

3.7 Hazards and Hazardous Materials

As a result of the analysis undertaken in the Initial Study for the proposed 2009 Master Plan, the LACCD determined that the proposed project may result in certain environmental impacts involving hazards and hazardous materials.¹ Comments received during the scoping period raised additional issues pertinent to this section, including potential effects relating to Burbank Airport, potential effects from wildfires, and potential effects on emergency plans. Therefore, these issues as well as the other issues discussed in the Initial Study, are being carried forward for detailed analysis in this EIR. This analysis was undertaken to identify opportunities to avoid, reduce, or otherwise mitigate potential significant impacts involving hazards and hazardous materials and to identify potential alternatives.

The analysis of hazards and hazardous materials consists of a summary of the regulatory framework that guides the decision-making process, the existing conditions at the proposed 2009 Master Plan area, thresholds for determining if the proposed 2009 Master Plan would result in significant impacts, anticipated impacts (direct, indirect, and cumulative), mitigation measures, and level of significance after mitigation. The potential for impacts involving hazards and hazardous materials at the proposed 2009 Master Plan site have been evaluated in accordance with Appendix G of the State California Environmental Quality Act (CEQA) Guidelines.²

3.7.1 Setting

3.7.1.1 Regulatory Setting

Federal

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

CERCLA, also known as Superfund, is a federal law designed to clean up abandoned hazardous-waste sites that may endanger public health or the environment. This law outlines the potential liability related to the cleanup of hazardous substances, available defenses to such liability, appropriate inquiry into site status under Superfund, and statutory definitions of hazardous substances and petroleum products. The proposed project would be subject to CERCLA for the cleanup of any hazardous substances.

Superfund Amendment and Reauthorization Act Title II (SARA)

SARA of 1986 is the Emergency Planning and Community Right-to-Know Act.³ Facilities are required to report the following items on EPA Form R, the Toxic Chemical Release Inventory Reporting Form: facility identification; off-site locations to which toxic chemicals are transferred in wastes; chemical-specific information; and supplemental information. Form R requires a facility to list the hazardous substances that are handled on-site and to account for the total aggregate releases of listed toxic chemicals for the calendar year. Releases to the environment are to include emissions

¹ Los Angeles Community College District. 10 April 2009. Los Angeles Mission College 2009 Facilities Master Plan Initial Study. Prepared by: URS Corporation, 915 Wilshire Boulevard, Suite 700, Los Angeles, CA 90017.

² California Code of Regulations, Title 24, Division 6, Chapter 3, Sections 15000-15387. Available at: http://ceres.ca.gov/topic/env_law/ceqa/guidelines/

³ Office of the Law Revision Counsel. 22 January 2002. 42 U.S. Code, Chapter 116 et seq.: "Emergency Planning and Community Right-To-Know Act." Available at: <http://uscode.house.gov>.

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to the air, discharges to surface water, and on-site releases to land and underground injection wells. The proposed project would be subject to SARA for the use, storage, transport, disposal, or release of toxic chemicals.

The U.S. Department of Transportation (DOT)

The U.S. DOT regulates the transport of hazardous materials under Title 49 of the Code of Federal Regulations (CFR, Title 49). Title 49 prohibits the release of hazardous materials to the environment and requires all containers to meet strict standards for impact resistance, strength, and packing compatibility. In addition, Title 49 contains specific requirements for the training of drivers in inspection, operation of vehicles, loading and unloading of materials, the properties and hazards of the materials transported, and the use of vehicle controls and equipment, including operation of emergency equipment. The proposed project would be subject to DOT requirements related to the use, generation, storage, and disposal of hazardous wastes.

Resource Conservation and Recovery Act (RCRA)

The federal RCRA of 1976 was the first major federal act regulating the potential health and environmental problems associated with the nation's growing volume of municipal and industrial waste. It amended the Solid Waste Disposal Act of 1965 and gave the EPA the authority to control hazardous and nonhazardous solid wastes from the cradle to the grave (i.e., generation, transportation, treatment, storage, and disposal). RCRA and the implementation regulations developed by the EPA provide the general framework for the national hazardous and nonhazardous waste management systems. This framework includes the determination of whether hazardous wastes are being generated, techniques for tracking wastes to eventual disposal, and the design and permitting of hazardous-waste management facilities.

In 1984, RCRA was expanded with the Hazardous and Solid Waste Amendments of 1984. The amendments strengthened the law by covering small-quantity generators of hazardous waste and establishing requirement for hazardous waste incinerators, and the closing of substandard landfills. In 1986, the law was expanded further to regulate underground storage tanks and other leaking waste storage facilities. Hazardous-waste regulations promulgated in 1991 address siting, design, construction, operation, monitoring, corrective action, and closure of disposal facilities.

Additional regulations addressing solid waste issues are contained in Title 40, Code of Federal Regulations (CFR), Part 258. The proposed 2009 Master Plan would be subject to the requirements of RCRA related to the generation, storage, or disposal of hazardous and nonhazardous solid wastes.

State

Hazardous Waste Control Law of 1972

Individual states may implement hazardous waste programs under RCRA with EPA approval; however, California has not yet received this EPA approval. Therefore, the California Hazardous Waste Control Law of 1972 is administered by the California EPA (Cal/EPA) and is the original hazardous-waste control law in California to regulate hazardous wastes. This law initiated programs that track hazardous-waste generators and their hazardous waste streams and handling practices. While the California Hazardous Waste Control Law is more stringent than RCRA, until the EPA approves the California program, both the state and federal laws apply in California. The proposed

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2009 Master Plan would be subject to requirements of this law related to the generation, storage, and disposal of hazardous wastes.

Titles 22, 23, and 27 of the California Code of Regulations

In California, Titles 22 and 23 of the California Code of Regulations (CCR) address hazardous materials and wastes. Title 22 defines, categorizes, and lists hazardous materials and wastes, including universal wastes. Title 23 addresses public health and safety issues related to hazardous materials and wastes, and it specifies disposal options. Title 27 of the CCR addresses landfill closure standards and landfill-related public health and safety issues. The proposed 2009 Master Plan would be subject to requirements of this law related to the use, generation, storage, and disposal of hazardous wastes.

The Hazardous Materials Release Response Plans and Inventory Law of 1986

Health and Safety Code, Section 25500 et seq., governs hazardous materials handling, reporting requirements, and local agency surveillance programs. The proposed 2009 Master Plan would be subject to requirements of this law related to maintaining hazardous material inventories, business plans, and emergency response plans.

Title 8 of the California Code of Regulations

The California Occupational Safety and Health Administration (Cal/OSHA) has established requirements to limit occupational exposure to lead. Construction, alteration, and repair work, including demolition, is subject to Title 8, CCR, Section 1532.1 for lead, which outlines permissible exposure limits, exposure assessment requirements, methods of compliance, and necessary respiratory protection and protective clothing. Demolition work associated with construction of the proposed 2009 Master Plan would be subject to this law.

Regional

Asbestos-Containing Materials (ACMs)

Title 40, CFR, Part 61.145, National Emission Standard for Asbestos, Standard for Demolition and Renovation, and the SCAQMD, Rule 1403, Asbestos Emissions from Demolition/Renovation Activities, require the following:

- The facility must conduct a survey to inspect, identify, and quantify all friable and Class I and Class II non-friable ACMs prior to demolition or restoration;
- Proper notification must be submitted to SCAQMD;
- An on-site representative must be present during removal, disturbance, and handling of ACMs;
- ACMs must be removed in accordance with the required schedule and procedures and following the proper handling operations; and
- ACMs must be disposed of following proper disposal methodology, including maintaining waste shipment records and using appropriate labeling.

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Underground Storage Tanks (USTs)

The Los Angeles Regional Water Quality Control Board (RWQCB) oversees the UST Program for the Los Angeles regional area. Specific areas of concern within the Los Angeles RWQCB jurisdiction are the Los Angeles River Watershed, the San Gabriel River Watershed, and the Los Angeles/Ventura Coastal Area. Regulatory authority for USTs in the proposed project area is held by the Certified Unified Program Agency (CUPA). As part of the CUPA, the City of Los Angeles Fire Department oversees tank monitoring, installation, removal, and site mitigation.

Contaminated Soil and Groundwater

Under Water Code, Division 7, Section 13304 the Los Angeles RWQCB oversees investigation and mitigation of sites contaminated from USTs, wells, or other sources. Oversight by the Los Angeles RWQCB is not limited to specific pollutants or specific media, but is focused on determining whether an unauthorized release may result in pollution of regional water bodies. In addition, SCAQMD Rule 1166 sets control requirements for volatile organic compound (VOC) emissions from excavating, grading, handling, or treating contaminated soil and SCAQMD Rule 1150 requires implementation of an approved Excavation Management Plan for excavations of landfill material. Requirements include development and approval of a mitigation plan, notification to SCAQMD, monitoring, and handling requirements for the contaminated soil.

Local

Regulatory authority of hazardous materials management in the community of Sylmar, as part of the City of Los Angeles, is held by the CUPA. As part of the CUPA, the Los Angeles Fire Department (LAFD) regulates storage and disposal of hazardous materials through enforcement and education programs. The LAFD manages the Hazardous Waste Generator Inspection Program and California Accidental Risk Prevention (CalARP) Program, which requires facilities with greater than threshold levels of hazardous materials to file a hazardous materials inventory that includes storage locations and emergency contact information for the facility. The LAFD oversees the Hazardous Materials Inspection/Business Plan Program to monitor compliance with hazardous materials storage requirements. The Hazardous Materials Division also works with the LAFD to respond to chemical emergencies to ensure proper containment and clean up.

Regulation 29, CFR, Section 19 10.120, Hazardous Waste Operations and Emergency Response, under the authority of the federal Occupational Safety and Health Administration (OSHA) and Cal/OSHA, outlines methods and requirements for workers who handle or are potentially exposed to hazardous wastes and materials.

3.7.1.2 Environmental Setting

Hazards

Regional

The closest airport in the vicinity of the proposed 2009 Master Plan site is approximately four miles to the south, and is a non-commercial general aviation airport known as Whiteman Airport. The second closest airport in the vicinity of the LAMC site is approximately 10 miles to the southeast, and is the commercial airport known as Bob Hope Airport (formerly Burbank Airport).

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There are three components to characterizing fire hazards: the potential for wildland fires (natural or man-made); the potential for urban fires (man-made); and the characteristics of the urban-wildland interface in between, where the natural and urban components merge. Wildland fires can also be known as brush or forest fires. The proposed 2009 Master Plan area is located within an urbanized area. The closest wildland is the Angeles National Forest, located approximately one mile east, southeast, and northeast of the LAMC Main Campus and approximately 2/3-miles east of the proposed Athletic Fields. The Angeles National Forest is operated by the U.S. Department of Agriculture Forest Service. The urban-wildland interface lies between the boundary of the Angeles National Forest and the campus areas. For the Nursery Property, this interface lies approximately 1 mile north and east. For the Athletic Fields, this interface lies approximately 1/3-mile east. Based on the City of Los Angeles Department of City Planning parcel profile reports for the Nursery Property, it is not located within a Very High Fire Hazard Severity Zone, as designated by the City of Los Angeles Fire Department (LAFD). The proposed Athletic Fields are located adjacent to the west of Pacoima Wash, which is primarily a gravel wash. The proposed Athletic Fields are located within a Very High Fire Hazard Severity Zone, as designated by the LAFD (Figure 3.7-1).

LAMC currently has an adopted emergency response plan and emergency evacuation plan. Section 3.12, Public Services, discusses emergency response further.

Hazardous Materials

Main Campus and East Campus

The 2007 Master Plan EIR discussed the hazardous materials impacts for the 2007 Master Plan, which includes both the Main Campus and the East Campus. No changes in these existing conditions have been identified.

Nursery Property

A drive-by survey of the Nursery Property was completed by URS on May 13, 2009. Access onto the property was not permitted; and, therefore, observations were made from the public right-of-way along Hubbard Street. The property encompasses approximately 1.152 acres that fronts Hubbard Street (13211 Hubbard Street) and is surrounded by chain-link fencing.

The southwestern portion of the Nursery Property is currently developed with an approximately 2,634-square-foot, single-family residence that was constructed in 1949/1950, and the northeastern portion appears to be used as a commercial plant nursery. A swimming pool is located in the rear of the property behind the residence (Figure 3.7-2, Nursery Property Site Plan).

Based on observations made from the street, hazardous materials are likely used and/or stored on-site, including, but not limited to, cleaning supplies, maintenance supplies such as paints and painting related materials, pool treatment chemicals, pesticides, herbicides, and fertilizers. No wastes were observed from the public right-of-way currently being generated at the subject property. Presumably, wastes associated with the residence would include general household refuse as well as any trash, recyclables, and green waste generated from the nursery operation.

The Nursery Property was not included in lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5. URS contacted an environmental database firm, Environmental Data Resources, Inc. (EDR) of Milford, Connecticut, to conduct a search for

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facilities listed by regulatory agencies as potentially having environmental concerns. The subject property was not identified in the agency database report obtained from EDR (Appendix F).

The residence on the property was constructed in 1949/1950; and, therefore, based on the construction date, there is potential for asbestos-containing building materials and lead-based painted surfaces to be present on-site. Other materials may also exist on-site that may require special handling and disposal.

Based on a review of historical sources, the Nursery Property appears to have been used for agricultural purposes (row crops and orchards) prior to development in 1949/1950. Therefore, pesticides, herbicides, and fertilizers may have been historically used and/or stored on-site. Further resources, including a review of records at the City of Los Angeles Department of Building and Safety, revealed that the property was being used for commercial truck storage in 2000. In 2004, a violation was issued to the property by the City of Los Angeles for conducting major auto repair and automobile service in a residential zone.

Athletic Fields (LACCD Property)

On May 13, 2009, URS conducted a site reconnaissance of the 6.4-acre LACCD parcel that is part of the proposed Athletic Fields. The LACCD property is an undeveloped vacant lot covered with dense, waist-high native vegetation. The ground surface was not visible. No structures are located on the LACCD property, and based on a review of historical sources it appears to have never been developed (Figure 3.7-3, Athletic Fields Site Plan).

Hazardous materials and/or wastes were not observed on-site. The LACCD property was not included in lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The LACCD property was not identified in the agency database report obtained from EDR (Appendix F).

Athletic Fields (ACOE Property)

Also on May 13, 2009, URS conducted a site reconnaissance of the 8.2-acre ACOE parcel that is part of the proposed Athletic Fields. The ACOE property is an undeveloped vacant lot covered with native vegetation and shrubs. Numerous dirt paths cross the ACOE property and a small concrete pad with conduit piping was observed in the central portion of the property. The former use of the concrete pad is not known. Based on a review of historical sources, the ACOE property appears to have never been developed.

Hazardous materials and/or wastes were not observed onsite. The ACOE property was not included in lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The ACOE property was not identified in the agency database report obtained from EDR (Appendix F).

Figure 3.7-1 Vicinity Map

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Figure 3.7-2 Nursery Property Site Plan

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Figure 3.7-3 Athletic Fields Site Plan

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3.7.2 Significance Thresholds

As noted in the Initial Study, for the purposes of this EIR, and in accordance with Appendix G of the CEQA Guidelines, an impact to Hazards and Hazardous Materials is considered significant if the proposed project would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- 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;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- 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;

The following additional threshold questions were found not to be applicable to this project in the Initial Study; however, they are discussed below in response to questions raised by the public during the scoping process:

- 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-use airport, would the project result in a safety hazard for people residing or working in the project area?
- For a project within the vicinity of a private airstrip, would the project result in safety hazard for people residing or working in the project area?
- Impair implementation of or physically interfere with an adopted emergency plan or emergency evacuation plan?
- 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?

3.7.3 Environmental Impact Analysis

3.7.3.1 Methodology

The methodologies employed to evaluate impacts included review of: regulatory agency databases; aerial photography; topographic maps; city directories; on-site reconnaissance; interviews with college personnel; and review of published maps available on public web sites.

3.7.3.2 *Campus Impacts*

Construction Impacts

Hazards

Since the nearest airport is several miles from the project site, no airport hazard impacts involving nearby airports would occur.

The Nursery Property is not located within a Very High Fire Hazard Severity Zone; therefore, there would be less-than-significant impact related to wildfire as a result of construction activities.

Because additional traffic during construction would be minimal, construction activities would cause a less-than-significant impact related to emergency evacuation plans.

Hazardous Materials

During and after the proposed construction on the Nursery Property, any hazardous materials utilized would be limited to those typically used in construction, academic support, and standard maintenance activities. All hazardous materials would be contained, stored, used, and disposed in accordance with manufacturers' instructions and handled in accordance with applicable standards and regulations. Therefore, these activities would not cause significant impacts.

An unknown amount of hazardous materials may exist on the Nursery Property. The residence on the property was constructed in 1949/1950; and, therefore, based on the construction date, there is potential for asbestos-containing building materials and lead-based painted surfaces to be present on-site and to be released during demolition. Without mitigation, the release of these materials would be a significant impact.

Based on the current and historic use of the Nursery Property for agricultural purposes, truck storage, and auto repair, site soils may contain lead, asbestos, pesticides, herbicides, total petroleum hydrocarbons (TPH), VOCs, and metals. Without mitigation, the release of these materials during construction would be a significant impact.

Hazardous materials that are likely used or stored on-site may include cleaning supplies, maintenance supplies such as paints and painting related materials, pool-treatment chemicals, pesticides, herbicides, and fertilizers. Without mitigation, the release of these materials during construction would be a significant impact.

The Nursery Property is located within one-quarter-mile of three existing schools: the college itself; Hubbard Street Elementary School; Harding Street Elementary School; and the LifeHouse Maclay Healthcare Center. During construction, heavy equipment would be used that could result in the combustion or release of flammable fuels during an accident that could affect the school or neighboring homes. In addition, dust and debris could be created during the demolition of existing structures at the Nursery Property that could cause exposure to potentially harmful substances that may be contained within the building materials. Without mitigation, such impacts would be significant.

During construction, diesel-fueled trucks will travel along Hubbard Street and Maclay Streets. Based on current traffic flow, the increased traffic and exhaust emissions would be less than significant.

Operational Impacts

Hazards

Flight tracks from Bob Hope Airport are generally aligned northwest-southeast, although flights also take off to the south of the airport, then circle around toward the proposed 2009 Master Plan site. Based on review of the Bob Hope Airport web site, flight tracks seldom pass directly over the proposed 2009 Master Plan area. The proposed 2009 Master Plan is not located within an airport land-use plan, within two miles of a public airport, or within the vicinity of a private airstrip or within an area designated as an airport hazard area by the City of Los Angeles Department of City Planning. Therefore, the proposed 2009 Master Plan would not result in a safety hazard for people residing or working in the proposed 2009 Master Plan area as a result of nearby public-use airports or private airstrips. Therefore, the proposed 2009 Master Plan could be considered to have no impacts.

Both the temporary and permanent facilities proposed for the Nursery Property would be built to meet the latest fire codes to protect the property from both urban and wild fires. Consequently, there would be no impacts from wildfires.

Based on the proposed maximum use of the Nursery Property of 50 vehicles, this addition to the traffic flow is not significant when compared to the average daily traffic. Therefore, the operation at the Nursery Property would result in a less-than-significant impact related to emergency evacuation.

Hazardous Materials

Neither the temporary nor the permanent facilities proposed for the Nursery Property would generate hazardous materials.

Cumulative Impacts

Hazards

As a result of the lack of rainfall and projected drying over time resulting from the effects of climate change, an increased risk of wildfires is projected in California. Nonetheless, both the temporary and permanent facilities proposed for the Nursery Property would not add to fire risk in the area, and would meet the latest fire codes to protect the property from both urban and wildfires. Consequently, no cumulative impacts would be anticipated.

Hazardous Materials

Since there are no other major construction activities or generators of hazardous waste in the vicinity of the Nursery Property, no cumulative impacts involving hazardous materials would be anticipated.

3.7.3.3 Athletic Fields Impacts

Construction Impacts

Hazards

Because the Athletic Fields are within a Very High Fire Hazard Severity Zone, without mitigation, construction activities could cause a significant impact related to wildfires.

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During and after the proposed construction on the proposed Athletic Fields, any hazardous materials utilized would be limited to those typically used in construction and standard maintenance activities. All hazardous materials would be contained, stored, used, and disposed of in accordance with manufacturers' instructions and handled in accordance with applicable standards and regulations. Therefore, no impacts from material storage or use would be anticipated.

The proposed Athletic Fields are located within one-third-mile of an existing school. During construction, heavy equipment would be used during the proposed project that could result in the combustion or release of flammable fuels during an accident that could affect the school or neighboring homes. Without mitigation, such impacts would be significant.

Operational Impacts

Hazards

The Athletic Fields would bring up to several hundred athletes and visitors at a time to an open area, potentially increasing the opportunity for man-made or accidental fires. Since the fields will be landscaped and irrigated and the athletic use does not require the use of flammable materials, the Athletic Fields would have no operational impacts involving potential fire hazards.

Hazardous Materials

Use of the Athletic Fields would not generate hazardous materials. Since materials to be used would be non-hazardous, the project would have no impact from release, transport, use, or disposal of waste disposal would occur during operations.

Cumulative Impacts

Because of the lack of cumulative development projects in the area, the impact of development on wildfire risk would be less than significant.

There are no other aspects of the proposed Athletic Fields that would result in either project-specific or cumulative hazards or hazardous materials impacts. Therefore, the proposed 2009 Master Plan contribution to adverse cumulative hazards or hazardous materials impact is not considered to be cumulatively considerable, and therefore would not be significant.

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3.7.4 Mitigation Measures for Significant Impacts

Impact Number	Impact	Mitigation Measure (MM) Number	Mitigation Measure	Post Mitigation Level of Impact
Construction				
Impact HAZ-1	The residence on the property was constructed in 1949/1950; and, therefore, based on the construction date, there is potential for asbestos-containing building materials and lead-based painted surfaces to be present on-site.	MM HAZ-1	Prior to any demolition activities, building materials shall be sampled and analyzed for asbestos and lead content in accordance with applicable standards and regulations. These materials and any universal wastes on-site including, but not limited to, mercury switches and thermostats, batteries, and lamps and bulbs (including fluorescent tubes, high-density discharge lamps, sodium vapor lamps, and any lamps that exhibit a characteristic of a hazardous waste), as well as any air conditioning units which may contain chlorofluorocarbons (CFCs), refrigerants shall be removed by a licensed contractor and properly disposed.	Less than significant
Impact HAZ-2	Based on the current and historic use of the Nursery Property, site soils may contain lead, asbestos, pesticides, herbicides, total petroleum hydrocarbons (TPH), VOCs, and metals.	MM HAZ-2	A Phase I hazardous materials survey shall be performed prior to development on the Nursery Property. If warranted, a Phase II survey shall further be performed. Contaminated soils, if any, shall be properly handled and disposed of in accordance with applicable regulations. In addition, soils excavated and graded from the Nursery Property shall be sampled and shall not be reused if found to be hazardous.	Less than significant
Impact HAZ-3	Hazardous materials are likely used and/or stored on-site including, but not limited to, cleaning supplies, maintenance supplies such as paints and painting related materials, pool treatment chemicals, pesticides, herbicides, and fertilizers.	MM HAZ-3a	Any hazardous materials and/or wastes found at the Nursery Property shall be properly disposed off-site in accordance with applicable regulations prior to any demolition activities.	Less than significant

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Impact Number	Impact	Mitigation Measure (MM) Number	Mitigation Measure	Post Mitigation Level of Impact
Impact HAZ-4	Heavy construction equipment would be used during the proposed project that could result in the combustion or release of flammable fuels, and dust and debris created during demolition activities could expose the public to hazardous materials.	MM HAZ-4	A work plan shall be prepared to address the management of accidental releases in the event of an upset or accident and to control dust and debris during demolition. This plan shall be submitted for approval by the appropriate regulatory authorities before any construction activities are performed.	Less than significant
Impact Haz 5	Athletic Fields would be located within a Very High Fire Hazard Severity Zone, construction activities could cause a significant impact related to wildfires and mitigations during construction must occur.	MM Haz 5	Require fire safety measures during construction activities. Have water truck always available. Post construction, add landscaping and irrigation to reduce potential fire severity.	Less than significant

3.7.5 Level of Significance after Mitigation

Implementation of Mitigation Measures MM Haz-1 through MM Haz-5 would reduce the impacts to a less-than-significant level.