

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, 9000 Airport Boulevard*¹ (Phase I), the *Phase II Subsurface Investigation Report, 9000 Airport Boulevard*² (Phase II), and the *Soil Vapor Assessment Report, 9000 Airport Boulevard*³ (Soil Vapor Assessment) prepared by Partner Engineering and Science, Inc. (Partner). These reports are provided in Appendices F.1, F.2, and F.3 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
- Occupational Safety and Health Act of 1970
- Toxic Substances Control Act

¹ Partner Engineering and Science, Inc., *Phase I Environmental Site Assessment Report, 9000 Airport Boulevard*, March 9, 2023. Refer to Appendix F.1 of this Draft EIR.

² Partner Engineering and Science, Inc., *Phase II Subsurface Investigation Report, 9000 Airport Boulevard*, Los Angeles, California, 90045, March 24, 2023. Refer to Appendix F.2 of this Draft EIR.

³ Partner Engineering and Science, Inc., *Soil Vapor Assessment Report, 9000 Airport Boulevard*, Los Angeles, California, 90045, September 5, 2023. Refer to Appendix F.3 of this Draft EIR.

- 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 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

⁴ USEPA, *Superfund CERCLA Overview*, www.epa.gov/superfund/superfund-cercla-overview, accessed September 22, 2025.

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 (California 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 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.

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 September 22, 2025.

(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 (PCB)s are hazardous materials regulated by the USEPA under 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.

(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

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 September 22, 2025.

(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.

(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 the release of hazardous materials and for the 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;

⁷ U.S. Department of Transportation, *Pipeline and Hazardous Materials Transportation Law: An Overview*, September 2021.

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

- 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:

- 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.

⁹ *Federal Emergency Management Agency, History of FEMA, www.fema.gov/about/history, accessed September 22, 2025.*

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 including:

- 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, 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 Policies

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 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.

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.*

(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 the 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

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

(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 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

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.*

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 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.

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.

(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

The Phase I, which was prepared in order to provide a baseline assessment of the existing environmental condition on the Project Site, meets the applicable industry standards of ASTM E1527-13 and E1527-21. 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) and Historical RECs (HRECs). As stated in the Phase I included as Appendix F.1 of this Draft EIR, RECs refer to the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment or the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment; and HRECs refer to a previous release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority and meets unrestricted use criteria.¹⁴ Based on the findings of the Phase I, a Phase II and Soil Vapor Assessment were prepared. The summary below is based on the Phase I, Phase II, and Soil Vapor Assessment unless otherwise noted. Refer to Appendices F.1, F.2, and F.3 of this Draft EIR, respectively.

(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 an approximately 37,860-square-foot rental car facility. The Project Site currently has two single-story buildings with auto maintenance facilities and office uses, as well as surface parking. The smaller of the two buildings is located in the north-central portion of the Project Site and the larger building is located in the west-central portion of the

¹⁴ *Partner Engineering and Science, Inc., Phase I Environmental Site Assessment Report, 9000 Airport Boulevard, March 9, 2023. Refer to Appendix F.1 of this Draft EIR.*

Project Site. Additionally, the Project Site contains accessory structures including a carwash, multiple carport canopies, and two fueling station canopies.

As discussed in the Phase I, the Project Site was undeveloped land prior to 1938. Between 1947 and 1952, the Project Site consisted of vacant graded land and by 1955, Airport Junior High School had been developed. The junior high school occupied the Project Site between 1955 and 1981. The existing rental car facility was developed in 1981 and has occupied the Project Site since that time.

(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 the potential to adversely impact the Project Site. The records search 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 Phase I includes a review of regulatory records and environmental databases related to hazardous waste generation and known issues of concern. The majority of these listings are related to historic and ongoing operations as a rental car lot which involves the storage and dispensing of gasoline and do not represent a concern to the Project Site. These records are discussed in detail in Sections 4.1 and 4.2 of the Phase I. The one listing identified as an HREC for the Project Site is discussed further below and RECs identified as part of site reconnaissance are discussed in Section 2.b.(3), below.

The Project Site was identified as a leaking UST (LUST) site by the LARWQCB for a release occurring on or before September 10, 2003 that impacted soil and groundwater with petroleum and non-petroleum hydrocarbons. This database listing is considered a HREC. The release was identified in connection with the historical use of USTs on the Project Site, which included four 10,000-gallon gasoline USTs and one 7,000-gallon diesel UST. Minor soil impacts were detected in the vicinity of the fuel dispensers within the eastern portion of the Project Site (Eastern System) and petroleum hydrocarbons were detected in soil in the vicinity of the fuel dispensers within the western portion of the Project Site (Western System). The contaminated soil near the Western System was reportedly confined to the UST area and around the dispenser island closest to those USTs. Total petroleum as gasoline (TPHg) and methyl tert-butyl ether (MBTE) were detected up to 0.036 milligrams per kilogram (mg/kg)

and 2.0 mg/kg, respectively, while aromatic hydrocarbons, namely, benzene, toluene, ethylbenzene, and xylene (BTEX) were not detected above laboratory reporting limits.

Following the discovery, additional soil samples were taken and one groundwater monitoring well was installed near the Western System. Soil samples collected between 45 and 55 feet below ground surface (bgs) contained the highest levels of MBTE, ranging between 1.3 to 48 micrograms per kilogram ($\mu\text{g/kg}$). MBTE and tert-Butyl alcohol (TBA) were detected in groundwater up to 8,700 micrograms per liter ($\mu\text{g/l}$) and 2,500 $\mu\text{g/l}$, respectively, while BTEX were not detected above laboratory reporting limits. Between March 24 and April 4, 2005, the four gasoline USTs and one diesel UST associated with the Western System were removed and approximately 1,000 tons of contaminated soil was excavated and transported off-site.

In 2008 and 2009, four additional groundwater monitoring wells were installed. Confirmation soil sampling conducted in 2009 indicated that concentrations of TPHg, total petroleum as diesel (TPHd), and BTEX were below laboratory detection limits in the soil samples. However, soil samples associated with one of the groundwater monitoring wells detected elevated concentrations of MTBE and TBA up to 28,000 mg/kg and 61,000 mg/kg, respectively, which are above established screening levels. The high concentrations of MTBE and TBA were reportedly detected in a clay layer between 45 and 60 feet bgs. The latest groundwater monitoring data collected in July 2012 indicated that TPHg, BTEX, MTBE, and TBA were non-detectable in all five monitoring wells. Subsequently, the LARWQCB issued a no further action (NFA) letter on September 24, 2013. Therefore, based on a review of the data indicating the residual soil impacts were left in place at 45 to 60 feet bgs, removal of the prior generation of UST systems and associated impacted soil, and issuance of the NFA letter, the closed LUST case and prior generation of USTs represent an HREC for the Project Site.

(b) Surrounding Sites

Sections 4.2.3 and 4.2.4 of the Phase I identify database listings for adjoining properties and surrounding area, respectively. Notable listings include LUST cases at 9029 Airport Boulevard, 5800 Arbor Vitae Avenue, 9204 Airport Boulevard, 9217 Airport Boulevard, and 9419 Airport Boulevard; a release of chlorinated hydrocarbons at 1237 Arbor Vitae Street; and listings for RCRA small quantity generators of hazardous waste. However, based on their regulatory status, age, and distance from the Project Site, these listings do not represent a concern for the Project Site. Refer to the Phase I for a detailed discussion of these listings.

Additionally, based on the DTSC EnviroStor database mapping system, a portion of the Project Site is overlaid as the location of the former Los Angeles Air Force Station No. 1, Westchester, California (Site No. J09CA045300), Formerly Used Defense Site. However, as described in the Technical Memorandum—Former Air Force Annex Property, included as Appendix F.4 of this Draft EIR, the former Los Angeles Air Force Station No. 1, Westchester,

California (Site No. J09CA045300) was not located within the boundaries of the Project Site but was located at 5760 Arbor Vitae Street, southeast of Arbor Vitae Street.¹⁵

(3) Site Reconnaissance

A site reconnaissance was conducted for the Project Site on February 23, 2023 as part of the Phase I. A detailed discussion of the findings is provided in Section 6 of the Phase I, which is summarized below.

(a) USTs

Four USTs are currently located in the northwestern portion of the Project Site. The USTs consist of one 20,000-gallon gasoline UST, one compartmentalized 20,000-gallon gasoline/diesel UST, and two 12,000-gallon gasoline USTs. The USTs are connected via underground piping to 21 fuel dispensers situated on concrete islands beneath canopied areas. The 20,000-gallon USTs were installed in 2005 and the 12,000-gallon USTs were installed in 1993. All of the USTs and associated piping are of double-walled fiberglass reinforced plastic construction and are continuously monitored for leaks. No releases have been reported in connection with the current UST systems; however, as noted above, a release associated with the prior generation of USTs is an HREC for the Project Site. Although the USTs appear to be in compliance with current regulations, the environmental risk associated with USTs increases over time and, at the time of site reconnaissance, no subsurface investigations had been completed in connection with the USTs since 2012. Therefore, based on the age of the USTs and lack of subsurface data, the on-site UST systems represent a REC.

(b) ASTs

One 2,000-gallon, one 1,800-gallon, and two unknown capacity ASTs for the storage of motor oil, used motor oil, and diesel were identified on-site. The ASTs were installed in 2005 and are equipped with secondary containment. No staining, leaks, or spills were noted in the vicinity of the ASTs, and as such, these do not represent a REC.

(c) PCBs

Two pad mounted transformers were identified on-site, which are not labeled indicating PCB content. No staining or leakage was observed near the transformers. Based on the good condition of the equipment, the transformers do not represent a REC.

Fifteen below grade hydraulic lifts were identified on-site within the large auto maintenance facility, as well as concrete patching indicative of former below grade lifts. The

¹⁵ Partner Engineering and Science, Inc., *Technical Memorandum—Former Air Force Annex Property, 9000 Airport Boulevard, September 25, 2025. Refer to Appendix F.4 of this Draft EIR.*

dates of installation of these current and former lifts are not known; however, the lifts were presumably installed in the 1980s or early 1990s in connection with the current use as a rental car facility. As such, it is unlikely that PCBs are present in the hydraulic oil. Nevertheless, based on the subgrade nature and long-term duration of use, releases of hydraulic fluid cannot be ruled out. Therefore, the current and former hydraulic lifts represent a REC.

(d) Oil/Water Clarifiers

Three oil/water clarifiers were installed on the Project Site in 1982. One is associated with the on-site car wash and is used to treat wastewater streams consisting of detergents, wash water, and residual oils from car washing operations. The remaining two are connected to floor/trench drains within the automotive repair buildings and are used to treat wastewater streams consisting of floor wash water, new/used oil, solvents, and various automotive fluids. These systems have the potential to impact the subsurface of the Project Site in the event they become compromised, and, based on the age of the systems and hazardous nature of the waste streams, a release of hazardous substances cannot be ruled out. Therefore, the on-site clarifiers represent a REC.

(e) Hazardous Substances and Petroleum Products

Hazardous substances associated with the car rental facility were observed on-site, including car wash thinner, cleaner/degreaser, used antifreeze, and waste cleaning solution. The materials were found to be properly labeled and stored with no signs of leaks, stains, or spills. Secondary containment is not provided. Small quantities of general maintenance supplies were also identified and found to be properly labeled and stored with no signs of leaks, stains, or spills. As such, the presence of these materials do not represent a REC.

(f) 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.

Although on-site buildings were constructed in 1981, based on Partner's limited visual evaluation, ACMs may be present. It is noted that friable asbestos was not identified on-site.

(g) 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 on-site buildings were constructed in 1981 after LBP was banned. Therefore, the potential for the presence of LBP at the Project Site is low.

(4) 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 not located within a designated methane zone and the potential for methane on-site is low.

(5) Subsurface Investigation and Soil Vapor Assessment

(a) Subsurface Investigation

As discussed above in Subsections 2.b.(2) and 2.b.(3), one HREC and three RECs were identified on the Project Site. Therefore, a Phase II Subsurface Investigation was completed to evaluate the potential impact of petroleum hydrocarbons and/or VOCs to soil gas, soil, and/or groundwater related to the historical and current uses of USTs, clarifiers, and underground hydraulic lifts on the Project Site. The Phase II is included as Appendix F.2 of this Draft EIR and the findings are summarized below.

The initial part of the Phase II investigation consisted of the collection and analysis of 15 soil/soil gas borings, as well as the collection and analysis of groundwater samples from three existing groundwater monitoring wells. Very low estimated concentrations of gasoline range organics were detected in 11 of the 14 samples and motor oil range organics were detected in two samples. However, these concentrations were below the reporting limit and may have originated in the laboratory rather than representing on-site soil conditions. TBA was detected in seven of the 14 samples and a low concentration of chloromethane was detected in one sample, but these concentrations were also below the reporting limits. No other VOCs were detected in soil samples.

Various VOCs were detected in 10 soil gas samples from 10 borings in the vicinity of the USTs, fuel dispensers, clarifiers, and hydraulic lifts. However, only benzene was detected at concentrations exceeding applicable regulatory guidelines for commercial/industrial uses in four locations.

During a second round of field work, four groundwater samples were collected from three historic monitoring wells on-site. No VOCs or TPH were detected above laboratory detection limits in any of the samples collected.

(b) Soil Vapor Assessment

Based on the detection of benzene, a Soil Vapor Assessment was subsequently conducted. The Soil Vapor Assessment is included as Appendix F.3 of this Draft EIR and the findings are summarized below.

A total of 32 additional soil vapor samples were collected from the Project Site and analyzed for VOCs. Low concentrations of various VOCs including, but not limited to, freon, trichlorofluoromethane, TBA, MTBE, trichloroethene (TCE), and tetrachloroethene (PCE) were detected, but were below their respective soil gas screening levels.

Twenty-seven of the soil gas samples contained concentrations of benzene above the most conservative soil gas screening level of 67 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). Benzene was detected generally at depths between 5-12 feet bgs and ranged up to $180 \mu\text{g}/\text{m}^3$. The highest concentrations of benzene were found in borings south of the fuel dispensers and Western System, but close to the central USTs, clarifiers, and the large auto maintenance facility. Based on these results, there appears to be diffuse low-level benzene impacts primarily around the fuel dispensers and Western System. On-site use of petroleum products is expected due to the current use of the Project Site for automotive repair operations and VOC vapor migration into the building is expected to have minimal effect on indoor air quality within the existing buildings given that the highest detections of benzene were found outside of enclosed office spaces, either in parking lots or in open automotive repair bays. Nevertheless, because demolition of the existing buildings and construction of the new buildings are planned, removal of all subsurface features of concern is recommended. Removal of these subsurface features is identified as an interim remediation project and all ground disturbance activities will be completed prior to, and independent of the Project.

(6) Airport Land Use Plans

The Project Site is located within two miles of Los Angeles International Airport (LAX), which is located adjacent to the western boundary of the Project Site and is within the boundaries of the Airport Influence Area for the airport as designated in the County's Airport Land Use Plan.

(7) 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 Manchester Avenue, located approximately 0.4 miles north of the Project Site.¹⁶

(8) Wildlands

The Project Site is located in an urbanized, generally flat area, and there are no wildlands or steep slopes located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone, nor is it located within a City-designated fire buffer zone.^{17,18} Additionally, the Project Site is not designated within a Fire Hazard Severity Zone based on updated maps published by CalFire in March 2025.¹⁹

3. Project Impacts

a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G (Appendix G), 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;*

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*

¹⁶ City of Los Angeles, Geohub, Disaster Routes, www.arccgis.com/apps/mapviewer/index.html?layers=6223f108d67d49958d05092e0b488740, accessed September 22, 2025.

¹⁷ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APN 4125-010-016 <http://zimas.lacity.org/>, accessed September 15, 2025.

¹⁸ City of Los Angeles, 2024 Local Hazard Mitigation Plan, Wildfire Severity Zones in West Los Angeles APC, Figure 13-7, p. 18-12.

¹⁹ CalFire, Fire Hazard Severity Zones, <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>, accessed September 22, 2025.

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, Phase II, and Soil Vapor Assessment 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. Based on the results of the Phase I, the Phase II and Soil Vapor Assessment were performed to further evaluate existing on-site conditions.

c. Project Design Features

The following project design feature is proposed with respect to hazards and hazardous materials:

Project Design Feature HAZ-PDF-1: Project construction will not begin until removal of all subsurface features (e.g., existing USTs, current and former hydraulic lifts, and oil/water clarifiers) associated with the existing onsite rental car operations occur, and the associated ground disturbance activities are complete. No overlapping ground disturbance activities between interim Project Site remediation activities and the Project will occur.

d. Analysis of Project Impacts

As discussed in Section II, Project Description, of this Draft EIR, Project includes two options: Option 1 would develop one building comprised of up to 435,390 square feet of floor area and a maximum building height of 50 feet. Option 2 would develop three buildings comprised of up to 410,056 square feet of floor area and a maximum building height of 46 feet. The Project would include truck trailer parking spaces and vehicle parking spaces under Option 1, and vehicle parking spaces under Option 2. As these Project Options do not affect the analysis of hazards and hazardous materials, no differentiation is provided below and the impacts of the Project discussed below apply to both.

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?

(1) Impact Analysis

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. These hazardous materials would be handled in accordance with all applicable regulatory protocols. 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. 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 and state Occupational Safety and Health Acts, 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. It is noted that the transport and disposal of soil is considered a routine part of construction when it does not involve contaminated materials. However, the transport and disposal of contaminated soils is not routine and is therefore discussed below under Threshold (b).

Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in industrial warehouses, including cleaning products, paints, and those used for maintenance of landscaping. The amount of hazardous materials routinely used for the operation of the Project would be less than the amount currently used by the existing rental car facility, which include gasoline, diesel, and other hazardous materials associated with automobiles. As an industrial warehouse use, the Project would not involve the routine transport, use, and disposal of large quantities of hazardous materials typically associated with industrial manufacturing uses. The Project's limited use of common hazardous materials (e.g., cleaning products, paints, and those used for maintenance of landscaping) present a low risk for hazards exposure and such materials can typically be disposed of at Class II or III landfills. 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. As noted above, though soil export is typically

considered a routine part of construction, the transport and disposal of contaminated soils is not routine and is therefore discussed below under Threshold (b).

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

(2) Mitigation Measures

Impacts related to routine transport, use, or disposal of hazardous materials would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts related to routine transport, use, or disposal of 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.

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 and Historical Recognized Environmental Conditions*

As discussed above in Subsections 2.b.(2) and 2.b.(3), one HREC and three RECs were identified on-site. Specifically, the HREC is a closed LUST case related to a release from a previous generation of USTs, and the RECs are the existing USTs, current and former hydraulic lifts, and three oil/water clarifiers. To further assess these issues, the Phase II and Soil Vapor Assessment were performed and revealed benzene concentrations exceeding the applicable regulatory levels for commercial/industrial uses. While the Soil Vapor Assessment ultimately determined the benzene concentrations on-site would have only a minimal effect on the existing buildings, it was recommended that all subsurface features of concern be removed prior to new construction of buildings. As described in Project Design Feature HAZ-PDF-1, removal of these subsurface features is identified as an interim remediation project and all ground disturbance activities will be completed prior to, and independent of the Project. **Nevertheless, while the interim remediation project would remediate known issues, 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 previously unidentified contaminated soil and soil gas beneath the Project Site 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 RECs and HREC would be significant prior to mitigation.

(ii) Underground and Aboveground Storage Tanks

As discussed above in Subsection 2.b.(3)(b), ASTs were observed on-site, but are equipped with secondary containment and no staining, leaks, or spills were noted in their vicinity. These ASTs would be removed in accordance with applicable regulations and therefore would not create a significant hazard to the public through reasonably foreseeable upset and accident conditions.

As previously discussed, an HREC associated with a closed LUST case related to a release from a previous generation of USTs and a REC associated with the existing on-site USTs were identified on-site. As described in Project Design Feature HAZ-PDF-1, removal of these subsurface features is identified as an interim remediation project and all ground disturbance activities will be completed prior to, and independent of the Project.

However, Project-related grading and excavation activities could uncover or disturb any previously unknown or unidentified USTs or residual soil and/or groundwater contamination.

In the event that 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. Unexpected contamination encountered during Project construction 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.

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

Because previously unknown or unidentified USTs may be located on-site and the potential for residual contamination from the USTs exists, the Project could exacerbate risk of upset and accident conditions associated with the release of hazardous materials into the environment. Therefore, Project impacts related to the USTs would be significant prior to mitigation.

(iii) Polychlorinated Biphenyls

As discussed above in Subsection 2.b.(3)(c), current and former hydraulic lifts and two pad-mounted transformers were identified on-site. While the transformers are unlikely to contain PCBs, the current and former hydraulic lifts were identified as a REC. The interim remediation project would remove the current RECs on the Project Site, and pursuant to Project Design Feature HAZ-PDF-1, this related project will be complete prior to construction of the Project. **In the event that previously unknown 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.(3)(f), although on-site buildings were constructed in 1981, based on Partner's limited visual evaluation, ACMs may be present. In the 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 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.(3)(g), based on the age of the existing buildings on-site, 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.**

(b) Operation

(i) Recognized Environmental Conditions and Historical Recognized Environmental Conditions

As discussed above in Subsections 2.b.(2) and 2.b.(3), one HREC and three RECs were identified on-site. Specifically, the HREC is a closed LUST case related to a release from a previous generation of USTs, and the RECs are the existing USTs, current and former hydraulic lifts, and three oil/water clarifiers. These existing conditions would be remediated during construction of the Project 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 industrial warehouse and office 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 and 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 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. Impacts associated with asbestos or ACMs during operation of the Project would not 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.**

(2) Mitigation Measures

The following mitigation measure addresses Project impacts related to the release of hazardous materials into the environment:

Mitigation Measure HAZ-MM-1: Soil Management Plan—The Applicant shall implement the Soil Management Plan (SMP) for Contaminated Soils

prepared by Partner, included as Appendix F.5 of this Draft EIR, 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 foundations on the Project Site to ensure that contaminated soils are properly identified, excavated, and disposed of off-site.

The protocols in the SMP include, but are not limited to, the following:

- A qualified environmental consultant shall be present on the Project Site during grading and excavation activities in the known or suspected locations of previous 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 executed in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1166, Volatile Organic Compound Emissions from Decontamination of Soil (Rule 1166). Testing and sampling of soils so that VOC-contaminated soils can be separated from inert soils for proper disposal shall be conducted in accordance with the provisions of the SMP.
- 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.

- Vapor Suppression and dust control 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.
- In the event undocumented subsurface features of potential environmental concern (e.g., underground tanks, abandoned wells, sumps, hydraulic lifts, clarifiers, buried drums) are encountered during the course of ground cover demolition, excavation, site grading, and/or other earthmoving activities, the general contractor shall cordon off and halt construction activities in the immediate area and implement the procedures outlined in the SMP in coordination with the qualified environmental consultant.

(3) Level of Significance After Mitigation

Mitigation Measure HAZ-MM-1 requires implementation of the protocols described in the SMP, which shall be implemented during grading, excavation, and installation of piles and tiebacks on the Project Site to ensure that contaminated soils, and, if encountered, undocumented subsurface features, are properly identified, excavated, and disposed of off-site during Project construction. The SMP describes 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. With implementation of Mitigation Measure HAZ-MM-1, potentially significant impacts to the public or the environment from the release of hazardous materials 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;

As discussed in the Initial Study included as Appendix A of this Draft EIR, there are no LAUSD schools within a one-quarter mile radius of the Project Site nor are any schools proposed to be built within this radius. The nearest schools located in the vicinity of the Project Site include Carousel School (0.9 miles north of the Project Site); Westport Heights Elementary School (1.1 miles north of the Project Site); Oak Street Elementary School (1.5 miles east of the Project Site); and Open Magnet Charter School (1.5 miles north of the Project Site). 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 standards and regulations including, but not limited to, federal and state OSHA requirements, and would not create a significant hazard to existing or future nearby schools. **As such, as determined in the Initial Study, the Project's potential impacts associated**

with hazards emissions within 0.25 miles of an existing school would be less than significant and no further analysis is required.

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 Project Site is identified in numerous databases reviewed as part of the Phase I. The majority of these listings are related to historic and ongoing operations as a rental car lot which involves the storage and dispensing of gasoline and do not represent a concern to the Project Site. However, the closed LUST case associated with the previous generation of USTs is considered an HREC for the Project Site. While this case is closed, and as described in Project Design Feature HAZ-PDF-1, removal of subsurface features (e.g., existing USTs, current and former hydraulic lifts, and oil/water clarifiers) will be completed prior to initiation of Project construction and independent of the Project., the potential for residual contamination from this listing exists. **Therefore, the Project Site's listing on a database compiled pursuant to Government Code Section 65962.5 has the potential to create a significant hazard to the public or the environment. Impacts during construction would be significant prior to mitigation. Because impacts would be fully mitigated during Project construction, impacts during operation would be less than significant.**

(2) Mitigation Measures

Refer to Mitigation Measure HAZ-MM-1 provided above under Threshold (b).

(3) Level of Significance After Mitigation

Mitigation Measure HAZ-MM-1 requires the protocols contained in the SMP, included as Appendix F.4 of this Draft EIR, to 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. With implementation of Mitigation Measure HAZ-MM-1, 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;

(1) Impact Analysis

As noted above, the Project Site is located within two miles of LAX, which is located adjacent to the western boundary of the Project Site and is within the boundaries of the Airport Influence Area for the airport. As such, the Project would be subject to the safety policies included in the County's Airport Land Use Plan related to approach surfaces, building height restrictions, and acceptable uses. In addition, in its September 19, 2024 comment letter on the Project's Notice of Preparation (refer to Appendix A.3 of this Draft EIR), the ALUC stated that the Project does not include any significant issues with Airport Land Use Plan compatibility and further ALUC review for compliance is not required. Further, included in Appendix F.6, the Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and has issued a Determination of No Hazard to Air Navigation for the Project. The aeronautical study revealed that the structures would not exceed obstruction standards and would not be a hazard to air navigation provided an FAA Form 7460-2, Notice of Actual Construction or Alteration, would be filed within five days after construction reaches its greatest height. Based on the aeronautical study, marking and lighting are not necessary for aviation safety. With respect to airport noise, as discussed in Section IV.H, Noise, of this Draft EIR, the Project Site is located within the 70–75 CNEL noise contours, which is considered normally/conditionally acceptable for industrial use.²¹ In addition, the Project would comply with CALGreen sound insulation requirements for buildings exposed to noise levels exceeding 65 dBA (L_{eq}). **Impacts would be less than significant, and no mitigation measures are required.**

(2) Mitigation Measures

Impacts related to airport hazards would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts related to airport hazards were determined to be less than significant without mitigation. Therefore, no mitigation measures are required, and the impact level remains less than significant.

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, the nearest disaster route is Manchester Avenue, located approximately 0.4 miles north of the Project

²¹ Los Angeles World Airports (LAWA), Los Angeles International Airport 3Q24 Noise Contours.

Site.²² However, in response to a more localized emergency, such as a hillside wildfire, LAFD works in coordination with the Los Angeles Department of Transportation and Los Angeles Police Department (LAPD) to identify the most appropriate local egress option and direct individuals to those routes. Other routes are shared in real time depending on which disaster and suitable evacuation routes are identified.²³ While it is expected that the majority of construction activities for the Project would be confined to the Project Site, off site construction activities would occur in adjacent street rights-of-way, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would remain open such that at least one travel lane in each direction would be available. In the event of an emergency during construction of the Project, the LAFD and LAPD would instruct businesses and residents of the area as to specific evacuation protocols at that time. The Applicant and construction contractor would comply with all LAFD and LAPD evacuation requirements. In addition, while operation of the Project would generate traffic in the Project Site vicinity and would result in some modifications to the Project Site's access, the Project would comply with LAFD access requirements and would not impede emergency access in the Project Site vicinity. **Therefore, as concluded in the Initial Study, the Project would not physically interfere with or impair the implementation of an emergency evacuation plan and impacts would be less than significant. No further analysis is 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, the Project Site is located in an urbanized, generally flat area, and there are no wildlands or steep slopes located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone, nor is it located within a City-designated fire buffer zone.^{24,25} Additionally, the Project Site is not designated within a Fire Hazard Severity Zone based on updated maps published by CalFire in March 2025.²⁶ Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. In particular, LAMC Section 57.106.5.2 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

²² City of Los Angeles, Geohub, Disaster Routes, www.arcgis.com/apps/mapviewer/index.html?layers=6223f108d67d49958d05092e0b488740, accessed September 22, 2025.

²³ City of Los Angeles, Los Angeles Safety Element of the General Plan, November 2021, p. 23.

²⁴ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APN 4125-010-016 <http://zimas.lacity.org/>, accessed September 15, 2025.

²⁵ City of Los Angeles, 2024 Local Hazard Mitigation Plan, Wildfire Severity Zones in West Los Angeles APC, Figure 13-7, p. 18-12.

²⁶ CalFire, Fire Hazard Severity Zones, <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>, accessed September 22, 2025.

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. In addition, the Project's proposed office and industrial uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. **Therefore, as determined in the Initial Study, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death as a result of exposure to wildland fires. As such, impacts would be less than significant, and no further analysis is required.**

e. Cumulative Impacts

(1) Impact Analysis

As indicated in Section III, Environmental Setting, of this Draft EIR, there are 4 related projects in the vicinity of the Project Site. Related Project Nos. 1 through 4 are located outside of the boundaries of the Project Site. Development of the Project in combination with Related Project Nos. 1 through 4 has the potential to increase the risk for an accidental release of hazardous materials. However, each of these 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 development proposals on these properties.

Pursuant to Project Design Feature HAZ-PDF-1, Project construction will not begin until removal of all subsurface features (e.g., existing USTs, current and former hydraulic lifts, and oil/water clarifiers) associated with the existing onsite rental car operations occur, and the associated ground disturbance activities are complete. No overlapping ground disturbance activities between interim Project Site remediation activities and the Project will occur. As such, interim Project Site activities and the Project would not combine for a cumulative impact.

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.