

IV. Environmental Impact Analysis

F. Hazards and Hazardous Materials

1. Introduction

This section analyzes the Project's potential hazards and hazardous materials impacts that could occur during Project construction and operation. In addition, this section analyzes the Project's incremental contribution to cumulative hazards and hazardous materials impacts from past, present, and probable future projects. The analysis is based in part on the *Phase I Environmental Site Assessment Report, 130 West College Street, Los Angeles, CA 90012*¹ (Phase I ESA); *Phase II Environmental Site Assessment Report, 130 West College Street, Los Angeles, CA 90012*² (Phase II); and *Clarification of Environmental Reports for 130 West College Street, Los Angeles, CA* prepared for the Project by Smith-Emery Laboratories, and the *Certificate of Compliance for Methane Test Data, 130 West College Street, Los Angeles, CA 90012 Memorandum*³ (Methane Memorandum) prepared by Langan Engineering and Environmental Services (Langan). These reports are provided in Appendices F.1, F.2, F.3, and F.4 of this Draft EIR, respectively.

2. Environmental Setting

a. Regulatory Framework

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

- Resource Conservation and Recovery Act
- Comprehensive Environmental Response, Compensation, and Liability Act

¹ Smith-Emery Laboratories, *Phase I Environmental Site Assessment Report, 130 West College Street, Los Angeles, CA 90012*, April 6, 2023. Refer to Appendix F.1 of this Draft EIR.

² Smith-Emery Laboratories, *Phase II Environmental Site Assessment Report Performed at: 130 West College Street, Los Angeles, CA 90012*, May 31, 2023. Refer to Appendix F.2 of this Draft EIR.

³ Langan Engineering and Environmental Services, *Methane Evaluation for 130 West College Street, Los Angeles, CA 90012*, March 14, 2024. Refer to Appendix F.4 of this Draft EIR.

- Occupational Safety and Health Act of 1970
- Toxic Substances Control Act
- Hazardous Materials Transportation Act
- Research and Special Programs Administration Regulations
- Uniform Fire Code
- Federal Emergency Management Agency
- Disaster Mitigation Act of 2000
- Other Hazardous Materials Regulations
- State Policies and Regulations
- California Hazardous Materials Release Response Plans and Inventory Law of 1985
- Hazardous Waste and Substances Sites
- Hazardous Waste Control Law
- License to Transport Hazardous Materials—California Vehicle Code, Section 32000.5 et seq.
- Underground Storage Tanks Program
- Aboveground Petroleum Storage Act
- Lead-Based Paint Regulations
- California Division of Occupational Safety and Health
- The Safe Drinking Water and Toxic Enforcement Act
- California Water Code
- California Public Resources Code, Division 3, Chapter 1, Section 3229
- California Fire Code
- California Standard Emergency Management System Program
- Emergency Managers Mutual Aid Plan
- South Coast Air Quality Management District Rule 1113

- South Coast Air Quality Management District Rule 1166
- South Coast Air Quality Management District Rule 1403
- Los Angeles County Operational Area Emergency Response Plan
- Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan
- Certified Unified Program Agency
- Los Angeles Fire Code
- Los Angeles Municipal Code (Methane Zones and Methane Buffer Zones)
- City of Los Angeles General Plan, Conservation Element

(1) Federal

(a) Resource Conservation and Recovery Act

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

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

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

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as “Superfund,” was enacted by Congress on December 11, 1980.⁴ This law provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites, providing for liability of persons responsible for releases of hazardous waste at these sites, and

⁴ USEPA, *Superfund CERCLA Overview*, www.epa.gov/superfund/superfund-cercla-overview, accessed August 14, 2025.

established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled the revision of the National Contingency Plan. The National Contingency Plan provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also establishes the National Priorities List, which is a list of contaminated sites warranting further investigation by the U.S. Environmental Protection Agency (USEPA). CERCLA was amended most recently by the Small Business Liability Relief and Brownfields Revitalization Act of 2002, which exempts contributors of very small quantities of hazardous substances and household, small business, and nonprofit generators of municipal solid waste from liability for Superfund response costs at National Priority List sites and provides for expedited settlements with certain persons based on a limited ability to pay.⁵

(c) Occupational Safety and Health Act of 1970

The Occupational Safety and Health Act of 1970, which is implemented by the federal Occupational Safety and Health Administration (OSHA), contains provisions with respect to hazardous materials handling. OSHA was created to assure safe and healthful working conditions by setting and enforcing standards and by providing training, outreach, education, and assistance. OSHA provides standards for general industry and construction industry on hazardous waste operations and emergency response. OSHA requirements, as set forth in 29 Code of Federal Regulations (CFR) Section 1910, et. seq., are designed to promote worker safety, worker training, and a worker's right-to-know. The U.S. Department of Labor has delegated the authority to administer OSHA regulations to the State of California. The California OSHA (Cal/OSHA) program (codified in the California Code of Regulations [CCR], Title 8, or 8 CCR generally and in the Labor Code Sections 6300–6725) is administered and enforced by the California Division of Occupational Safety and Health (DOSH). Cal/OSHA is very similar to the OSHA program. Among other provisions, Cal/OSHA requires employers to implement a comprehensive, written Injury and Illness Prevention Program (IIPP) for potential workplace hazards, including those associated with hazardous materials.

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

⁵ USEPA, *Summary of the Small Business Liability Relief and Brownfields Revitalization Act*, www.epa.gov/brownfields/summary-small-business-liability-relief-and-brownfields-revitalization-act, accessed August 14, 2025.

Waste Operations and Emergency Response and 29 CFR 1926, Safety and Health Regulations for Construction, as well as other applicable federal, state, and local laws and regulations.

(d) Toxic Substances Control Act

In 1976, the federal Toxic Substances Control Act (TSCA) (15 USC Sections 2601–2671) established a system of evaluation in order to identify chemicals which may pose hazards. TSCA is enforced by the USEPA through inspections of places in which asbestos-containing materials (ACMs) are manufactured, processed, and stored and through the assessment of administrative and civil penalties and fines, as well as injunctions against violators. TSCA establishes a process by which public exposure to hazards may be reduced through manufacturing, distribution, use and disposal restrictions or labeling of products. Polychlorinated Biphenyls (PCBs) are hazardous materials regulated by the USEPA under the TSCA. These regulations ban the manufacture of PCBs although the continued use of existing PCB-containing equipment is allowed. PCBs were formerly used in such applications as hydraulic fluids, plasticizers, adhesives, fire retardants, and electrical transformers, among others. TSCA also contains provisions controlling the continued use and disposal of existing PCB-containing equipment. The disposal of PCB wastes is also regulated by TSCA (40 CFR 761), which contains life cycle provisions similar to those in RCRA. In addition to TSCA, provisions relating to PCBs are contained in the Hazardous Waste Control Law (HWCL), which lists PCBs as hazardous waste.

Under TSCA, the USEPA has enacted strict requirements on the use, handling, and disposal of ACMs. These regulations include the phasing out of friable asbestos and ACMs in new construction materials beginning in 1979. In 1989, the USEPA banned most uses of asbestos in the country. Although most of the ban was overturned in 1991, the current banned product categories include corrugated paper, rollboard, commercial paper, specialty paper, flooring felt, and any new uses. On March 18, 2024, the USEPA announced a final rule to prohibit ongoing uses of chrysotile asbestos, the only known form of asbestos currently used in or imported to the United States.⁶ TSCA also establishes USEPA's Lead Abatement Program regulations, which provide a framework for lead abatement, risk assessment, and inspections. Those performing these services are required to be trained and certified by USEPA.

⁶ USEPA, "Biden-Harris Administration finalizes ban on ongoing uses of asbestos to protect people from cancer," March 18, 2024, www.epa.gov/newsreleases/biden-harris-administration-finalizes-ban-ongoing-uses-asbestos-protect-people-cancer, accessed August 14, 2025.

(e) Hazardous Materials Transportation Act

The U.S. Department of Transportation (USDOT) prescribes strict regulations for the safe transportation of hazardous materials, including requirements for hazardous waste containers and licensed haulers who transport hazardous waste on public roads. The Secretary of the USDOT receives the authority to regulate the transportation of hazardous materials from the Hazardous Materials Transportation Act (HMTA), as amended and codified in 49 USC Section 5101 et seq. The Pipeline and Hazardous Materials Safety Administration (PHMSA),⁷ formerly the Research and Special Provisions Administration, was delegated the responsibility to write the hazardous materials regulations, which are contained in Title 49 CFR Parts 100–185.⁸ Title 49 CFR contains the regulations set forth by the HMTA and specifies requirements and regulations with respect to the transport of hazardous materials. It requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Under the HMTA, the Secretary of USDOT “may authorize any officer, employee, or agent to enter upon, inspect, and examine, at reasonable times and in a reasonable manner, the records and properties of persons to the extent such records and properties relate to: (1) the manufacture, fabrication, marking, maintenance, reconditioning, repair, testing, or distribution of packages or containers for use by any ‘person’ in the transportation of hazardous materials in commerce; or (2) the transportation or shipment by any ‘person’ of hazardous materials in commerce.”

(f) Research and Special Programs Administration Regulations

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

⁷ U.S. Department of Transportation, *Pipeline and Hazardous Materials Safety Administration, Federal Hazmat: An Overview of Federal Laws for Hazardous Materials Transportation*, September 2021.

⁸ *Federal Register, Code of Federal Regulations 49, Parts 100 to 185, Revised as of October 1, 2010.*

(g) Uniform Fire Code

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

- Separation of incompatible materials with a noncombustible partition;
- Spill control in all storage, handling, and dispensing areas; and
- Separate secondary containment for each chemical storage system. The secondary containment must hold the entire contents of the tank, plus the volume of water needed to supply the fire suppression system for a period of 20 minutes in the event of a catastrophic spill.

(h) Federal Emergency Management Agency

The Federal Emergency Management Agency (FEMA) was established in 1979 via executive order and is an independent agency of the federal government. In March 2003, FEMA became part of the U.S. Department of Homeland Security with the mission to lead the effort in preparing the nation for all hazards and effectively manage federal response and recovery efforts following any national incident.⁹ FEMA also initiates proactive mitigation activities, trains first responders, and manages the National Flood Insurance Program and the U.S. Fire Administration.

(i) Disaster Mitigation Act of 2000

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

⁹ Federal Emergency Management Agency, www.fema.gov/about/history, accessed August 14, 2025.

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

The mitigation planning provisions outlined in Section 322 of this act establish performance-based standards for mitigation plans and require states to have a public assistance program (Advance Infrastructure Mitigation [AIM]) to develop county government plans. The consequence for counties that fail to develop an infrastructure mitigation plan is the chance of a reduced federal share of damage assistance from 75 percent to 25 percent if the damaged facility has been damaged on more than one occasion in the preceding 10-year period by the same type of event.

(j) Other Hazardous Materials Regulations

In addition to the USDOT regulations for the safe transportation of hazardous materials, other applicable federal laws that also address hazardous materials include:

- Community Environmental Response Facilitation Act (CERFA) of 1992;
- Clean Water Act;
- Clean Air Act;
- Safe Drinking Water Act; and
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

(2) State

(a) State Policies and Regulations

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

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

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

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

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

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

The California Hazardous Materials Release Response Plans and Inventory Law of 1985, also known as the Business Plan Act requires preparation of Hazardous Materials Business Plans and disclosure of hazardous materials inventories, including an inventory of hazardous materials handled, plans showing where hazardous materials are stored, an emergency response plan, and provisions for employee training in safety and emergency response procedures for businesses that handle, store, or transport hazardous materials in amounts exceeding specified minimums (California Health and Safety Code [HSC], Division 20, Chapter 6.95, Article 1). Statewide, DTSC has primary regulatory responsibility for management of hazardous materials, with delegation of authority to local jurisdictions that enter into agreements with the state. Local agencies are responsible for administering these regulations.

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

(c) Hazardous Waste and Substances Sites

Government Code Section 65962.5, amended in 1992 and 2022, requires the CalEPA to develop and update annually the Hazardous Waste and Substances Sites (Cortese List), which is a list of hazardous waste sites and other contaminated sites. The Cortese List is a planning document used by the state, local agencies, and developers to comply with California Environmental Quality Act (CEQA) requirements pertaining to providing information about the location of hazardous materials release sites. While the Cortese List is no longer maintained as a single list, the following databases provide information that meet the Cortese List requirements:

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

(d) Hazardous Waste Control Law

The HWCL empowers DTSC to administer the State's hazardous waste program and implement the federal program in California. CCR Titles 22 and 23 address hazardous materials and wastes. Title 22 defines, categorizes, and lists hazardous materials and wastes. Title 23 addresses public health and safety issues related to hazardous materials and wastes and specifies disposal options.

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

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

(f) Underground Storage Tanks Program

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

(g) Aboveground Petroleum Storage Act

In 1989, California established the Aboveground Petroleum Storage Act instituting a regulatory program covering aboveground storage tanks (ASTs) containing specified petroleum products (HSC Sections 25270–25270.13). The Aboveground Petroleum Storage Act applies to facilities with storage capacities of 10,000 gallons or more or are subject to oil pollution prevention and response requirements under 40 CFR Part 112. Under the Aboveground Petroleum Storage Act, each owner or operator of a regulated AST facility must file biennially a storage statement with the SWRCB disclosing the name and address of the AST facility; the contact person for the facility; and the location, size, age, and contents of each AST that exceeds 10,000 gallons in capacity and that holds materials that are at least five percent petroleum. In addition, each owner or operator of a regulated AST must prepare a Spill Prevention Control and Countermeasure (SPCC) Plan in accordance with federal and state requirements (40 CFR Part 112 and HSC Section 25270.5[c]). The responsibility for inspecting ASTs and ensuring that SPCC Plans have been prepared lies with the RWQCBs.

(h) Lead-Based Paint Regulations

Lead-based paint (LBP) is defined as any paint, varnish, stain, or other applied coating that has a one milligram per square centimeter (mg/cm^2) (5,000 microgram per gram [$\mu\text{g}/\text{g}$] or 0.5 percent by weight) or more of lead. The U.S. Consumer Product Safety Commission (16

CFR 1303) banned paint containing more than 0.06 percent lead for residential use in 1978. Buildings built before 1978 are much more likely to have LBP.

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

(i) California Division of Occupational Safety and Health

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

(j) The Safe Drinking Water and Toxic Enforcement Act

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

(k) California Water Code

The CWC authorizes the SWRCB to implement provisions of the Clean Water Act, including the authority to regulate waste disposal and require cleanup of discharges of hazardous materials and other pollutants. With regard to construction dewatering discharge analysis and treatment, groundwater may be encountered during deeper excavations for the subterranean parking structure, building foundations, or other subterranean building components. Under the CWC, discharges of any such groundwater to surface waters, or any point sources hydrologically connected to surface waters, such as storm drains, is prohibited

unless conducted in compliance with a Waste Discharge Requirement (WDR) permit. In addition to the CWC, these permits implement and are in compliance with the federal Clean Water Act's National Pollutant Discharge Elimination System (NPDES) program. In accordance with these legal requirements, dewatering, treatment, and disposal of groundwater encountered during construction activities would be conducted in accordance with the Los Angeles RWQCB's (LARWQCB) Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, pursuant to adopted Order No. R4-2018-0125, or any other appropriate WDR permit identified by the LARWQCB.¹⁰ Compliance with an appropriate WDR permit would include monitoring, treatment if appropriate, and proper disposal of any encountered groundwater in accordance with applicable water quality standards. If, for example, extracted groundwater contains Total Petroleum Hydrocarbons (TPH) or other petroleum breakdown compounds in concentrations exceeding water quality standards, compliance with legal requirements would mandate treatment to meet published state water quality standards prior to discharge into a storm drain system.

(l) California Public Resources Code Section 3229, Division 3

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

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

The California Fire Code (CFC), Chapter 9 of Title 24 of the CCR, was created by the California Building Standards Commission based on the International Fire Code (IFC) and is updated every three years. The IFC is a model code that regulates minimum fire safety requirements for new and existing buildings, facilities, storage and processes. The IFC addresses fire prevention, fire protection, life safety, and safe storage and use of hazardous materials in new and existing buildings, facilities, and processes.

The overall purpose of the CFC is to establish the minimum requirements to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. Chapter 49 of the CFC contains minimum standards for development in the wildland–urban interface

¹⁰ Los Angeles Regional Water Quality Control Board, Order No. R4-2018-0125, *Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties*, adopted September 13, 2018.

and fire hazard areas. The CFC also provides regulations and guidance for local agencies in the storage, use, and handling of hazardous materials, as well as the development and enforcement of fire safety standards. The 2022 CFC, which is based on the 2021 IFC, became effective January 1, 2023.

(n) California Standard Emergency Management Program

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

(o) Emergency Managers Mutual Aid Plan

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

was most recently updated in March 2022 and is retitled as the Emergency Management Mutual Aid Plan.¹¹

(3) Regional

(a) South Coast Air Quality Management District Rule 1113

South Coast Air Quality Management District (SCAQMD) Rule 1113, Architectural Coating, requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce volatile organic compound (VOC) emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

(b) South Coast Air Quality Management District Rule 1166

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

(c) South Coast Air Quality Management District Rule 1403

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

(d) Los Angeles County Operational Area Emergency Response Plan

The County of Los Angeles (County) developed the Operational Area Emergency Response Plan (OAERP) to ensure the most effective allocation of resources for the maximum

¹¹ California Governor's Office of Emergency Services (Cal OES), *State of California Emergency Management Mutual Aid Plan*, March 2022.

benefit and protection of the public in time of emergency. The OAERP does not address normal day-to-day emergencies or the well-established and routine procedures used in coping with them. Instead, the operational concepts reflected in this plan focus on potential large-scale disasters like extraordinary emergency situations associated with natural and man-made disasters and technological incidents which can generate unique situations requiring an unusual or extraordinary emergency response. The purpose of the plan is to incorporate and coordinate all facilities and personnel of the County government, along with the jurisdictional resources of the cities and special districts within the County, into an efficient operational area organization capable of responding to any emergency using a Standard Emergency Management System, mutual aid and other appropriate response procedures. The goal of the plan is to take effective life-safety measures and reduce property loss, provide for the rapid resumption of impacted businesses and community services, and provide accurate documentation and records required for cost-recovery.

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

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

(4) Local

(a) Certified Unified Program Agency

The LAFD is designated by the State as a CUPA for the City and is the primary local agency with responsibility for implementing federal and state laws and regulations pertaining to hazardous materials management. A CUPA is a local agency that has been certified by CalEPA to implement the six state environmental programs within the local agency's jurisdiction. This program was established under the amendments to the California HSC made by Senate Bill 1082 in 1994. The six consolidated programs are:

- Hazardous Materials Release Response Plan and Inventory (Business Plans);
- California Accidental Release Prevention (CalARP);

- Hazardous Waste (including Tiered Permitting);
- USTs;
- ASTs (SPCC requirements); and
- UFC Article 80 Hazardous Material Management Program (HMMP) and Hazardous Material Identification System (HMIS)

As the CUPA for the City, LAFD maintains the records regarding location and status of hazardous materials sites in the county and administers programs that regulate and enforce the transport, use, storage, manufacturing, and remediation of hazardous materials.

The LAFD monitors the storage of hazardous materials in the City for compliance with local requirements. Specifically, businesses and facilities that store more than threshold quantities of hazardous materials as defined in California HSC Code Chapter 6.95 are required to file an Accidental Risk Prevention Program with LAFD. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. LAFD also has the authority to administer and enforce federal and state laws and local ordinances for USTs. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LAFD inspectors.

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

(b) Los Angeles Fire Code

At the local level, the LAFD monitors the storage of hazardous materials for compliance with local requirements. Specifically, businesses and facilities that store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the California HSC are required

to file an Accidental Risk Prevention Program with the LAFD.¹² This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. The LAFD also issues permits for hazardous materials handling and enforces California's Hazardous Materials Release Response Plans and Inventory Law (HSC Section 25500 et seq.). Basic requirements of California's Hazardous Materials Release Response Plans and Inventory Law include the development of detailed hazardous materials inventories used and stored on-site, a program of employee training for hazardous materials release response, identification of emergency contacts and response procedures, and reporting of releases of hazardous materials. Any facility that meets the minimum reporting thresholds (i.e., a mixture containing a hazardous material that has a quantity at any one time during the reporting year that is equal to, or greater than, 55 gallons for materials that are liquids, 500 pounds for solids, or 200 cubic feet for compressed gas) must comply with the reporting requirements and file a Business Emergency Plan (BEP) with the local administering agency.¹³

The LAFD also administers the Fire Life Safety Plan Check and Fire Life Safety Inspections interpreting and enforcing applicable standards of the California Fire Code, Title 19 of the CCR, Uniform Building Code, as well as city and national codes concerning new construction and remodeling. As part of the Fire Life Safety Plan Check and Fire Life Safety Inspections, businesses that store hazardous waste or hazardous materials in amounts exceeding the thresholds noted above are subject to review.

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

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

LAMC Chapter IX, Article 1, Division 71, Section 91.7103, also known as the Los Angeles Methane Seepage Regulations, establishes requirements for buildings and paved areas located in methane zones and methane buffer zones. Requirements for new construction within such zones include methane gas sampling and, depending on the detected concentrations of methane and gas pressure at the site, application of design remedies for reducing potential methane impacts. Location of these sites within the zones may also require

¹² *The CalARP program encompasses both the federal "Risk Management Program," established in the Code of Federal Regulations, Title 40, Part 68, and the State of California program, in accordance with the Title 19 of the California Code of Regulations, Division 2, Chapter 4.5.*

¹³ *California Health & Safety Code, Division 20, Chapter 6.95, Article 1; California Code of Regulations, Title 19, Sections 2620–2732; California Code of Regulations, Title 24, Part 9, Section 80.115; Los Angeles Municipal Code, Article 7 of Chapter V, Section 57.120.1, and 57.120.1.4.*

a minimum design to be implemented. The required methane mitigation systems are based on the site design level, with more involved mitigation systems required at higher levels. The required methane mitigation systems are designed so that when properly implemented, they reduce methane-related risks to a less than significant level.

(d) City of Los Angeles General Plan Conservation Element

The City of Los Angeles General Plan includes a Conservation Element adopted in September 2001. The following policy in the Conservation Element is relevant to hazards and hazardous materials:

Policy 3: Continue to protect neighborhoods from potential accidents and subsidence associated with drilling, extraction and transport operations, consistent with California Department of Conservation, Division of Oil and Gas requirements.

b. Existing and Historic Conditions

Current and past land uses within the Project Site were identified to assess their potential to present concerns relative to the potential presence of hazards and/or the handling of hazardous materials. These concerns are classified as Recognized Environmental Conditions (RECs), which are defined by the ASTM International Standard Practice for Environmental Site Assessments—E1527-13 as “the presence or likely presence of any hazardous substances or petroleum products in on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.” In order to differentiate between conditions relating to current and prior uses, conditions relating to prior uses are classified as Historical RECs (HRECs). Additionally, Controlled RECs (CRECs) are RECs that resulted from a past release that have been addressed to the satisfaction of the applicable regulatory authority. The existence of RECs, HRECs, and CRECs on the Project Site due to prior and current on-site activities is addressed below. This summary is based on the Phase I ESA and Phase II, unless otherwise noted. Refer to Appendices F.1 and F.2 of this Draft EIR.

(1) Current and Historical Uses of the Project Site

As described in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with a surface asphalt parking lot used for bus storage. There are no buildings or landscaping within the Project Site but there is a billboard, lighting, a shipping container, and fencing. Six electric vehicle (EV) charging stations for buses are also located on-site. During the site reconnaissance conducted for the Phase I ESA, portable restrooms on the northwestern portion of the Project Site, an electric panel board on the northern portion

of the Project Site, and eleven 55-gallon drums filled with soil cuttings on the northwestern corner of the Project Site were observed.

As discussed in the Phase I ESA, prior to 1888, five retail stores, two dwellings, two restaurants, one lodging, and a shoe/cotton retail store were located on the western portion of the Project Site; the remainder of the Project Site was vacant land. South Pacific Railway Co.'s railroad tracks were present on the western portion of the Project Site from at least 1906 to early 1980s. Pacific Motor Trucking Co. was engaged in automotive fueling on the western portion of the Project Site between 1940 and 1960. A variety of commercial and industrial operations were present on the eastern portion of the Project Site, including retail stores, warehousing, light manufacturing, offices, factories, multiple machine shops, chemical mixing areas, steel storage tanks, foundry area, gasoline equipment, brush manufacturing, paint booths, and a chemical factory/plant. A large building on the eastern portion of the Project Site was occupied by Keystone Ironworks in 1906, Sparling Meter Company in 1954 and 1957, and Water Meter Manufacturing in 1950 and 1953. From 1960 to 1970, the Project Site was used mainly for offices, to manufacture gym equipment and to store a variety of materials, including school equipment, iron, and other goods. By 1992, all on-site structures had been demolished and the Project Site was cleared. Since 2002, the Project Site has been occupied by Mission Transportation and used to park school buses.

As noted in the Phase I ESA, the Project Site was historically used as a chemical plant, multiple machine shops, foundry, steam hammer shop, oil tool shop, and wood finishing shop. Two 550-gallon USTs were installed within the Project Site in 1940. A site assessment conducted for the Project Site in 1997 identified ten small steel storage tanks, a dye shop, a machine shop, a varnishing stack (exhaust pipe), a chemical warehouse and mixing area, two elevators, and two spray paint booths. The subsequent soil sampling program conducted in 1997 detected perchloroethene (PCE)/trichloroethene (TCE) and other VOCs in both subsurface soils and soil vapor at levels exceeding the current DTSC and Regional Screening Level (RSL) screening levels. Therefore, the historical industrial uses of the Project Site and the detections of PCE/TCE and other VOCs is considered to be a REC.

(2) Hazardous Materials Database Search

The Phase I ESA included information requests from various agencies to obtain environmentally relevant information regarding the Project Site, as well as a search of federal, state, and local environmental databases to determine if the Project Site or nearby properties are listed and have a potential to adversely impact the Project Site.¹⁴ The records search

¹⁴ Agencies included in the database search: Los Angeles Regional Water Quality Control Board (LARWQCB), Department of Toxic Substances Control (DTSC), South Coast Air Quality Management District (SCAQMD), Los Angeles County Fire Department Health and Hazardous Materials Division (LACFD HHMD), the City of (Footnote continued on next page)

included numerous government databases, such as those of registered USTs, operators who are hazardous waste generators, former landfills, and sites with a known hazardous materials release. These findings are summarized below. Please note that historic addresses may not be the same as the current address.

(a) Project Site

The Project Site is listed in the Underground Storage Tank, Facility Inventory Database (CA FID UST), Statewide Evaluation and Planning System (SWEPS UST), Hazardous Substance Storage Container Database (HIST UST), California Environmental Reporting System, and Cleanup Program Sites—Spills, Leaks, Investigations and Cleanup databases, as detailed below.

The Project Site has been issued several permits for the installation and abandonment of USTs by the applicable regulatory agencies. At 860 North Spring Street, two 550-gallon gasoline USTs and a private fueling station were permitted in 1940. In 1960, the Project Site was permitted to operate as an auto fueling station at 130 West College Street. In 1979, the Project Site was permitted to install an 8,000-gallon tank and associated four-inch fill pipe. In 1986, a permit was issued to abandon an 8,000-gallon tank that was installed in 1971 and no visible soil contamination was reported to be found during the removal. Smith-Emery Laboratories reviewed the inconsistency in installation dates and believes this is the same tank and the mismatched dates are a record keeping error.¹⁵ This listing does not represent a significant environmental concern for the Project Site and Project.

(b) Surrounding Sites

The following is a summary of listings of adjacent properties and properties in the immediate vicinity of the Project Site. Details of each property are provided in the Phase I ESA.

The property at 129 West College Street, across West College Street north of the Project Site, is listed on the LAFD CUPA database. The property at 117 East College Street, across West College Street north of the Project Site, is listed on following databases: CA FID UST, SWEPS UST, and HIST UST. The property at 1001 North Main Street, across West College Street west of the Project Site, is listed on following databases: Resource Conservation and Recovery Act-Small Quantity Generator (RCRA-SQG), Facility and Manifest Data (HAZNET), Hazardous Waste Tracking System (HWTS), Facility Index System/Facility Registry System (FINDS), and Enforcement and Compliance History Information (ECHO). Based on the lack of

Los Angeles Bureau of Sanitation (LABS), and Los Angeles City Fire Department Certified Unified Program Agency (LAFD CUPA).

¹⁵ *Smith-Emery Laboratories, "Clarification of Environmental Reports for 130 West College Street, Los Angeles, CA," September 15, 2025. Refer to Appendix F.3 of this Draft EIR.*

evidence of a release of a hazardous material and relative distance of these properties from the Project Site across West College Street, these listings do not represent a significant environmental concern for the Project Site and Project.

The property at 1135 and 1137 North Alameda Street, across North Alameda Street east of the Project Site, is listed on following databases: Hazardous Waste and Substances Sites List (CORTESE), CERS, Leaking Underground Fuel Tank Report (LUST), EDR Exclusive Historic Gas Stations (EDR Hist Auto), HIST UST, CA FID UST, and SWEEPS UST. The property operated as a gasoline service station from at least 1969 to 2005 and six USTs were located on-site (2,000-gallon, 5,000-gallon, and 8,000-gallon unleaded, 2000-gallon and 5,000-gallon regular unleaded, and one unknown size waste oil). An unauthorized release of gasoline that impacted soil was discovered at 1135 and 1137 North Alameda Street on October 25, 2014. The LARWQCB provided regulatory oversight and closure on February 12, 2016 indicating the LUST is no longer a threat to the environment. Based on the case closure status and relative distance from the Project Site across North Alameda Street, the listings at this address do not represent a significant environmental concern for the Project Site and Project.

No other adjoining properties or properties within the immediate vicinity (i.e., within 100 feet) of the Project Site are listed on any of the regulatory databases researched or the listings, are associated with the storage or disposal of hazardous wastes (including AST or UST listings), are known to have had a chemical release, or are indicated as a property use where the use of hazardous chemicals would be expected. Therefore, no adjoining properties or properties within the immediate vicinity of the Project Site represent a significant environmental concern for the Project Site and Project.

(3) Hazardous Materials Use and Storage

Based on information provided by the Applicant and field observations, no significant quantities of hazardous materials are used or stored on the Project Site. The Applicant is not aware of spills or releases associated with existing uses on-site. Field observations noted no obvious indications of spills or releases. No historical spills or releases were identified in the review of historical data other than those noted above.

(4) Hazardous Waste Generation, Handling, and Disposal

Based on USEPA criteria, for a waste to be considered a hazardous waste, it must pose a threat in the absence of special regulation. According to the USEPA, waste is considered hazardous if it exhibits certain hazardous waste characteristics (i.e., ignitability, corrosivity, reactivity, or toxicity) or contains chemicals identified on a USEPA list that would render it hazardous.

Based on the site reconnaissance conducted for the Phase I ESA and information provided by the Applicant, RCRA-regulated hazardous waste is not currently generated on-site, and no evidence of on-site hazardous waste disposal was observed. Therefore, the Project Site does not contain uses resulting in hazardous waste generation, handling, and disposal.

(5) Underground Storage Tanks

No visual evidence of USTs such as pipes, vents, or dispensers indicating existing or historic on-site USTs was observed during the site reconnaissance of the Project Site. However, as discussed above in Subsection 2.b.(2)(a), several historic gasoline and/or service stations, as well as other facilities with USTs were reported to be historically located at the Project Site. Therefore, the former presence of USTs is determined to be a REC for the Project Site.

(6) Aboveground Storage Tanks

During the site reconnaissance for the Phase I ESA, no evidence of existing ASTs was observed. Therefore, the Project Site does not contain ASTs.

(7) Polychlorinated Biphenyls (PCBs)

Typical sources of PCBs include electrical transformer cooling oils, fluorescent light fixture ballasts, and hydraulic oil. In 1976, the USEPA banned the manufacture and sale of PCB-containing transformers. Prior to this date, transformers were frequently filled with a dielectric fluid containing PCB-laden oil. PCB-contaminated transformers known or assumed under the TSCA to contain between 50 and 499 ppm of PCBs are subject to USEPA regulations.¹⁶ By 1985, the USEPA required that commercial property owners with transformers containing more than 500 ppm of PCBs must register the transformer with the local fire department, provide exterior labeling, and remove combustible materials within five meters.¹⁷

Pole-mounted transformers in good condition were observed on northern portion of the Project Site along West College Street and the southeastern portion of the Project Site along North Main Street during the site reconnaissance. Approximately five pad-mounted

¹⁶ USEPA, *PCBs Questions & Answers*, www.epa.gov/pcbs/learn-about-polychlorinated-biphenyls-pcbs, accessed June 27, 2024.

¹⁷ 40 CFR 761.30.

transformers were observed throughout the Project Site. The transformers may contain PCBs and as such, there is a potential for PCBs to be present on the Project Site.

(8) Asbestos-Containing Materials

Asbestos is a naturally occurring mineral made up of microscopic fibers. Asbestos has unique qualities which include its strength, fire resistance, resistance to chemical corrosion, poor conduction of heat, noise, and electricity, and low cost. Asbestos was widely used in the building industry starting in the late 1800s and up until the late 1970s for a variety of uses, including acoustic and thermal insulation and fireproofing, and is often found in ceiling and floor tiles, linoleum, pipes, structural beams, and asphalt. Despite its useful qualities, asbestos becomes a hazard if the fibers separate and become airborne. Inhalation of airborne asbestos fibers could cause lung diseases. Any building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could contain asbestos or ACMs.

The Project Site is presently a parking lot and no structures are located on-site. Therefore, the potential for the presence of ACMs at the Project Site is low.

(9) Lead-Based Paint

LBP was widely used in the past as a protective coating material and was a major ingredient in paint pigment. The Consumer Products Safety Commission banned paint and other surface coating materials that contain lead in 1978. Deterioration, damage, or disturbance of LBP on buildings or other structures may result in exposure to lead through inhalation or ingestion.

The Project Site is presently a parking lot and no structures are located onsite. The manufacture date of the shipping container located onsite is not known, however, because the buildings on the Project Site were demolished in the late 1980s well after the ban went into effect, it is unlikely to contain LBP. Therefore, the potential for the presence of LBP at the Project Site is low.

(10) Methane Gas

Methane is a colorless, odorless natural gas that is not toxic but is highly combustible and potentially explosive in the presence of oxygen. Methane can typically be found at oil fields, oil wells, and landfills. The accumulation of methane below the ground due to pavement and structures can result in elevated concentrations, creating an explosion risk. The City of Los Angeles Department of Building and Safety (LADBS) has established methane zones, which indicate a high risk for methane exposure, and methane buffer zones, which indicate a lower risk for methane exposure. Based on LADBS's Zone Information and Map Access System (ZIMAS), the Project Site is located within a designated Methane Zone. In compliance

with LADBS Methane Mitigation Standards, methane testing was performed, and the results are provided in the Methane Memorandum included as Appendix F.4 of this Draft EIR. The field measurements for the Project Site indicate no methane concentration above zero ppm by volume and no differential pressure readings above zero inches of water column at all testing locations. Moreover, analytical results at these testing locations reported non-detect concentrations of methane. Nevertheless, because the Project Site is located within a designated methane zone, a sub-slab barrier and passive ventilation system would be installed in compliance with LADBS Site Design Level I requirements.

(11) Subsurface Investigation

As discussed above in Subsection 2.b.(1), the historical industrial uses of the Project Site and the detections of PCE/TCE and other VOCs at levels in prior environmental investigations exceeding the current DTSC and RSL screening values constitute a REC. Therefore, a Phase II was performed to evaluate the potential presence of USTs, the condition of subsurface soils, and the potential presence of soil vapors. The Phase II is included in Appendix F.2 of this Draft EIR and the findings are summarized below.

The Phase II included soils sampling for VOCs, TPH, and metals at the Project Site at depths of 2, 5, 10, 15, and 20 feet below ground surface (bgs), as well as sampling for VOCs in soil gas. Soil samples detected trace to low concentrations of VOCs and TPH but all concentrations were below the laboratory reporting limits, and no further soil assessment was determined to be warranted. Heavy metals, including antimony, arsenic, barium, chromium, cobalt, copper, molybdenum, nickel, vanadium, mercury, and zinc, were detected at the Project Site at concentrations within the California background levels, with the exception of lead. Lead concentrations in two samples were below the RSL but exceeded the Maximum California background level and the Soluble Threshold Limit Concentration (STLC) for lead. Further testing found a lead concentration of 30.5 milligrams per liter (mg/L), exceeding the STLC threshold value of 5 mg/L. Based on the test results, soils at two feet in one boring location are characterized as California regulated Hazardous Waste and require special handling and disposal.

Two VOCs (PCE and TCE) were detected in each of the soil vapor samples from the Project Site analyzed. PCE was detected above the reporting limit in two of the analyzed soil vapor samples. Elevated PCE concentrations were found in two soil vapor at concentrations of 0.104 micrograms per liter ($\mu\text{g/L}$) and 0.096 $\mu\text{g/L}$ exceeding the DTSC soil gas screening level of 0.067 $\mu\text{g/L}$. Elevated TCE was found in one sample at a concentration of 0.108 $\mu\text{g/L}$ exceeding the DTSC soil gas screening level of 0.1 $\mu\text{g/L}$.

Based on the above, contaminated soils that require special handling and disposal are present onsite. However, based on the proposed development of a subterranean parking garage, which would minimize human occupancy, soil vapors are not expected to be of concern

with the installation of a vapor barrier to prevent any PCE migration into the proposed building through cracks and/or fractures.

(12) Airport Land Use Plans

The Project Site is not located within an airport land use plan area or within two miles of an airport. The nearest airport is the Hollywood-Burbank Airport located approximately 10 miles northwest of the Project Site. Therefore, the potential for airport hazards at the Project Site is low.

(13) Emergency Response and Evacuation Plans

As part of its long-term planning process, the City identifies critical lifeline systems in the event of an emergency. The nearest disaster route is North Alameda Street, which is adjacent to the Project Site.¹⁸ Therefore, there is a potential to interfere with disaster routes.

(14) Wildlands

The Project Site is located in an urbanized area and is currently developed with a surface asphalt parking lot used for bus storage. Downtown Los Angeles is fully built out and there are no wildlands located on or in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or within Fire District No. 1.¹⁹ Therefore, the potential for wildland fires at the Project Site is low.

3. Project Impacts

a. Thresholds of Significance

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

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

¹⁸ City of Los Angeles, Geohub, Disaster Routes, <https://geohub.lacity.org/datasets/lacounty::disaster-routes-1/explore?location=34.094196%2C-118.323390%2C15.32>, accessed August 14, 2025.

¹⁹ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 130 West College Street, August 14, 2025.

- Threshold (b):** *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;*
- Threshold (c):** *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;*
- Threshold (d):** *Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment;*
- Threshold (e):** *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area;*
- Threshold (f):** *Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan;*
- Threshold (g):** *Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.*

For this analysis, the Appendix G Thresholds listed above are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G questions.

The 2006 L.A. CEQA Thresholds Guide identifies the following criteria to evaluate impacts associated with hazards and hazardous materials:

(1) Risk of Upset/Emergency Preparedness

- Compliance with the regulatory framework;
- The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance;
- The degree to which the project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences; and
- The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance.

(2) Human Health Hazards

- Compliance with the regulatory framework for the health hazard;
- The probable frequency and severity of consequences to people from exposure to the health hazard; and
- The degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.

b. Methodology

As previously indicated, the Phase I ESA and Phase II were prepared for the Project to evaluate potential impacts relative to hazards and hazardous materials. The objective of these reports is to provide a baseline description of the Project Site related to historical and existing uses, as well as the storage and disposal of hazardous materials. The analysis of potential impacts regarding hazards and hazardous materials is based on the following: (1) site inspections; (2) interviews with parties familiar with the Project Site; (3) historical research into the past uses of the Project Site; and (4) hazardous materials research with regard to the Project Site, adjoining properties, and surrounding area. In addition, the Phase I ESA provides general information regarding asbestos-containing materials, lead-based paints, and other environmental issues and conditions. Based on the results of the Phase I ESA, a Phase II was performed to further evaluate existing onsite conditions. As also indicated above, the analysis of methane gas is based on the Methane Evaluation Memo prepared for the Project.

c. Project Design Features

No project design features are proposed with respect to hazards and hazardous materials.

d. Analysis of Project Impacts

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

As discussed in the Initial Study included as Appendix A of this Draft EIR, the Project would not involve the routine transport of hazardous materials to and from the Project Site. During demolition, excavation, on-site grading, and building construction, hazardous materials such as fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be routinely used on the Project Site through the duration of construction. While some hazardous materials used during construction could require disposal, such activity would occur only for the duration of construction and would cease

upon completion of the Project. As such, construction of the Project would not involve the routine disposal of hazardous materials. Notwithstanding, all potentially hazardous materials used during construction of the Project would be used and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, there are regulations aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. The Project would be in full compliance with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials, including, but not limited to RCRA, California Hazardous Waste Control Law, federal OSHA, Cal/OSHA, SCAQMD rules, and permits and associated conditions issued by LADBS. These aforementioned federal, state, and local requirements include obtaining material safety data sheets from chemical manufacturers, making these data sheets available to employees, labeling chemical containers in the workplace, developing and maintaining a written hazard communication program, and developing and implementing programs to train employees about hazardous materials. Therefore, Project construction activities would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in commercial office, restaurant, and uses, including cleaning products, paints, and those used for maintenance of landscaping. Such routine use would be consistent with that currently occurring on the Project Site and other nearby properties. However, as a commercial office, restaurant, and retail development, the Project would not involve the routine transport, use, and disposal of large quantities of hazardous materials since the routine transport, use, and disposal of large quantities of hazardous materials is typically associated with industrial and manufacturing uses. The Project's limited use of common hazardous materials (e.g., cleaning products, paints, and those used for maintenance of landscaping) can typically be disposed of at Class II or III landfills, which accept most common waste materials, such as those identified above. In addition, all hazardous materials used on the Project Site during operation (if any) would be used, stored, and disposed of in accordance with all applicable federal, state, and local requirements.

Based on the above, with compliance with all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, the Project's impact associated with the routine transport, use, or disposal of hazardous materials during construction and operation of the Project would be less than significant, and no mitigation measures are required.

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

(1) Impact Analysis

(a) Construction

(i) Recognized Environmental Conditions

As discussed above in Subsection 2.b.(1), the historical industrial uses of the Project Site for over 80 years (which include a chemical factory, foundry, paint booths, manufacturing, machine shops, and historical USTs), together with prior detections of PCE/TCE and other VOCs at the Project Site in both subsurface soils and soil vapor at levels exceeding the current DTSC and RSL screening levels, is considered to be a REC. The Phase II for the Project Site to further assess the REC associated with historical uses identified the presence of lead in the soils at the Project Site that exceeds the STLC. Thus, the soils on the Project Site are characterized as a California regulated hazardous waste and require special handling and disposal. Elevated levels of PCE and TCE were also identified at the Project Site that exceed the DTSC screening levels. Lead-contaminated soil would be removed in accordance with SCAQMD Rule 1466 which requires formal notification to SCAQMD prior to construction. **Nevertheless, while construction activities would occur in accordance with regulatory requirements, and ground disturbance associated with site clearance, excavation, and grading activities during construction would be required to comply with relevant and applicable federal, state, and local regulations and requirements, the presence of contaminated soil and soil gas beneath the Project Site could exacerbate the risk of upset and accident conditions associated with the release of hazardous materials into the environment. Therefore, Project impacts with regards to the REC would be significant prior to mitigation.**

(ii) Underground and Aboveground Storage Tanks

As discussed above in Subsection 2.b.(6), ASTs were not observed at the Project Site. However, as discussed above in Subsection 2.b.(2), the historical industrial and commercial uses on the Project Site included USTs. While several former on-site USTs have been removed and received closure status, construction activities may disturb previously unknown or unidentified USTs or residual contamination during construction. Project-related grading and excavation, particularly those activities associated with construction of the Project's subterranean level, could uncover or disturb any previously unknown or unidentified USTs or residual contamination, including soil and/or groundwater that was within historical cleanup standards when originally removed and sampled but may now exceed current cleanup standards.

In the event previously unidentified USTs or residual contamination is uncovered or disturbed during Project construction, soil and/or groundwater impacts and the potential exposure of people and the environment to hazardous materials could occur. If USTs or contaminated soils or groundwater are encountered during construction, the Project would be

required to and would comply with applicable regulatory requirements pertaining to their removal.²⁰ In accordance with regulatory requirements, soil sampling would be conducted during the UST removal process.

Unexpectedly encountered contamination would be excavated, treated, or disposed of to the satisfaction of the applicable regulatory agencies, which could include LAFD, LARWQCB, and/or the DTSC. Compliance with regulatory permitting, notification, and worker safety regulations and programs would address construction worker safety at, or near, areas with potential contamination. Adherence to these guidelines would serve to effectively avoid worker exposure to hazardous materials that may be encountered on-site during construction activities.

Nevertheless, while impacts with regards to ASTs would be less than significant since no ASTs were observed at the Project Site, because the potential for residual contamination exists and previously unknown or unidentified USTs may be located on-site, the Project could exacerbate risk of upset and accident conditions associated with the release of hazardous materials into the environment. Therefore, Project impacts with regards to the USTs would be significant prior to mitigation.

(iii) Polychlorinated Biphenyls

As discussed above in Subsection 2.b.(7), multiple potential sources of PCBs, both pole- and pad-mounted transformers, were identified on the Project Site. **In the event that PCBs are found during construction, suspect materials would be removed in accordance with all applicable federal, state, and local regulations including, but not limited to, TSCA and California Hazardous Waste Control Law, and, thus, the Project would not exacerbate the risk of upset and accident conditions associated with the release of PCBs into the environment. Therefore, impacts related to the removal of PCBs during construction would be less than significant, and no mitigation measures are required.**

(iv) Asbestos-Containing Materials

As discussed above in Subsection 2.b.(8), the Project Site is presently a parking lot and no structures are located on-site. Therefore, the potential for the presence of ACMs is low. In the unlikely event any ACM is found, the identified ACM and suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable regulations and requirements including, but not limited to, TSCA and SCAQMD Rule 1403. With compliance with the applicable regulations and requirements, Project construction

²⁰ California Code of Regulations, Title 23, Division 3, Chapter 16, Article 7, October 2022.

activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment. **As such, with compliance with applicable regulations, the Project would not exacerbate the risk of upset and accident conditions associated with the release of ACMs into the environment. Therefore, impacts related to the removal of ACMs during construction would be less than significant and no mitigation measures are required.**

(v) Lead-Based Paint

As discussed above in Subsection 2.b.(9), the Project Site is presently a parking lot. No structures are presently located on-site; hence, the potential for the presence of LBP is low. In the unlikely event any LBP is found, the identified and suspect LBP would be removed in accordance with procedural requirements and regulations for the proper removal and disposal of LBP prior to demolition activities. Examples of procedural requirements include the use of respiratory protection devices while handling lead-containing materials, containment of lead or materials containing lead on the Project Site or at locations where construction activities are performed, and certification of all consultants and contractors conducting activities involving LBP or lead hazards. With compliance with relevant regulations and requirements described above, Project construction activities would not expose people to a substantial risk resulting from the release of LBP into the environment. **As such, compliance with regulatory requirements including, but not limited to, TSCA and 8 CCR, Section 1529, would ensure that the Project would not exacerbate the risk of upset and accident conditions associated with the release of LBPs into the environment. Therefore, impacts related to the removal of LBP during demolition would be less than significant and no mitigation measures are required.**

(vi) Methane Gas

As discussed above in Subsection 2.b.(10), although methane was not detected in any of the samples taken on-site, the Project Site is located within a LADBS designated Methane Zone. During construction, adherence to construction safety measures, including, but not limited to, the preparation of a health and safety plan, distribution and use of personal protective equipment, maintaining good housekeeping on-site at all times, and holding routine safety meetings, as well as compliance with adherence to standard construction safety measures, as well as compliance with OSHA and Cal/OSHA safety requirements, would serve to reduce the risk in the event that elevated levels of methane gases are encountered. **As such, with compliance with existing regulations, the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving methane gas. The Project's impact associated with methane gas and hydrogen sulfide would be less than significant and no mitigation measures are required.**

*(b) Operation**(i) Recognized Environmental Conditions*

As discussed above, lead is present in the soils at levels that exceed the STLC and elevated levels of PCE and TCE were also identified at the Project Site that exceed the DTSC screening levels. These existing conditions would, however, be remediated during construction of the Project as discussed below and would not result in a release of hazard materials into the environment during Project operation. Additionally, operation of the Project would not result in a release of hazardous materials into the environment because the Project includes office, restaurant, and commercial uses, which are uses not typically associated with the release of hazardous materials (e.g., processing plants, manufacturing facilities, landfills, etc.). **Therefore, the Project would not exacerbate the risk of upset and accident conditions associated with the release of hazardous materials into the environment. Impacts during operations would be less than significant and no mitigation measures are required.**

(ii) Underground and Aboveground Storage Tanks

The Project does not include the installation of USTs but may include the installation of AST(s) for use with an emergency generator(s), which are required pursuant to Los Angeles City Fire Code Section 913 related to fire pumps. As such, operation of the Project could expose the public to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard associated with ASTs. However, in accordance with LAFD requirements, any AST containing more than 60 gallons of combustible materials would have a form of secondary containment and would comply with applicable design standards. Any AST containing 10,000 gallons or more of specified petroleum products would be subject to state requirements, including preparation of a SPCC Plan and biennial filing of a storage statement with the SWRCB. With adherence to applicable regulatory requirements, potential Project impacts associated with the installation and operation of any new ASTs would be less than significant.

Thus, with adherence to applicable regulatory requirements, the Project would not exacerbate the risk of upset and accident conditions associated with USTs or ASTs. Impacts associated with USTs and ASTs during operation of the Project would be less than significant, and no mitigation measures are required.

(iii) Polychlorinated Biphenyls

In accordance with applicable regulations, which ban the manufacture of PCBs, the new electrical systems to be installed as part of the Project would not contain PCBs. **Accordingly, new electrical systems installed as part of the Project would not exacerbate the risk of upset and accident conditions associated with the release of PCBs into the environment.**

Therefore, no impacts related to PCBs during operation of the Project would occur, and no mitigation measures are required.

(iv) Asbestos-Containing Materials

Development of the Project would include the use of commercially-sold construction materials that do not contain asbestos or ACMs as a result of the USEPA's ban. Accordingly, Project operation would not make use of or expose people to friable asbestos or ACMs on the Project Site since the Project would not be constructed with materials that contain asbestos or ACMs. **Therefore, operation of the Project would not exacerbate the risk of upset and accident conditions associated with the release of ACM into the environment. Thus, no impacts associated with asbestos or ACMs during operation of the Project would occur, and no mitigation measures are required.**

(v) Lead-Based Paint

Development of the Project would include the use of commercially-sold construction materials, including paints, that do not contain lead as a result of the federal ban on LBP. Accordingly, Project operation is not anticipated to make use of or expose people to LBP on the Project Site since the Project would not be constructed with lead-based materials. **Operation of the Project would not exacerbate the risk of upset and accident conditions associated with the release of LBP into the environment. Impacts associated with LBP during operation of the Project would not occur, and no mitigation measures are required.**

(vi) Methane Gas

As discussed above in Subsection 2.b.(10), although methane was not detected in any of the samples taken on-site, the Project Site is located within a LADBS designated Methane Zone. Pursuant to LAMC Section 91.7104.2, all buildings located in the Methane Zone and Methane Buffer Zone shall provide a methane mitigation system as required by LAMC Table 71 based on the appropriate Site Design Level. Based on the testing results provided in Appendix F.4 of this Draft EIR and site location, the Project is designated as Design Level I, which requires, at a minimum, a passive sub-slab barrier and ventilation system to be installed. The required methane mitigation system for the Project would meet both the City's Methane Ordinance and LADBS standards with regards to projects located in a Methane Zones. As such, installation of the required methane mitigation system would reduce or eliminate any potential effects of methane from the subsurface to release and impact building users or the general public on the Project Site. **Therefore, operation of the Project would not exacerbate the risk of upset and accident conditions associated with the release of methane into the environment. Impacts associated with methane during operation of the Project would not occur, and no mitigation measures are required.**

(2) Mitigation Measures

The following mitigation measures address Project impacts related to the release of hazardous materials into the environment:

Mitigation Measure HAZ-MM-1: Soil Management Plan—The Applicant shall retain a qualified environmental consultant to prepare a Soil Management Plan for Contaminated Soils (SMP) which will be submitted to the City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities. The SMP shall be implemented during grading, excavation, and installation of piles and tiebacks on the Project Site to ensure that contaminated soils (including those associated with removed or previously unidentified underground storage tanks if encountered) are properly identified, excavated, and disposed of off-site.

Elements of the SMP shall include:

- A qualified environmental consultant shall be present on the Project Site during grading and excavation activities in the known or suspected locations of contaminated soils and shall be on call at other times as necessary, to monitor compliance with the SMP and to actively monitor the soils and excavations for evidence of contamination.
- The SMP shall be prepared and executed in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil (Rule 1166). The SMP shall require the timely testing and sampling of soils so that volatile organic compound (VOC)-contaminated soils can be separated from inert soils for proper disposal. The SMP shall specify the testing parameters and sampling frequency.
- Soil monitoring during soil excavation including visual observation, representative sampling via a photo ionization detector, and/or VOC monitoring in accordance with SCAQMD Rule 1166.
- During the Project's excavation phase, the Applicant shall remove and properly dispose of impacted materials in accordance with the provisions of the SMP. If soil is stockpiled prior to disposal, it will be managed in accordance with the Project's Storm Water Pollution Prevention Plan (SWPPP), prior to its transfer for treatment and/or disposal. All impacted soils shall be properly treated and disposed of in accordance with SCAQMD Rule 1166, as well as applicable requirements of the California Department of Toxic Substances Control (DTSC), and Los Angeles Regional Water Quality Control Board (LARWQCB).
- During excavation, SCAQMD Rule 1166 requires that soils identified as VOC-contaminated shall be sprayed with water or another approved

vapor suppressant or covered with sheeting and securely anchored during periods of inactivity of greater than an hour, to prevent contaminated soils from becoming airborne. Per SCAQMD Rule 1166, VOC-contaminated soils shall be transported from the Project Site by a licensed transporter and disposed of at a licensed storage/treatment facility to prevent VOC-contaminated soils from becoming airborne or otherwise released into the environment.

- Dust suppression shall also be used for any active or inactive stockpile that is known or suspected to contain contaminants including metals above state or federal hazardous waste limits. Active and inactive excavations and stockpiles of soil shall be kept visibly moist by water spray, treated with a vapor suppressant, or covered with a continuous heavy-duty plastic sheeting (4 mm or greater) or other covering. The covering shall be overlapped at the seams and securely anchored.
- Prior to the commencement of grading and excavation, the findings of the Phase II Environmental Site Assessment shall be reported to the County of Los Angeles Fire Department Health and Hazardous Materials Division (HHMD) Site Mitigation Unit (SMU) (323-890-4045), and the Los Angeles Fire Department (LAFD) for review and comment. The recommendations of the HHMD and LAFD shall be incorporated into the SMP.

Mitigation Measure HAZ-MM-2: Combined Methane/Vapor Intrusion Mitigation System (MMS/VIMS)—The methane mitigation system required pursuant to LAMC Section 91.7402.2 shall be designed as a combined MMS/VIMS capable of mitigating VOC vapors including tetrachloroethylene (PCE) in addition to methane. The MMS/VIMS, shall include, at a minimum the following components:

- A standard de-watering system or a reinforced concrete mat slab designed to accommodate hydrostatic pressure;
- A complete impervious membrane (barrier) system that shall form an integral and permanent bond to poured concrete to prevent water vapor, methane, and PCE and other VOC transmission at the interface of the membrane and structural concrete. The barrier material shall be selected for dual compatibility for both methane, PCE, and chlorinated VOC exposure.
- Perforated horizontal pipes that shall be installed below the membrane within a protective gravel layer that shall collect vapor flowing from the subsurface.
- Vent risers that shall direct collected vapors from the horizontal pipes for dispersion into the atmosphere.
- Conduit seals in all electrical and communication conduits that prevent gas migration through dry utility conduits.

- Utility trench dams installed along the exterior sides of the building that prevent gas migration.

Mitigation Measure HAZ-MM-3: Post-Construction Monitoring — Following Project construction, but prior to building occupancy, post-construction monitoring for vapor intrusion shall occur. The monitoring event is to be performed in accordance with DTSC's *Supplemental Guidance: Screening and Evaluating Vapor Intrusion dated February 2023 (DTSC 2023 Guidance)*. This event would include, at minimum, two indoor air sampling events, with the second event occurring approximately six months after the first.

The monitoring event shall involve the use of a portable gas meter and VOC detector to screen for vapors and steel canisters for the collection of air samples to evaluate the indoor air at each level of the proposed subterranean parking structure and the building's first occupied space (assumed to be the ground floor).

The sampling activities will also include the collection of outdoor (ambient) air samples to provide a background comparison of indoor and ambient air.

If the indoor air samples indicate exceedances to applicable regulatory thresholds under the DTSC 2023 Guidance, engineering controls shall be implemented to reduce the levels of those contaminants. These engineering controls may include one or more of the following actions:

- Increasing ventilation rates in the subterranean parking and ground floor levels.
- Installing inline carbon filters within the building HVAC system.
- Repairing any gaps or cracks around concrete penetrations.
- Converting the passive system to an active mitigation system.

The use of the engineering controls shall be in consultation with a qualified environmental professional. Following implementation of any engineering controls, a new monitoring event of indoor and ambient air shall be conducted to confirm that the contaminants of potential concern have been reduced to an acceptable level per the DTSC 2023 Guidance.

(3) Level of Significance After Mitigation

Mitigation Measure HAZ-MM-1 requires the preparation of an SMP which shall be implemented during grading, excavation, and installation of piles and tiebacks on the Project Site to ensure that contaminated soils are properly identified, excavated, and disposed of off-site during Project construction. The SMP would describe specific soil-handling controls required to comply with federal, state, and local overseeing agencies; prevent unacceptable exposure to contaminated soils or vapors during construction; and prevent the improper disposal of contaminated soils. Mitigation Measure HAZ-MM-2 requires the installation of a

combined MMS/VIMS and Mitigation Measure HAZ-MM-3 requires post construction monitoring to confirm the MMS/VIMS is preventing vapor intrusion. With implementation of Mitigation Measures HAZ-MM-1 through HAZ-MM-3, potentially significant impacts to the public or the environment from the release of hazardous materials (i.e., VOCs) released during upset and/or accident conditions would be reduced to a less-than-significant level.

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

(1) Impact Analysis

There are two existing schools within 0.25 miles of the Project Site. Castelar Elementary School and Ann Street Elementary School are located approximately 0.2 and 0.23 miles northwest of the Project Site, respectively. As previously discussed, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of commercial and residential developments, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed uses would be typical of commercial office, restaurant, and retail developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products including, but not limited to, fuels, lubricants, and other automotive products. Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used within and in the vicinity of the Project Site. In addition, the Project would not involve the use or handling of acutely hazardous materials, substances, or waste since the routine transport, use, and disposal of large quantities of hazardous materials is typically associated with industrial and manufacturing uses which are not included in the Project. Furthermore, all materials used during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. Nevertheless, as discussed under Threshold (b) above, the Project Site contains contaminated soil and soil gas. **While construction activities would occur in accordance with regulatory requirements, and ground disturbance associated with site clearance, excavation, and grading activities during construction would be required to comply with relevant and applicable federal, state, and local regulations and requirements, because of the presence of contaminated soil and soil gas beneath the Project Site, the Project has the potential to emit hazardous emissions or materials within one-quarter mile of an existing or proposed school. As such, during construction, impacts would be significant prior to mitigation. Operational impacts would be less than significant without mitigation.**

(2) Mitigation Measures

Mitigation Measures HAZ-MM-1 through HAZ-MM-3 are proposed with respect to the release of hazardous materials into the environment during construction.

(3) Level of Significance After Mitigation

With implementation of Mitigation Measure HAZ-MM-1 through HAZ-MM-3, potentially significant impacts regarding hazardous emissions or use of acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school during Project construction would be reduced to a less-than-significant level. Operational impacts would be less than significant without mitigation.

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

(1) Impact Analysis

As discussed above in Subsection 2.b.(2), the historical industrial uses of the Project Site and the detections of PCE/TCE and other VOCs at levels in prior environmental investigations exceeding the current DTSC and RSL screening values constitute a REC. To further assess the REC associated with historical uses, a Phase II was performed to collect soil samples to assess potential chemical impact to the soil, evaluate the presence of potential chemical vapor, and to evaluate the results to assess subsurface conditions in anticipation of the Project. The results of Phase II are presented in Subsection 2.b.(11) above and in Appendix F.2 of this Draft EIR. As discussed therein and summarized above, lead exceeds regulatory limits and elevated levels of PCE and TCE were identified. **During construction, the presence of contaminated soil and soil gas beneath the Project Site could create a significant hazard to the public or the environment caused in whole or in part from the Project's exacerbation of existing environmental conditions. Impacts during construction would be significant prior to mitigation. Because impacts would be fully mitigated during construction, impacts during operation would be less than significant.**

(2) Mitigation Measures

Mitigation Measures HAZ-MM-1 through HAZ-MM-3 are proposed with respect to the release of hazardous materials into the environment during construction.

(3) Level of Significance After Mitigation

With the implementation of Mitigation Measure HAZ-MM-1 which requires an SMP shall be implemented during grading, excavation, and installation of piles and tiebacks on the Project Site to ensure that contaminated soils are properly identified, excavated, and disposed of off-site; Mitigation Measure HAZ-MM-2 which requires the installation of a combined MMS/VIMS; and Mitigation Measure HAZ-MM-3 which requires post-construction monitoring to verify the mitigation system is preventing vapor intrusion, impacts related to hazardous materials database listings during construction would be reduced to a less than significant level. Because impacts would be fully mitigated during construction, impacts during operation would be less than significant.

Threshold (e): For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area;

As discussed in the Initial Study included as Appendix A of this Draft EIR, the Project Site is not located within an airport land use plan or within two miles of a public or private airport. The nearest airport is the Hollywood-Burbank Airport located approximately 11 miles northwest of the Project Site. As such, the Project would not have the potential to exacerbate existing environmental conditions that would result in a safety hazard for people residing or working in the Project area. **Therefore, no impact would occur, and no mitigation measures are required.**

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

As discussed in the Initial Study included as Appendix A of this Draft EIR, nearest emergency/disaster route to the Project Site is Alameda Street adjacent to the Project Site to the west.²¹ While it is expected that the majority of construction activities for the Project would be confined to the Project Site, the Project would include trenching within the public right-of-way for utility connections, which could potentially require temporary lane closures. However, if lane closures are necessary, both directions of travel would continue to be maintained in accordance with the Construction Traffic Management Plan prepared pursuant to Project Design Feature TR-PDF-1 that would be implemented to ensure adequate circulation and emergency access. With regard to operation, the Project would not require the permanent closure of any local public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. In addition, the Project would comply with LAFD access

²¹ City of Los Angeles, Geohub, Disaster Routes, www.arcgis.com/apps/mapviewer/index.html?layers=6223f108d67d49958d05092e0b488740, accessed August 14, 2025.

requirements and applicable LAFD regulations regarding safety. **Therefore, the Project would not impede emergency access within the Project Site or vicinity that could cause an impediment along City designated disaster routes such that the Project would impair the implementation of the City's emergency response plan. As such, the Project's impact related to the implementation of the City's emergency response plan would be less than significant, and no mitigation measures are required.**

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

As discussed in the Initial Study included as Appendix A of this Draft EIR, Project Site and surrounding area are fully developed and not adjacent to wildlands. Additionally, the Project Site is not located within a Very High Fire Hazard Severity Zone or Fire District No. 1 as mapped by the City.²² While the northwestern portion of the Project Site is located in a Moderate Fire Hazard Severity Zone based on CalFire's March 2025 mapping²³, the Project's design and construction would comply with all applicable LAFD and Code requirements pertaining to fire safety. Specifically, LAMC Section 57.107.5.2 provides that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; LAMC Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects; and LAMC Section 57.507.3.1 establishes fire water flow standards. **Therefore, impacts would be less than significant, and no mitigation measures are required.**

e. Cumulative Impacts

(1) Impact Analysis

As indicated in Section III, Environmental Setting, of this Draft EIR, there are 21 related projects in the vicinity of the Project Site. Development of the Project in combination with the related projects has the potential to increase the risk for an accidental release of hazardous materials. However, each of the related projects would require evaluation for potential threats to public safety, including those associated with the use, storage, and/or disposal of hazardous materials, ACMs, LBP, PCBs, and oil and gas and would be required to comply with all applicable federal, state, and local laws, rules, and regulations, as discussed above for the Project. Because environmental safety issues are largely site-specific, this evaluation would occur on a case-by-case basis for each individual project affected, in conjunction with

²² City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 130 College, January 9, 2024.

²³ CalFire, Fire Hazard Severity Zones, <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>, accessed August 20, 2025.

development proposals on these properties. **Therefore, with full compliance with all applicable federal, state, and local laws, rules, and regulations, as well as implementation of site-specific recommendations for the related projects, cumulative impacts related to hazards and hazardous materials would be less than significant.**

(2) Mitigation Measures

Cumulative impacts with regard to hazards and hazardous materials would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts with regard to hazards and hazardous materials were determined to be less than significant without mitigation. Therefore, no mitigation measures are required, and the impact level remains less than significant.