3.9 Hazards and Hazardous Materials

3.9.1 Introduction

This section describes the hazardous materials or hazardous conditions that could be encountered as a result of implementation of the proposed Expo Phase 2 project. Hazardous materials include, but are not necessarily limited to, solvents, fuels, and oils; metals, lead, and asbestos associated with older construction (pre-1974); paints, cleansers, and pesticides that are used in activities such as construction activities or building or grounds maintenance. Potential effects include those associated with exposure to pre-existing hazardous materials found along the alignment and hazardous materials used, stored, transported, or disposed of during proposed project operations.

Greater detail on Hazards and Hazardous Materials can be found in the *Hazards and Hazardous Materials Technical Background Report*. Full bibliographic references can be found in Appendix B (Bibliography).

Other issues related to hazardous materials or hazardous conditions that are evaluated elsewhere in this ~~D~~FEIR include the release of potential hazardous materials associated with the removal of existing track and pavement and the demolition of existing buildings, which are addressed in Chapter 4 (Construction Impacts); vehicle emissions and noise impacts associated with construction and/or operational activities occurring near a school, which are addressed in Section 3.4 (Air Quality) and Section 3.12 (Noise and Vibration); disturbance of a hazardous materials site listed in Section 65962.5 of the Government Code, which are addressed in Chapter 4 (Construction Impacts); emergency response or evacuation plans, which are addressed in Section 3.2 (Transportation/Traffic); and local circulation and emergency response times during operational and construction activities, which are addressed in Section 3.15 (Safety and Security).

3.9.2 Existing Conditions

Chapter 6.5 of the *California Health and Safety Code* sets forth regulations related to hazardous materials management and disposal and defines “hazardous materials” as “any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment.”

Permitted Facilities Using Hazardous Materials

Permitted facilities include those businesses that use hazardous materials or handle hazardous wastes in accordance with current hazardous materials and hazardous waste regulations. Multiple databases were searched to identify the number, type, and location of permitted facilities. Table 3.9-1 (Type and number of Permitted Facilities using Hazardous Materials by Segment) identifies the type and total number of permitted facilities within the 0.5-mile buffer area by segment (1 mile total) identified in the search.

Table 3.9-1 Type and Number of Permitted Facilities Using Hazardous Materials by Segment

Segment 1: Expo ROW	Segment 1a: Venice/Sepulveda	Segment 2: Sepulveda to Cloverfield	Segment 3: Olympic	Segment 3a: Colorado	Name and Description of Regulatory Database
3	10	13	9	9	**RCRA-LQG—Resource Conservation and Recovery Act Information System Large Quantity Generators:** Sites that generate, transport, store, treat, and/or dispose of hazardous wastes as defined by the Resource Conservation and Recovery Act. Facilities permitted to generate more than 1,000 kilograms (kg) of hazardous waste or over 1 kg of acutely hazardous waste per month.
80	106	115	120	130	**RCRA-SQG—Resource Conservation and Recovery Act Information System Small Quantity Generators:** Sites that generate, transport, store, treat and/or dispose of hazardous wastes as defined by the Resource Conservation and Recovery Act. Facilities permitted to generate more than 100 kg per month but less than 1,000 kg per month of non-acutely hazardous materials.
34	41	42	32	29	**UST—Underground Storage Tanks:** Facilities permitted to maintain underground storage tanks (USTs)
65	76	36	55	61	**CA FID—Facility Inventory Database:** Facilities on a historical listing of active and inactive USTs
48	53	94	54	84	**HIST UST—Hazardous Substances Storage Contained Database:** Facilities on a historic list of UST sites
1	2	3	1	0	**AST—Aboveground Petroleum Storage Tank Facilities:** Facilities with registered above ground storage tanks
20	25	9	10	9	**DRYCLEANERS—Dry Cleaner-Related facilities:** A list of drycleaner-related facilities that have EPA ID numbers, which are facilities with certain SIC codes, such as: power laundries; family and commercial laundries; garment pressing and cleaner's agents; linen supply; coin-operated laundries and cleaning; dry-cleaning plants except rugs; carpet and upholstery cleaning; industrial launderers; laundry and garment services.
1	1	3	1	1	**TRIS—Toxic Chemical Release System:** Facilities that release toxic chemicals to the air, water, and land in reportable quantities under the Emergency Planning and Community Right-to-Know Act (SARA Title III, Section 313).
76	34	93	69	81	**EMI—Emissions Inventory Data:** Toxic and criteria pollutant emissions data collected by the California Air Resources Board (ARB) and local air pollution agencies for 25 different source categories, such as light-duty passenger cars, consumer products, or off-road equipment, to name a few, and assembled by County, air basin, air district, and statewide

Table 3.9-1 Type and Number of Permitted Facilities Using Hazardous Materials by Segment

Segment 1: Expo ROW	Segment 1a: Venice/Sepulveda	Segment 2: Sepulveda to Cloverfield	Segment 3: Olympic	Segment 3a: Colorado	Name and Description of Regulatory Database
277	366	348	297	591	**HAZNET—Hazardous Waste Information System:** Facilities that have filed hazardous waste manifests with the Department of Toxic Substances Control (DTSC).
111	141	154	141	150	**FINDS—Facility Index System:** FINDS contains both facility information and "pointers" to other sources of information that contain more detail. These include: Resource Conservation and Recovery Information System (RCRIS); Permit Compliance System (PCS); Aerometric Information Retrieval System (AIRS); FATES (which includes both the FIFRA [Federal Insecticides Fungicide Rodenticide Act] and the [Toxic Substances Control Act] TSCA Enforcement System); FTTS (which includes the FIFRA/TSCA Tracking Systems); Comprehensive Environmental Response, Compensation, and Liability Act(CERCLIS); DOCKET (enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes); Federal Underground Injection Control (FURS); Federal Reporting Data System (FRDS); Surface Impoundments (SIA); TSCA Chemicals in Commerce Information System (CICS); PCB Activity Database System (PADS); RCRA-J (Resource Conservation and Recovery Act for medical transporters/ disposers); Toxic Chemical Release Inventory System (TRIS); and TSCA.
716	***855***	***910***	***789***	***1,145***	***Total***

SOURCE: EDR 2007

This table summarizes the number of facilities located within the 0.5-mile buffer zone as identified by EDR. Sites located between adjoining segments are listed in both segments. Many of the facilities are permitted for more than one hazardous material use and, therefore, appear in more than one database.

Environmental Cases and Spill Sites

Environmental cases are opened for those sites that are suspected of releasing hazardous materials or have had cause for hazardous materials investigations and are identified on regulatory agency lists. Table 3.9-2 (Type and Number of Environmental Cases and Spill Sites by Segment) lists, by segment, the type and number of "Environmental Cases," "Environmental Cases—No further Action or Referred to Another Agency," and "Spill Sites" within a 0.5-mile buffer area (1 mile total) of the various alignment options.

Table 3.9-2 Type and Number of Environmental Cases and Spill Sites by Segment

Segment 1: Expo ROW	Segment 1a: Venice/Sepulveda	Segment 2: Sepulveda to Cloverfield	Segment 3: Olympic	Segment 3a: Colorado	Name and Description of Regulatory Database
Environmental Cases					
14	14	13	5	11	**CA SLIC—Spills, Leaks, Investigations, and Cleanup Program:** Sites with small to medium non-fuel contamination. Most are regulated under site cleanup requirements
0	0	5	1	1	**CERCLIS—Comprehensive Environmental Response, Compensation and Liability Information System:** Sites that are either on or proposed for inclusion on the National Priorities List (NPL) and sites that are in the screening and assessment phase for possible inclusion on the NPL
0	0	0	0	0	**RAATS—RCRA Administrative Action Tracking System:** Enforcement actions taken under RCRA pertaining to major violations
0	0	3	2	2	**VCP—Voluntary Cleanup Program:** Contains low threat level properties with either confirmed or unconfirmed releases and the project proponents have requested that DTSC oversee investigation and/or cleanup activities and have agreed to cover DTSC's costs
0	0	0	0	0	**DEED—Deed Restriction Listing:** Sites that have been issued a deed restriction because of presence of hazardous materials
2	1	0	0	0	**NOTIFY 65—Proposition 65 Records:** Facilities that have reported a release that could threaten a drinking water source
0	1	8	5	4	**SWF/LF—Solid Wastes Facilities and/or Landfills Sites:** Contain an inventory of solid waste disposal facilities or landfills in a particular state. Active, inactive, or closed solid waste disposal sites.
8	15	10	9	9	**WDS—Water Discharge System, California Water Resources Control Board:** Sites that have been issued waste discharge requirements
2	2	2	2	3	**FTTS:** Tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-To-Know-Act) over the previous five years
17	31	59	63	62	**LUST—Leaking Underground Storage Tanks:** An inventory of reported leaking underground storage tank incidents
12	30	47	54	56	**CORTESE:** Identifies public drinking water wells with detectable levels of contamination, hazardous substance sites selected for remedial action, sites with known toxic material identified through the abandoned site assessment program, sites with USTs having a reportable release, and all solid waste disposal facilities from which there is known migration

Table 3.9-2 Type and Number of Environmental Cases and Spill Sites by Segment

Segment 1: Expo ROW	Segment 1a: Venice/Sepulveda	Segment 2: Sepulveda to Cloverfield	Segment 3: Olympic	Segment 3a: Colorado	Name and Description of Regulatory Database
0	0	9	8	8	**WMUDS/SWAT—Waste Management Unit Database System:** Used for program tracking and inventory of waste management units. The source is the State Water Resources Control Board.
0	0	0	1	1	**BEP—Bond Expenditure Plan:** Department of Health Services developed a site-specific expenditure plan as the basis for an appropriation of Hazardous Substance Cleanup Bond Act funds.
4	4	9	7	6	**EnviroStor:** DTSC recently replaced the "CalSites" database with a new database of hazardous substance release sites, known as the "EnviroStor" database. The DTSC's site Mitigation and Brownfield Reuse Program's (SMBRP's) EnviroStor database identifies sites that have known contamination or sites for which there may be reasons to investigate further.
59	*98*	*165*	*157*	*163*	*Subtotal*
Environmental Cases - No Further Action or Referred to Another Agency					
0	1	27	4	5	**CERCLIS-NFRAP—Comprehensive Environmental Response, Compensation, and Liability Information System-No Further Remedial Action Planned:** Sites that have been removed or archived from the inventory of CERCLIS sites.
0	*1*	*27*	*4*	*5*	*Subtotal*
Reported Spills					
15	13	13	25	25	**Emergency Response Notification System (ERNS):** Records and stores information on reported releases of oil and hazardous substances
2	2	2	2	1	**Hazardous Materials Incident Report System (HMIRS):** Contains hazardous material spill incidents reported to the Department of Transportation
17	24	29	50	57	**CHMIRS—California Hazardous Material Incident Report System:** Information on reported hazardous material incidents, i.e. accidental releases or spills
34	*39*	*44*	*77*	*83*	*Subtotal*
93	***138***	***236***	***238***	***251***	***Total***

SOURCE: EDR 2007

This table summarizes the number of facilities located within the 0.5-mile buffer zone as identified by EDR. Sites located between adjacent segments are listed in both segments. Many of the facilities are permitted for more than one hazardous material use and, therefore, appear in more than one database.

Other Hazardous Materials

The study area could contain other hazardous materials from previous land uses and/or existing conditions that could be encountered as a result of construction or demolition activities, including, but not necessarily limited to, asbestos, lead, polychlorinated biphenyls (PCBs), methane gas, and lead arsenate. Refer to Section 3.8 (Geology, Soils, and Seismicity) for information and analysis related to methane gas.

Electromagnetic Fields (EMF)

Federal and state agencies have reviewed past studies to determine if exposure to EMF causes adverse health effects and have found no basis for setting health standards to date (NIEHS 2002). If an LRT Alternative is selected, the radio towers, overhead catenary system (OCS) and traction power substations (TPSS) could be a potential source of EMFs.

3.9.3 Regulatory Setting

Federal

Several federal agencies regulate hazardous materials. These include the Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), Federal Emergency Management Agency (FEMA), and the U.S. Department of Transportation (U.S. DOT). Major Federal laws include the *Comprehensive Environmental Response, Compensation, and Liability Act*, the *Resource Conservation and Recovery Act*, and the *Toxic Substances Control Act*. Applicable Federal regulations are contained primarily in Titles 10, 29, 40, and 49 of the *Code of Federal Regulations* (CFR).

State

Primary state agencies with jurisdiction over hazardous chemical materials management are the California Environmental Protection Agency (Cal EPA), the Department of Toxic Substance Control (DTSC), and the Water Quality Control Board (WQCB). The DTSC is also responsible for submitting to the Secretary for Environmental Protection all hazardous materials sites identified within federal, state, and/or county hazardous waste lists and databases pursuant to Government Code Section 65962.5. Such lists include the CORTESE List which compiles hazardous materials sites pursuant to Government Code Section 65962.5. Other State or regional agencies involved in hazardous materials management are the Department of Industrial Relations (State OSHA implementation), Office of Emergency Services (OES—California Accidental Release Prevention Implementation), South Coast Air Quality Management District (SCAQMD), California Air Resources Board (ARB), California Department of Transportation (Caltrans), State Office of Environmental Health Hazard Assessment (OEHHA—Proposition 65 implementation), and the California Integrated Waste Management Board (CIWMB). The enforcement agencies for hazardous materials transportation regulations are the California Highway Patrol (CHP) and Caltrans. Major State laws include *Hazardous Materials Management Act*, *Hazardous Waste Control Act*, *Hazardous Substances Act*, and Hazardous Materials Storage and Emergency Response.

Emergency Response to Hazardous Materials Incidents

California has developed an Emergency Response Plan to coordinate emergency services provided by federal, state, and local government and private entities. Response to hazardous materials incidents is one component of this plan. The state OES administers the plan, which coordinates the responses of other agencies, including the Cal-EPA, the CHP, California Department of Fish and Game, and the Regional Water Quality Control Board (RWQCB).

3.9.4 Analytic Methodology

Data used to prepare this section were taken from various sources, including the general plans, the municipal codes, and the emergency plans of the cities of Culver City, Los Angeles, and Santa Monica; previous environmental studies prepared for the proposed project area; and other data sources. An Environmental Data Research (EDR) Data Map Corridor Study (EDR 2007) was compiled for the study area; an environmental site assessment ~~would be~~was conducted after the preliminary selection of the ~~Locally~~ Recommended Preferred Alternative ~~(LPA)~~ in fall 2009.

The existing and historic hazardous materials likely to be encountered along the alignments considered were identified through a search of federal and state regulatory agency databases for each alternative, as well as a 0.5-mile buffer area (1 mile total) surrounding the alignments. A review of federal and state regulatory agency databases was conducted in October 2007. The analysis assumes that operation of the proposed project would comply with all applicable federal, state, and local laws and regulations governing hazardous or potentially hazardous materials.

The analysis in this section focuses on the management of hazardous or potentially hazardous materials during operation of the proposed project. Potential construction-related impacts are analyzed in Chapter 4 (Construction Impacts).

3.9.5 Criteria, Impact Evaluation, and Mitigation Measures

Criterion	**Would the project routinely expose the public or the environment to hazardous materials?**

No-Build Alternative

There would be roadway and transit service improvements associated with the No-Build Alternative. However, the only improvement that would change the physical environment in the Expo Phase 2 ROW would be the I-405 Widening project. Compliance with the safety procedures mandated by applicable federal, state, and local laws would reduce routine exposure to the public or the environment to hazardous materials. Therefore, the No-Build Alternative would result in a ***less-than-significant*** impact.

Transportation Systems Management (TSM) Alternative

The TSM Alternative would include all of the improvements under the No-Build Alternative and new on-street bus services to directly serve the Expo Phase 2 community transit needs. Those additional improvements would include minor physical modifications such as upgraded bus

stops and additional buses. Bus operators would comply with the safety procedures mandated by applicable federal, state, and local laws would reduce routine exposure to the public or the environment to hazardous materials. As with the No-Build Alternative, the TSM Alternative would result in a ***less-than-significant*** impact.

LRT Alternatives

Electromagnetic Fields

Operation of light-rail transit would introduce new EMF sources associated with the electrical power system used to propel the vehicles, including the OCS, ~~and~~ TPSS, and the radio towers. Figure 3.9-1 (Proposed TPSS Locations [Revised]) shows the location of potential TPSS sites within the proposed project and the sensitive receptors within a 100-foot buffer zone. The proposed radio tower locations are defined in Section 2.4.6 (Other Related Facilities).

The light-rail transit OCS would distribute a nominal 750 volts of direct current (DC) or 0.6 kilovolts (kV) along the alignment. For comparison, typical overhead power lines carry a much higher voltage of up to 400 kV AC. Tests to gauge the strength of EMFs were conducted on light-rail lines similar to the ones that would be developed as part of this project in the Washington D.C. area. Magnetic fields of 80 to 150 milligaus were recorded at 10 to 15 feet from the source. This is far below the most conservative risk standard of 1,000 mG (for workers with cardiac pacemakers) and equivalent to that produced by the average computer monitor. For comparison purposes, a person 100 feet from the base of the power line is exposed to EMF of 1.6mG. Evidence points to the light-rail-generated EMFs being too low to adversely affect riders or nearby sensitive receptors (LACMTA 2005).

Because EMFs produced by LRT systems are relatively weak~~,~~ and TPSS are self-contained, ~~and no sensitive receptors would be located within 100 feet of the TPSS sites,~~ the proposed project would result in a ***less-than-significant*** impact or increased risk to human health associated with EMFs.

FEIR Design Options

Development of the Sepulveda Grade Separation, Colorado Parking Retention, Colorado/4th Parallel Platform and South Side Parking, Maintenance Facility Buffer, or Expo/Westwood Station No Parking design options would not introduce additional EMF sources not already contemplated as part of the LRT Alternatives. Therefore, no change would be anticipated with implementation of the design options, and impacts would remain ***less than significant***.

Transportation, Storage, and Use of Hazardous Materials

Due to the nature of the proposed project as passenger transit, no hazardous materials would be intentionally transported during the operation of the LRT along the corridor. During operational activities, typical household-type and commercial cleaning products, as well as maintenance products, would be used to clean the stations and the interior of the light-rail vehicles.

The LRT Alternatives would also include a maintenance facility. The facility would accommodate daily servicing and cleaning of the LRVs, vehicle inspection and repairs, overnight train storage, crew areas, and associated activities. Activities may take place in the shop and/or yard through the day and night, as described at the end of Section 2.4.6 (Other Related Facilities).

Source: PBS&J, ESRI

Figure 3.9-1 Proposed TPSS Locations [Revised]

~~The maintenance facility would allow the storage of vehicles, and include maintenance and repair shops, interior vehicle cleaning, and exterior car washing, all of which could result in the accidental release of hazardous materials. The facility would also be equipped to provide wheel truing facilities and light repairs~~. Operation of the proposed maintenance facility would be monitored by federal and state agencies, such as Cal-OSHA and CalEPA that regulate safety practices and the use and disposal of potential hazardous materials.

Grounds and landscape maintenance within the corridor, at each station, and at the maintenance facility could use a wide variety of commercial products containing hazardous materials, including cleaners and degreasers, solvents, paints, lubricants, adhesives, sealers, and pesticides/herbicides. Use of hazardous materials would present a slightly greater risk of accident than storage of hazardous materials. However, for those employees who would work with hazardous materials, the amount of hazardous materials that are handled at any one time along the corridor and at each station would be relatively small. Metro ~~will develop~~has policies and procedures governing hazardous materials to comply with the safety procedures mandated by applicable federal, state, and local laws, thereby reducing the potential consequences of an accident during handling.

Federal, state, and local regulations govern the use, transportation, and storage of hazardous wastes. Hazardous materials are required to be stored in designated areas designed to prevent accidental release to the environment. *California Building Code* (CBC) requirements prescribe safe accommodations for materials that present a moderate explosion hazard, high fire or physical hazard, or health hazards. Appropriate documentation for all hazardous waste that is transported in connection with project-related activities would be provided as required for compliance with existing hazardous materials regulations codified in Titles 8, 22, and 26 of the *California Code of Regulations*, and their enabling legislation set forth in Chapter 6.95 of the *California Health and Safety Code,* as well as Title 49 of the *Code of Federal Regulations*. Compliance with all applicable federal and state laws related to the storage of hazardous materials would be implemented to maximize containment (through safe handling and storage practices) and to provide for prompt and effective cleanup if an accidental release occurs.

Therefore, the operation of the LRT system would pose a ***less-than-significant*** impact to the public and the environment from routine exposure to hazardous materials and wastes.

FEIR Design Options

Implementation of the Sepulveda Grade Separation, Colorado Parking Retention, Colorado/4th Parallel Platform and South Side Parking, Maintenance Facility Buffer, or Expo/Westwood Station No Parking design options would comply with applicable federal, state and local regulations governing the use, transportation, and storage of hazardous wastes, consistent with the LRT Alternatives. As such, the operation of the design options would not increase the potential hazards associated with such activities. Therefore, impacts related to the design options would be considered ***less than significant***, consistent with the LRT Alternatives.

Criterion	**Would the project create the potential for upset or accident conditions involving the release of hazardous materials?**

No-Build Alternative

There would be roadway and transit service improvements associated with the No-Build Alternative. However, the only improvement that would change the physical environment in the Expo Phase 2 ROW would be the I-405 Widening project. This projecte No-Build Alternative could create the potential for upset or accident conditions involving the release of hazardous or potentially hazardous materials such as aerially deposited lead, asbestos and lead based paint. The contractor for this project will be required to implement all recommendations proposed in the required initial site assessment. Compliance with the safety procedures mandated by applicable federal, state, and local laws would reduce the potential consequences of an accident involving the release of hazardous materials. The No-Build Alternative would result in a ***less-than-significant*** impact.

Transportation Systems Management (TSM) Alternative

The TSM Alternative would include all of the improvements under the No-Build Alternative and new on-street bus services to directly serve the Expo Phase 2 community transit needs. Those additional improvements would include minor physical modifications such as upgraded bus stops and additional buses and would not create potential for upset or accidents involving the release of hazardous materials. As with the No-Build Alternative, the TSM Alternative would result in a ***less-than-significant*** impact.

LRT Alternatives

The proposed project would include construction grading, the removal of existing track and pavement, and the demolition of existing buildings that could result in the release of potential hazardous materials. These construction-related effects are addressed in Chapter 4 (Construction Impacts).

From an operational perspective, the exposure of individuals within the study area to hazardous materials through upset or accident conditions could occur by improper handling or use of hazardous materials or hazardous wastes during operation of the proposed project and/or through a collision of an LRV with a vehicle or train another LRV that contained hazardous materials. Due to the nature of the proposed project as passenger transit, no hazardous materials would be intentionally transported during the operation of the LRVT along the corridor. The potential for an LRV to collide with another vehicle at a grade crossing that was transporting hazardous materials could occur. As discussed in Section 3.15 (Safety and Security), numerous regulations that ensure safety at at-grade rail crossings will be required. This will reduce the possibility of this impact to less-than-significant levels.

During operationalmaintenance activities, the Maintenance Facility would have no diesel operated equipment onsite except for a back-up generator, which would be operated for an average of 30 minutes a week for upkeep purposes only. All solvents used in association with the maintenance activities would be water based, and if a paint booth were added to facility operations, the booth would be completely enclosed and filters used to prevent the emission of VOCs to the atmosphere.typical household-type and commercial cleaning products, as well as maintenance products, would be used to clean the stations and the interior of the LRVs. The

proposed maintenance facility would store and maintain vehicles, which could result in the generation of hazardous wastewater. The *Metro Fire/Life Safety Design Criteria* would require that the drainage system for the Maintenance Facility include oil separators, grease and sand traps on all floor drainage systems which service maintenance and vehicle storage areas to provide for the extraction of oil, grease, sand and other substances that are harmful or hazardous to the structure or public drainage systems. Periodic maintenance checks and flushing shall be conducted on all drains, oil separators and grease traps to assure that they are clear of obstructions and perform their designed function. Any flammable liquids and greases shall be removed to an area approved for disposal, thereby reducing this impact. Additionally, the *Metro Design Criteria* would require that the wash facility be equipped with required waste water treatment facility.

Metro, the agency that will operate the project, has policies and procedures governing the use of hazardous materials for grounds and landscape maintenance that comply with the safety procedures mandated by applicable federal, state, and local laws, thereby reducing the potential consequences of an accident during handling. Federal, state, and local regulations govern the use, transportation, and storage of wastes identified as hazardous. Metro, as the agency that will operate the project, will comply with all of these regulations. Therefore, impacts related to reasonably foreseeable upset and accident conditions involving the release of hazardous materials during operation of the LRT Alternatives that would create a significant hazard to the public or the environment would be ***less than significant***.

FEIR Design Options

Development of the Sepulveda Grade Separation, Colorado Parking Retention, Colorado/4th Parallel Platform and South Side Parking, Maintenance Facility Buffer, or Expo/Westwood Station No Parking design options would involve the redesign of certain elements within the proposed alignment. The use of any cleaning or landscape maintenance products during the operation or maintenance of the design options would be conducted in accordance with the *Metro Fire/Life Safety Design Criteria* and/or *Metro Design Criteria,* as well as all safety procedures mandated by applicable federal, state, and local laws, thereby reducing the potential consequences of an accident during handling, consistent with the LRT Alternatives. As such, impacts would be ***less than significant***.

Criterion	**Would the project emit hazardous emissions or handle hazardous ~~or acutely hazardous~~ materials, substances, or waste within 0.25 mile of an existing or proposed school?**

No-Build Alternative

There would be roadway and transit service improvements associated with the No-Build Alternative. However, the only improvement that would change the physical environment in the Expo Phase 2 ROW would be the I-405 Widening project. Compliance with federal, state, and local laws and regulations would minimize the risk associated with the exposure of schools to hazardous or potentially hazardous materials. The Metro fleet is already 90 percent clean air CNG (Compressed Natural Gas) vehicles, and thus, even if operational emissions increase, no hazardous emissions would result. No new stationary sources of hazardous materials would be proposed for the No-Build Alternative. Therefore, the No-Build Alternative would result in a ***less-than-significant*** impact.

Transportation Systems Management (TSM) Alternative

The TSM Alternative would include all of the improvements under the No-Build Alternative and new on-street bus services to directly serve the Expo Phase 2 community transit needs. Those additional improvements would include minor physical modifications such as upgraded bus stops and additional buses that would not emit or carry hazardous or acutely hazardous materials. As with the No-Build Alternative, the TSM Alternative would result in a ***less-than-significant*** impact related to the handling or emission of hazardous materials.

LRT Alternatives

There are several schools located along, and within 0.25 mile of, the LRT Alternative alignments. Section 3.4 (Air Quality) and Section 3.12 (Noise and Vibration) address vehicle and diesel emissions (air quality) and noise impacts associated with ~~construction and/or~~ operational activities to schools within 0.25 mile from the proposed alignment. Chapter 4 (Construction Impacts) addresses air quality and noise impacts associated with construction activities. With regard to operational activities, no new stationary sources of hazardous materials would be proposed for the Expo Phase 2 project, except the maintenance facility. New Roads High School is located within 0.25 mile of the maintenance facility. As previously stated, the Maintenance Facility would have no diesel operated equipment onsite except for a back-up generator, which would be operated for an average of 30 minutes a week for upkeep purposes only. All solvents used in association with the maintenance activities will be water based, and if a paint booth is added to facility operations, the booth would be completely enclosed and filters used to prevent the emission of VOCs to the atmosphere.~~; however, the facility would only handle routine cleaning products, landscaping materials, and some parts for LRV repair.~~ Compliance with federal, state, and local laws and regulations minimize the risk associated with the exposure of schools to hazardous or potentially hazardous materials. Therefore, the LRT Alternatives would result in a ***less-than-significant*** impact related to the handling or emission of hazardous materials.

FEIR Design Options

Development of the Sepulveda Grade Separation, Colorado Parking Retention, Colorado/4th Parallel Platform and South Side Parking, Maintenance Facility Buffer, or Expo/Westwood Station No Parking design options would involve the redesign of certain elements within the proposed alignment. None of the design options would place hazardous emitting uses, materials, substances, or waste within 0.25 miles of a school beyond those which were previously contemplated under the LRT Alternatives. Since the types of products that would be used with respect to the design options would be consistent, in terms of type and manner of use, with those discussed above for the LRT Alternatives, impacts would be ***less than significant***.

Criterion	**Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5?**

No-Build Alternative

There would be roadway and transit service improvements associated with the No-Build Alternative. However, the only improvement that would change the physical environment in the Expo Phase 2 ROW would be the I-405 Widening project. The portion of the I-405 Widening

project within the Expo Phase 2 ROW contains no existing hazardous materials sites identified pursuant to Government Code Section 65962.5. ***No impact*** would occur.

Transportation Systems Management (TSM) Alternative

The TSM Alternative would include all of the improvements under the No-Build Alternative and new on-street bus services to directly serve the Expo Phase 2 community transit needs. Those additional improvements would include minor physical modifications such as upgraded bus stops and additional buses and would not result in disturbance of any Section 65962.5 sites. As a result, ***no impact*** would occur.

LRT Alternatives

As identified in Table 3.9-2 (Type and Number of Environmental Cases and Spill Sites by Segment), the LRT Alternatives could be located on, or across from, hazardous materials sites identified within federal, state, and/or county hazardous waste lists and databases pursuant to Government Code Section 65962.5.[68] Potential impacts associated with the disturbance of a hazardous materials site during construction activities is analyzed in Chapter 4 (Construction Impacts). From an operational perspective, the potential for accident conditions that could involve the release of hazardous materials is addressed in Section 3.15 (Safety and Security) and is ***less than significant***.

FEIR Design Options

Development of the Sepulveda Grade Separation, Colorado Parking Retention, Colorado/4th Parallel Platform and South Side Parking, Maintenance Facility Buffer, or Expo/Westwood Station No Parking design options would involve the redesign of certain elements within the proposed alignment. As discussed above, potential impacts associated with the disturbance of a hazardous materials site during construction activities is analyzed in Chapter 4 (Construction Impacts). From an operational perspective, the potential for accident conditions that could involve the release of hazardous materials is addressed in Section 3.15 (Safety and Security). Impacts would be the same as under the LRT Alternatives and would remain ***less than significant***.

Criterion	**Would the project be located within 2 miles of a public airport or public use airport where the project would result in a safety hazard for people residing or working in the project area?**

The nearest airport to the study area is the Santa Monica Municipal Airport. The Santa Monica Municipal Airport is governed by the Santa Monica Airport Code and the Los Angeles Regional Planning Commission/Airport Land Use Commission's Airport Land Use Compatibility (ALUC) guidelines. These guidelines are intended to provide for reasonable, safe, and efficient use of the airport as a public transportation facility. Potential land use development is ~~to be~~ judged to be compatible with the airport based on criteria set forth in the ALUC Procedural Policies contained in the Airport Land Use Compatibility document. According to the Santa Monica Municipal Airport Influence Area Map, the No-Build Alternative, TSM Alternative, and the LRT Alternatives would not occur within the Airport Influence Area for the Santa Monica Airport,

[68] Government Code Section 65962 requires that the DTSC annually update the *Hazardous Waste and Substances Sites List* (also known as the Cortese List).

which is generally bounded by Ocean Park Boulevard, Barrington Avenue, Dewey Street, and 18th Street.

No-Build Alternative

There would be roadway and transit service improvements associated with the No-Build Alternative. However, the only improvement that would change the physical environment in the Expo Phase 2 ROW would be the I-405 Widening project. The No-Build Alternative is not within the Airport Influence Area for the Santa Monica Airport; therefore, the No-Build Alternative would result in ***no impact*** related to safety hazards associated with the ongoing operation of a public airport.

Transportation Systems Management (TSM) Alternative

The TSM Alternative would include all of the improvements under the No-Build Alternative and new on-street bus services to directly serve the Expo Phase 2 community transit needs. Those additional improvements would include minor physical modifications such as upgraded bus stops and additional buses, which would not result in a safety hazard at the Santa Monica Airport. Therefore, the TSM Alternative would result in ***no impact*** related to safety hazards associated with the ongoing operation of a public airport.

LRT Alternatives

The nearest airport to the study area is the Santa Monica Municipal Airport which is approximately 1.2 miles from Segment 2 (Sepulveda to Cloverfield), between Bundy Drive and Walgreen Avenue. According to the Santa Monica Municipal Airport Influence Area Map, the LRT Alternatives would not occur within the Airport Influence Area for the Santa Monica Airport; therefore, the LRT Alternatives would result in ***no impact*** related to safety hazards associated with the ongoing operation of a public airport.

FEIR Design Options

Development of the Sepulveda Grade Separation, Colorado Parking Retention, Colorado/4th Parallel Platform and South Side Parking, Maintenance Facility Buffer, or Expo/Westwood Station No Parking design options would involve the redesign of certain elements within the proposed alignment. As the proposed design options would not extend the project area such that it would be within the Santa Monica Airport Influence Area, ***no impact*** as a result of the proposed design options would occur.

Criterion	**Would the project physically interfere with an adopted emergency response or evacuation plan?**

No-Build Alternative

There would be roadway and transit service improvements associated with the No-Build Alternative. The cities of Culver City, Los Angeles, and Santa Monica, as well as the County of Los Angeles, each has public safety elements and municipal code provisions that address emergency response and emergency evacuation procedures. The No-Build Alternative would comply with all applicable local, state, and federal laws and regulations governing emergency

access and evacuation. Therefore, a ***less-than-significant*** impact associated with emergency response and evacuation would occur.

Transportation Systems Management (TSM) Alternative

The TSM Alternative would include all of the improvements under the No-Build Alternative and new on-street bus services to directly serve the Expo Phase 2 community transit needs. Those additional improvements would include minor physical modifications such as upgraded bus stops and additional buses. The cities of Culver City, Los Angeles, and Santa Monica, as well as the County of Los Angeles, each have public safety elements and municipal code provisions that address emergency response and emergency evacuation procedures. The TSM Alternative would comply with all applicable local, state, and federal laws and regulations governing emergency access and evacuation. Therefore, a ***less-than-significant*** impact associated with emergency response and evacuation would occur.

LRT Alternatives

Emergency response and emergency evacuation plans can be affected by temporary or permanent circulation changes, including road closures, lane reconfigurations, and other access changes associated with construction activities or a change in circulation patterns if the LRT Alternatives were implemented. The cities of Culver City, Los Angeles, and Santa Monica, as well as the County of Los Angeles, each has public safety elements and municipal code provisions that address emergency response and emergency evacuation procedures. None of Metro's operations will interfere with the ability of federal, state, or local jurisdictions to respond to emergency conditions. Section 3.2 (Transportation/Traffic) addresses the circulation changes proposed as part of the project and those that have been identified to avoid or reduce potential project-related congestion and emergency response. Section 3.15 (Safety and Security) addresses interference with local circulation and emergency response times during operational and construction activities. The proposed project would comply with all applicable local, state, and federal laws and regulations governing emergency access and evacuation. Therefore, a ***less-than-significant*** impact associated with emergency response and evacuation would occur.

FEIR Design Options

Development of the Sepulveda Grade Separation, Colorado Parking Retention, Colorado/4th Parallel Platform and South Side Parking, Maintenance Facility Buffer, or Expo/Westwood Station No Parking design options would involve the redesign of certain elements within the proposed alignment. As the proposed design options would not result in any modification that would interfere with local circulation and emergency response times during operational and construction activities, as with the LRT Alternatives, and because the proposed project would comply with all applicable local, state, and federal laws and regulations governing emergency access and evacuation, no additional impact would be anticipated with the proposed design options. Further, the introduction of a grade separation at Sepulveda Boulevard would further ensure that potential impacts to emergency response or evacuation plans are minimized. Impacts would be ***less than significant***, consistent with the proposed project.

Criterion	Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No-Build Alternative

There would be roadway and transit service improvements associated with the No-Build Alternative. The study area is fully developed (i.e., urban) and does not contain any known wildlands. Therefore, the No-Build Alternative would not result in any impacts associated with wildland fires, and ***no impact*** would occur.

Transportation Systems Management (TSM) Alternative

The TSM Alternative would include all of the improvements under the No-Build Alternative and new on-street bus services to directly serve the Expo Phase 2 community transit needs. Those additional improvements would include minor physical modifications such as upgraded bus stops and additional buses. As with the No-Build Alternative, the study area is fully developed (i.e., urban), and ***no impact*** would occur.

LRT Alternatives

The study area is fully developed (e.g., urban) and does not contain any known wildlands designated by the California Department of Forestry and Fire Protection as a Substantial Wildfire Hazard Area or a Very High Fire Hazard Severity Zone, nor does the study area contain any wildfire hazard areas designated by any of the relevant General Plans. Therefore, the LRT Alternatives would not result in any impacts related to wildland fires, and ***no impact*** would occur.

FEIR Design Options

The Sepulveda Grade Separation, Colorado Parking Retention, Colorado/4th Parallel Platform and South Side Parking, Maintenance Facility Buffer, or Expo/Westwood Station No Parking design options would occur within a fully developed, urban area and does not contain any known wildlands. As such, ***no impact*** as a result of implementation of the proposed design options would occur.