4.8 HAZARDS AND HAZARDOUS MATERIALS

4.8.1 INTRODUCTION

This section of the Recirculated Draft EIR describes and evaluates potential impacts related to hazards and hazardous materials that could result from construction and operation of the proposed Project. Since circulation of the December 2020 Draft EIR, the footprint of the proposed ATS system has been modified to address stakeholder comments and to enhance the compatibility and visual character of the proposed Project with the existing and planned developments surrounding the proposed ATS system. The section contains: (1) a description of the existing land uses within the modified footprint of the proposed Project and surrounding areas as they pertain to hazardous materials use, as well as a description of the Adjusted Baseline Environmental Setting; (2) a summary of the federal, State, and local regulations related to hazards or hazardous materials; 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.

After circulation of the December 2020 Draft EIR for public review, the City revised the design of the proposed Project in response to consultation with key stakeholders in the community and comments received on the December 2020 Draft EIR. Specific changes to the proposed Project include raising the height of the ATS guideway along Market Street to preserve existing views of historic buildings, relocating the Prairie Avenue/Pincay Drive Station to the southwest corner of Prairie Avenue and Manchester Boulevard, redesigning the proposed MSF to allow this facility to be located on the proposed site with a new Vons store, and realignment of the guideway and stations on Prairie Avenue to the west side of Prairie Avenue. These changes include updated construction and operational details which resulted in similar impacts to hazards and hazardous materials compared to the December 2020 Draft EIR.

In response to comments from the Inglewood Unified School District (IUSD) on the December 2020 Draft EIR, this section addresses potential hazards at IUSD schools, including incorporating the findings of a rail safety study prepared for Kelso Elementary School referenced below.

Information from the following hazard investigations conducted for the proposed Project were used in part to prepare this section:

- *Hazardous Material Assessment*, Geosyntec Consultants, July 3, 2018 (**Appendix L.1**),
- *Hazards and Hazardous Materials*, Geosyntec Consultants, July 3, 2018 (**Appendix L.2**),
- *Inglewood Transit Connector EDR Radius Map Report*, EDR, September 15, 2021 (**Appendix L.3**), and
- *Railroad Safety Study*, Inglewood Transit Connector Project, Meridian Consultants LLC, March 2021 (**Appendix L.4**)

Prior to the December 2020 Draft EIR, a Revised Initial Study (included in **Appendix A.2** of this Recirculated Draft EIR) was prepared using the California Environmental Quality Act (CEQA) Guidelines Environmental Checklist Form to assess potential environmental impacts associated with hazards and hazardous materials. Seven screening criteria were evaluated, and four were found to result in "no impact" or "less than significant impacts." The proposed Project, as modified, does not change the findings of the Revised Initial Study as follow:

- The routine transport, use, or disposal of hazardous materials associated with the proposed Project, as modified would continue to result in "Less than Significant Impacts." As discussed in the Revised Initial Study, construction and operation of the proposed Project would comply with existing federal, State, and local regulations, and routine precautions would be undertaken to reduce the potential for accidental releases of hazardous materials or substances. As such, the proposed Project, as modified from the Revised Initial Study would not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials and substances. Therefore, this issue is not addressed further in this section.
- Potential impacts related to being located within an airport land use plan or within two miles of a public airport, public use airport, or private airstrip, resulting in a safety hazard for people residing or working in the area were evaluated and determined to have "No Impact." Los Angeles International Airport (LAX) is located more than 2 miles southwest and Hawthorne Municipal Airport is located approximately 2.75 miles southeast of the proposed Project area, as modified since the Revised Initial Study. The proposed Project would not construct any buildings or structures to a height that would interfere with or obstruct any airport operations. Therefore, this issue is not addressed further in this section.[1]
- Potential impacts related to the exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fire were evaluated and determined to have "No Impact." The City is developed and urbanized and is without an urban/wildland interface. The footprint of the proposed Project alignment, as modified is not within a Moderate, High, or Very High Fire Hazard Severity Zone as designated by the California Department of Forestry and Fire Protection (CAL FIRE). Therefore, this issue is not addressed further in this section.[2]

The remaining three of seven screening criteria are addressed below in *Section 4.8.5: Thresholds of Significance*.

Impacts determined to be less than significant are discussed further in **Section 6.0: Other Environmental Considerations**. Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Recirculated Draft EIR.

1 *Hazardous Material Assessment Technical Memorandum*, Geosyntec Consultants, July 3, 2018.
2 *Hazardous Material Assessment Technical Memorandum*, Geosyntec Consultants, July 3, 2018.

4.8.2 METHODOLOGY

Hazardous materials generally refers to hazardous substances, hazardous waste, and other materials that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. Hazardous materials are used in products (e.g., household cleaners, industrial solvents, paint, pesticides, etc.) and in the manufacturing of products (e.g., electronics, newspapers, plastic products, etc.). Hazardous materials can include petroleum products, natural gas, synthetic gas, acutely toxic chemicals, and other toxic chemicals that are used in agriculture, commercial and industrial uses, retail businesses, hospitals, and households. Accidental releases of hazardous materials can result from a variety of incidents, including highway incidents, warehouse fires, train derailments, shipping accidents, and industrial incidents.

The term "hazardous materials" as used in this section includes all materials defined in the California Health and Safety Code as follows:

> *A material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. 'Hazardous materials' include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the unified program agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.*

The term includes chemicals regulated by the United States Department of Transportation (USDOT), the United States Environmental Protection Agency (USEPA), the California Department of Toxic Substances Control (DTSC), the California Governor's Office of Emergency Services, and other agencies as hazardous materials, wastes, or substances.

Analysis in this section is focused on the use or management of hazardous or potentially hazardous materials resulting from construction and operational activities envisioned under the proposed Project. The severity of potential hazards to people, property, and the environment associated with the heightened interaction with hazardous materials associated with implementation of the proposed Project is also analyzed. Analysis in this section is based on various existing databases and historical data, including California Hazardous Material Incident Report System (CHMIRS), HAZNET, HIST CORTESE, and Los Angeles County Industrial Waste and Underground Storage Tank Sites. Contaminated site locations extracted from these databases are then delineated on the proposed Project guideway, stations, and MSF locations, and impacts are assessed according to the potential activities that would take place on specific sites.

Additionally, this section addresses short-term construction impacts resulting from demolition of underground storage tanks (USTs) and other existing (typically older) structures, work in the vicinity of historical oil well and pipeline activity, work in areas with previously documented soil contamination, and other subsurface construction activities, as well as operational impacts associated with the type of uses proposed and the materials that the operation of these uses would entail. In determining the level of significance, the analysis recognizes that all components of the proposed Project would be required to comply with relevant federal and State laws and regulations that are designed to ensure the safety of routine transport, use, management, or disposal of hazardous materials.

4.8.3 REGULATORY FRAMEWORK

The following presents the federal, State, and local regulatory framework, laws, ordinances, and regulations governing the proposed Project as related to hazards and hazardous materials (HHM).

4.8.3.1 Federal

Occupational Safety and Health Act

The Occupational Safety and Health Act (OSHA) is intended to create a safe workplace.[3] OSHA establishes procedures and standards for the safe handling and storage of hazardous chemicals. In addition, a safety data sheet (SDS) containing specified information must be provided to customers, making them aware of chemical hazards to which they may be exposed. OSHA also establishes standards regarding the safe exposure limits for chemicals to which construction workers may be exposed. Safety and Health Regulation for Construction[4] contains Compliance Guidelines for construction activities, which include occupational health and environmental controls to protect worker health and safety. These Guidelines articulate the required health and safety plan(s) to be developed and implemented during construction, including associated training, protective equipment, evacuation plans, chains of command, and emergency response procedures.

Emergency Planning and Community Right-to-Know

The Emergency Planning and Community Right-to-Know Act (EPCRA)[5] requires facilities that store or use hazardous chemicals to submit a specified plan with copies of SDSs to the State Emergency Response Center (SERC) and the local emergency planning center (LEPC). Additionally, facilities must submit an annual inventory list with details on the amount, location, and storage method of regulated chemicals present at the facility.[6]

3 29 USC Section 651 et seq. (1970), 29 CFR Section 1910 et seq. (1999).
4 29 CFR Section 1926.65 Appendix C – Compliance Guidelines (1993).
5 42 USC Section 116 et seq. (2010), 40 CFR Section 350 et seq. (2011).
6 40 CFR Section 370.20 et seq. (2002).

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) enables USEPA to track industrial chemicals produced or imported into the United States.[7] USEPA screens the chemicals and can require testing to determine if any pose an environmental or human-health hazard. Any chemical that poses an unreasonable risk then can be regulated or banned from manufacturing or importation. Congress enacted major amendments to TSCA in 2016 via the Lautenberg Act,[8] which strengthened USEPA's authority to regulate chemicals.

Clean Air Act

Section 112 of the Clean Air Act requires USEPA to set air toxics standards for regulating the emissions of hazardous air pollutants.[9] The 1990 federal Clean Air Act Amendments establish a program designed to prevent the release of highly hazardous chemicals.[10]

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA)[11] establishes design, construction, and operational standards to prevent chemical releases from USTs. RCRA, Subtitle I regulates USTs containing hazardous substances or petroleum. USEPA sets standards governing tank construction based on whether the tank is new or whether an existing tank is upgraded. USEPA also imposes operation and maintenance procedures for UST owners and operators and establishes reporting requirements from regulated tanks that release substances into the environment.

RCRA Subtitle C[12] is intended to proactively manage hazardous waste and to minimize and avoid hazardous waste contamination. RCRA Subtitle C addresses hazardous waste from cradle-to-grave, regulating the generation, transport, storage, treatment, and disposal of hazardous waste by "large-quantity generators" (1,000 kilograms/month or more). RCRA, Subtitle I, the Hazardous and Solid Waste Amendments (HSWA) of 1984, expanded and clarified RCRA Subtitle C. USEPA administers RCRA Subtitle C pursuant to regulations found at 40 CFR Section 260 et seq. and has delegated RCRA Subtitle C implementation and enforcement within California to the State. Under RCRA regulations, hazardous wastes must be tracked from the time of generation to the point of disposal. At a minimum, each generator of hazardous waste must register and obtain a hazardous waste activity identification number. If hazardous wastes are stored for more than 90 days or treated or disposed at a facility, any treatment, storage, or

7 15 USC Section 2601 et seq. (1976), 40 CFR Section 700 et seq. (2012).
8 H.R. 2576 — 116th Congress, "Federal Government Advertising Equity Accountability Act," (2016).
9 Clean Air Act Title I, Section 112, USC 7412 "Hazardous Air Pollutants."
10 EPA, "The Clean Air Act – Highlights of the 1990 Amendments," United States Environmental Protection Agency, accessed June 22, 2020, https://www.epa.gov/clean-air-act-overview/clean-air-act-highlights-1990-amendments.
11 42 USC Section 6991 et seq., (1976), 40 CFR Section 280 et seq., (2014).
12 42 USC Section 6901 et seq.

disposal unit must be permitted under RCRA. Additionally, all hazardous waste transporters are required to be permitted and must have an identification number.

Hazardous Materials Transportation Act

The Hazardous Materials Transportation Act regulates transport of hazardous materials on water, rail, highways, airplanes, and pipelines.[13] The US Department of Transportation (DOT) administers the Act.[14] Title 49 of the CFR specifies additional requirements and regulations with respect to the transport of hazardous materials. Title 49 of the CFR requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Drivers are also required to be trained in function and commodity specific requirements. In addition, vehicles transporting certain types or quantities of hazardous materials must display placards (warning) signs. Transporters of hazardous wastes must be permitted and have an identification number.

4.8.3.2 State

Department of Toxic Substances Control

At the State level, authority for the Statewide administration and enforcement of RCRA is enforced through CalEPA's DTSC. While the DTSC has primary State responsibility in regulating the generation, storage, and disposal of hazardous materials, DTSC may further delegate enforcement authority to local jurisdictions. In addition, the DTSC is responsible and/or provides oversight for contamination cleanup, and administers Statewide hazardous waste reduction programs.[15] DTSC operates programs to accomplish the following: (1) deal with the aftermath of improper hazardous waste management by overseeing site cleanups; (2) prevent releases of hazardous waste by ensuring that those who generate, handle, transport, store, and dispose of wastes do so properly; and (3) evaluate soil, water, and air samples taken at sites.

Division of Occupational Safety and Health

The California OSHA (Cal-OSHA) program is administered and enforced by the Division of Occupational Safety and Health (DOSH). The Cal-OSHA program is similar to the Federal OSHA program in that both programs contain rules and procedures related to exposure to hazardous materials during demolition and construction activities. In addition, Cal-OSHA requires employers to implement a comprehensive, written

13 49 USC Section 1801 et seq., (1975).
14 49 CFR Section 100 et seq., (2016).
15 22 CCR Division 4.5, "Environmental Health Standards for the Management of Hazardous Waste," 2020, https://govt.westlaw.com/calregs/Index?transitionType=Default&contextData=(sc.Default).

Injury and Illness Prevention Program (IIPP). An IIPP is an employee safety program for potential workplace hazards, including those associated with hazardous materials.[16]

California Highway Patrol and Department of Transportation

The California Highway Patrol and California 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.[17] The provisions of this section apply to the highway transportation of hazardous materials and hazardous waste and include restrictions on labeling/placards, transportation routes, and other measures to ensure safe transport of regulated materials.

Hazardous Waste Control Act

The Hazardous Waste Control Act was passed in 1972 and established the California Hazardous Waste Control Program within the Department of Health Services. California's hazardous waste regulatory effort became the model for the federal RCRA. California's program, however, was broader and more comprehensive than the federal system, regulating wastes and activities not covered by the federal program. California's Hazardous Waste Control Law[18] was followed by emergency regulations in 1973 that clarified and defined the hazardous waste program, as follows:

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

California Government Code Section 65962.5

The Hazardous Waste and Substance Sites (Cortese) List is a planning document used by the State, local agencies, and developers to comply with the CEQA requirements in providing information about the location of hazardous materials release sites.[19] Government Code Section 65962.5 requires the California

16 California Code of Regulations, Title 8 Section 3203, "Injury and Illness Prevention Program," 2020, https://www.dir.ca.gov/title8/3203.html.
17 California Vehicle Code Division 13, Chapter 5, Article 1, Section 31303–31309
18 Hazardous Waste Control Law, California Health and Safety Code sections 25100 et seq
19 https://calepa.ca.gov/sitecleanup/corteselist/.

Environmental Protection Agency (CalEPA) to develop at least annually an updated Cortese List. The Department of Toxic Substances Control is responsible for a portion of the information contained in the Cortese List. Other State and local government agencies are required to provide additional hazardous material release information for the Cortese List.[20]

CEQA[21] requires the lead agency to consult the lists compiled pursuant to Government Code Section 65962.5 to determine whether a project and any project alternatives are identified on any of the following lists:

- **EPA NPL**: USEPA's National Priorities List (NPL) includes all sites under USEPA's Superfund program, which was established to fund cleanup of contaminated sites that pose risk to human health and the environment.
- **EPA CERCLIS and Archived Sites**: USEPA's Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) includes a list of 15,000 sites nationally identified as hazardous sites. This would also involve a review for archived sites that have been removed from CERCLIS due to No Further Remedial Action Planned (NFRAP) status.
- **EPA RCRIS (RCRA Info)**: The Resource Conservation and Recovery Act Information System (RCRIS or RCRA Info) is a national inventory system about hazardous waste handlers. Generators, transporters, handlers, and disposers of hazardous waste are required to provide information for this database.
- **DTSC Cortese List**: DTSC maintains the Cortese list as a planning document for use by the State and local agencies to comply with the CEQA requirements in providing information about the location of hazardous materials release sites. This list includes the Site Mitigation and Brownfields Reuse Program Database (CalSites).
- **DTSC HazNet**: DTSC uses this database to track hazardous waste shipments.
- **SWRCB LUSTIS**: Through the Leaking Underground Storage Tank Information System (LUSTIS), the State Water Resources Control Board (SWRCB) maintains an inventory of USTs and leaking USTs, which tracks unauthorized releases.

The required lists of hazardous material release sites are commonly referred to as the "Cortese List," named after Dominic L. Cortese, the California State Assemblyman who authored the legislation. Because the statute was enacted more than 20 years ago, some of the provisions refer to agency activities that are no longer being implemented and, in some cases, the information required in the Cortese List does not exist. Those requesting a copy of the Cortese Lists are now referred directly to the appropriate information resources contained on internet websites hosted by the boards or departments referenced in the statute, including DTSC's online EnviroStor database and the SWRCB's online GeoTracker database.

20 California Government Code Section 65962.5

21 California Public Resources Code Section 21092.6.

Sites that are no longer considered "active" because the SWRCB, a regional board, or the County has determined that no further action is required because actions were taken to adequately remediate the release, or because the release was minor, presents no environmental risk, and no remedial action is necessary, are listed as "closed" and deleted from the list.[22]

Hazardous Materials Business Plan

Any business that handles, stores, or disposes of a hazardous substance at a given threshold quantity must prepare a hazardous materials business plan (HMBP). HMBPs are intended to minimize hazards to human health and the environment from fires, explosions, or an unplanned release of hazardous substances into air, soil, or surface water. The HMBP must be carried out immediately whenever a fire, explosion, or unplanned chemical release occurs. An HMBP includes three sections: (1) an inventory of hazardous materials, including a site map, which details their location; (2) an emergency response plan; and (3) an employee-training program. HMBPs serve as an aid to employers and employees in managing emergencies at a given facility. They also help better prepare emergency response personnel for handling a wide range of emergencies that might occur at the facility. Effective March 15, 2021, HMBPs are required to be submitted via the California Environmental Reporting System (CERS). The plans must be resubmitted, reviewed, revised, or amended as necessary every three years. The HMBP must also be amended within 30 days whenever there are changes in the amount or location of stored hazardous chemicals on a site. The Los Angeles County Fire Department, Hazardous Materials Division conducts routine inspections at businesses required to submit business plans. The purpose of these inspections is to (1) ensure compliance with existing laws and regulations concerning HMBP requirements, (2) identify existing safety hazards that could cause or contribute to an accidental spill or release, and (3) suggest preventative measures designed to minimize the risk of a spill or release of hazardous materials.[23]

Risk Management Plan

Any owner or operator of a stationary source (non-transportation) with more than a threshold quantity of a regulated substance is required to prepare a risk management plan. The State statutes and regulations combine federal- and State-program requirements for the prevention of accidental releases of listed substances into the atmosphere: the CalARP program. CalARP requires that a risk management plan include a hazard assessment program, an accidental release prevention program, and an emergency response plan. The risk management plan must be revised every 5 years or as necessary. Typical facilities or businesses that are required to prepare risk management plans include: ammonia refrigeration

22 California Environmental Protection Agency, Cortese List: Section 65962.5(c), accessed March 2019, available at https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5c/.

23 California Health and Safety Code Sections 25500–25520.

facilities, water treatment and wastewater treatment plants that handle chlorine gas, and facilities that store flammable chemicals such as methane and propane.[24]

Titles 14, 22, 23, and 27 of the California Code of Regulations (CCR)

Title 14 requires that gas storage fields be closely monitored by facility operators to ensure their safe operation and to establish that no damage to health, property, or natural resources occurs.[25] Titles 22 and 23 of the CCR address hazardous materials and wastes. Title 22 defines, categorizes, and lists hazardous materials and wastes including universal wastes.[26] Title 23 addresses public health and safety issues related to hazardous materials and wastes, and specifies disposal options.[27] Title 27 of the CCR addresses landfill closure standards and landfill-related public health and safety issues.[28]

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

In 1996, CalEPA adopted the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program). The Unified Program consolidates and coordinates the six State programs that regulate business and industry use, storage, handling, and disposal of hazardous materials and wastes. The Los Angeles County Fire Department is the Certified Unified Program Agency (CUPA) responsible for administering providing the regulatory oversight for federal, State, and local laws and regulations related to hazardous materials use and disposal within the City. The CUPA protects the public health and the environment from accidental releases and improper handling, storage, transportation, and disposal of hazardous materials and wastes through coordinated efforts of inspections, emergency response, enforcement, and site mitigation oversight. In addition, the Los Angeles County Fire Department Health and Hazardous Materials Division (HHMD) implements the following programs that are relevant to the proposed Project:[29]

- Hazardous Materials Release Response Plans and Inventory Program
- Hazardous Waste Generator Program
- California Accidental Release Prevention (CalARP) Program
- Aboveground Storage Tank Program
- Underground Storage Tank Program

24 California Health and Safety Code Sections 25531–25543.3.
25 California Code of Regulations, Title 14, "Natural Resources."
26 California Code of Regulations, Title 22, "Social Security."
27 California Code of Regulations, Title 23, "Waters."
28 California Code of Regulations, Title 27, "Environmental Protection."
29 California Senate Bill 1082.

California Human Health Screening Levels

The California Human Health Screening Levels (CHHSLs or "Chisels")[30] are concentrations of 54 hazardous chemicals in soil or soil gas that CalEPA considers to be below thresholds of concern for risks to human health. The CHHSLs were developed by the Office of Environmental Health Hazard Assessment on behalf of CalEPA. The CHHSLs were developed using standard exposure assumptions and chemical toxicity values published by the EPA and CalEPA. The CHHSLs can be used to screen sites for potential human health concerns where releases of hazardous chemicals to soils have occurred. Under most circumstances, the presence of a chemical in soil, soil gas, or indoor air at concentrations below the corresponding CHHSL can be assumed to not pose a significant health risk to people who may live or work at the site. There are separate CHHSLs for residential and commercial/industrial sites.

Senate Bill 1889, Accidental Release Prevention Law/CalARP

Senate Bill (SB) 1889 required California to implement a new federally mandated program governing the accidental airborne release of chemicals promulgated under Section 112 of the Clean Air Act. Effective January 1, 1997, CalARP replaced the previous California Risk Management and Prevention Program and incorporated the mandatory federal requirements. CalARP addresses facilities that contain specified hazardous materials, known as "regulated substances," which if involved in an accidental release could result in adverse off-site consequences. CalARP defines regulated substances as chemicals that pose a threat to public health and safety or the environment because they are highly toxic, flammable, or explosive.[31]

California Emergency Services Act

The California Emergency Services Act[32] was adopted to establish the State's roles and responsibilities during human-made or natural emergencies that result in conditions of disaster and/or extreme peril to life, property, or the resources of the State. This act is intended to protect health and safety by preserving the lives and property of the people of the State.

California Code of Regulations, Title 5, Section 14010(d) (Schools and Rail Safety)

CCR Title 5, Section 14010(d) contains minimum standards for construction of school facilities including consideration of railroad safety when selecting new school sites. CCR Title 5, Section 14010(d) contains standards for school site selection, as it relates to railroad track easements. Specifically, Section 14010(d) provides that if a proposed site is within 1,500 feet of a railroad track easement, a safety study shall be undertaken by a professional trained in assessing cargo manifests, frequency, speed, and schedule of

30 Health and Safety Code Section 57008.
31 Health and Safety Code Sections 25531 – 25534.3.
32 California Public Resources Code Section 8550 – 8669.7.

railroad traffic, grade, curves, type and condition of track need for sound or safety barriers, need for pedestrian and vehicle safeguards at railroad crossings, presence of high-pressure gas lines near the tracks that could rupture in the event of a derailment, preparation of an evacuation plan. It further provides that if required, reasonable mitigation measures must be identified.[33] While these standards only apply to the review and approval of sites for new schools, as discussed above, a rail safety study was prepared for Kelso Elementary School in response to a request from IUSD.

State Fire Regulations

State fire regulations include those concerning building standards (as also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State fire marshal enforces these regulations and building standards in all State-owned buildings, State-occupied buildings, and State institutions throughout California.[34]

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

The California Fire Code, Chapter 33 related to fire safety during construction and demolition prescribes safeguards to provide reasonable safety to life and property from fire during such operations. Specific safeguards related to oil-fired heaters, gas heaters, refueling, smoking, waste disposal, welding, electrical, flammable, and combustible odors, water supply for fire protection, fire extinguishers, etc. Implementation of these safeguards are designed to reduce the potential of fire-related hazards during construction and demolition activities.[35]

State Water Resources Control Board

The SWRCB operates under the authority of CalEPA, with a mission to preserve, enhance, and restore the quality of California's water resources and drinking water for the protection of the environment, public health, and all beneficial uses, and to ensure proper water resource allocation and efficient use, for the benefit of present and future generations. There are nine regional water quality control boards (RWQCBs) that develop and enforce water quality objectives and implementation plans that will best protect the beneficial uses of the State's waters. The RWQCBs develop "basin plans" for their hydrologic areas, govern requirements/issue waste discharge permits, take enforcement action against violators, and monitor water quality. The RWQCBs have the authority to require the remediation of sites where groundwater quality may be degraded by hazardous materials or substances releases from USTs or other sources. The proposed Project is within the jurisdiction of the Los Angeles RWQCB (Region 4). The Los Angeles RWQCB

33 California Code of Regulations, Title 5, "School Facilities Construction," Section 14010(d).
34 California Health and Safety Code Section 13000 et seq.
35 California Fire Code 2019.

issued Order No. R4-2007-0019 which provides General Waste Discharge Requirements (WDRs) relative to the groundwater remediation at petroleum hydrocarbon fuel and/or volatile organic compound (VOC) impacted sites. The Order identifies a list of materials that can be used for in-situ remediation zone treatment purposes.[36]

The State Water Board adopted a Low-Threat Underground Storage Tank Case Closure Policy.[37] The Policy applies to petroleum UST sites subject to Chapter 6.7 of the Health and Safety Code. The Policy establishes both general and media-specific criteria.

Both Regional Water Boards and local agencies have been directed to review all cases in the petroleum UST Cleanup Program using the framework provided in the Policy. This review shall be accomplished within existing budgets and be performed no later than 365 days from the effective date of this Policy. These case reviews shall, at a minimum, include the following for each UST case:

1. Determination of whether or not each UST case meets the criteria in the Policy or is otherwise appropriate for closure based on a site-specific analysis.
2. If the case does not satisfy the criteria in this Policy or does not present a low-risk based upon a site-specific analysis, impediments to closure shall be identified.
3. Each case review shall be made publicly available on the State Water Board's GeoTracker web site

If both the general and applicable media-specific criteria are satisfied, then the leaking UST case is generally considered to present a low threat to human health, safety, and the environment. The Policy recognizes, however, that even if all of the specified criteria in the Policy are met, there may be unique attributes of the case or site-specific conditions that increase the risk associated with the residual petroleum constituents. In these cases, the regulatory agency overseeing corrective action at the site must identify the conditions that make case closure under the Policy inappropriate.

Asbestos-Containing Materials and Lead-Based Paint

Several regulations and guidelines pertain to abatement of and protection from exposure to asbestos-containing materials (ACM) and lead-based paint (LBP), including Construction Safety Orders 1529 (pertaining to ACM) and Section 1532.1 (pertaining to LBP) from CCR, Title 8, and Part 61, Subpart M, of the Code of Federal Regulations (pertaining to ACM). California Health and Safety Code Section 39650 et seq. provides further regulations on airborne toxic control measures. In California, ACM and LBP abatement must be performed and monitored by contractors with appropriate certification from the

36 LARWQCB Basin Plan, March 13, 2020, https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/.

California Department of Health Services. Asbestos is also regulated as a hazardous air pollutant under the Clean Air Act and a potential worker safety hazard under the authority of Cal/OSHA. Requirements for limiting asbestos emissions from building demolition and renovation are specified in SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities); see below. California Government Code Sections 1529 and 1532.1 provide for exposure limits, exposure monitoring, respiratory protection and good working practice by workers exposed to lead and ACMs.

Other Hazardous Materials

The removal of hazardous materials, such as PCBs, mercury-containing light ballast, and mold, must be completed in accordance with applicable regulations pursuant to 40 CFR 761 (PCBs), 40 CFR 273 (mercury-containing light ballast), and 29 CFR 1926 (molds) by workers with the hazardous waste operations and emergency response (HAZWOPER) training, as outlined in 29 CFR 1910.120 and 8 CCR 5192.

4.8.3.3 Regional and Local

South Coast Air Quality Management District

Remediation of contamination has the potential to expose workers to hazardous emissions. The South Coast Air Quality Management District (SCAQMD) regulates emissions from soil remediation activities through Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil. This rule requires development and approval of a mitigation plan, monitoring of VOC concentrations, and implementation of the mitigation plan if VOC-contaminated soil is detected.[38]

SCAQMD Rule 1403 specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of ACM. The rule's requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and cleanup procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials (ACWM).[39]

Regional Water Quality Control Board

USTs are regulated under Subtitle I of RCRA and its implementing regulations, which establish construction standards for new UST installations, as well as standards for upgrading existing USTs and associated piping. After 1998, all nonconforming tanks were required to be either upgraded or closed.

38 Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, AQMD, 2001, http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf.

39 Rule 1403 – Asbestos Emissions from Demolition/Renovations Activities, AQMD, 2007, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf.

The storage of hazardous materials in USTs is regulated by CalEPA's SWRCB, which has delegated authority to each of the nine RWQCBs and, typically on the local level, to the local fire department. The State's UST Program regulations include, among others, permitting USTs, installation of leak detection systems and/or monitoring of USTs for leakage, UST closure requirements, release reporting/corrective action, and enforcement. The State's Site Cleanup Program (SCP)[40] regulates and oversees the investigation and cleanup of unauthorized discharges of pollutants and pollution-impaired sites not overseen by the UST Program.[41] The primary goal of the SCP is to direct and provide oversight of site investigation and cleanup activities that will result in restoration and/or protection of water quality, human health, and the environment.

Los Angeles County Fire Department

At the local level, the County of Los Angeles Fire Department (LACoFD) monitors the storage of hazardous materials in the City for compliance with local requirements. Specifically, businesses and facilities which store more than threshold quantities of hazardous materials are required to file an Accidental Risk Prevention Program with the LACoFD. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. The LACoFD also has delegated authority to administer and enforce Federal and State laws and local ordinances for USTs. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LACoFD Inspectors.[42]

The LACoFD administers and enforces federal and State laws and local ordinances for USTs in the City of Inglewood. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LACoFD Inspectors.

City of Inglewood General Plan

The City's General Plan, Safety Element outlines the following relevant measures as means to minimize the dangerous aspects of hazardous materials:[43]

- 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.

40 42 USC Section 6901 et seq.
41 42 USC Section 6901 et seq.
42 California Health and Safety Code, Chapter 6.95.
43 *City of Inglewood* General Plan, "Safety Element" (1995).

- The City must have continuous coordination among its staff to ensure that hazardous material operations are located in zones and facilities that are appropriate and safe for such use.
- The City must ensure that these uses are located safe distances from residences, schools, hospitals, large assemblages of people, etc.
- The City must inform the public of the potential perils that accompany hazardous material sites. Public awareness as acquired through public education programs will enable the citizenry to learn to protect themselves by observing and implementing safety procedures during a spill or explosion.

The City's General Plan, Safety Element identifies evacuation routes that assume worst-case displacement and surface rupture from a seismic event. Within the City, Florence Avenue, La Brea Avenue, Crenshaw Boulevard, and Imperial Highway are identified as designated evacuation routes. In addition, the Safety Element of the General Plan identifies emergency corridors that can be most readily opened immediately following a seismic event. These include Inglewood Avenue, La Brea Avenue/Hawthorne Boulevard, Prairie Avenue, Crenshaw Boulevard, La Cienega Boulevard, Van Ness Avenue, West Boulevard, Florence Avenue, Manchester Boulevard, Century Boulevard, Imperial Highway, and Centinela Avenue.

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

The City of Inglewood Multi-Hazard Mitigation Plan (MHMP) was developed to reduce or eliminate long-term risk to human life and property from both natural and man-made hazards.[44] The plan includes a list of mitigation measures to be implemented in order to meet identified goals and objectives related to emergency readiness and hazard reduction. In addition, the City prepared an Emergency Response Plan to comply with the California Standardized Emergency Management System and the Federal Emergency Management Agency (FEMA) National Incident Management System. The plan includes information on the Emergency Operations Organization, the roles, and responsibilities of each City division, and includes operational checklists to guide response actions. The City's Multi-Hazard Mitigation plan was adopted on August 18, 2009, with a 5-year planning horizon. The City is currently undergoing the development of a revised and updated plan.

The City's Office of Emergency Services (OES) acts in coordination with all City departments to maximize the City's potential to prevent, prepare for, respond to, and recover from both natural and man-made emergencies and disasters. The 2010 MHMP generally provides a means to prepare and maintain systems, supplies and other logistical items to support emergency/disaster response and recovery among City departments. According to the MHMP, "all future development/redevelopment projects will be

44 *City of Inglewood,* Multi-Hazard Mitigation Plan, March 23, 2010.

constructed to current design standards and building codes and are not expected contribute to community vulnerability from natural or technological hazards."[45] The overall goals of the plan are to:

- Minimize the loss of life and property from natural hazard events
- Protect public health and safety
- Increase public awareness of risk from natural hazards
- Enhance emergency services including warning systems

City of Inglewood Municipal Code

The Inglewood Municipal Code adopts the Los Angeles County Fire Code as the Fire Code of the City.[46] Additionally, the Municipal Code designates the LACoFD as the administering agency for the hazardous material inventory and emergency response program within the City, including the provisions of the California Hazardous Materials Release Response Plans and Inventory Law and other hazardous materials related regulations.[47] These sections of the Municipal Code set forth requirements to ensure fire safety of new and reconstructed buildings within Inglewood.

4.8.4 EXISTING CONDITIONS

Sensitive Receptors

The proposed Project alignment is located along North Market Street, West Manchester Boulevard, and South Prairie Avenue, which are zoned for transit oriented development, including commercial and residential development, and mixed use. Surrounding uses are mainly commercial, although there are some sensitive land uses, including residences, schools, and childcare facilities. Schools and daycare facilities within one-quarter mile (1,320 feet) of the proposed alignment of the ATS system are identified below:

Table 4.8-1
School and Daycare Facilities Near the Project

Name	Address	Distance (ft.)	Direction
A Bright Beginning Child Development Center	712 Manchester Blvd	25	South
A Bright Beginning Infant and Toddler Center	503 Prairie Ave	25	West
Kelso Elementary School	809 Kelso St	25	West
Slauson Learning Center	260 Locust St	40	East
Tender Care Child Development center	335 Spruce Ave	75	Southwest
Wilder Preparatory Academy Charter School	336 Spruce Ave	100	Southwest

45 City of Inglewood, 2010. Multi-Hazard Mitigation Plan, March 23, 2010.
46 Inglewood Municipal Code, "Chapter 6, Article 1: Fire Code and Amendments," https://www.qcode.us/codes/inglewood/view.php?topic=6-1&frames=off.
47 Inglewood Municipal Code, "Chapter 6, Article 2, Section 6-5: Hazardous Materials Disclosure Agency,"https://www.qcode.us/codes/inglewood/view.php?topic=6-2-6_5&frames=off.

Family First Charter School	110 La Brea Ave	120	West
Canterbury Learning Academy	204 S. La Brea Ave	350	West
South Bay Child Development Center	521 Queen St	370	North
Debbie's Child Development Center	521 Osage Ave	470	West
Inglewood Adult School	106 E Manchester Blvd	600	West
City Honors College Preparatory Academy	120 Regent St	1,000	West
George W Crozier Middle School	120 Regent St	1,000	West
Inglewood High School	231 Grevillea Ave	1,000	West
VLT Learning Center	233 Spruce St	1,090	Southwest
Dolores Huerta Elementary School	4125 105th St	1,250	Southwest
City Honors High School	155 Kelso St	1,400	Southwest

Properties Listed on Government Databases

A review of local, State, and federal government-maintained databases for properties within one mile of the proposed Project alignment that release and/or have released hazardous materials was conducted by Environmental Database Resources, Inc. (EDR). The EDR report did not include listings of areas of the proposed Project within the existing public right-of-way. However, properties listed that are within the proposed Project alignment—i.e., those that would require full or partial acquisition and/or an easement (see **Table 3.0-5: Anticipated Project Acquisitions**)—are as follows:

Table 4.8-2
Properties Within Proposed Project Alignment Listed on Government Databases for Hazardous Materials

Addresses	Government Databases[1]
317 and 333 E. Florence Avenue	Cortese, CERS, CERS TANKS, ECHO, FINDS, HAZNET, LACHMS, LUST RCRA-LQG, UST
200–270 N. Market Street (even number addresses) and 300–330 E. Florence Avenue (Commercial property northeast of Market at Regent Avenue)	CERS, CERS HAZ WASTE, DRYCLEANERS, ECHO, EDR Hist Auto, EDR Hist Cleaner, EMI, FINDS, HAZNET, HWTS, RCRA-SQG, RCRA-LQG, RCRA NonGen/NLR
500 and 510 E. Manchester Boulevard	CERS, CERS HAZ WASTE, CERS TANKS, CHMIRS, CIWQS, Cortese, ECHO, FINDS, LUST, HIST CORTESE, HIST UST, HAZNET, HWTS, LACHMS, NPDES, RCRA-LQG, RCRA NonGen/NLR, SWEEPS UST, UST
600 S. Prairie Avenue	CERS, Cortese, ECHO, EMI, FINDS, HAZNET, LACHMS, LUST, RCRA-LQG, RCRA NonGen/NLR, UST
923 S. Prairie Avenue	CERS
3900 W. Manchester	CA FID UST, CERS, CERS HAZ WASTE, Cortese, HIST UST, LACHMS, LUST, RCRA NonGen/NLR, SWEEPS UST, UST
1035–1051 S. Prairie Avenue (odd number addresses; commercial property northwest of Prairie at Hardy Street)	DRYCLEANERS, ECHO, EMI, EDR Hist Cleaner, CERS, FINDS, RCRA NonGen/NLR

1. Description of Database Acronyms:
CA FID UST = Facility Inventory Database contains active and inactive underground storage tank from State Water Resource Control Board
CERS = California Environmental Protection Agency (CalEPA) combines data about environmentally regulated sites and facilities in California into a single database
CERS HAZ WASTE = California Environmental Protection Agency (CalEPA) Regulated Site Portal
CERS TANKS = CERS Aboveground Petroleum Storage and Underground Storage Tank
CHMIRS = California Hazardous Material Incident Report System from the California Office of Emergency Services
CIWQS = California Integrated Water Quality System used by the State and RWQCB to track information about places of environmental interest, manage permits and other orders, track inspections, and manage violations and enforcement activities
Cortese = These sites are designated by the State Water Resource Control Board (LUST), the Integrated Waste Board (SWF/LS), and DTSC
DRYCLEANERS = A list of drycleaner related facilities that have EPA ID numbers

ECHO = Provided by EDR, ECHO provides integrated compliance and enforcement information for about 800,000 facilities nationwide
EDR Hist Auto = EDR Exclusive Records of listings of potential gas station/filling station/service station sites
EDR Hist Cleaner = EDR Exclusive Records of listings of potential dry cleaner sites
EMI = Toxics and criteria pollutant emissions data collected by the Air Resources Board and local air pollution agencies
FINDS = Facility Index System contains both facility information and "pointers" to other sources of information
HAZNET = Data is extracted from the copies of hazardous waste manifests received each year by the DTSC
HIST CORTESE = Same as Cortese, but no longer updated by the agencies
HIST UST = Historical UST Registered Database
HWTS = Registered Hazardous Waste Site
LACHMS = Los Angeles County Hazardous Materials Sites, Los Angeles County Industrial Waste and Underground Storage Tank Sites
LUST= Leaking Underground Storage Tank in GeoTracker
NPDES = A listing of National Pollutant Discharge Elimination System permits, including stormwater
RCRA-LQG = Resource Conservation and Recovery Act-Large Quantity Generators
RCRA-SQG = Resource Conservation and Recovery Act-Small Quantity Generators
RCRA NonGen / NLR = RCRA Non-Generators that do not presently generate hazardous waste
SWEEPS UST = Statewide Environmental Evaluation and Planning System Underground Storage Tank
UST = Underground Storage Tank in State Water Resources Control Board's Hazardous Substance Storage Container Database

Source: Inglewood Transit Connector, The EDR Radius Map Report. Environmental Data Resources, Inc. 2021, September 15.

Properties listed in government databases do not necessarily represent environmental concerns. Some databases track properties because there are special conditions, while others track properties that hold permits for the storage, operation, generation, and/or emission of hazardous materials.

Properties within 500 feet to the proposed Project alignment that are listed on government databases are provided below:

Table 4.8-3
Properties Adjacent to Proposed Project Alignment Listed on Government Databases for Hazardous Materials

Addresses	Government Databases[1]
200 E. Beach Avenue	CERS, CERS HAZ WASTE, CIWQS, EMI, NPDES, RCRA NonGen/NLR, SEMS-ARCHIVE, WDS
301 and 412 E. Florence Avenue	RCRA NonGen / NLR
220 and 230 N. La Brea Avenue	CERS HAZ WASTE, EDR Hist Auto, HAZNET, HWTS, RCRA-SQG, RCRA-VSQG
304, 330, and 341 E. Queen Avenue	EDR Hist Auto, EDR Hist Cleaner, RCRA NonGen/NLR
216 and 257 S. Market Street	EDR Hist Auto, EDR Hist Auto, CERS HAZ WASTE, HAZNET, HWTS
112, 136, and 205 N. Market Street	EDR Hist Cleaner
300, 336, and 401 E. Hillcrest Boulevard	ECHO, FINDS, HAZNET, HIST UST, HWTS, RCRA NonGen/NLR, RCRA-SQG
400 E. Kelso Avenue	ECHO, FINDS, RCRA NonGen/NLR
650 E. Nutwood Street	RCRA NonGen/NLR
115 S. Locust Avenue	RCRA NonGen/NLR
151 N. Locust Avenue	RCRA NonGen/NLR
924 S Osage Avenue	RCRA NonGen/NLR
231, 400, 425, 501, 600, 700, and 811 E. Manchester Boulevard	CERS, CERS HAZ WASTE, DRYCLEANERS, ECHO, EDR Hist Auto, EDR Hist Cleaner, FINDS, HAZNET, HIST UST, HWTS, LUST, RCRA NonGen/NLR, RGA LUST, SWEEPS UST, UST
South Locust Street and Manchester Ave	CHMIRS
601 S. Prairie Avenue	CERS TANKS, EDR Hist Auto, HIST UST, LACHMS, SWEEPS UST, UST

Table 4.8-3
Properties Adjacent to Proposed Project Alignment Listed on Government Databases for Hazardous Materials

801 S. Prairie Avenue	RCRA NonGen/NLR
837 S. Prairie Avenue	EDR Hist Cleaner
911 S. Prairie Avenue	CERS, CERS HAZ WASTE, CERS TANKS, DRYCLEANERS, ECHO, EDR Hist Cleaner, EMI, drycleaners, FINDS, HAZNET, HWTS, RCRA NonGen/NLR
950 S. Prairie Avenue	RCRA NonGen/NLR

1. *Description of Database Acronyms:*
CERS = California Environmental Protection Agency (CalEPA) combines data about environmentally regulated sites and facilities in California into a single database
CERS HAZ WASTE = California Environmental Protection Agency (CalEPA) Regulated Site Portal
CERS TANKS = CERS Aboveground Petroleum Storage and Underground Storage Tank
CHMIRS = California Hazardous Material Incident Report System from the California Office of Emergency Services
CIWQS = California Integrated Water Quality System used by the State and RWQCB to track information about places of environmental interest, manage permits and other orders, track inspections, and manage violations and enforcement activities
DRYCLEANERS = A list of drycleaner related facilities that have EPA ID numbers
ECHO = Provided by EDR, ECHO provides integrated compliance and enforcement information for about 800,000 facilities nationwide
EDR Hist Auto = EDR Exclusive Records of listings of potential gas station/filling station/service station sites
EDR Hist Cleaner = EDR Exclusive Records of listings of potential dry cleaner sites
EMI = Toxics and criteria pollutant emissions data collected by the Air Resources Board and local air pollution agencies
FINDS = Facility Index System contains both facility information and "pointers" to other sources of information
HAZNET = Data is extracted from the copies of hazardous waste manifests received each year by the DTSC
HIST UST = Historical UST Registered Database
HWTS = Registered Hazardous Waste Site
LACHMS = Los Angeles County Hazardous Materials Sites, Los Angeles County Industrial Waste and Underground Storage Tank Sites
LUST= Leaking Underground Storage Tank in GeoTracker
NPDES = A listing of National Pollutant Discharge Elimination System permits, including stormwater
RCRA-SQG = Resource Conservation and Recovery Act-Small Quantity Generators
RCRA NonGen / NLR = RCRA Non-Generators that do not presently generate hazardous waste
RCRA-VSQG = RCRA Very Small Generators
RGA LUST = EDR Recovered Government Archive Leaking Underground Storage Tank database
SEMS-ARCHIVE = Superfund Enterprise Management System Archive
SWEEPS UST = Statewide Environmental Evaluation and Planning System Underground Storage Tank
UST = Underground Storage Tank in State Water Resources Control Board's Hazardous Substance Storage Container Database
WDS = California Water Resources Control Board - Waste Discharge System

Source: Inglewood Transit Connector, The EDR Radius Map Report. Environmental Data Resources, Inc. 2021, September 15.

Underground Storage Tanks

Soils and groundwater in the City have the potential to be contaminated due to historical spills and leaking USTs. A UST is defined by law as "any one or combination of tanks, including pipes connected thereto, that is used for the storage of hazardous substances and that is substantially or totally beneath the surface of the ground" (certain exceptions apply).[48] There are nine known Leaking Underground Storage Tanks

48 California State Water Resources Control Board, Division of Water Quality, "Underground Storage Tank Program," accessed March 2019, available at https://www.waterboards.ca.gov/ust/.

(LUSTs) within 500 feet of the proposed Project identified by the State Water Resources Control Board.[49] These locations are listed as follows and are arranged by proximity to each guideway segment:

Market Street Segment

- ***317 E. Florence Avenue*** (Los Angeles County Metropolitan Transportation Authority [Metro]); RWQCB Case Number R-60173 involved potential contamination of gasoline in soil; remediation completed, and case closed as of January 13, 2017; and
- ***230 N. La Brea Avenue*** (Fujita Corporation); RWQCB Case Number R-37884 involved potential contamination of gasoline; case closed as of September 10, 2003.

Manchester Boulevard Segment

- ***501 E. Manchester Boulevard*** (Simon's Mini Market); RWQCB Case Number I-13094 involved potential contamination of gasoline in drinking water aquifer; remediation completed, and case closed as of November 1, 2006;
- ***501 E. Manchester Boulevard*** (Simon's Mini Market); Los Angeles County Department of Public Works case number 009805-013094; remediation completed, and case closed as of January 9, 2014;
- ***500 E. Manchester Boulevard*** (former Sears Auto Center); RWQCB Case Number I-09429 involved potential contamination of gasoline in soil; remediation completed, and case closed as of July 19, 1996;
- ***3900 W. Manchester Boulevard*** (the Forum); RWQCB Case Number R-09447 involved potential contamination of gasoline in soil; remediation completed, and case closed as of February 23, 1998;
- ***3900 W. Manchester Boulevard*** (the Forum); RWQCB Case Number R-09447A involved potential contamination of gasoline, methyl tertiary-butyl ether (MTBE)/tert-Butyl alcohol (TBA)/other fuel oxygenates, and tetrachloroethylene (PCE) in drinking water aquifer; remediation completed, and case closed as of July 15, 2013; and
- ***145 E. Manchester Boulevard*** (UNOCAL #1923); RWQCB Case Number I-09888; leaking tank closed and case closed as of October 7, 1993.

Prairie Avenue Segment

- ***600 S. Prairie Avenue*** (former Airport Park Hotel); RWQCB Case Number R-63615 involved potential contamination of gasoline in soil; remediation completed, and case closed as of April 10, 2018.

49 California State Water Resources Control Board, GeoTracker, accessed September 2021, available at https://geotracker.waterboards.ca.gov/.

All identified LUST cases have been remediated and closed at the time of this analysis. Per the California DTSC, there are no other contaminated, State agency-monitored properties in the vicinity of the proposed Project.[50]

Further, the SWRQCB identifies a number of registered USTs within 500 feet of the proposed Project guideway segments, listed as follows:[51]

Market Street Segment

- ***317 E. Florence Avenue*** (Metro), LACoFD facility ID not available; and
- ***111 N. Locust Street*** (Senior Center Site), LACoFD facility ID not available.

Manchester Boulevard Segment

- ***145 E. Manchester Boulevard*** (Wowsj Mart), LACoFD facility ID LACoFA0017377;
- ***338 E. Manchester Street*** (Retail Boutique), LACoFD facility ID not available;
- ***450 E. Manchester Boulevard*** *(*Bruno's Burgers), Statewide Environmental Evaluation and Planning System (SWEEPS) UST S106923602;
- ***501 E. Manchester Boulevard*** (G&M Oil Co #193), LACoFD facility ID LACoFA001738; and
- ***510 E. Manchester Boulevard*** (Vons Fuel Center #2502), LACoFD facility ID LACoFA0033888.

Prairie Avenue Segment

- ***601 S. Prairie Avenue*** (Miles Mini Mart), LACoFD facility ID LACoFA0021214;
- ***600 S. Prairie Avenue*** (Pincay 60-Acre Property [Hollywood Park property]), LACoFD facility ID not available; and
- ***1050 S. Prairie Avenue*** (Hollywood Park Racetrack), LACoFD facility ID LACoFA0021198.

Three of these registered USTs are located within the footprint of the proposed Project: The Metro K Line at 317 E. Florence Avenue, Vons Fuel Center at 510 E. Manchester Boulevard, and the Hollywood Park (LASED) property at 600 S. Prairie Avenue.

The Vons Fuel Center #2502 at 510 E. Manchester Boulevard (facility ID LACoFA0033888) is proposed for removal as part of the proposed Project. The portion of the Vons property containing the gas station is proposed for use as a surface parking area for the new Vons replacement store. As part of the demolition process for the proposed Project, this UST facility would be closed and removed from the site. The site

50 California Department of Toxic Substances Control, EnviroStor, accessed March 2019, available at https://www.envirostor.dtsc.ca.gov/public/.

51 California State Water Resources Control Board, GeoTracker, accessed September 2021, available at https://geotracker.waterboards.ca.gov/.

would be remediated for any contamination in accordance with the appropriate regulatory requirements pursuant to UST closure and any additional regulatory requirements; closure requirements and approval would be sought from the jurisdiction having authority included the LARWQCB.

Historical Oil and Gas Extraction Activities

The City is located within the southern portion of a large oil field that includes Baldwin Hills to the northwest of the Project. The oil deposits in this oil field have been explored and actively extracted for nearly a century.[52] Records indicate a substantial number of abandoned, plugged, or idle oil and gas and dry hole wells in the City.[53,54] The Potrero Oil Field traverses much of the northern and eastern portions of the City, including portions of the proposed Project including the Market Street Segment and Manchester Boulevard Segment of the guideway.[55] Contaminants frequently associated with oil and gas activities include crude oil, refined petroleum products, drilling mud, metals, PCBs, pesticides and volatile organic compound (VOCs) impacts in soil and soil vapor. Potential sources for these contaminants include oil wells, well cellars, pumps, pipes, sumps, storage tanks, separators, transformers, and application of petroleum products/crude oil (likely containing PCBs and pesticides) for dust/weed control. As commonly found near oil and gas fields, the subsurface conditions in the vicinity of the proposed Project may also include naturally occurring methane and hydrogen sulfide gas.[56]

While the City is entirely urbanized and largely precluded from future oil exploration and drilling, a number of historical oil and gas exploration and drilling activities have occurred in the vicinity of the proposed Project. These locations are listed as follows, according to their unique American Petroleum Institute (API) well number and Project guideway segment:

Manchester Boulevard Segment

- ***API 0403713694***; oil and gas well located within the Potrero Oil Field on the southeastern side of Spruce Avenue, approximately 90 southeast of the proposed MSF site across Spruce Avenue and 150 feet southwest of the Spruce Avenue and Manchester Boulevard intersection; plugged and abandoned

52 City of Inglewood, General Plan Update Technical Background Report*,* August 2006.
53 Dry hole wells are oil, water, or gas wells which are determined not to be commercially profitable.
54 California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR), Well Statewide Tracking and Reporting System (WellSTAR) database, interactive map, accessed March 2019, available at https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.94276/37.10257/6.
55 California Department of Conservation, DOGGR, WellSTAR, interactive map, accessed March 2019, available at https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.94276/37.10257/6.
56 *Hazardous Material Assessment*, Geosyntec Consultants, July 3, 2018.

to the satisfaction of the California Department of Natural Resources, Division of Oil and Gas (now DOGGR) as of March 5, 1930.[57,58]

Prairie Avenue Segment

- ***API 0403705654***; dry hole well located on the southern side of Nutwood Street, approximately 150 feet west of Prairie Avenue; plugged and abandoned to the satisfaction of the California Department of Natural Resources, Division of Oil and Gas (now DOGGR) as of March 19, 1930.[59,60]

No previously identified oil and gas or dry hole wells are located within the footprint of the proposed Project guideway, stations, or parcels that would be used for support facilities.

Aged Buildings

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

- **Asbestos** is a mineral fiber that is carcinogenic and harmful to respiratory health and is considered both a hazardous air pollutant and a human health hazard. Because of its fiber strength and heat resistance, it was widely used prior to the 1980s in California in a variety of building construction materials for insulation, fire-retardation, and friction and heat-resistant products, such as ducting insulation, wallboard, shingles, ceiling tiles, floor tiles, insulation, plaster, and floor backing. Thus, buildings constructed prior to 1980 could contain ACM. The risk to human health is from inhalation of airborne asbestos, which commonly occurs when ACM are disturbed during activities such as demolition and renovation. Due to the age of the buildings within the area, it is likely that ACM are present.
- **Lead** is a recognized harmful environmental pollutant exposed through air, drinking water, food, soils, paint, and dust. Lead was widely used in paint, gasoline, water pipes, and many other products prior to 1977 when the U.S. Consumer Product Safety Commission banned the use of lead-based paint.

57 California Department of Conservation, DOGGR, WellSTAR, Well Details for API # 03713694, accessed March 2019, available at https://secure.conservation.ca.gov/WellSearch/Details?api=03713694#main-content.

58 California Department of Natural Resources, Division of Oil and Gas (now DOGGR), WellSTAR, Well Record for API #03713694, accessed March 2019, available at https://secure.conservation.ca.gov/WellRecord/037/03713694/03713694_2018-02-27_DATA.pdf.

59 California Department of Conservation, DOGGR, WellSTAR, Well Details for API # 03705654, accessed March 2019, available at https://secure.conservation.ca.gov/WellSearch/Details?api=03705654.

60 California Department of Natural Resources, Division of Oil and Gas (now DOGGR), WellSTAR, Well Record for API # 03705654, accessed March 2019, available at https://secure.conservation.ca.gov/WellRecord/037/03705654/03705654_2018-02-09_DATA.pdf.

Common methods of paint removal, such as sanding, scraping, and burning, create dust and the potential for lead to be absorbed into the body and pose a potential health risk. Since many of the structures located within the area were built prior to the federal regulations banning the use of LBPs, it is likely to exist in structures constructed prior to 1977.

- **Polychlorinated Biphenyls (PCBs)** are synthetic chemicals that were manufactured for use in various industrial and commercial applications—including oil in electrical and hydraulic equipment, and plasticizers in paints, plastics, and rubber products—because of their nonflammability, chemical stability, high boiling point, and electrical insulation properties. When released into the environment, PCBs persist for many years, accumulate and concentrate in organisms. The USEPA has classified PCBs as probable human carcinogens. In 1979, USEPA banned the use of PCBs in new electrical equipment and began a program to phase out PCB-containing equipment. Thus, older industrial areas in the vicinity of the proposed Project could contain PCBs.

4.8.5 ADJUSTED BASELINE

This section assumes the Adjusted Baseline Environmental Setting as described in **Section 4.0: Environmental Impact Analysis**, *4.0.5: Adjusted Baseline*. Related to hazards and hazardous materials, the changes associated with the Adjusted Baseline projects include excavation and construction activities within the HPSP area and the establishment of new uses.

For the purposes of the hazards and hazardous materials analysis, the Adjusted Baseline includes projects that will be constructed immediately northeast of the intersection of West Century Boulevard and South Prairie Avenue which are expected to include the use, storage, and disposal of hazardous materials. Construction of these improvements will not likely have any direct effect on the hazards and hazardous materials associated with the proposed Project, as the improvements being constructed would be expected to have only site-specific hazard issues.

As described in the SMP for the HPSP project and the Adjusted Baseline projects, following completion of construction, none of the sites for related projects included in the Adjusted Baseline will contain contaminants of potential concern that are above the criteria set in the SMP. Remediation has or will occur during grading and site preparation activities. The regulatory oversight required for these types of remediation activities would be required prior to completion of construction and would require that no potential for off-site migration could adversely affect the proposed Project. Also, the Adjusted Baseline projects will 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. Therefore, while the number of hazardous materials being transported, stored, handled, and disposed of with these new land uses will increase, they would not substantively alter the environmental setting a beyond that existing under current existing conditions.

4.8.6 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in the CEQA Guidelines were used to determine Project impacts related to hazards and hazardous materials. As discussed in *Section 4.8.1*, three screening criteria related to hazards and hazardous materials of Appendix G of the CEQA Guidelines were not carried through for further analysis in this EIR. The Project would result in a significant impact if it would:

Threshold HAZ-1: **Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.**

Threshold HAZ-2: **Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.**

Threshold HAZ-3: **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.**

4.8.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

The project includes ITC Design Guidelines (Design Guidelines) and Construction Commitment Program (CCP) as described in **Section 3.0: Project Description**. The CCP addresses temporary effects during construction of the Project. The Design Guidelines describe the design features of the proposed Project.

4.8.7.1 Project Design Features

The Project includes the following features that limit potential exposure of hazards and hazardous materials during construction and operation of the proposed Project alignment and that manages the Project's construction activities that can interfere with emergency access:

PDF HAZ-1 Hazardous Materials Program

The following practices will be followed during construction to address the potential for encountering hazardous materials during construction of the Project.

- Building Demolition Plan – Prior to any demolition occurring, conduct an evaluation of all buildings built prior to 1980 to be demolished to identify the presence of asbestos containing materials (ACMs) and lead-based paint (LBP). Remediation shall be implemented in accordance with the recommendations of these evaluations to ensure that no ACMs or LBP remain present and to ensure ACMs and LBP are removed to levels established for public safety.
- Hazardous Materials Contingency Plan – Prior to construction, prepare a plan addressing the potential for discovery of unidentified underground storage tanks (USTs), hazardous materials, petroleum

hydrocarbons, or hazardous or solid wastes encountered during construction. This Plan shall address UST decommissioning, field screening and materials testing methods, contaminant management requirements, and health and safety requirements to ensure no exposure to hazards or hazardous materials occurs on site and to ensure any materials encountered during construction are removed to levels established for public safety.

- Soil Management Plan – After final construction plans are prepared showing the lateral and vertical extent of soil excavation during construction are prepared, prepare a Soil Management Plan to establish soil reuse criteria, define a sampling plan for stockpiled materials, describe the disposition of materials that do not satisfy the reuse criteria, and specify guidelines for imported materials.
- Health and Safety Plan – Prior to construction, prepare a Health and Safety Plan to address the potential for exposure to any constituents of concern that may be encountered during construction.

PDF TRANS-2 Construction Staging & Traffic Control Program

A Construction Staging and Traffic Control Program will be developed by members of the Project Task Force (as defined in the Construction Commitment Program), subject to review and acceptance by the City and/or the JPA, and will address the following topics:

- Coordination with other public infrastructure projects within the City's boundaries.
- Detour routes, including analysis of impacts to pedestrian, business, bicycle, and traffic flow.
- Coordination of closures and restricted access during the construction period with special attention during periods of expected heavy traffic from events scheduled at SoFi Stadium and other venues in the Los Angeles Sports and Entertainment District at Hollywood Park, the Forum, and the Inglewood Basketball and Entertainment Center.
- Coordination with the City, police, and fire services department regarding maintenance of emergency access and response times.
- Monitoring and coordination of construction materials deliveries.
- Notification to businesses and residents on upcoming construction activities including but not limited to the establishment of a website with project construction information, signage, and web-based media.

The Traffic Control Program will be updated as needed based on the following principals:

- Minimize traffic impacts on residential streets.
- Establish minimum traffic lane requirements for Manchester Boulevard, Florence Avenue, and Prairie Avenue during construction such that at least the full number of traffic lanes in the peak direction, and if feasible, one traffic lane in the off-peak direction is available, with additional capacity provided through appropriate detour routes. The directional traffic lanes may be reversible to maintain the peak directional capacity in either direction as necessitated by traffic demands. For all other streets

potentially affected by construction, maintain at least one lane of traffic in each direction unless otherwise approved by the City.

- Maintain access to and from all alleys at one or both ends of the alley when possible. If an alley is obstructed such that a turnaround by any vehicle is not feasible, traffic flaggers shall be provided to control access to/from the alley.
- Maintain access for all public safety vehicles (such as police, fire, and emergency response).
- Maintain bicycle and pedestrian access within the Project area or approved detours at all times.
- Provide adequate street access to City service vehicles, including but not limited to trash pickup and street sweeping service vehicles, during planned service times.
- Sidewalk closures should be avoided to the degree feasible and are permitted only when approved by the City. Accessible detours shall be provided if sidewalk closures are necessary.
- Use traffic control officers/flaggers as appropriate to minimize the degree and duration of impacts and maintain safety.
- Establish and maintain wayfinding signage.
- Maintain vehicular and pedestrian access to all businesses and residents impacted by construction activities including roadway closures.
- Hold quarterly community outreach meetings with businesses and residents to provide updates on temporary, full, or partial street closures necessary for construction. Website will be updated 45 to 60 days prior to planned dates of any street closures.
- All closures, full or partial, are subject to City review and approval which shall consider measures to minimize the degree and duration of street and lane closures.

PDF TRANS-3 Preliminary Haul and Overload Routes

- Haul routes and overload/oversized vehicle routes are subject to review and approval by the City.
- To the extent possible, truck deliveries and hauling of bulk materials such as aggregate, bulk cement, dirt, etc. to the Project area, and hauling of material from the Project area, shall be scheduled during off-peak hours to avoid the peak commuter traffic periods on designated haul routes.
- Truck deliveries and hauling of dirt, aggregate, bulk cement, and all other materials and equipment, shall be on designated routes only (freeways and nonresidential streets).

PDF TRANS-4 Pedestrian Access Program

A Pedestrian Access Program will be developed by members of the Project Task Force (as defined in the Construction Commitment Program), subject to review and acceptance by the City and/or the JPA, and will adhere to the following principles:

- Pedestrian access to buildings shall be maintained at all times.
- Maintain all crosswalks to the extent feasible. Whenever a crosswalk is removed from service, establish, and maintain temporary accessible replacement crosswalks as close as practicable to the original crosswalk locations unless the City determines that a replacement crosswalk is not necessary to maintain an adequate level of service. Replacement crosswalks shall be identified and controlled by wayfinding signs approved by the City.
- Establish and maintain pedestrian wayfinding signage.
- Maintain sidewalk access for pedestrians, including providing temporary sidewalks if existing sidewalks are disrupted during construction. Any sidewalk closures are subject to review and approval by the City.
- Sidewalks that are being maintained in a temporary condition shall meet all applicable safety standards, including but not limited to the requirements of the Federal Americans with Disabilities Act and similar California laws for sidewalks being maintained in a temporary condition.
- Protect pedestrians from construction-related debris, dust, and noise; such protection may include the use of dedicated pedestrian barriers.
- Coordinate with the Inglewood Unified School District and the City to provide crossing guards at locations requested by IUSD or the City when crosswalks or sidewalks are closed. Identify temporary alternate routes to school, working closely with IUSD and the City, and disseminate this information to schools and stakeholders affected by construction.

PDF AQ-1 Construction Air Quality Program

At a minimum, use equipment that meets the U.S. Environmental Protection Agency (USEPA)'s Final Tier 4 emissions standards for off-road diesel-powered construction equipment with 50 horsepower (hp) or greater, for all phases of construction activity, unless it can be demonstrated to the City Planning Division with substantial evidence that such equipment is not available. To ensure that Final Tier 4 construction equipment or better shall be used during the proposed Project's construction, the City shall include this requirement in applicable bid documents, purchase orders, and contracts. The City shall also require periodic reporting and provision of written construction documents by construction contractor(s) and conduct regular inspections to the maximum extent feasible to ensure and enforce compliance.

Such equipment will be outfitted with Best Available Control Technology devices including a California Air Resources Board (CARB)-certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPF are capable of achieving at least 85 percent reduction in particulate matter emissions. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by Final Tier 4 emissions standards for a similarly sized engine, as defined by the CARB's regulations. Successful contractors must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. The proposed Project representative will make available to the lead agency and Southern California Air Quality Management District (SCAQMD) a comprehensive

inventory of all off-road construction equipment, equal to or greater than 50 horsepower that will be used during construction. The inventory will include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, best available control technology (BACT) documentation, and CARB or SCAQMD operating permit shall be maintained on site at the time of mobilization for each applicable piece of construction equipment.

If any of the following circumstances listed below exist and the Contractor provides written documentation consistent with project contract requirements, the Contractor shall submit an Alternative Compliance Plan that identifies operational changes or other strategies that can reduce a comparable level of NOx emissions as Tier 4-certified engines during construction activities.

- Equipment such as concrete/industrial saws, pumps, aerial lifts, light stands, air compressors, and forklifts shall be electric or alternative-fueled (i.e., nondiesel). Pole power shall be utilized to the maximum extent feasible in lieu of generators. If stationary construction equipment, such as diesel-powered generators, must be operated continuously, such equipment must be Final Tier 4 construction equipment or better and located at least 100 feet from air quality sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible.
- At a minimum, require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year trucks (e.g., material delivery trucks and soil import/export with a gross vehicle weight rating of at least 14,001 pounds), or best commercially available equipment that meet CARB's 2010 engine emissions standards at 0.01 g/hp-hour of particulate matter and 0.20 g/hp-hour of NOx emissions or newer, cleaner trucks.
- Require the use of electric or alternatively fueled (e.g., natural gas) sweepers with high-efficiency particulate air (HEPA) filters.
- All roadways, driveways, sidewalks, etc., being installed as part of the Project should be completed as soon as practicable; in addition, building pads should be laid as soon as practicable after grading.
- To the extent feasible, allow construction employees to commute during off-peak hours.
- Make access available for on-site lunch trucks during construction, as feasible, to minimize off-site construction employee vehicle trips.
- Every effort shall be made to utilize grid-based electric power at any construction site, where feasible.
- Contractors shall maintain and operate construction equipment to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications and documentation demonstrating proper maintenance, in accordance with the manufacturer's specifications, shall be maintained on site. Tampering with construction equipment to increase horsepower or to defeat emission control devices must be prohibited.
- Require in all applicable bid documents, purchase orders, and contracts of the requirement to notify all construction vendors, contractors, and/or haul truck operators that vehicle and construction equipment idling time will be limited to no longer than five minutes, consistent with the CARB's policy.

Impact HAZ-1: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction

Construction of the proposed Project would entail demolition, excavation, and grading activities which would disturb the existing physical landscape. As described in *Section 4.8.4: Existing Conditions*, areas near the proposed Project have been identified to contain former and current commercial operations and historic oil and gas exploration and production activities. Additionally, construction activities would involve the use of materials—including fuels, paints, oils, transmission fluids, solvents, and other acidic and alkaline solutions—that require special handling, transport, and disposal. These materials would be transported to and from the proposed Project for use during construction activities. The improper handling and transport of the materials could result in the accidental release of hazardous materials, thereby potentially exposing the public or the environment to hazardous materials.

Transportation of Construction Materials

As discussed in *Section 4.8.3.1***,** the transport of hazardous materials is regulated by USDOT and Caltrans.[61] The transport regulations ensure safe transport of the regulated materials by addressing how hazardous materials are labeled, identifying approved transport routes, and including provisions that restrict containment during highway transportation of hazardous materials and wastes. Furthermore, the City has established "Designated Truck Routes."[62] As shown in **Figure 4.12-4: Construction Haul/Delivery Routes and Staging Areas,** the primary delivery routes for the proposed Project include Florence Avenue, Manchester Boulevard, Prairie Avenue, and Century Boulevard. The Project would implement **PDF TRANS-3**, which requires construction vehicles to use designated truck routes during off-peak hours. Therefore, compliance with existing regulations and implementation of project features would reduce potential impacts related to the transportation of hazards and hazardous materials to less than significant.

Construction Materials

Common construction materials such as fuels, paints, cleaners, solvents, and welding materials would be used during construction. In general, aside from refueling needs for heavy equipment, the hazardous materials typically used on a construction site would be 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 construction site at any one time would not result in large bulk amounts that, if spilled, could cause significant soil or groundwater contamination.

62 Inglewood Municipal Code. Chapter 3 – Motor vehicles and traffic, Article 3 – Truck Route regulations.

62 Inglewood Municipal Code. Chapter 3 – Motor vehicles and traffic, Article 3 – Truck Route regulations.

If a spill of hazardous materials on the construction sites were to occur, the spilled materials would be localized because of the relatively small quantities involved and it would be cleaned up in a timely manner in accordance with best management practices (BMPs) as specified in the contaminated soil contingency plan (**PDF HAZ-1)**. Additionally, as the proposed Project would disturb more than an acre of land, it would be required to implement requirements of the NPDES General Construction Permit, including BMPs implemented as part of a Stormwater Pollution Prevention Plan (SWPPP). The BMPs would address the safe handling of hazardous materials. In the unlikely event of an inadvertent spill, response measures would contain the hazardous materials. The use of construction BMPs would minimize the potential adverse effects from accidental release of hazardous materials or wastes. These BMPs could include, but are not necessarily limited to, the following:

- Establishment of a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Requirements to follow manufacturer's recommendations on use, storage and disposal of chemical products used in construction;
- Avoidance of overtopping construction equipment fuel gas tanks;
- Proper containment and removal of grease and oils during routine maintenance of construction equipment; or
- Proper disposal of discarded containers of fuels and other chemicals.

As described above, refueling activities of heavy equipment would be conducted in a dedicated and controlled area. Secondary containment and protective barriers would also be implemented to minimize potential hazards that might occur. Given the required protective measures (i.e., BMPs) and the quantities of hazardous materials typical for construction, as well as implementation of **PDF HAZ-1,** the potential of exposure of hazardous materials to construction workers, the public, or contamination to soil and/or groundwater would be reduced to acceptable standards, and potential impacts related to construction materials would be less than significant.

Pre-1980 Structures and Improvements

Construction of the proposed Project would involve the demolition of existing buildings at the commercial center at the northeast corner of Market Street and Regent Avenue, 150 S. Market Street, the retail commercial buildings at 500 E. Manchester Boulevard and 923 and 1035 S. Prairie Avenue. Due to their age, some of these buildings may have the potential to release hazardous materials, such as ACMs, LBP, and other potentially hazardous building materials, including PCBs, mercury, or chlorofluorocarbons found in fluorescent lighting and electrical switches. The release of these hazardous materials into the

environment may expose construction workers and members of the public in the vicinity of the demolition activities to hazardous materials.

Preparation and implementation of the Building Demolition Plan as described in **PDF HAZ-1** would include an evaluation of all buildings to be demolished prior to demolition activities. The Building Demolition Plan would gauge the likelihood and levels of possible ACMs, LBP, PCBs, and other hazardous materials that could be encountered and would identify the approach to remove and dispose of the materials in compliance with applicable rules and regulations, including SCAQMD Rule 1403[63] and Cal/OSHA regulations regarding LBP, ACMs, PCBs, mercury, or chlorofluorocarbons, as listed above in *Section 4.8.3: Regulatory Framework*.

SCAQMD Rule 1403 specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of ACM.[64] The rule's requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and cleanup procedures, and storage, disposal, and landfilling requirements for ACWM. Under the Lead Renovation, Repair, and Painting Rule, contractors who renovate or partially demolish pre-1978 residential buildings must be lead-safe certified by USEPA and use lead-safe practices. Lead abatement activities are regulated by the USEPA; lead abatement companies are governed by the USEPA and the USEPA requires individuals and firms that conduct lead-based paint activities, including abatement, to be licensed.

Implementation of the Building Demolition Plan (**PDF HAZ-1**) and compliance with relevant federal, state, and local regulations and requirements for identified hazardous materials would reduce potentially significant impacts related to exposing hazards to the public or the environment.

Underground Tanks and Soil Hazards

Construction of the proposed Project would involve excavation, loading, and transportation of soils and USTs that may contain hazardous materials. As shown in **Table 4.8-2** and further discussed below, the proposed improvements would be developed on properties listed on Government databases for hazardous materials.

Market Street/Florence Avenue Station

This proposed station would be located on the even number addresses of 200—270 N. Market Street and 300—330 E. Florence Avenue. The property is currently developed with a strip mall and surface parking.

63 Rule 1403 – Asbestos Emissions from Demolition/Renovations Activities, AQMD, 2007, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf.

64 Rule 1403 – Asbestos Emissions from Demolition/Renovations Activities, AQMD, 2007, http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf.

Current and historic uses at the property have required permits for the use of various chemicals, including petroleum hydrocarbons, dry-cleaning solvents to alkaline and acidic solutions, other inorganic solid waste, pharmaceutical waste, ignitable waste, chromium, mercury, selenium, m-cresol, nicotine, 2-propanone, acetone, cyclohexane, lindane, selenium sulfide, and other organic chemicals. **PDF HAZ-1** requires preparation of a Soil Management Plan, which will determine whether there are recognized environmental conditions on the property caused by the current and historic uses of hazardous materials at the property and if there is possible presence of contaminated soil. If required, the Soil Management Plan will require implementation of a Contaminated Soil Contingency Plan that will include procedures for segregation, sampling, and chemical analysis of the soil. Contaminated soil will be profiled for disposal and will be transported to an appropriate waste or recycling facility licensed to accept and treat the type of waste indicated by the profiling process. Compliance with the Soil Management Plan, Contaminated Soil Contingency Plan, and Health and Safety Plan (**PDF HAZ-1**) will ensure that potential exposure of hazardous materials to construction worker and the public are limited and that their removal is consistent with existing regulations enforced by the Cal-OSHA, DTSC, RWQCB, SCAQMD, and LACoFD.

Additionally, the landing leg of the proposed elevated passenger walkway for the Market Street/Florence Avenue station, on the north side of Florence Avenue would be developed on property with the addresses of 317 and 333 E. Florence Avenue. Both addresses are associated with USTs, including two LUST cases (RWQCB Case Number R-60173 and RWQCB Case Number R-37884) that have been closed. According to the SWRQCB, the 317 E. Florence address, which is the Metro K Line Downtown Inglewood Station, also operate one UST. Although this UST is unlikely to be within the footprint of the development area of the proposed elevated passenger walkway, the Soil Management Plan and Hazardous Materials Contingency Plan (**PDF HAZ-1**) will determine this possibility and include recommendations for its safe removal and/or relocation, if needed and in accordance with applicable regulations and guidelines to ensure that potential exposure of hazards to the construction workers, the public, and environment is limited.

Maintenance and Storage Facility

The proposed MSF would be constructed on property associated with the 500 and 510 E. Manchester Boulevard addresses. The property is currently developed with a grocery store, gas station, and surface parking. The property contains at least one UST (facility ID LACoFA0033888) related to operations of the gas station; it is also associated with a previous LUST (RWQCB Case Number I-09429), which was closed by RWQCB on July 19, 1996. All USTs on this property would be decommissioned and removed as part of the proposed Project and would be addressed in the Hazardous Materials Contingency Plan and Health and Safety Plan (**PDF HAZ-1**). Closure of the gas station and removal of the USTs, related piping, and/or dispensers would be subject to the requirements of LACoFD and RWQCB. Any potential contamination would be remediated in accordance with the appropriate regulatory requirements, including conditions directed on the Closure Permit as well as meet the requirements of California Health and Safety Code

Section 25298, Underground Storage of Hazardous Substances, California Code of Regulations Title 23, Sections 2670 through 2672, Underground Storage Tank Closure Requirements, and the Los Angeles County Department of Public Works, Environmental Programs Division, Underground Storage Tank Program: Closure.[65] Therefore, construction of the proposed MSF would not result in an accidental release of hazardous materials into the environment.

Prairie Avenue Guideway and Roadway Improvements

Towards the Prairie Avenue/Hardy Street Station—on the west side of Prairie Avenue—the proposed guideway would be constructed on and over private property, including 923 S. Prairie Avenue, which is followed by a CalEPA database for the storage of chemicals, related to the operation of a T-Mobile cell tower. No violations have been identified on this property. Nevertheless, the Soil Management Plan (**PDF HAZ-1**) will identify potential concerns, including the potential removal of the cell phone tower and chemicals, if required, as a part of the proposed Project.

The proposed expansion of the Prairie Avenue right-of-way, between Manchester Boulevard and Hardy Street would encroach onto 3900 W. Manchester Boulevard and 600 S. Prairie Avenue, which are listed on government databases for USTs containing gasoline, MTBE, and other fuels. With recent developments in this area (i.e., the Forum and SoFi Stadium and Entertainment District), any potential hazards identified have likely been removed and/or remediated. The Soil Management Plan and Health and Safety Plan (**PDF HAZ-1**) will determine the extent of hazardous soils, if any, and ensure that any potential exposure of the hazards from soil disturbance to construction workers, the public, and environment would be limited.

Prairie Avenue/Hardy Street Station

The property proposed for the Prairie Avenue/Hardy Street Station is currently developed with a strip mall and surface parking. Addresses associated with this property include the odd numbers of 1035—1051 S. Prairie Avenue. One of the addresses is associated with dry cleaning solvents. Implementation of **PDF HAZ-1,** which requires preparation of the Soil Management Plan, Contaminated Soil Contingency Plan, if warranted, and Health and Safety Plan will determine the extent of potential hazardous soils and their remediation/removal if necessary. Compliance with **PDF HAZ-1** will ensure that soil disturbance would be compliant with government regulations and reduce the potential exposure of hazards to construction workers, the public, and environment.

Properties Adjacent to the Proposed Inglewood Transit Connector Project

As listed in **Table 4.8-3**, numerous properties adjacent and near the proposed Project alignment have been identified on Government databases for hazardous materials. Depending on the current and historic uses

65 Los Angeles County Department of Public Works, Environmental Programs Division, *Underground Storage Tank Program: Closure*, accessed June 30, 2020, https://pw.lacounty.gov/epd/UST/closure.cfm.

of the hazardous materials and operations at these properties, environmental conditions at these properties may exist and affect the soils that would be disturbed by Project implementation. The Soil Management Plan and Health and Safety Plan that would be prepared under **PDF HAZ-1** for each phase of the proposed Project will consider the adjoining properties' potentially hazardous soil conditions. If required, a contaminated soil contingency plan will be implemented to ensure the safe handling and removal of hazardous soils and to limit environmental exposure to construction workers and the public.

Summary of Impacts

Construction of the proposed Project would not result in the accidental or inadvertent release of hazardous materials into the environment. The proposed Project includes the CCP, which is implemented as a project design feature (**PDF HAZ-1**) that requires the preparation and implementation of Building Demolition Plans, Hazardous Materials Contingency Plans, Soil Management Plans, and Health and Safety Plans that will outline hazards and hazardous materials within the Project area and identify how they are to be handled, removed, remediated, transported, and/or disposed of in a safe manner that would comply with applicable regulations, guidelines, and BMPs. Accordingly, potential exposure of hazards and hazardous materials to construction workers, the public, and the environment would be reduced to acceptable standards, and reasonably foreseeable upsets and accident conditions involving hazards and hazardous materials during construction would be less than significant.

Operation

Operation of the proposed Project would require the storage and handling of various types of regulated chemicals that are considered hazardous:

- **Cleaning and Building Maintenance Supplies.** Maintenance of each of the three stations and the MSF would require use and storage of janitorial cleaning supplies, paints and thinners, and pesticides for landscaping.
- **Train and Vehicle Fleet Maintenance Supplies.** The MSF would use and store chemicals for the purpose of maintaining Automated Transit System (ATS) trains and vehicle fleet. These may include fuel, solvents, oil, lubricants, transmission fluid, coolants, and absorbents.
- **Power Distribution System (PDS) Substations and Backup Power Generators.** The MSF and Prairie Avenue/Hardy Street Station would each operate a PDS substation and power generator. Various chemicals would be used and stored, including but not limited to dielectric fluid, transformer oil, insulating oils, sulfuric acid, and sulfur hexafluoride in order to insulate and cool electrical conductors and operate the PDS substations. Diesel fuel would also be stored for the operation of the power generators.

The use and storage of these chemicals have the potential to be released into the environment if they are not properly handled and stored in accordance with the manufacturers' instructions and applicable

federal, State, and local regulations, including those set forth by the federal- and Cal-OSHA, DTSC, as well as a facility-specific Hazardous Materials Business Plan (HMBP) that would be prepared for the proposed Inglewood Transit Connector project, administered by the LACoFD. The HMBP would address hazards related to the operations of the proposed Project, such as fires, explosions, or an unplanned release of hazardous substances into air, soil, or surface water.

The HMBPs would inventory the hazardous materials used and stored at each of the three stations and MSF and include an emergency response plan, including spill response measures to ensure that in the event that a release occurs, protocols would be implemented to contain and control the release in a manner that is protective of human health and the environment. The LACoFD would be required to review plans and ensure that hazardous substances used for the proposed Project are properly stored and the accident response plan is in place. The LACoFD would be responsible for inspecting and monitoring the use and storage of the hazardous materials. Material safety data sheets would be obtained from chemical manufacturers and made available to employees. Chemical containers would be required to be properly labeled. The proposed Project would be required to develop and maintain a written hazard communication program and develop and implement programs to train employees about hazardous materials.

Project operations may require the transportation of hazardous materials to and from stations and the MSF. The transport of these materials is regulated by the USDOT and Caltrans, which together determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the risk of accidental release.

Compliance with federal, State, and local laws and regulations relating to transport, storage, disposal, and handling of hazardous materials during Project operations would reduce the potential for accidental release or upset of hazards and hazardous materials in the environment reduce potential health risks. Therefore, operational impacts are less than significant.

Summary of Impacts

Operation of the proposed Project would require the use and storage of various types of hazardous materials at the proposed stations and MSF site. If not handled and stored in accordance with the manufacturers' instructions and applicable federal, State, and local regulations, the use and storage of the hazardous materials would have the potential to be released into the environment. The proposed Project would comply with federal- and Cal-OSHA, DTSC, the project's HMBP, administered by the LACoFD, as well as USDOT and Caltrans transportation requirements for hazardous materials. Accordingly, risks related to the use and storage of hazardous materials would be reduced to acceptable standards, and operational impacts would be less than significant.

Mitigation Measures

Construction

No mitigation is required.

Operation

No mitigation is required.

Level of Significance after Mitigation

Impacts would be less than significant.

Impact HAZ-2: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Section 4.8.4 lists schools and childcare facilities within one-quarter mile (1,320 feet) of the proposed Project alignment.

Construction

As discussed in **Impact HAZ-1,** construction of the proposed Project would involve the use, handling, transport, and disposal of hazardous materials that if improperly handled could result in an accidental release and potential exposure of hazards to the public, including schools adjacent to the proposed ATS system and along designated truck routes.

Handling of Construction Materials

Hazardous materials used at construction sites include fuels, paints, oils, transmission fluids, solvents, acidic and alkaline solutions, and welding materials. The materials would be brought onto the site by the construction contractor, packaged in consumer quantities, and used in accordance with manufacturer recommendations. The quantities of the materials at any one time would not result in large bulk amounts that, if spilled, would cause significant contamination or exposure to the public and schools. An accidental spill would be localized and contained due to the relatively small quantities involved and cleaned up in a timely manner, required by existing regulations, including OSHA. Removal procedures would be detailed in the contaminated soil contingency plan that is required for all construction activities and incorporated in the proposed Project as **PDF HAZ-1**, ***Hazardous Materials Program***. Construction best management practices, included in the proposed Project's Stormwater Pollution Prevention Plan, would limit pollutants entering to the stormwater as well as exposure of potential hazards and hazardous materials to the public, including schools. Given the required protective measures, limited quantities of hazardous materials used

at any one time at the construction site, and implementation of PDF HAZ-1, potential impacts related to the exposure of hazardous materials at nearby schools would be less than significant.

Transportation of Construction Materials

Construction materials would be transported along designated truck routes approved by the City (**PDF TRANS-3**). The routes would be along freeways and major thoroughfares, including Florence Avenue, Manchester Boulevard, Prairie Avenue, and Century Boulevard and would avoid residential streets. There are, however, existing schools along these routes. The transportation of hazardous materials is regulated by the Hazardous Materials Transportation Act, which is administered by the USDOT and Caltrans.[66] All truck drivers carrying hazardous materials to and from the construction sites—including materials for construction of the proposed ATS system and demolished existing building materials, underground improvements, and any contaminated soils—are required to have a commercial driver license with a hazardous materials (HazMat) endorsement; the HazMat endorsement allows truck drivers to transport hazardous material legally. Truck drivers would be trained for safety and to become familiar with hazardous materials requirements and complying with applicable packaging, labeling, and shipping regulations.[67] **PDF TRANS-3** also requires truck deliveries and the hauling of bulk construction-related materials to and from the Project area to be scheduled during off-peak hours. The morning peak hour would coincide with morning drop-off activities at schools. Accordingly, potential impacts related to the transportation of hazardous materials and school operations would be further limited with **PDF TRANS-3**. **PDF TRANS-4** would further minimize pedestrian exposure to hazardous materials by maintaining safe routes to schools. **PDF TRANS-4** requires the maintenance of safe and accessible sidewalks and crosswalks during construction and installation of wayfinding signs to ensure adequate levels of service of City-maintained pedestrian facilities. It also requires dedicated pedestrian barriers to protect pedestrians from construction-related debris, dust, and noise, and the use of crossing guards to address pedestrian safety and potential hazards related to construction activities. Therefore, compliance with existing regulations and the implementation of **PDF TRANS-3** and **PDF TRANS-4** would reduce potential impacts related to the transportation of construction and hazardous materials near schools to less than significant.

Construction Emissions

Air Emissions. Project construction would generate potentially hazardous air emissions. Air quality impacts are analyzed in **Section 4.2: Air Quality**. Specifically, a Health Risk Assessment was conducted to determine if Toxic Air Contaminants (TAC) from Project construction would significantly contribute to cancer risk at sensitive receptors within one-quarter mile, including schools and daycare centers. As discussed under **Impact AQ-3**, the HRA found that the proposed Project's construction-related emissions

66 49 USC Section 1801 et seq., (1975).

67 California Vehicle Code Division 13, Chapter 5, Article 1, Section 31303–31309

with mitigation (i.e., **PDF AQ-1**) would reduce health risks caused by off-road construction equipment to acceptable standards, and impacts are less than significant. Implementation of **PDF AQ-1** would mitigate regional air quality impacts and health risks at the sensitive receptors, including schools, to less than significant. **PDF AQ-1** requires construction equipment to meet Tier 4 emissions standards. Tier 4 compliant engines significantly reduce emissions of particulate matter (PM) and oxides of nitrogen (NOx) to near zero levels.[68] Construction equipment must also be outfitted with the best available control technology, including Level 3 diesel particulate filters, which further reduces particulate matter emissions by at least 85 percent. **PDF AQ-1** requires construction equipment and vehicles to be nondiesel and/or at a minimum meet CARB's 2010 engine emissions standards (0.01 g/hp-hour of particulate matter and 0.20 g/hp-hour of NOx emissions). Sweepers must have high-efficiency particulate air (HEPA) filters installed. To the extent feasible, equipment will be pole powered in lieu of generators. Additionally, if stationary equipment cannot be enclosed within acoustical barriers, the equipment must be muffled and, whenever possible, located at least 100 feet from sensitive land uses, including schools. Stationary construction equipment, such as diesel- that must be operated continuously must be placed at least 100 feet from air quality sensitive land uses, such as schools and daycare facilities, whenever possible. As demonstrated in **Tables 4.2-21** and **4.2-22**, the combined use of mitigating project features of **PDF AQ-1** reduces potentially significant health risks and impacts caused by construction emissions to less-than-significant levels.

Noise and Vibration. Construction activities would generate noise and vibration that could affect schools proximate to the proposed ATS system and along truck routes. Noise and vibration impacts are analyzed in **Section 4.10: Noise and Vibration. Impact NOI-1** includes noise modeling and impact analysis conducted at sensitive receptors near the proposed ATS system. Kelso Elementary School and a daycare facility, which are closest to the Project, are identified as receptors. The modeling conducted showed that construction noise levels at both sites would not exceed established thresholds, and impacts would be less than significant. Construction traffic noise was also assessed. As discussed in **Impact NOI-1,** delivery of construction materials would occur mainly during the night shift; therefore, construction traffic noise would have no impact on school operations.

Potential vibration impacts on buildings and human annoyance is discussed in **Impact NOI-2**. As documented in **Table 4.10-25**, heavy construction equipment would not damage school buildings, which would create a hazardous condition. However, due to the close proximity of the construction area, as shown in **Table 4.10-26** (listed as Site 3), pile driving activities could create vibration levels considered to be an annoyance at Kelso Elementary School. **PDF NOISE-1**, Construction Noise Control Plan, and **PDF NOISE-2,** Construction Vibration Reduction Plan, would require coordination with Inglewood Unified

68 US EPA. Regulations for Emissions from Heavy Equipment with Compression-Ignition (Diesel) Engines. Site Accessed 2021, September 29. https://www.epa.gov/regulations-emissions-vehicles-and-engines/regulations-emissions-heavy-equipment-compression

School District administrators to minimize disruptive noise and vibration effects, and limit the location of pile driving to 310 feet of off-site vibration sensitive receptors, such as Kelso Elementary School. Compliance with **PDF NOISE-1** and **PDF NOISE-2** would reduce potential health hazards related to short-term construction noise and vibration effects at nearby schools to acceptable standards; impacts would be less than significant.

Summary of Construction Impacts

With compliance with applicable local, State, and federal regulations governing the transport, handling, and disposal of hazardous materials and the implementation of the proposed Project's CCP, Project construction impacts related to the handling of hazardous materials and release of emissions at schools located within one-quarter mile of the proposed Project would be less than significant.

Operation

Hazardous Materials

As discussed in **Impact HAZ-1,** the operation and maintenance of the proposed ATS guideway, stations, MSF, PDS substations, and emergency generators would require the storage and handling of chemicals that have the potential to be released into the environment.

- The stations would include use of materials typical to a commercial setting such as cleaning solutions, solvents, pesticides for landscaping, and painting supplies. Compliance with federal, State, and local laws and regulations relating to transport, storage, disposal, and handling of hazardous materials would minimize any potential for accidental release or upset of hazardous materials during station operation. Additionally, the proposed Project would comply with planning and emergency response regulations pertaining to the presence of such materials during operation.
- Operations of the MSF and Prairie Avenue/Hardy Street Station would be subject to the requirements of programs administered by the LACoFD for storage of all hazardous materials on site, including diesel fuel for the emergency generators, which would be required to adhere to a facility-specific HMBP.
- The MSF would require the use of equipment, tools, and materials for maintenance activities; these may also require the use of various materials and substances that would be considered hazardous. The PDS substations at the MSF and Prairie Avenue/Hardy Street Station would use and store bulk quantities of hazardous materials—such as fuel, solvents, oil, transmission fluid, paints, and other chemicals—that would have the potential to be released into the environment if not properly handled and stored. The proposed Project would comply with existing regulations governing the storage and handling of such chemicals, and applicable regulations to responding to accidental release of such chemicals.

Therefore, the potential exposure of hazardous materials to the environment and sensitive receptors, including nearby schools, would be reduced to acceptable standards, and impacts would be less than significant.

Hazardous Emissions

Air emissions that would be generated by operation of the proposed ATS System are analyzed in **Section 4.2**. In general, the proposed Project would have an overall beneficial effect on regional and local air quality. The Project would result in a significant reduction in vehicle emissions. Coupled with the removal of several existing land uses that generate emissions, the proposed Project would result in net negative emissions. Furthermore, the ATS trains and guideway would be powered by electricity, which would not generate emissions associated with fuel combustion. Therefore, Project operations would not result in the generation of hazardous air emissions that would impact schools.

Rail Safety Hazards

Title 5 California Code of Regulations Section 14010(d) requires the preparation of a Rail Safety Study (RSS) when a proposed new school site is within 1,500 feet of an existing railroad track easement. Although not applicable to the proposed Project, at the request of the IUSD, the City prepared an RSS for the potential derailment of the proposed 1.6-mile elevated ATS trains. For analytical purposes, the RSS uses Kelso Elementary School as the primary site as it is nearest to the proposed Project alignment; potential impacts to other schools would be less as they are farther away.

A quantitative probability (annual frequency) of a derailment accident was determined for the ATS trains using the portion of the ITC Guideway within 1,500 feet of Kelso Elementary School. The determination of the likelihood of derailment is based on a comparison of the ATS train travel characteristics with the characteristics of similar systems in the Federal Railroad Association (FRA) railroad accident statistics.

The probabilities of a train accident and a train derailment are computed considering the following findings:

- The trains would operate on a single main line track.
- The trains will run on an elevated guideway, which eliminates potential conflicts with pedestrian and vehicular traffic that could affect students traveling to and from schools.
- The frequency of ATS trains and speed (maximum up to 50 mph) are similar to other transit lines operated by Metro in the region.
- The ATS trains would be strictly used for transporting passengers; there will not be any other cargo.
- The ATS trains would not transport hazardous materials, such as fuel, as it would be electrically powered.

Accordingly, the probability of an accident for each train mile in one direction is 1.44E-04 (or 0.000144) or 2.88E-04 (or 0.000288) in both directions, which is extremely low. The annual probability of the occurrence of a train derailment within 1,500 feet of Kelso Elementary School and during school operating hours (7 AM to 4 PM) was determined to be roughly zero (0.00E+0.0). Therefore, potential risk related to derailment of the proposed ATS trains is less than significant. (Additional discussion on safety and security programs for fixed guideway transit systems is provided below in the Operations discussion of **Impact HAZ-3**.)

Summary of Operational Impacts

Hazardous Materials. The proposed Project would comply with federal, State, and local laws and regulations relating to the transport, storage, disposal, and handling of hazardous materials during Project construction and operation. The use and storage of hazardous materials would comply with a project-specific HMBP, which would be administered by LACoFD. Therefore, potential impacts cause by hazardous materials at schools within one-quarter mile would be less than significant.

Hazardous Emissions. The Project would generate construction emissions; however, the emissions would not significantly contribute to health risks or acute impacts at nearby schools. Furthermore, mitigation measures required to reduce the Project's regional air quality impacts would also reduce localized air quality impacts, including at school sites. With the reduction of vehicle trips in the Project vicinity, removal of commercial uses for development of the proposed stations, and the operation of the proposed electric powered ATS, the proposed Project would result in an overall beneficial reduction of toxic emissions within a quarter mile of the proposed Project, including at school sites. Therefore, impacts related to hazardous emissions is less than significant.

Rail Safety Operations. An RSS was prepared for Kelso Elementary School, as it is the closest school to the proposed guideway. The RSS determined that the likelihood of a train accident in one direction is 1.44E-04 (or 0.000144) or 2.88E-04 (or 0.000288) in both directions. The annual probability of a derailment for the ATS railcars is roughly zero (0.00E+0.0) during school hours.

Mitigation Measures

Construction

No mitigation is required.

Operation

No mitigation is required.

Level of Significance after Mitigation

Impacts would be less than significant.

Impact HAZ-3: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

As described in *Section 4.8.3.3*, the proposed Project would be constructed in accordance with current design standards and building codes, which is consistent with the MHMP. Implementation of these standards and codes would minimize the loss of life and property from natural hazard events and protect public health and safety. The proposed Project would not interfere or impair with the City's ability to increase public awareness or make any improvements to emergency services and warning systems.

Construction

The proposed Project is located largely within public rights-of-way. For this reason, construction activities may cause the temporary closure of travel lanes, roadways segments, and sidewalks along the elevated guideway and stations within the street rights-of-way.

The City of Inglewood Public Works Department, Transportation Division operates and maintains the following:

- ITS traffic management center and intersection monitoring cameras
- Traffic signals and stop signs
- Intersection design and roadway alignments
- Public parking structures and lots
- Parking meters
- Parking permit districts
- Crosswalks and roadway striping
- Street lighting
- Street and traffic signs
- Street closures and barricades

The City Department of Public Works Engineering Division is responsible for issuing permits related to street closures for construction activities including Encroachment and Excavation Permits. An encroachment or excavation permit is required for all construction work within or related to the use of any public street right-of way.

Temporary Closures of Roadways and Sidewalks

Construction of the proposed stations, parking lots, and MSF would mainly occur within the properties affected. Perimeter improvements at these facilities, such as new driveways and sidewalk improvements, may require the temporary closure of lanes and sidewalks adjacent to the improvement area. Construction of the proposed ATS guideway and Prairie Avenue roadway shift would predominantly occur within the rights-of-way and as discussed in *Section 3.7*: *Construction*, would result in temporary street and/or lane closures. The closure of streets would be confined to the construction phase of the proposed Project and as required by **PDF TRANS-2,** Construction Staging and Traffic Control Program, would typically occur during off-peak hours. Closures would be temporary in nature and would not last the entirety of the Project construction phase. However, the phased construction duration of the proposed Project would be approximately four years, which could adversely affect the existing emergency access routes and services.

Specifically, the proposed Project could restrict access to streets that are designated as evacuation routes in the Safety Element of the City's General Plan, including Florence Avenue, Prairie Avenue and Manchester Boulevard. Street closures would interfere with emergency response or evacuation plans involving the use of these streets, even though the closures would be conducted in accordance with the City's permitting process. Adjacent collector/local streets on either side of Florence Avenue, Prairie Avenue and Manchester Boulevard could be used during street or lane closures.

The CCP will require all potential street and/or lane closures during construction to be reviewed and approved by the City and shall include measures to minimize the degree and duration of the closures.

The Construction Staging and Traffic Control Plan would include detour routes and would require coordination with the City, police, and fire services department regarding maintenance of emergency access and response times.

Preparation and implementation of the Construction Staging and Traffic Control Plan would ensure that adequate access or appropriate detour routes are provided along Florence Avenue, Prairie Avenue, and Market Street. Impacts would be less than significant.

Operation

The proposed Project would not interfere or impair with the City's ability to increase public awareness or make any improvements to emergency services and warning systems during operations.

ATS Guideway

The proposed Project would operate in conformance with established safety requirements. The American Society of Civil Engineers (ASCE) Standard 21, Part 1 – Automated People Mover Standards[69] which addresses safety and performance requirements that apply to proposed Project. ASCE published a safety and security standard that included requirements that address federal and State regulations for independent safety oversight agencies. Safety and security programs should also adhere to ASCE 21, Part 4 (ASCE 21.4-08) – Automated People Mover Standards—Part 4: Security Emergency Preparedness System Verification and Demonstration Operations, Maintenance, and Training Operational Monitoring.[70]

Safety oversight of fixed guideway transit systems is required at the State government level under the Federal Transit Administration, Part 659, Rail Fixed Guideway Systems – State Safety Oversight requirements when there is a similar transit system operating within the State.[71] The proposed Project's safety and security programs would be subject to the requirements the of CPUC and State Safety Oversight of Fixed Guideway Transit Systems. In addition, the operation of the proposed Project would be required to adhere to all State and local safety requirements including those of the City's fire and police departments. With adherence to the federal, State, and local safety requirements, the proposed Project would not conflict with the requirements of an emergency response plan or emergency evacuation plan.

Roadway Reconfiguration and Restriping

Roadway configuration and striping for the proposed Project are shown in **Figures 3.0-10** to **3.0-24: Striping Plans**, and **Figures 3.0-25** to **3.0-32: Cross-sections**. Proposed improvements would be designed consistent with standards established in the City's Circulation Element.[72] The City's Department of Public Works, Transportation Division would review and approve the final roadway configuration and restriping improvements.[73] Therefore, operation of the reconfigured and restriped roadways would not interfere with adopted emergency response plan or emergency evacuation and this impact is less than significant.

69 American Society of Civil Engineers (ASCE). Standard 21 - Automated People Mover Standards. Part 1, Section 3 (ASCE 21-05). https://ascelibrary.org/doi/book/10.1061/9780784408735

70 American Society of Civil Engineers (ASCE). Standard 21, Part 4 (ASCE 21.4-08) - Automated People Mover Standards—Part 4: Security Emergency Preparedness System Verification and Demonstration Operations, Maintenance, and Training Operational Monitoring. https://standards.globalspec.com/std/1147223/ASCE%2021.4-08

71 Code of Federal Regulations (CFR), Title 49. Transportation. Subtitle B. Other Regulations Relating to Transportation, Chapter VI. Federal Transit Administration, Part 659, Rail Fixed Guideway Systems; State Safety Oversight.

72 Inglewood General Plan, Circulation Element. 1992, December 15. https://www.cityofinglewood.org/DocumentCenter/View/128/Circulation-Element-1992.

73 City of Inglewood, Transportation and Traffic. Accessed: 2021, October 28. https://www.cityofinglewood.org/451/Transportation-Traffic

Mitigation Measures

Construction

No mitigation is required.

Operation

No mitigation is required.

Level of Significance after Mitigation

Construction

Impacts would be less than significant.

Operation

Impacts would be less than significant.

4.8.8 CUMULATIVE IMPACTS

Hazardous materials and hazard impacts are generally localized to specific sites and do not combine with one another in a way to create a greater or more severe hazard. Because of the relative infrequencies and the variances in timing, the geographic scope for cumulative hazards and hazardous materials impacts varies based on the hazard and the significance threshold being analyzed. 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. Hazardous materials incidents tend to be limited to a smaller more localized area surrounding the immediate location and extent of a release and could only be cumulative if two or more hazardous material releases overlapped spatially and contemporaneously.

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

As discussed in **Section 3.0: Project Description**, the City is considering building a parking structure on the City's Inglewood Transit Facility (ITF) site located on the southeast corner of Prairie Avenue and Arbor Vitae Street. This parking structure would provide additional public parking near event venues in the LASED and for the IBEC. The ITF site is currently improved as a surface parking lot and bus transit facility. This potential parking structure would provide up to 2,500 parking spaces in a six-level building. Although this proposed

parking facility is not proposed as part of the Project, it is considered a related project for the purposes of assessing potential cumulative impacts.

The 2009 EIR for the Hollywood Park Specific Plan (HPSP) project evaluated the impacts of developing the City's four-acre ITF site with respect to potential hazardous materials and risk of upset. As described in the 2009 EIR, the City's ITF has undergone numerous site assessment evaluations over the past two decades; those which are relevant to the proposed Project are shown in **Table 4.8-4: ITF Site-Specific Investigations**. A summary of the investigative history associated with the City's Civic Center site is provided below.

Table 4.8-4
ITF Site-Specific Investigations

Investigation	Prepared By	Date
Phase I Environmental Site Assessment and Limited Compliance Assessment	ENVIRON International Corporation	April 11, 2005
Soil Management Plan	Erler & Kalinowski, Inc.	July 3, 2007
Technical Report and Work Plan	Erler & Kalinowski, Inc.	April 24, 2008
Field Portable X-Ray Fluorescence Spectrometry for In-Situ Screening of Arsenic in Soil	Erler & Kalinowski, Inc.	February 26, 2015

Source: City of Inglewood, Final Environmental Impact Report for the Hollywood Park Redevelopment Project, June 3, 2009.

A Soil Management Plan (SMP) summarizing prior screening-level subsurface investigations was prepared in July 2007 and submitted and approved by the RWQCB, to address localized areas found to contain or suspected to contain chemicals of potential concern (COPCs) on the Hollywood Park property including the City's Civic Center site where the proposed Project may locate a PDS substation either above or below grade. The SMP includes soil and soil gas COPCs criteria and soil management and construction risk management protocols to be implemented during planned redevelopment of the property, including soil reuse and waste disposal classification protocols.

Soil sampling revealed arsenic in shallow soil at the ITF site. All shallow arsenic-contaminated soil has been removed from the City's Civic Center site as of the summer of 2020. The remaining soil on the site is below the Property-specific Soil Criteria (PSC) requirement and removal is deemed complete; no further action is recommended. The RWQCB required no further action, and the site was developed by the City with as a surface parking lot and bus transfer facility.

The proposed Project in conjunction with other cumulative projects would include the use, storage, and disposal of varying quantities of hazardous materials. The proposed Project does not include any substantive emissions of hazardous materials that would be associated with industrial land uses (e.g., manufacturing, chemical processing, handling of bulk quantities of hazardous materials or wastes). Just as

with the proposed Project, all commercial uses/businesses would be required to submit business information and hazardous materials inventory forms to the LACoFD and/or appropriate jurisdiction having responsibility, such as the California Environmental Reporting System. All hazardous materials are required to be stored and handled according to the manufacturer's instructions 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, would be localized in extent.

As discussed previously, adherence to the regulatory requirements would ensure that incidents at the proposed Project and other cumulative projects are infrequent, and thus unlikely to occur simultaneously in a way that could result in the public or environment being exposed to multiple releases of hazardous materials. For the aforementioned reasons, the proposed Project, in conjunction with other cumulative projects, would not create a significant cumulative hazard impact to the public or the environment through the routine transport, use, or disposal of hazardous materials.

A cumulative impact related to transport, use, or disposal of hazardous materials could occur if there were hazards releases in the vicinity and at the same time as a release associated with the construction or operation of the proposed Project. For the purposes of this analysis, the geographic scope considered for analysis of this criterion is a 1-mile-radius area from the proposed Project. A 1-mile radius is reasonable in light of the relatively small amounts and types of hazardous materials that would be associated with construction and operation of the proposed Project.

The proposed Project in conjunction with other cumulative projects would include the use, storage, and disposal of varying quantities of hazardous materials. The proposed Project does not include any substantive emissions of hazardous materials such as might be associated with industrial land uses (e.g., manufacturing, chemical processing, handling of bulk quantities of hazardous materials or wastes). Just as with the proposed Project, all commercial uses/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 LACoFD, as the CUPA, and other CUPA agencies for the cumulative projects outside of LACoFD's 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, would likely be localized in extent.

As noted above, adherence to the regulatory requirements would ensure that incidents at the proposed Project and other cumulative projects within a 1-mile radius are infrequent, and thus unlikely to occur simultaneously in a way that could result in the public or environment being exposed to multiple releases of hazardous materials. For the reasons described above, the proposed Project, in conjunction with other cumulative projects, would not create a cumulatively significant hazard impact to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, this cumulative impact would be less than significant.

Construction and operation of the proposed Project, like the other largely residential and commercial cumulative projects identified in **Section 4.0**, *4.0.6: Cumulative Assumptions*, would include the use of relatively small quantities of hazardous materials and generation of small amounts of hazardous wastes. The proposed Project and other cumulative projects would not require the transport, storage, use, or disposal any unusually large, toxic, or explosive quantities of hazardous materials or hazardous wastes. The proposed Project and other cumulative residential and commercial projects, would use, store, handle, and dispose of relatively limited quantities of hazardous materials, such as cleaning fluids, lubricants, paints, and fuels. Similarly, these types of projects generate small quantities of hazardous wastes, including small leftover amounts of hazardous materials previously discussed, paint cans, medical wastes, and the like.

The proposed Project and cumulative projects and their associated businesses would be required to adhere to the comprehensive set of existing federal, State, and local regulatory requirements, including the HMBP programs administered by the LACoFD. These programs require all users of hazardous materials to implement employee training, safe storage, and appropriate handling requirements to ensure that upset and accident conditions are minimized. In the unlikely event that an accidental release was to occur, these programs require spill response measures to ensure that incidents are quickly contained and, therefore, would not travel off site in a way that could cumulatively combine to affect large numbers of people or affect substantial parts of the environment.

The proposed Project and cumulative projects would be required to operate in conformance with established safety requirements during operation to ensure compliance with City emergency service and warning systems. The proposed Project and cumulative projects would operate in conformance with ASCE standards and Federal Transportation Administration requirements. The proposed Project's and cumulative projects' safety and security programs would be subject to the requirements the of CPUC and State Safety Oversight of Fixed Guideway Transit Systems. In addition, operation of the proposed Project and cumulative projects would be required to adhere to all State and local safety requirements including those of the City's fire and police departments. With adherence to the federal, State, and local safety

requirements, the proposed Project, in conjunction with other cumulative projects, would not conflict the requirements of an emergency response plan or emergency evacuation plan.

For the reasons described above, the proposed Project, in conjunction with other cumulative projects, would not create a cumulatively considerable hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Therefore, cumulative impacts would not be significant.

4.8.9 CONSISTENCY WITH CITY OF INGLEWOOD GENERAL PLAN

There are no specific policies within the General Plan that apply to the proposed Project regarding hazards or hazardous materials. The City's General Plan Safety Element outlines measures related to potential hazardous materials incidents. As discussed above, compliance with federal, State, and local laws and regulations relating to transport, storage, disposal, and sale of hazardous materials would minimize any potential for accidental release or upset of hazardous materials.

There are no specific policies within the General Plan that apply to the proposed Project regarding emergency response and emergency evacuation plans. The City's General Plan Safety Element outlines measures related to disasters that require emergency evacuation plans. As discussed above, compliance with federal, State, and local laws and regulations relating to emergency response and emergency evacuation plans would ensure consistency with the General Plan Safety Element.