boulevard, between the Arena Site and East Parking and Hotel Site. This property is listed as a generator of oil-containing waste, possibly from automotive repair shop operations. This listing is an indication that a potential release could have occurred at this location based on the land use.
- Imagine Logistics Inc., 3734 West Century Boulevard, Suite 7, between the Arena Site and East Parking and Hotel Site. This property is listed as a generator of organic chemicals, the property use is not listed and no indication of any releases. This listing is an indication that a potential release could have occurred at this location based on the land use.
- Sport Tees Inc./Custom Made T's Inc./Miracle Method of the US, 3732 West Century Boulevard, between the Arena Site and East Parking and Hotel Site. This property is listed as a generator of organic chemicals, acids, hydrocarbon solvents, and organic solvents, and is listed as a laundry/dry cleaner. No indication of any releases are reported for the site. However, this listing is an indication that a potential release could have occurred at this location based on the land use.
- Diversified Analytical Service, 3732 West Century Boulevard, Unit 3, between the Arena Site and East Parking and Hotel Site. This property is listed as a generator of aqueous anionic solution, organic solids, contaminated soil from site cleanup, liquids with metals, and oil-water separation sludge. No reported releases for the site. However, this listing is an indication that a potential release could have occurred at this location based on the land use.
- Service Station 5050/Lees Union/Unocal Corp SS 5050, 4000 West Century Boulevard, adjoins northeastern side of the surface parking lot at southwestern corner of South Prairie Avenue and West Century Boulevard. This property is a former vehicle fueling and service station with underground storage tanks (USTs) and is currently occupied by a fast food restaurant. TPH and benzene, toluene, ethylbenzene, and xylenes (BTEX) were detected in groundwater samples from 1993 to 1996, when the monitoring wells were destroyed and the case was closed by the RWQCB. Residual TPH in groundwater from this site is migrating to the northeast. When last monitored in 1996, concentrations of residual fuel-related compounds in groundwater on the subject property were low and the

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RWQCB closed the site. As a result, this listing does not indicate a potential for a release that could extend onto the Project Site.

- Chevron Station No 206907, 4015 West Century Boulevard, north of the ~~surface parking lot~~ West Parking and Transportation Hub site Site at northwestern corner of South Prairie Avenue and West Century Boulevard. The site is a current vehicle fueling and service station with USTs, and the site is shared with a fast food restaurant. Two USTs were installed in 1998 at the site: a 15,000-gallon gasoline UST and a 20,000-gallon gasoline UST. The available records do not list releases to the subsurface, and no soil or groundwater data are available for this site. However, this listing is still an indication that a potential release could have occurred at this location based on the land use.
- ~~Dukes Automotive Service/Budget Auto Enterprise/E & M German Car Repair/GES Auto Parts, 10223 South Prairie Avenue, approximately 250 feet south of the surface parking lots and across South Prairie Avenue from the Arena Site. This case site is an auto repair shop with records dating from 1969 to the present. In 1988, the site contained one 2,000-gallon UST and two 4,000-gallon USTs for storage of "product," etc. The construction and installation dates of these USTs is unknown, but the tanks were reportedly removed in 1987. The available records do not indicate releases to the subsurface, and no soil or groundwater data are available for this site. This listing is an indication that a potential release could have occurred at this location based on the land use.~~
- Auto Performance Team Corp, 10305 South Prairie Avenue, 130 feet southwest of the Arena Site. This site is listed as an auto repair shop from 2006 to 2014, and was observed to be an auto repair shop during the site visit on 24 October 2017. This listing is an indication that a potential release could have occurred at this location based on the land use.
- ~~Milner H W, 10324 South Prairie Avenue/10396 South Prairie Avenue, approximately 90/320 feet south of the Arena Site. These addresses are listed for the same property also listed as a historical gasoline and oil service station in 1927 and 1940, no other records indicating property use are available. The land use indicates a potential for a release to have occurred, however, the age of the land use would indicate that if any releases had occurred, natural attenuation would likely have reduced any potential threat to human health or the environment for most petroleum hydrocarbons.~~
- Rockview Dairy Facility/Mins Dairy, 10411 South Prairie Avenue, 490 feet south of the Arena Site. This property is listed as a convenience store from 1988 to 1996, and was part of a RWQCB cleanup site from 1993 to 1997. USTs were reportedly removed from the site in 1993. The GeoTracker database lists the soil as impacted by gasoline, and the case

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was closed in 1997.¹⁴ Closure would indicate that no further threat to human health or the environment remains.

- Mirage Cleaners/Bob & Mercys Cleaners & Laundry, 10412 South Prairie Avenue, 490 feet south of the Arena Site. This property is listed as a dry cleaner or laundry from 1971 to 2006, and reportedly handled PCE. The site no longer appears to be a cleaner or laundry. This listing is an indication that a potential release could have occurred at this location based on the land use.
- Yard Auto Repair/Smart Auto Repair, 10421 South Prairie Avenue, 490 feet south of the ~~West Parking and Transportation Hub site~~~~surface parking lot~~. This site is listed as an auto repair facility from 1987 to 2005, and appeared to be a block with three to four connected auto repair shops. This listing is an indication that a potential release could have occurred at this location based on the land use.
- New Way Automatic Laundry, 10424 South Prairie Avenue, 430 feet south of the Arena Site. This site is listed as a historical laundry or dry cleaner in 1964. This listing is an indication that a potential release could have occurred at this location based on the land use.
- G & A Auto Repair, 10427 South Prairie Avenue, 450 feet south of the Arena Site. This site is listed as an auto repair facility from 1990 to 2014. This listing is an indication that a potential release could have occurred at this location based on the land use.
- Whelen Elementary School Expansion, 104th/105th Street, 420 feet south of ~~the West Parking and Transportation Hub sSite~~~~the surface parking lot~~. This school site is listed in the DTSC database, with reported investigation of lead-based paint from demolished residential buildings conducted from 1999 to 2006. The buildings reportedly were built in the 1950s. The lead concentrations in soil were below the DTSC screening level of 255 milligrams per kilogram (“mg/kg”), and the site was closed by the DTSC. Closure would indicate that no further threat to human health or the environment remains.
- Universal Transmission/Pro Tires/Hollypark Auto Repair Shop/AAMES Radiator & AC/Sal Transmission/Elite Auto Center/Precision Autowerkz, 1201 South Prairie Avenue, 500 feet north of ~~the~~ West Parking and Transportation Hub Site. This site is listed as an auto repair facility from 1940 to 2014. 1203 and 1205 South Prairie Avenue have entries for Ralph’s Automotive Service and Tri-State Gasoline, and appear to be for the same strip mall property containing multiple auto repair facilities. In 1987, the LADPW received an application for a 550-gallon double walled fiberglass tank ~~that was~~ for vehicle waste oil. No spills or leaks for the property are reported in available agency

¹⁴ GeoTracker is the environmental database maintained by the State Water Resources Control Board that tracks sites with a history of releases to the subsurface that are overseen by the local Regional Water Resources Control Board.

files. This listing is an indication that a potential release could have occurred at this location based on the land use.

- Century Discount Tire/Universal Auto Service/American Automotive Centers/Dr Carfix Inc, 4055 West Century Boulevard, immediately north of the West Parking and Transportation Hub Site surface-parking-lot-across West Century Boulevard. This site is listed as an auto repair facility from 1988 to 2014. This listing is an indication that a potential release could have occurred at this location based on the land use.
- J & E Bugwagon/Advanced Auto Repair, 4101 West Century Boulevard, 330 feet west of the West Parking and Transportation Hub Site, across West Century Boulevard West Side-of-the-subject-property; this site is listed as an auto repair facility from 1988 to 2014. This listing is an indication that a potential release could have occurred at this location based on the land use.
- Sparkling Cleaners, 4102 West Century Boulevard, 330 feet west of the West Parking and Transportation Hub Site surface-parking-lots. This site is listed as a historic laundry or dry cleaner in 1964, but no current laundry or dry cleaning facility appears to be present at this property. This listing is an indication that a potential release could have occurred at this location based on the land use.
- All N Gears/Astro Automotive Service, 4110 West Century Boulevard, 420 feet west of the West Parking and Transportation Hub Site surface-parking-lot. This site is listed as an auto repair facility from 1986 to 2014. This listing is an indication that a potential release could have occurred at this location based on the land use.
- ARCO Station #9645/Former Thrifty Oil #251, 4130 West Century Boulevard, 690 feet west of the West Parking and Transportation Hub Site surface-parking-lots. This site is listed with six USTs: one 8,000-gallon UST for gasoline, one 15,000-gallon UST for gasoline, one 10,000-gallon UST for gasoline, one 6,000-gallon UST for gasoline, one 280-gallon UST for waste oil, and one UST of unknown capacity for waste oil. A different listing of USTs from a different database indicates the site had five USTs: three 12,000-gallon USTs for gasoline, one 15,000-gallon UST for gasoline, and one UST of unknown size and use. The site is also listed with a leaking UST case currently under regulatory oversight, and as a small quantity hazardous waste generator. The site disposed of aqueous solution with less than 10% organics, organic solids, waste oil, and oil/ water separation sludge. TPH, BTEX, and methyl tertiary butyl ether (MTBE) were detected in soil samples collected during UST removal activities, and approximately 900 cubic yards of soil were excavated and removed. Groundwater has not been sampled at this site. This listing is an indication that a potential release could have occurred at this location based on the land use and ongoing regulatory ~~oversight~~.

- Emery (former Menlo) World Wide, 3600 West Century Boulevard, 360 feet east of the parking lot and hotel East Parking and Hotel site Site. The site has recorded UST use. One 10,000-gallon gasoline UST was removed in July 2002. A 20,000-gallon diesel UST remains at the site and was permitted and in use as of 2007. Diesel fuel was detected in soil samples collected from the surface to 30 feet below ground surface (bgs) near the existing diesel UST in 1994. Groundwater at the site has reportedly not been investigated. Diesel fuel in soil at depths of up to 40-50 feet bgs were observed in later investigations. The RWQCB closed the case in 2015 after concurring with additional investigations by the responsible party showing groundwater was not affected by releases from the site. Closure would indicate that no further threat to human health or the environment remains.

Shallow Soil Sampling at Project Site

As part of the evaluation to determine the potential presence of legacy contaminants in the subsurface soils at the Project Site, EKI also collected surface soil samples for laboratory analysis. The samples were collected at locations on the Arena Site, and the East Parking and Hotel Site, and also included sampling existing soil stockpiles. The West Parking and Transportation Hub Site and Well Relocation Site were not included in the sampling program. The samples were analyzed for presence of TPH, VOCs, metals, polynuclear aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), pesticides, and herbicides. Samples were collected at the near surface (0 to 1 feet bgs) and between 4 and 5 feet bgs (locations are shown in **Figure 3.8-2**)

The analytical results were compared to the US EPA Regional Screening Levels (RSLs) for residential land use, as modified by Department of Toxic Substances Control (DTSC) Human and Ecological Risk Office (HERO) Note 3. These screening levels are referred to as the “HERO Note 3-modified RSLs” and are not considered to be cleanup threshold concentrations but merely screening levels that are intended to be a health-conservative preliminary evaluation of potential risk and hazard. The HERO Note 3 modified RSLs assume that a site will be used for residential purposes because that is the land use that would potentially be most sensitive with the highest potential exposure to health risk.

The laboratory analytical results for TPH in soil samples showed that diesel- and motor oil-range TPH were detected above the HERO Note 3-modified RSLs for residential land use (96 and 2,500 milligrams per kilogram (mg/kg), respectively) in four samples: the 0 to 1 foot bgs samples in sampling areas PC-4 (Arena Site - north), PC-6 (East Parking and Hotel Site) and PC-9 (Arena Site - south), and the stockpile sample in area PC-9 (see Figure 3.8-2). The highest detected concentrations of diesel- and motor oil range TPH at 940 mg/kg and 2,700 mg/kg, respectively, were found in the sample collected from 0 to 1 foot bgs in area PC-6. Gasoline-range TPH was not detected above the HERO Note 3-modified RSL for residential land use (82 mg/kg) in any of the samples collected. The motor oil-range TPH detections for all samples were below the HERO Note 3-modified RSL for commercial/industrial land use (33,000 mg/kg), but the diesel-range TPH detections were above the HERO Note 3-modified RSL for commercial/industrial land use (440 mg/kg) and may require additional investigation and remediation.

Figure 3.8-2 – Soil Sample Locations

The laboratory analytical results for metals (including hexavalent chromium and mercury) in soil samples showed concentrations all below the respective HERO Note 3-modified RSLs for residential land use with one exception.¹⁵ Hexavalent chromium was detected in one sample (PC-2) from the 4 to 5 foot bgs depth on the northern portion of the Arena Site at a concentration of 0.490 mg/kg which is above the screening level of 0.3 mg/kg.¹⁶

The surface soil samples (0 to 1 foot bgs) were also analyzed using a portable field method. The analytical results for arsenic showed one sample slightly above the DTSC regional background level in the northern Arena Site (12.1 mg/kg in PC-2 compared to background threshold of 12 mg/kg). Lead was detected above the HERO Note 3-modified RSL for residential land use of 80 mg/kg in 11 of the 52 soil samples analyzed using the field method, at concentrations up to 221 mg/kg (PC-7). Lead was not detected above the HERO Note 3-modified RSL for commercial/industrial land use (320 mg/kg).

VOCs, PAHs, PCBs, organochlorine pesticides, organophosphorus pesticides, and chlorinated herbicides were not detected above the respective HERO Note 3-modified RSLs for residential land use.

Schools and Daycare Centers

The schools nearest to any component of the Project Site (i.e., Arena Site, West Parking and Transportation Hub Site, East Parking and Hotel Site, or Well Relocation Site) are the Dolores Huerta Elementary School (4125 W 105th Street Lenox California) located approximately 620 feet (0.12 miles) to the southwest of the southwest corner of the Arena Site, and Morningside High School (10500 Yukon Avenue South) located approximately 985 feet (0.19 miles) southeast of the East Parking and Hotel Site. There are no daycare centers located within a quarter mile of the project site. The daycare center closest to the Project Site is the Daycare Family Lopez (4220 W 107th Street in Lennox California) which is approximately 1,950 feet (0.37 miles) southwest of the southwest corner of the West Parking and Transportation Hub Site.

Airports

The nearest public use airports to the Project Site include Los Angeles International Airport (LAX) and Jack Northrop Field/Hawthorne Municipal Airport (HHR). The Project Site is partially within the Planning Boundary/Airport Influence Area for LAX as designated within the Airport Land Use Plan (ALUP). The closest portions of the Project Site are approximately two miles east of the extended centerlines of Runways 25R and 25L at LAX, and less than 1.5 miles

¹⁵ Arsenic levels were compared to DTSC background concentrations for Southern California. DTSC calculated an upper bound of 12 mg/kg as an appropriate threshold for determining any presence of arsenic above background for school sites in Southern California (DTSC, 2008 as cited in the EKI technical memorandum). Arsenic was not detected above the DTSC concentration of 12 mg/kg in any of the soil samples analyzed.

¹⁶ The reporting limit for hexavalent chromium from the analytical laboratory is above the HERO Note 3-modified RSL for residential land use of 0.3 mg/kg, however, the method detection limit provided by the laboratory is lower than 0.3 mg/kg, and no estimated detections of hexavalent chromium between the reporting limit and the method detection limit are reported by the laboratory.

due north of Runway 7-25 at HHR. No other private airstrips are located in the vicinity of the Project Site.

For both public use airports, 14 Code of Federal Regulations Part 77 (14 CFR Part 77) *Safe, Efficient Use and Preservation of the Navigable Airspace* defines the various airport imaginary surfaces that protect the operating environments (airspace) surrounding the airport.¹⁷ 14 CFR Part 77 also stipulates the notification requirements for any proposed construction or alterations that could impact the established imaginary surfaces of an airport. 14 CFR Part 77 requirements would apply to both airports.

Commented [A10]: Consider adding a footnote to explain what imaginary surfaces are.

Wildland Fire

The City of Inglewood is a fully developed urban area that is not associated with wildland fires. According to the Fire Hazard Severity Zone mapping done by the California Department of Forestry and Fire Protection, the Project Site is located in an incorporated city that is considered to be Non-VHFHSZ (non-very high fire hazard safety zone).¹⁸ The City is responsible for fire protection in the area which is done in part by enforcement of Fire Code requirements contained within the Building Code, as well as fire protection services provided by the City of Inglewood Fire Department (see Section 3.13, Public Services).

3.8.2 Adjusted Baseline Environmental Setting

Commented [A11]: See comment on aesthetics section. Delete detail and reference 3.0 for substance.

As discussed in Section 3.0, Environmental Impacts, Settings, and Mitigation Measures, the Proposed Project is not anticipated to be constructed and begin operations until mid-~~2023~~ 2024 for the ~~2023-24~~ 2024-25 NBA basketball season. Also as discussed in Section 3.0, Environmental Impacts, Settings, and Mitigation Measures, the City has issued building permits for, and construction has commenced on, significant portions of the Hollywood Park Specific Plan north of the Project Site, including the construction of the approximately 70,000-seat NFL Stadium, an approximately 6,000 seat performance venue, approximately 518,077 sf of retail and restaurant uses, approximately 466,000 sf of office space, approximately 314 residential units, and approximately 9,900 parking spaces. Due to the certainty of these projects being constructed and in operation prior to opening of the Proposed Project, the City of Inglewood determined that it is appropriate to include these projects in an adjusted environmental setting for the Proposed Project. Accordingly, these changes associated with these developments within the Hollywood Park Specific Plan area are considered as part of the adjusted environmental baseline.

The NFL Stadium and retail/restaurant uses that will be constructed immediately northeast of the intersection of West Century Boulevard and South Prairie Avenue would be expected to include the use, storage and disposal of hazardous materials. Construction of these improvements ~~are will~~

¹⁷ Federal Aviation Administration (FAA), 2010. 14 Code of Federal Regulations Part 77 *Safe, Efficient, Use and Preservation of the Navigable Airspace*, Federal Register Volume 75, Number 139, July 21, 2010.

¹⁸ California Department of Forestry and Fire Protection (CAL FIRE), 2011. Fire and Resource Assessment Program. Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. Los Angeles County. September. Available: http://frap.fire.ca.gov/webdata/maps/los_angeles/LosAngelesCounty.pdf. Accessed: January 17, 2019.

not likely to have any direct effect on the hazards and hazardous materials associated with the Proposed Project, as the improvements being constructed there tend to have only site-specific hazard issues these tend to be site-specific with these types of land uses. The NFL Stadium and retail/restaurant uses would not be associated with substantive routine emissions of hazardous materials or wastes and any incidents such as accidental and upset conditions would likely be isolated and localized events. The construction of these improvements will likely require that site characterization and any subsequent remediation, if necessary, of the three areas of concern mentioned above for the former racetrack and casino site, would be completed such that no threat to human health or the environment remains. The regulatory oversight required for these types of subsurface investigation and cleanups would be required prior to completion of construction and would require that no potential for offsite migration could adversely affect downgradient locations including the Project Site. Therefore, while the amount of hazardous materials being transported, stored, handled and disposed of with these new land uses would increase, they would not substantively alter the analysis for the Proposed Project under current existing conditions.

3.8.3 Regulatory Setting

Federal

The primary federal agencies with responsibility for hazards and hazardous materials management include the US EPA, US Department of Labor Occupational Safety and Health Administration (Fed/OSHA), and the US Department of Transportation (DOT). Federal laws, regulations, and responsible agencies are summarized in **Table 3.8-1**.

State and local agencies often have either parallel or more stringent rules than federal agencies. In most cases, state law mirrors or overlaps federal law and enforcement of these laws is the responsibility of the state or of a local agency to which enforcement powers are delegated. For these reasons, the requirements of the federal law and its enforcement are discussed under either the state or local agency section.

State

California Environmental Protection Agency and Unified Program

California's Secretary for Environmental Protection has established a unified hazardous waste and hazardous materials management regulatory program (Unified Program) as required by Senate Bill 1082 (1993).

The California Environmental Protection Agency (Cal/EPA) oversees the implementation of the Unified Program. The Unified Program consolidates, coordinates, and makes consistent the administrative requirements, permits, inspection and enforcement activities of six environmental and emergency response programs. The state agencies responsible for these programs set the standards for their respective programs while local governments implement the standards.

**TABLE 3.8-1
 FEDERAL LAWS AND REGULATIONS RELATED TO HAZARDS AND HAZARDOUS MATERIALS MANAGEMENT**

Classification	Federal Law or Responsible Federal Agency	Description
Federal Aviation	Federal Aviation Administration	The Federal Aviation Administration's (FAA's) primary role is to promote aviation safety and control the use of airspace. Federal regulations and FAA Advisory Circulars applicable to compatible land use and/or safety include, but are not limited to, 14 Code of Federal Regulations Part 77 (14 CFR Part 77), Safe, Efficient Use, and Preservation of the Navigable Airspace; FAA Advisory Circular 150/5200-33B, Hazardous Wildlife Attractants on or near Airports; and FAA Order 5200.5A, Waste Disposal Sites on or near Airports.
Hazardous Waste Handling	Resource Conservation and Recovery Act of 1976 (RCRA)	Under RCRA, the US EPA regulates the generation, transportation, treatment, storage, and disposal of hazardous waste from "cradle to grave."
	Hazardous and Solid Waste Act	Amended RCRA in 1984, affirming and extending the "cradle to grave" system of regulating hazardous wastes. The amendments specifically prohibit the use of certain techniques for the disposal of some hazardous wastes.
	Toxic Substances Control Act (TSCA)	Code of Federal Regulations Title 40 Chapter 1, Subchapter R – Toxic Substances Control Act – Part 761 Polychlorinated Biphenyls (PCBs) – covers the identification and sampling requirements for PCBs for disposal purposes.
Hazardous Materials Management	Community Right-to-Know Act of 1986 (also known as Title III of the Superfund Amendments and Reauthorization Act (SARA))	Imposes requirements to ensure that hazardous materials are properly handled, used, stored, and disposed of and to prevent or mitigate injury to human health or the environment in the event that such materials are accidentally released.
Hazardous Materials Transportation	US Department of Transportation (DOT)	DOT has the regulatory responsibility for the safe transportation of hazardous materials. The DOT regulations govern all means of transportation except packages shipped by mail (49 CFR).
	US Postal Service (USPS)	USPS regulations govern the transportation of hazardous materials shipped by mail.
Occupational Safety	Occupational Safety and Health Act of 1970	Fed/OSHA sets standards for safe workplaces and work practices, including the reporting of accidents and occupational injuries (29 CFR).
Structural and Building Components (Lead-based paint, polychlorinated biphenyls, and asbestos)	Toxic Substances Control Act	Regulates the use and management of polychlorinated biphenyls in electrical equipment, and sets forth detailed safeguards to be followed during the disposal of such items.
	US EPA	The US EPA monitors and regulates hazardous materials used in structural and building components and their effects on human health.

The Unified Program is implemented at the local level by 86 government agencies certified by the Secretary of Cal/EPA. These Certified Unified Program Agencies (CUPAs) have typically been established as a function of a local environment health or fire agency. Some CUPAs also have contractual agreements with one or more other local agencies called "participating agencies (PAs)," which implement one or more program elements, under the oversight of the CUPA.

The state agency partners involved in the Unified Program have the responsibility of setting program element standards, working with Cal/EPA on ensuring program consistency and providing technical assistance to the CUPAs and PAs. The following state agencies are involved with the Unified Program:

- **California Environmental Protection Agency (Cal/EPA).** The Secretary of the California Environmental Protection Agency is directly responsible for coordinating the administration of the Unified Program. The Secretary certified Unified Program Agencies. The Secretary has certified 86 CUPAs to date. These 86 CUPAs carry out the responsibilities previously handled by approximately 1,300 state and local agencies.
- **Department of Toxic Substances Control (DTSC).** The Department of Toxic Substances Control provides technical assistance and evaluation for the hazardous waste generator program including onsite treatment (tiered permitting).
- **Governor’s Office of Emergency Services (OES).** The Governor’s Office of Emergency Services is responsible for providing technical assistance and evaluation of the Hazardous Material Release Response Plan (Business Plan) Program, the California Accidental Release Response Plan (CalARP) Programs, and carrying out FEMA requirements to prepare the State Multi-Hazard Mitigation Plan also known as the State Hazard Mitigation Program.
- **Office of the State Fire Marshal (OSFM).** The Office of the State Fire Marshal is responsible for ensuring the implementation of the Aboveground Petroleum Storage Act (APSA). They are also responsible for oversight of the Hazardous Material Management Plans and the Hazardous Material Inventory Statement Programs. These programs tie in closely with the Business Plan Program.
- **State Water Resources Control Board (SWRCB).** The State Water Resources Control Board provides technical assistance and evaluation for the underground storage tank program.

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Hazardous Waste Control Act

The hazardous waste management program enforced by DTSC was created by the Hazardous Waste Control Act (California Health and Safety Code Section 25100 et seq.), which is implemented by regulations described in CCR Title 22. This act implements the RCRA “cradle-to-grave” waste management system in California, but is more stringent in its regulation of non-RCRA wastes, spent lubricating oil, small-quantity generators, transportation and permitting requirements, as well as in its penalties for violations. The act also exceeds federal requirements by mandating the recycling of certain wastes, requiring certain generators to document a hazardous waste source reduction plan, requiring permitting for federally exempt treatment of hazardous wastes by generators, and implementing stricter regulation of hazardous waste facilities.

California Department of Industrial Relations, Division of Occupational Safety and Health Administration

The California Department of Industrial Relations, Division of Occupational Safety and Health Administration (Cal/OSHA), assumes primary responsibility for developing and enforcing workplace safety regulations within the state. Cal/OSHA standards are more stringent than federal OSHA regulations, and are presented in CCR Title 8. Standards for workers dealing with hazardous materials include practices for all industries (General Industry Safety Orders); specific practices are described for construction and hazardous waste operations and emergency response. Cal/OSHA conducts on-site evaluations and issues notices of violation to enforce necessary improvements to health and safety practices.

California Highway Patrol and Department of Transportation (Caltrans)

The California Highway Patrol (CHP) and Department of Transportation (Caltrans) are the enforcement agencies responsible for hazardous materials transportation regulations. Hazardous materials and waste transporters are responsible for complying with all applicable packaging, labeling, and shipping regulations. California Vehicle Code Section 31303 regulates the transport of hazardous materials.

State Water Resources Control Board

The State Water Resources Control Board (SWRCB) has primary responsibility to protect water quality and supply through their respective Regional Water Quality Control Boards (RWQCBs). As described in Section 3.9, Hydrology and Water Quality, RWQCBs are authorized by the Porter-Cologne Water Quality Control Act of 1969 to protect the waters of the state. The RWQCBs provide oversight for sites where the quality of groundwater or surface waters is threatened. Extraction and disposal of contaminated groundwater due to investigation/remediation activities or due to dewatering during construction require a permit from the RWQCBs if the water were discharged to storm drains, surface water, or land.

California Code of Regulations Title 23, Chapter 15, requires that non-hazardous liquid (greater than 42 gallons) or solid (greater than 10 cubic yards) waste must be reported to the RWQCB. Domestic wastewater and refuse releases are required to be reported under different non-Chapter 15 regulations.

California State Aeronautics Act

Public Utilities Code (Section 21001 et seq.) is also known as the State Aeronautics Act, which is designed to further protect the public interest in aeronautics and aeronautical progress. Measures in the Act include:

- (a) Fostering and promoting safety in aeronautics.
- (b) Effecting uniformity of the laws and regulations relating to aeronautics consistent with federal aeronautics laws and regulations.

(c) Developing, in cooperation with the private sector, airport management, local jurisdictions, federal authorities, and the general public, informational programs to increase the understanding of current air transportation issues including, but not limited to, aviation safety, planning, airport noise, airport development and management, and the role of aviation in the economic development of the state, as an integral part of the state's transportation system.

Article 2.7 of the Act addresses regulation of obstructions of the airspace and stipulates various restrictions on construction including height restrictions on buildings, utility poles and other potential hazards proposed within two miles of an airport runway.

California Fire Code

The 2016 California Fire Code is published by the California Building Standards Commission and incorporates by adoption the 2015 International Fire Code of the International Code Council. The California Fire Code is contained as Part 2 of the California Building Code and includes minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety and general welfare from the hazards of fire, explosion or dangerous conditions in new and existing buildings, structures and premises, and to provide safety and assistance to fire fighters and emergency responders during emergency operations. The City of Inglewood has adopted the California Fire Code with amendments.

Regional

Los Angeles County Airport Land Use Plan

Pursuant to Division 9, Part 1, Chapter 4, Article 3.5, Sections 21670 – 21679.5 of the California Public Utility Code, each county in California in which there is an airport served by a scheduled airline and each county with an airport operated for the benefit of the general public, with certain exceptions, is required to establish an airport land use commission (ALUC). Each ALUC must develop a plan for promoting and ensuring compatibility between each airport in the county and surrounding land uses. In Los Angeles County, the Los Angeles County Regional Planning Commission also acts as the ALUC. The ALUC's purpose is to coordinate planning for the area around public airports to protect the public health, safety and welfare from land ~~uses~~ that do not minimize the public's exposure to excessive noise and safety hazards. This is achieved through review of proposed development surrounding airports and through policy and guidance provided in the Los Angeles County ALUP, which was adopted on December 19, 1991.¹⁹

In formulating the Los Angeles County ALUP, the ALUC establishes ~~policies~~ provisions to ensure safe airport operations, through the delineation of Runway Protections Zones (RPZs) and height restriction boundaries. The following policies from the Los Angeles County ALUP are applicable to the Proposed Project:

¹⁹ Los Angeles County Airport Land Use Commission, Los Angeles County Airport Land Use Plan, prepared by the Department of Regional Planning, adopted December 19, 1991. Available: <http://planning.lacounty.gov/view/alup/>. Accessed September 2018.

Policies Related to Safety:

Policy S-5: Prohibit uses which would attract large concentrations of birds, emit smoke, or which may otherwise affect safe air navigation.

Policy S-6: Prohibit uses which would generate electrical interference that may detrimental to the operation of aircraft and/or aircraft instrumentation.

Policy S-7: Comply with the height restriction standards and procedures set forth in 14 CFR Part 77.

South Coast Air Quality Management District and Rule 1403

Asbestos is a carcinogen and is categorized as a hazardous air pollutant by the Environmental Protection Agency (EPA). The EPA has delegated the authority to enforce the federal asbestos regulations to the South Coast Air Quality Management District (SCAQMD). Air Quality Management District (AQMD) Rule 1403, adopted by SCAQMD on October 6, 1989, establishes survey, notification, and work practice requirements to prevent asbestos emissions from emanating during building renovation and demolition activities.

Local

County of Los Angeles Health Hazardous Materials Division

In 1982, the Los Angeles County Board of Supervisors established the Hazardous Materials Control Program in the Department of Health Services for the inspection of businesses generating hazardous waste. In 1991, the program merged into the Fire Department and it became the Health Hazardous Materials Division (HHMD). All Hazardous Material Specialists are sworn and badged Los Angeles County Deputy Health Officers.

In 1997, HHMD became a Certified Unified Program Agency (CUPA) to administer the following programs within Los Angeles County: the Hazardous Waste Generator Program, the Hazardous Materials Release Response Plans and Inventory Program, the California Accidental Release Prevention Program (Cal-ARP), the Aboveground Storage Tank Program and the Underground Storage Tank Program. HHMD is a division of the Department’s Prevention Services Bureau, and includes the following sections and units:

- Inspection Section
- Emergency Operations Section
- Special Operations Section
- Administration/Planning Section

City of Inglewood General Plan

The Safety Element of the Inglewood General Plan was adopted in July 1995. The following policies are articulated as “mitigation measures” in the City of Inglewood General Plan Safety Element and are relevant to Hazards and Hazardous Materials.

Safety Element

- Enforcement of the State law that requires businesses involved with hazardous materials to disclose the quantities of hazardous materials, their locations, their disposal and a management plan designed to decrease risks to the public.
- Private businesses and government agencies must continue to update and prepare the proper emergency responses in the event of a spill or explosion.
- The City must ensure that these uses are located safe distances from residences, schools, hospitals, large assemblages of people, etc.

The Proposed Project would be consistent with these policies ~~or mitigation measures~~ through the implementation of the required HMBP which would ensure that the storage, handling, and disposal of hazardous materials is done in accordance with practices that minimize exposure and inadvertent releases.

City of Inglewood Office of Emergency Services

The Office of Emergency Services achieves its mission of preparing for emergencies and disasters by serving the City of Inglewood through effective collaboration in preparing for, protecting against, responding to, recovering from, and mitigating the impacts of all hazards and threats. The City has an Emergency Plan (City of Inglewood MultiHazard Functional Plan (MHFP)) which is in the process of being updated at the time of preparation of this section.²⁰

3.8.4 Analysis, Impacts and Mitigation

Significance Criteria

A significant impact would occur if the Proposed Project would:

1. Create a hazard to navigable airspace and/or operations at a public airport;
2. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
3. 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;
4. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

²⁰ City of Inglewood, *Emergency Preparedness*, http://v1.cityofinglewood.org/depts/admin/emergency_preparedness.asp, accessed December 28, 2018.

5. 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;
6. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area;
7. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area;
8. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
9. Expose people or structures, either directly or indirectly, 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.

Methodology and Assumptions

Hazardous Materials Impacts

The potential for creation of significant impacts related to hazards and/or hazardous materials through construction and operation of the Proposed Project were was determined by through a review of the existing conditions, with particular attention paid to the presence of hazardous materials and hazardous wastes associated with past operations at the site Project Site and nearby vicinity. The review of past land uses is considered within the context that regulatory requirements have evolved over time, and were less stringent in years past with handling/disposal practices of hazardous materials becoming more stringent in once substantively different than more recent years. Exposure risks are dependent on a variety of factors such as the chemical of concern, concentration levels, medium (i.e., soil, groundwater, or soil vapor), and exposure pathway. Exposure can occur through disturbance from earthwork activities during construction, or for constituents that easily off-gas (e.g., VOCs), from vapor intrusion through foundations of new structures. This analysis makes conservative assumptions in regarding the potential for encountering legacy contaminants where more site specific data is either limited or unavailable. Human health risks can occur from either acute or chronic exposure, and both are considered in this analysis, however however, in order to quantitatively estimate exposure risks, a human health impact analysis or health risk assessment would be necessary. This type of risk assessment is typically conducted for sites with known releases of hazardous materials. This analysis relies on the select soil sampling that was conducted as part of the EKI technical memorandum to characterize the existing conditions of the subsurface at the Project Site (see below).

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Publicly available resources, including existing environmental databases and the The EKI technical memorandum, along with publicly available resources, including existing environmental databases, were reviewed in order to determine the potential for hazardous impacts that would occur from the construction and/or operation of the Proposed Project including the proposed off-site elements. Note that the status of the hazardous materials sites included in the

Commented [A14]: Need to clearly explain what these are.

EKI technical memorandum as under investigation and cleanup may change over time going forward as these ~~projects sites~~ progress towards compliance with regulatory oversight (i.e., complete characterization of extent of contamination and/or remediation to the point of no further threat to human health or the environment remaining). Compliance with applicable federal, state, and local health and safety laws and regulations by the project applicant and businesses in the area is assumed in this analysis, and local and state agencies would be expected to continue to enforce applicable requirements to the extent that they do so now. The findings of the CAG technical memorandum were validated against a review of the most recent information available on the Proposed Project, as well as for LAX and HHR airports.

The EKI technical memorandum also included a description of the limited soil sampling that has been undertaken on a portion of the Project Site. The samples were submitted to a certified laboratory for analysis. The sampling results were compared to the US EPA Regional Screening Levels (RSLs) for residential land use, as modified by DTSC HERO Note 3. These screening levels are referred to as the “HERO Note 3-modified RSLs” and are not considered to be cleanup threshold concentrations but merely screening levels that are intended to be a health-conservative preliminary evaluation of potential risk and hazard. The HERO Note 3 modified RSLs assume that a site will be used for residential purposes because that is the land use that would potentially have the highest exposure to health risk. The analysis of potential impacts related to legacy contaminants relies on these sampling results because they are considered to be the best available representation of site specific results of existing site subsurface conditions. The use of the HERO Note 3 modified RSLs provides a conservative approach to evaluate potential health risks from implementation of the Proposed Project, even though residential land uses are not proposed.

Airport-Related Hazards

In addition, the potential for the temporary and permanent elements of the Proposed Project to interfere with the land use plans associated with the two nearby airports (LAX and HHR) were evaluated in the comprehensive obstruction evaluation and airspace analysis conducted by CAG in September 2017. CAG utilized the applicable FAA rules and regulations for airport obstacle evaluations, navigational aid assessments, and aircraft operational procedures to conduct this airspace hazard analysis. While the most recent FAA and airport specific data available was applied to evaluate the potential impacts associated with the Proposed Project, these may change over time going forward.

Issues Previously Determined to be Less Than Significant

Upon review of the Proposed Project, the City of Inglewood determined that due to the physical characteristics of the Project Site and the Project as proposed, several environmental issues would involve issues or resources that would not be affected by the Proposed Project and need not be

further considered in the Draft EIR.²¹ The discussions below provide brief statements of reasons for the City’s determination that these issues do not warrant further consideration in the EIR.

The following significance criteria were found to address issues that would not be affected by the Proposed Project. With regard to significance criterion (7), as described under Environmental Setting, the Proposed Project is not located within 2 miles of any private airstrip and would not result in a safety hazard for people residing or working in the Project area. Therefore, significance criterion (7) does not apply to the Proposed Project. With respect to significance criterion (9), as described under Environmental Setting, the Proposed Project is located in a developed urban area served by the City of Inglewood Fire Department, and is not located within a very high or high fire hazard severity zone. Therefore, significance criterion (9) does not apply to the Proposed Project. The following discussion further addresses these criteria.

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The Proposed Project would not result in a safety hazard for people residing or working in the project area due to being located within 2 miles of any private airstrip.

Commented [A16]: Discuss—private airstrip deleted from Appendix G.

The Proposed Project is not located within 2 miles of any private airstrip and would not result in a safety hazard for people residing or working in the Project area. As such, the Proposed Project would not result in a safety hazard for people residing or working in the project area. Thus, there would be **no impact** of the Proposed Project related to this significance criterion.

The Proposed Project would not expose people or structures, either directly or indirectly, 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.

The Project Site is located in a developed urban area served by the City of Inglewood Fire Department and is not located within a very high or high fire hazard severity zone. As such, the Proposed Project would not 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. Thus, there would be **no impact** of the Proposed Project related to this significance criterion. Potential impacts associated with other fire-related services are provide in Section 3.13 of this EIR.

²¹ Public Resources Code section 21003(e) states that “[t]o provide more meaningful public disclosure, reduce the time and cost required to prepare an environmental impact report, and focus on potentially significant effects on the environment of a proposed project, lead agencies shall, in accordance with Section 21100, focus the discussion in the environmental impact report on those potential effects on the environment of a proposed project which the lead agency has determined are or may be significant. Lead agencies may limit discussion on other effects to a brief explanation as to why those effects are not potentially significant.”

Impacts and Mitigation Measures

Impact 3.8-1: Implementation of the Proposed Project ~~could~~ would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Construction

Project construction activities would include demolition and removal of existing buildings on the Project Site, excavation and removal of soils from portions of the Project Site, and construction of new buildings, structures, and other Project features. The potential for exposure of people or the environment to hazardous materials during these construction activities is addressed below.

Exposure to Hazards in Existing Buildings

The Proposed Project would include demolition of approximately 54,098 square feet of existing on-site vacant and commercial uses in structures of varying ages that could contain hazardous building materials. Exposure to hazardous building materials during demolition including ACMs, LBP, or other hazardous materials in structures would only occur during demolition activities but could result in adverse health effects if not managed appropriately. Once the structures on a property have been removed, there would be no further exposure during Project operation.

As described under Regulatory Setting, above, existing federal, State, and local regulations require that demolition or renovation activities that may disturb or require the removal of materials that consist of, contain, or are coated with ACM, LBP, PCBs, mercury, and other hazardous materials must be inspected and/or tested for the presence of hazardous materials. The hazardous materials must be managed and disposed of in accordance with laws and regulations, as described further below.

In the case of ACM and LBP, the identification, removal, and disposal is regulated under 8 CCR 1529 and 5208 for ACM and 8 CCR 1532.1 for LBP. All work must be conducted by a State-certified professional. If ACM and/or LBP is determined to exist onsite, a site-specific hazard control plan must be prepared and submitted to the appropriate agency (South Coast Air Management District for asbestos and Cal/OSHA for lead) detailing removal methods and specific instructions for providing protective clothing and equipment for abatement personnel. If necessary, a State-certified LBP and an asbestos removal contractor would be retained to conduct the appropriate abatement measures as required by the plan. Wastes from abatement and demolition activities would be disposed of at a landfill(s) licensed to accept such waste. Once all abatement measures have been implemented, the contractor would conduct a clearance examination and provide written documentation to the City that testing and abatement have been completed in accordance with all federal, state, and local laws and regulations.

In the case of PCBs, the identification, removal, and disposal is regulated by the EPA under the Toxic Substances Control Act (TSCA) (Title 40 Chapter 1 Subchapter R Part 761) and California regulations (22 CCR 66263.44). Electrical transformers and older fluorescent light ballasts not previously tested and verified to not contain PCBs must be tested. If PCBs are detected above

action levels, the materials must be disposed of at a licensed facility permitted to accept the materials. Upon completion of abatement measures, if applicable, the contractor would provide written documentation to the City that testing and abatement have been completed in accordance with all federal, state, and local laws and regulations.

In the case of mercury in fluorescent light tubes and switches, the identification, removal, and disposal is regulated under 22 CCR 67426.1 – 67428.1 and 66261.50. Under these regulations, the light tubes must be removed without breakage and disposed of at a licensed facility permitted to accept the materials. Upon completion of abatement measures, if applicable, the contractor would provide written documentation to the City that testing and abatement have been completed in accordance with all federal, state, and local laws and regulations.

Existing abatement laws and regulations, combined with enforcement mechanisms by agencies including SCAQMD, Cal/OSHA require compliance with applicable federal, State, and local laws and regulations that would prevent the exposure of individuals and the environment to the hazards during demolition. Therefore, exposure to asbestos containing materials, LBP and/or other hazardous building materials would be **less than significant**.

Use of Hazardous Materials during Construction

Construction activities would also likely require the use of limited quantities of hazardous materials such as fuels, oils, and lubricants for construction equipment; paints and thinners; and solvents and cleaners. These hazardous materials are typically packaged in consumer quantities and used in accordance with manufacturer recommendations, and would be transported to and from the Project Site. The improper handling and transport of hazardous materials could result in adverse health effects to workers or the public.

As discussed in the Regulatory Setting, transportation of hazardous materials is regulated by the DOT and Caltrans. Together, federal and State agencies determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the exposure of hazardous materials. In addition, businesses that use hazardous materials, including construction companies, are required to prepare and implement HMBPs describing procedures for the handling, transportation, generation, and disposal of hazardous materials. Because numerous laws and regulations, as previously described, govern the transportation and management of hazardous materials to reduce the potential hazards, the potential impact related to exposure of hazardous materials or wastes during construction would be **less than significant**.

Operation

The use of common hazardous materials would occur as part of the operation of the Proposed Project, primarily associated with maintenance activities as well as storage of diesel for the backup generator and bio-medical supplies for the sports medicine clinic. Hazardous chemicals common in other commercial/retail/hotel and support settings include paints, lubricants, solvents, cleaning supplies and relatively small quantities of fuels, oils, and other petroleum-based products. Activities

such as landscaping, can also become sources of releases of hazardous materials with pesticides and herbicides.

Because general arena and commercial/retail/hotel hazardous materials are typically handled and transported in small quantities, and because the health effects associated with them are generally not as serious as industrial uses, operation of a majority of the new uses at the site would not cause an adverse effect on the environment with respect to the routine transport, use, or disposal of general office and household hazardous materials.

The sports medicine clinic would likely include relatively small quantities of bio-hazards and other chemicals such as medical supplies, oxygen tanks and other treatment supplies that fit the classification of a hazardous material or waste. In addition, any administration of medication hyperdermically would produce bio-hazard waste. As part of adhering to local CUPA requirements, the clinic would be required to prepare and submit a Hazardous Materials Management Plan and Hazardous Materials Business Plan to the County Health Hazardous Materials Division (HHMD) as well as comply with any applicable fire code requirements as enforced by the City fire department.

For the arena and commercial/retail/hotel uses, the existing regulatory framework requires appropriate training of employees in the use, storage, and disposal of any hazardous materials and wastes. As required by the HHMD, the CUPA, any business that would store hazardous materials and/or waste at its site would be required to submit business information and hazardous materials inventory forms contained in Hazardous Materials Management Plan and Hazardous Materials Business Plan. In addition, all hazardous materials handlers are subject to inspection every three years. The HHMD, as the CUPA, requires all new commercial and other users to follow applicable regulations and guidelines regarding storage and handling of hazardous waste. All hazardous materials are required to be stored and handled according to manufacturer's directions and local, state and federal regulations including the Hazardous Waste Control Act (California Health and Safety Code Section 25100 et seq.), which is implemented by regulations described in CCR Title 22. With adherence to existing regulatory requirements, impacts related to the routine transport, use or disposal of hazardous materials associated with future uses at the site would be **less than significant**.

Mitigation Measures

None required.

Impact 3.8-2: Implementation of the Proposed Project ~~could~~ would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Construction

As noted above in Impact 3.8-1, construction activities would likely require the use of limited quantities of hazardous materials such as fuels, oils, and lubricants for construction equipment; paints and thinners; and solvents and cleaners. These materials would be transported to and from the Project Site. The improper handling and transport of hazardous materials could result in

accidental release of hazardous materials, thereby exposing site occupants to hazardous materials contamination.

Transportation

As discussed in the Regulatory Setting, transportation of hazardous materials is regulated by the US DOT and Caltrans. Construction activities would disturb more than one acre and thus would be required to implement requirements of the National Pollution Discharge Elimination System General Construction Permit. The permit requires implementation of best management practices (BMPs) which would include measures that address the safe handling of hazardous materials and also require spill response measures to contain any release, in the unlikely event that an inadvertent release did occur. The use of construction BMPs implemented as part of a Storm Water Pollution Prevention Plan (discussed further in Section 3.9, Hydrology and Water Quality) as required by the National Pollution Discharge Elimination System General Construction Permit would minimize the potential adverse effects from accidental release. These BMPs could include, but are not necessarily limited to, the following:

- Establish a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Follow manufacturer's recommendations on use, storage and disposal of chemical products used in construction;
- Avoid overtopping construction equipment fuel gas tanks;
- During routine maintenance of construction equipment, properly contain and remove grease and oils; or
- Properly dispose of discarded containers of fuels and other chemicals.

Onsite Construction Use

In general, aside from refueling needs for heavy equipment, the hazardous materials typically used on a construction site are brought onto the site by the construction contractor, packaged in consumer quantities and used in accordance with manufacturer recommendations. The overall quantities of these materials on the site at any one time would not result in large bulk amounts that, if spilled, could cause a significant soil or groundwater contamination issue. Spills of hazardous materials on construction sites are typically localized and would be cleaned up in a timely manner. As described above, refueling activities of heavy equipment would be conducted in a controlled dedicated area complete with secondary containment and protective barriers to minimize any potential hazards that might occur with an inadvertent release. Given the required protective measures (i.e., BMPs) and the quantities of hazardous materials typically needed for construction projects such as the ~~project~~ Proposed Project, the threat of exposure to the public or contamination to soil and/or groundwater from construction-related hazardous materials is considered a **less than significant impact**.

Operation

Operations associated with the arena, hotel, and associated facilities would primarily involve the use of relatively small quantities of common hazardous materials including paints and thinners, cleaning solvents, and fuels, oils, and lubricants. ~~For the Proposed Project uses, these are typically packaged in consumer quantities, as opposed to bulk deliveries for other industrial land uses, and used in accordance with manufacturer recommendations. Some limited quantities of bio-hazards and other chemicals would also be associated with the sports medicine clinic. In addition, the Proposed Project would include the storage of diesel for backup generators which if released could cause adverse effects to the public and the environment. Storage of all hazardous materials onsite, including the diesel fuel, would be required to adhere to a facility-specific HMBP. The preparation and implementation of a facility-specific HMBPs would be required of the arena as well as the hotel, and that even the HMBPs would identify safe measures to store, handle, and dispose of hazardous materials. The HMBP would also include spill response measures to ensure that in the unlikely event that a release does occur, there are protocols would be implemented to contain and control any accidental release in a manner that is protective of human health and the environment. Protocols such protocols could include employee training, the location of absorbent materials to contain a release, and notification requirements to ensure that human health and the environment is protected from any exposure. Because numerous laws and regulations govern the transportation and management of hazardous materials to reduce the potential hazards, this impact would be less than significant.~~

Commented [A17]: The Arena only will have one backup diesel generator, but per the Project Description there will be 3 others: one for the Western Parking structure, one for the eastern hotel, and one for the retail/restaurant/community building.

Mitigation Measures

None required.

Impact 3.8-3: Implementation of the Proposed Project could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Construction

Construction activities would likely require use of limited quantities of hazardous materials such as fuels for construction equipment, oils, and lubricants; paints and thinners; and solvents and cleaners. There are two schools that have been identified within a quarter mile of the Project Site, the Dolores Huerta Elementary School (4125 W 105th Street Lenox California) located approximately 620 feet (0.12 miles) to the southwest of the southwest corner of the Arena Site and Morningside High School (10500 Yukon Avenue South) located approximately 985 feet (0.19 miles) southeast of the East Parking and Hotel Site. Hazardous materials would be transported to and from the Project Site and could pass near these schools. The improper handling and transport of hazardous materials could result in accidental release of hazardous materials near schools, thereby exposing school occupants to hazardous materials.

As discussed in the Regulatory Setting (and also above in Impact 3.8-1), transportation of hazardous materials is regulated by the US DOT and Caltrans. Together, federal and State

agencies ~~determine~~establish driver-training requirements, load labeling procedures, and container specifications designed to minimize the risk of accidental release. In addition, businesses that use hazardous materials, including construction companies, are required to prepare and implement HMBPs describing procedures for the handling, transportation, generation, and disposal of hazardous materials in accordance with the Hazardous Waste Control Act (California Health and Safety Code Section 25100 et seq.), which is implemented by regulations described in CCR Title 22. Finally, construction on sites larger than one acre would be required to comply with the Construction General Permit and implement a SWPPP and its associated BMPs to control and limit any releases of hazardous materials. Because numerous laws and regulations govern the transportation and management of hazardous materials to reduce the potential hazards to levels that minimize health risks, this impact would be **less than significant**.

Operation

Operation of the project would involve the use of relatively small quantities of common hazardous materials including paints and thinners, cleaning solvents, and fuels, oils, bio-hazards, and lubricants, and the proposed use of the site would not be associated with ~~any~~ substantive hazardous emissions when compared with industrial land uses. ~~Storage of all~~ hazardous materials including the diesel for the backup generator, and any medical materials would be stored within appropriate storage containers in accordance with regulatory requirements, such as the Hazardous Waste Control Act, ~~such ensuring~~ that there would be no substantive emissions of hazardous materials. As previously discussed, transportation of hazardous materials is regulated by the DOT and Caltrans, which together determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the risk of accidental release. In addition, and as discussed in the Regulatory Setting, the preparation and implementation of facility-specific HMBPs in accordance with the Hazardous Waste Control Act (California Health and Safety Code Section 25100 et seq.), which is implemented by regulations described in CCR Title 22 would be required of all businesses that handle, generate, and dispose of hazardous materials. Because numerous laws and regulations govern the transportation and management of hazardous materials to reduce the potential hazards to levels that minimize health risks, this impact would be **less than significant**.

Mitigation Measures

None required.

Impact 3.8-4: Implementation of the Proposed Project would 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, could create a significant hazard to the public or the environment.

[Note to Team: This impact discussion will be provided in the next round of review.]

Impact 3.8-5: Implementation of the Proposed Project ~~could~~ would not result in a safety hazard or excessive noise for people visiting, residing or working in the project area due to the proximity to a public airport~~s~~ and associated Airport Land Use Plan~~s~~.

The Project Site is partially within the Planning Boundary/Airport Influence Area for the LAX airport as designated within the ALUP. Therefore, the Proposed Project would trigger the notification requirements associated with LAX. For HHR, the Project Site is not within an Airport Influence Area; however, it would trigger the notification requirements under 14 CFR Part 77. As such, it will be necessary for the Project applicant to submit a Federal Aviation Administration (FAA) Form 7460-1, "Notice of Proposed Construction or Alteration" (at least 45 days prior to the start of any construction) due to the proximity to both LAX and HHR. This form can either be prepared manually or via the FAA's online Obstruction Evaluation /Airport Airspace Analysis (OE/AAA) website.

Once submitted, the FAA Form 7460-1 application would be managed by the FAA's Los Angeles Airports District Office (ADO) and would include coordination with the California Department of Transportation's Division of Aeronautics and LAX as well as HHR. If any of the temporary or permanent structures from the Proposed Project would penetrate the 14 CFR Part 77 ~~imaginary~~ surfaces established for LAX or HHR, a formal determination would be made as to whether or not the penetration(s) would constitute a hazard to air navigation. In addition, the FAA analysis would evaluate potential impacts to the navigational aids supporting aircraft operations to/from the airport. Because of the notification requirement, a comprehensive obstruction and airspace evaluation for the Proposed Project was conducted in September 2017²² (Appendix X) to identify whether temporary or permanent structures associated with construction and/or operation of the Proposed Project would create a hazard to air navigation.

Specific information related to the Project Site, temporary construction equipment, and proposed permanent structures would be required to complete the FAA Form 7460-1, including surveyed location and elevation data. Even though this information would not be available until the actual construction plans have been prepared, enough information on the Proposed Project has been available to evaluate the potential airspace impacts and was the subject of the airspace analysis conducted in the CAG technical memorandum.²³

In addition to addressing the 14 CFR Part 77 notification criteria and imaginary surfaces associated with LAX and HHR, the CAG technical memorandum also addressed the following related airspace elements:

- Visual Flight Rules (VFR) Traffic Pattern Airspace;
- Visual Glide Slope Indicators;

²² Capitol Airspace Group (CAG), 2017. *Project Condor Obstruction Evaluation & Airspace Analysis*, Technical Memorandum, September 13, 2017.

²³ Capitol Airspace Group (CAG), 2017. *Project Condor Obstruction Evaluation & Airspace Analysis*, Technical Memorandum, September 13, 2017.

- Instrument Departure Procedures and Diverse Vector Areas;
- Published Instrument Approach Procedures;
- Enroute Airways; and
- Minimum Vectoring/Instrument Flight Rules (IFR) Altitudes.

The following sections summarize the findings related to both the temporary (construction equipment) and permanent structures of the Proposed Project.

Construction

The Proposed Project would require temporary construction equipment at the Project Site. The most critical equipment with respect to potential airspace hazards are the tall cranes that would be above the finished elevation of the permanent structures. Since construction plans have not been prepared, but in anticipation of the proposed finished height of the Arena Structure to be no greater than 150 feet above ground level (AGL), the CAG technical memorandum assumed the temporary construction equipment would be no higher than 300 feet AGL.

Commented [A18]: Confirm.

Since the CAG technical memorandum was conducted, more detailed information about the Proposed Project has become available. The preliminary building elevation plans for the Proposed Project show the highest permanent structure (the Arena Structure) at approximately 118 feet AGL. For this structure height, it is assumed the tallest cranes would be no greater than 200 feet AGL instead of 300 feet AGL. Thus, the CAG technical memorandum ~~is considered applicable and assumptions~~ reflects a worst case scenario. The findings of the CAG technical memorandum with respect to the temporary construction equipment are summarized in **Table 3.8-2**.

**TABLE 3.8-2
 POTENTIAL AIRSPACE OBSTRUCTIONS RELATED TO TEMPORARY CONSTRUCTION EQUIPMENT**

Airspace Element	LAX	HHR
14 CFR Part 77 Imaginary Surfaces	Yes	Yes
Visual Flight Rules (VFR) Traffic Pattern Airspace	None	None
Visual Glide Slope Indicators	None	None
Instrument Departure Procedures and Diverse Vector Areas	Yes	None
Published Instrument Approach Procedures	Yes	None
Enroute Airways	None	None
Minimum Vectoring/Instrument Flight Rules (IFR) Altitudes	None	None

NOTE:

Based on temporary construction equipment with a height of 300 feet above ground elevation.

SOURCE: Capitol Airspace Group, 2017. *Project Condor Obstruction Evaluation & Airspace Analysis*, Technical Memorandum, September 13, 2017.

As noted, the potential to create temporary obstructions to the surrounding airspace is based on the assumption in the CAG technical memorandum that the construction equipment could be up

to 300 feet AGL. For the 14 CFR Part 77 Imaginary Surfaces, the temporary construction equipment would need to be identified as an obstruction in the appropriate aeronautical publications and be properly marked and lighted per the FAA requirements. At 300 feet AGL, the construction equipment would require a temporary increase to the Runway 7L and Runway 7R instrument departure procedures at LAX. Similarly, at 300 feet AGL, the construction equipment would also require a temporary increase to the instrument approach procedure minimums for Runway 25L at LAX.

The CAG technical memorandum notes that these temporary impacts would depend on the final overall elevations and placement of construction equipment within the Project Site. Regardless, the potential impact related to the navigable airspace by the temporary construction equipment at 300 feet AGL would be **less than significant**. Additionally, as a condition of approval, the formal application (Form 7460-1) would be submitted to the FAA at least 45 days prior to the start of any construction. This process would dictate how the construction equipment would need to be identified as a temporary obstruction in the appropriate aeronautical publications and how it would need to be properly marked and lighted per FAA criteria. As stated previously, the latest information available for the Proposed Project indicates that the temporary construction equipment would be lower (200 feet AGL) than that evaluated in the CAG technical memorandum. At 200 feet AGL, the potential impact by the temporary construction equipment to the navigable airspace surrounding the Project Site would be **less than significant**.

Operation

The largest permanent structures resulting from the Proposed Project would include the Arena Structure and the 6-story parking garage at the West Parking and Transportation Hub Site. These permanent structures were estimated to be up to 150 feet AGL in the CAG technical memorandum. However, the most recent preliminary building elevation plans for the Proposed Project show the Arena Structure as the tallest permanent structure with a height of approximately 118 feet AGL. Regardless, the CAG technical memorandum is still considered applicable and reflects a worst case scenario. The findings of the CAG technical memorandum with respect to the permanent structures are summarized in **Table 3.8-3**.

TABLE 3.8-3
POTENTIAL AIRSPACE OBSTRUCTIONS RELATED TO THE PERMANENT STRUCTURES

Airspace Element	LAX	HHR
14 CFR Part 77 Imaginary Surfaces	None	Yes
Visual Flight Rules (VFR) Traffic Pattern Airspace	None	None
Visual Glide Slope Indicators	None	None
Instrument Departure Procedures and Diverse Vector Areas	None	None
Published Instrument Approach Procedures	None	None
Enroute Airways	None	None
Minimum Vectoring/Instrument Flight Rules (IFR) Altitudes	None	None

NOTE:

Based on permanent structures with a height of 150 feet above ground elevation.

SOURCE: Capitol Airspace Group, 2017. *Project Condor Obstruction Evaluation & Airspace Analysis*, Technical Memorandum, September 13, 2017.

The only potential obstruction by the permanent structures of the Proposed Project identified in the CAG technical memorandum would be to the 14 CFR Part 77 Imaginary Surfaces for HHR. Specifically, at a height of 150 feet AGL, the permanent structures would penetrate the 14 CFR Part 77 Horizontal Surface around HHR. The Horizontal Surface for HHR has been established at an elevation of 216 feet above mean sea level (AMSL). Based on the preliminary grading plans, the finished floor elevation of the Arena Structure ~~is~~ would be just under 92 feet AMSL. When this is combined with the Arena Structure's approximate height of 118 feet AGL, the overall height is 210 feet AMSL. At this height, the Arena Structure would not penetrate the Horizontal Surface for HHR and therefore, the potential impact related to the navigable airspace surrounding the Project Site would be **less than significant**.

Mitigation Measures

None required.

Impact 3.8-6: Implementation of the Proposed Project ~~could~~ would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

The City's Office of Emergency Services (OES) acts in coordination, conjunction and collaboration with all city departments to maximize the City's potential to prevent ~~against~~, prepare for, respond to and recover from both natural and man-made emergencies and disasters. OES is currently working to revise, implement and test the City of Inglewood MultiHazard Functional Plan (MHFP), ~~but for purposes of this analysis the existing MHFP was used~~. The plan generally provides a means to prepare and maintain systems, supplies and other logistical items to support emergency/disaster response and recovery among city departments.

Construction

Construction activities including staging, material stockpiling and equipment storage, would occur within the boundaries of the Project Site. Construction-related traffic on adjacent streets could potentially create obstacles for emergency responders that could affect emergency response times and emergency access to the Project Site and neighboring uses during construction. **[Note to Team: Will coordinate this discussion with Event Transportation Management Plan and Section 3.14 Transportation and Circulation when that is drafted]**

Construction activities for development would involve temporary lane closures. As discussed in Section 3.14, Transportation and Circulation, a Construction Management Plan would be

prepared by the project applicant and approved by the City's Department of Public Works [**Note to Team: Confirm**]. The intent of the Construction Management Plan would be to minimize disruptions to traffic flow, maintain emergency vehicle access to the Project Site and neighboring land uses, and schedule worker and construction equipment delivery to avoid peak traffic hours. Implementation of this plan would ensure that emergency response or evacuation would not be substantively impaired during construction and therefore the potential impacts during construction would be **less than significant**.

Operation

As discussed in Section 3.13, Public Services, fire protection and emergency medical services would be provided to the site by the Los Angeles County Fire Department (LACFD). LACFD provides emergency services and response to structure fires, wildfires, commercial fires, hazardous materials incidents, urban search and rescue, and swift water rescue. Development of the Project Site would be required to ensure that the street system can accommodate emergency response and evacuation in accordance with implementation of state and local fire code requirements contained within the California Building Code.

The Proposed Project would include the implementation of an Emergency Plan [**Note to Team: Will coordinate this discussion with Event Transportation Management Plan and Section 3.14 Transportation and Circulation when that is drafted**] that would establish dedicated personnel and emergency procedures to assist the LACFD during an emergency incident; establish a drill procedure to prepare for emergency incidents; establish an on-site emergency assistance center/first aid station with emergency equipment and on-site medical personnel to provide first aid to game/event patrons or employees that may require medical assistance; and establish procedures to be following during an emergency incident to reduce impacts on the increased need for emergency medical services. Additionally, all project-specific designs, including private internal circulation and building site plans, would be subject to review and approval by the City, including emergency service providers, in accordance with City Building Permit requirements.

The Proposed Project's design and existing emergency response requirements would be sufficient to ensure that the potential health and safety risks associated with the project would have no significant impairment of or interference to implementation of any emergency response or evacuation plans. The potential impact related to this criterion would remain a **less-than-significant** impact.

Mitigation Measures

None required.

Cumulative Impacts

This section presents an analysis of the cumulative effects of the Proposed Project in combination with other past, present, and reasonably foreseeable future projects within the area that could cause cumulatively considerable impacts. While hazardous materials and hazard impacts are generally localized to specific sites and generally do not combine with one another because of the relative infrequencies and the variances in timing, ~~The the~~ greater Los Angeles metropolitan area has been selected as the geographic scope for cumulative hazardous materials impacts because of the regional land use~~s~~ that include~~s~~ transportation, storage, and handling of hazardous materials and wastes. Impacts relative to hazardous materials usually depend on the nature and extent of the hazardous materials release, and existing and future soil and groundwater conditions. For example, hazardous materials incidents tend to be limited to a smaller more localized area surrounding the immediate location and extent of the release, and could only be cumulative if two or more hazardous materials releases overlapped spatially.

The timeframe during which the ~~proposed~~ Proposed Project could contribute to cumulative hazards and hazardous materials effects includes the construction and operations phases. Similar to the geographic limitations discussed above, it should be noted that impacts relative to hazardous materials are generally time-specific. Hazardous materials events could only be cumulative if two or more hazardous materials releases occurred at overlapping times.

Impact 3.8-7: Implementation of the Proposed Project, in combination with other development, would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

The Proposed Project along with other past, present and reasonably foreseeable projects would include the use, storage, and disposal of varying quantities of hazardous materials. The Project does not include any substantive emissions of hazardous materials such as might be associated with industrial land uses. Just as with the ~~project~~ Project, all commercial ~~users~~ businesses would be required to submit business information and hazardous materials inventory forms contained in a Hazardous Materials Management Plan and Hazardous Materials Business Plan. The HHMD, as the CUPA, and other CUPA agencies for the cumulative projects outside of HHMD jurisdiction, requires all new commercial and other users to follow applicable regulations and guidelines regarding storage and handling of hazardous waste. All hazardous materials are required to be stored and handled according to manufacturer's directions and local, state and federal regulations. With adherence to existing regulatory requirements, releases from routine transport, use or disposal of hazardous materials would be minimized and, in the unlikely event of a release, localized in extent. As noted above, adherence to the regulatory requirements would ensure that incidents are relatively infrequent and thus unlikely to occur simultaneously in a way that could become cumulatively considerable. Therefore, adherence to existing regulatory requirements would reduce cumulative impacts related to the release of hazardous materials to **less than significant**.

Mitigation Measures

None required.

Impact 3.8-8: Implementation of the Proposed Project, in combination with other development, would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

The project, like other past, present, and reasonably foreseeable future projects, would include the use of hazardous materials and generation of hazardous wastes to some degree. The proposed land uses would not require, however, any substantive quantities of hazardous materials and would not generate substantive quantities of hazardous wastes. Similar to other commercial and business land uses, the use, storage, handling, and disposal of relatively limited quantities of hazardous materials and wastes would be required to adhere to existing regulatory requirements such as management through a Hazardous Materials Management Plan or Hazardous Materials Business Plan. Both require all facilities to include sound practices around employee training, safe storage, and appropriate handling requirements to ensure that upset and accident conditions are minimized. In the unlikely event that an incident would occur, these management measures would include spill response measures to ensure that incidents are quickly contained and therefore would not combine with one another to become cumulatively considerable. Thus, the potential cumulative impact would be **less than significant**.

Mitigation Measures

None required.

Impact 3.8-9: Implementation of the Proposed Project, in combination with other development, would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

As discussed above, construction and operations activities would likely require the use of limited quantities of hazardous materials such as fuels, oils, and lubricants for construction and operations equipment; paints and thinners; and solvents and cleaners. These materials could be transported to and from the area near schools. The improper handling and transport of hazardous materials could result in accidental release of hazardous materials, thereby exposing school occupants to hazardous materials. In the event that two or more emissions incidents occur at the same time and within ¼-mile of a school, the emissions could be cumulatively considerable.

As discussed in the Regulatory Setting, transportation of hazardous materials is regulated by the DOT and Caltrans. Together, federal and State agencies determine driver-training requirements,

load labeling procedures, and container specifications designed to minimize the risk of accidental release. In addition, and as discussed in the Regulatory Setting, businesses that use hazardous materials, including construction companies (short-term construction) and operating businesses and facilities (long-term operations), are required to prepare and implement HMBPs describing procedures for the handling, transportation, generation, and disposal of hazardous materials. All cumulative projects and operations would be required to comply with the same regulations. Because numerous laws and regulations govern the transportation and management of hazardous materials to reduce the potential hazards and the unlikely probability of more than one event occurring simultaneously, this impact would be considered **less than significant**.

Mitigation Measures

None required.

Impact 3.8-10: Implementation of the Proposed Project, in combination with other development, could 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, could create a significant hazard to the public or the environment.

As noted above in the Environmental Setting section and within the EKI technical memorandum, the Project Site and vicinity includes numerous sites with documented uses and [possible?] unauthorized releases of hazardous materials. Many of the existing and future cumulative projects would include earthwork activities that could encounter legacy contaminants from releases that occurred over time. Potential impacts could occur if the earthwork activities of the project-Project would combine simultaneously with other existing and proposed construction activities that all encountered legacy contaminants and produced either emissions or exposure hazards. However, the likelihood of more than one of the cumulative projects having a substantial hazardous materials release that affects the same resources within the same temporal period as the project-Project is relatively low based on the fact that many of these hazardous materials sites are in varying stages of characterization or remediation. In general, impacts related to hazardous materials are more site-specific and would only combine through limited mechanisms: releases through routine transport of hazardous materials and waste to or from the site using the same roadways or releases of hazardous materials through accidental upset conditions. However, due to the stringent policies regulating how hazardous materials are transported including type of containerization, as well as the proposed phased approach of development at the Project Site, the probability of such use resulting in emissions or releases from accidents that would cause a significant cumulative impact is relatively low. While upset and accident conditions could occur, they generally occur as isolated events that do not combine with other projects. All proposed projects in the region would be required to comply with similar transportation requirements and County requirements including preparation and implementation of a Hazardous Materials Business Plan, which outlines the guidance for transporting hazardous materials safely to and from their destinations. As a result, the potential

cumulative impact related to sites contained on hazardous materials lists would be **less than significant**.

Mitigation Measures

None required.

Impact 3.8-11: Implementation of the Proposed Project, in combination with other development, would not result in a safety hazard or excessive noise for people residing or working in the project area due to the proximity to public airports and associated Airport Land Use Plan for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area.

The Proposed Project along with all other past, present, or reasonably foreseeable future projects located within the County's Airport Land Use Plan are required to adhere to the applicable FAA 14 CFR Part 77 requirements. Adherence to these FAA requirements ensures that projects cannot combine with one another to become cumulatively considerable and therefore the potential impact is **less than significant**.

Mitigation Measures

None required.

Impact 3.8-12: Implementation of the Proposed Project, in combination with other development, would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

For the Proposed Project, lane closures and restrictions would only occur during construction. Upon completion of an existing or future cumulative project, that project would no longer require lane closures and the impact relative to an adopted emergency response plan or emergency evacuation plan would be less than significant. A cumulative impact could result if multiple development projects within a proximate geographical area are implementing construction management plans concurrently. However, each construction traffic management plan would be subject to review and approval by the City Department of Public Works, in consultation with Caltrans, affected transit providers, and local emergency service providers including the Fire and Police departments. Each plan would ensure that acceptable operating conditions on local roadways and freeway facilities are maintained. Should cumulative projects occur over overlapping time periods within a close geographic area, the City Department of Public Works would require adjustments to the schedules in the Construction Traffic Management Plans to reduce adverse lane restrictions or closures. Compliance with the required traffic control plans

would minimize impacts to emergency response or emergency evacuation plans and would be **less than significant**.

Mitigation Measures

None required.

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