
IV. ENVIRONMENTAL IMPACT ANALYSIS

H. HAZARDS AND HAZARDOUS MATERIALS

REGULATORY SETTING

Federal

The Federal Resource Conservation and Recovery Act (RCRA) (Title 40 of the Code of Federal Regulations [CFR]) gives the U.S. Environmental Protection Agency (USEPA) the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste by "large-quantity generators" (1,000 kilograms/month or more). Under RCRA regulations, hazardous wastes must be tracked from the time of generation to the point of disposal. At a minimum, each generator of hazardous waste must register and obtain a hazardous waste activity identification number. If hazardous wastes are stored for more than 90 days or treated or disposed at a facility, any treatment, storage, or disposal unit must be permitted under RCRA. Additionally, all hazardous waste transporters are required to be permitted and must have an identification number. RCRA allows individual states to develop their own program for the regulation of hazardous waste, as long as it is at least as stringent as RCRA.

The Federal 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. Federal OSHA requirements, as set forth in Title 29 of the Code of CFR, are designed to promote worker safety, worker training, and a worker's right-to-know. OSHA has delegated the authority to administer OSHA regulations to the State of California.

Title 49 of the CFR specifies additional requirements and regulations with respect to the transport of hazardous materials.¹ Title 49 of the CFR requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Drivers are also required to be trained in function and commodity specific requirements. In addition, vehicles transporting certain types or quantities of hazardous materials must display placards (warning) signs. As previously indicated, transporters of hazardous wastes must be permitted and have an identification number.

As set forth in Section II, Project Description, and elsewhere in this Draft EIR, the Project includes a program to upgrade power capacity to FSHA by installing a new higher-capacity circuit and replacing existing poles along that circuit. Several different types of helicopters may be used during activities. A large helicopter, such as a Sikorsky S64E "Skycrane," may be used for the installation of some new poles.

¹ Title 49 of the CFR contains the regulations set forth by the Hazardous Materials Transportation Act of 1975.

Smaller helicopters may be used for wire stringing, as well as material, equipment or personnel transportation. The Federal Aviation Administration (FAA) requires a Congested Area Plan for use of helicopters in populated areas. The Congested Area Plan includes identification of helicopter staging areas and flight paths with the least potential to affect populated areas within the distances specific by FAA. At elevations where damage from downdraft can occur, FAA regulations require that a skycrane cannot fly within 150 feet laterally of an occupied structure, including homes, buildings, and roads. A loaded skycrane (i.e., one carrying equipment or material) cannot fly within 300 feet laterally of an occupied structure. Structures are required to be unoccupied during flight operations if the required distances cannot be maintained during the flight.

State

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

The storage of hazardous materials in underground storage tanks (USTs) is regulated by Cal EPA's State Water Resources Control Board (SWRCB), which has delegated authority to the RWQCB and typically on the local level, to the local fire department.

The California OSHA (Cal-OSHA) program is administered and enforced by the Division of Occupational Safety and Health (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 Injury and Illness Prevention Program (IIPP). An IIPP is an employee safety program for potential workplace hazards, including those associated with hazardous materials.

The Hazardous Waste Source Reduction and Management Review Act of 1989 require generators of 12,000 kilograms/year of typical/operational hazardous waste to conduct an evaluation of their waste streams every four years and to select and implement viable source reductions alternatives. This Act does not apply to non-typical hazardous waste (such as asbestos and polychlorinated biphenyls). The California Vehicle Code also states that every motor carrier transporting hazardous materials (for which the display of hazardous materials placards are required or in excess of 500 pounds, transported for a fee, which

would require placarding if shipped in greater amounts in the same manner) must have a Hazardous Materials Transportation License issued by the California Highway Patrol.

The management of medical wastes is further governed by regulations of the Medical Waste Management Act. Under these regulations, medical waste generators are required to be registered. Furthermore, all medical waste transporters doing business in California must report information regarding business ownership, location, vehicles, and clients to the California Department of Public Health (CDPH). Only medical waste transporters listed with CDPH are allowed to transport medical waste. All medical waste transporters must carry paperwork issued by CDPH in each vehicle while transporting medical waste.

Lead-Based Paint

While adults can be affected by excessive exposure to lead, the primary concern is the adverse health effects on children. If not detected early, children with high levels of lead can suffer from damage to the brain and nervous system; behavior and learning problems such as hyperactivity, slowed growth, hearing problems; and headaches. Adults can suffer from lead-related effects such as reproductive problems (in both men and women), high blood pressure and hypertension, nerve disorders, memory and concentration problems, and muscle and joint pain.

The demolition of buildings containing lead-based paints (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 health exposure. Lead-contaminated debris and other wastes must also be managed and disposed of in accordance with applicable provisions of California Health and Safety Code.

Regional and Local

South Coast Air Quality Management District Rule 1403

The South Coast Air Quality Management District (SCAQMD) implements the National Emission Standards for Hazardous Air Pollutants (NESHAP) through its Rule 1403, Asbestos Emissions from Renovation/Demolition Activities. Rule 1403 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 asbestos-containing structures, asbestos storage facilities, and waste disposal sites. Rule 1403 regulations require that the following actions be taken: (1) a survey of the facility prior to issuance of a permit by SCAQMD; (2) notification of SCAQMD prior to

construction activity; (3) asbestos removal in accordance with prescribed procedures; (4) placement of collected asbestos in leak-tight containers or wrapping; and (5) proper disposal.

Los Angeles County

The Los Angeles County Department of Public Works (DPW) Environmental Programs Division (EPD) prepares and administers the Los Angeles County Integrated Waste Management Plan and Hazardous Waste Management Plan, which provides direction for the proper management of all waste generated within the county. As the county's lead agency, EPD advises the Los Angeles County Board of Supervisors regarding all waste management issues. EPD implements numerous programs to meet state-mandated solid waste reduction goals, such as programs for recycling, composting, source reduction, household hazardous waste management, and public education. In addition, EPD regulates USTs in unincorporated areas and more than 76 cities to protect groundwater resources. This program, which is the largest in the state, involves some 10,000 USTs at more than 2,500 sites. Site remediation plans are reviewed and approved prior to the cleanup of contamination caused by leaking underground storage tanks. EPD also regulates industrial waste management systems at 5,000 generator sites and permits and inspects industrial waste discharges into more than 3,000 miles of local sewers within the unincorporated areas and 38 contract cities. EPD responds as a support unit to reported incidents involving existing and/or potential discharges of contaminants or toxic materials/waste into DPW drainage facilities.

ENVIRONMENTAL SETTING

Historical Use of the Project Site

As discussed in Section II (Environmental Setting), the first structures on the Project site were part of a resort hotel opened in 1927 and designed by noted architect Myron Hunt. The Dominican Sisters of Mission San Jose purchased the property in 1931 and founded the Flintridge Sacred Heart Academy (the "FSHA") as a boarding school for girls in grades 1 through 12. The school has been operating continuously since 1931.

For landscaping, building maintenance and cleaning, and for science classes, the school utilizes small amounts of petroleum products (gas and oil); typical cleaning supplies; and acids, solvents, batteries, and thermometers. All of these materials are stored, used, and disposed of in accordance with applicable regulations.

ENVIRONMENTAL IMPACTS

Threshold of Significance

In accordance with Appendix G of the CEQA Guidelines, a project could have a significant environmental impact if the project would do the following:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- 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;
- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- 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;
- 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, result in a safety hazard for people residing or working in the project area;
- f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area;
- g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
- h) 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.

As discussed in Section IV.A (Impacts Found to be Less Than Significant), the Project would not result in impacts related to issues “a,” “d,” “e,” and “f.” Therefore, no further discussion of these issues is required.

Project Impacts

Flintridge Sacred Heart Academy Campus

Risk of Upset/ Hazard Materials Emissions in Proximity to a School

Construction

Implementation of the Project would include the demolition of Cottages 1 and 2 and demolition of the Tennis Shelter.² Given the age of these structures, it is possible that ACMs and LBPs could be encountered during the demolition and removal process. However, all handling, transport, and disposal of these materials would occur in accordance with Title 8 of the California Code of Regulations, Sections 17920.10, 105197, 105250, and 105254 of the California Health and Safety Code, and SCAQMD Rule 1403, all of which would ensure that no construction workers or students/faculty of FSHA would be exposed to acute risks associated with ACMS and LBPs.

During the construction of the individual development projects, the types of hazardous materials that could be found at the Project site include materials such as vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials to be used during construction would be used and stored in accordance with manufactures' instructions and handled in compliance with applicable federal, state, and local regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these regulations and standards.

Therefore, for the reasons stated above, Project impacts related to risk of upset and hazardous materials emission in proximity to a school and on the FSHA campus during construction would be less than significant.

Operation

The Specific Plan would allow for the expansion of the existing Arts Center and High School Buildings, development of a new parking structure, development of a new athletic area, and other landscaping improvements. Under buildout of the Specific Plan, the FSHA would continue to operate as a school. As stated previously, for landscaping, building maintenance and cleaning, and for science classes, the school utilizes small amounts of petroleum products (gas and oil); typical cleaning supplies; and acids, solvents, batteries, and thermometers. All of these materials are stored, used, and disposed of in accordance with applicable regulations. The types and amounts of hazardous materials that are current used, stored, and disposed of as part school operations would not change as a result of the Specific Plan. School operations

² *It is possible that the Tennis Shelter would be relocated to another location on the campus.*

under the Specific Plan would not expose students/faculty to acute risks associated with exposure of hazardous materials. Therefore, Project impacts related to risk of upset and hazardous materials emission in proximity to a school and on the FSHA campus during operation would be less than significant.

Impair/Interfere with Emergency Response/Evacuation Plan

Construction

During the construction phases for the development projects under the Specific Plan, temporary partial lane closures could occur to allow for the delivery of materials and the movement of haul trucks. However, as a requirement of the Specific Plan, a Construction Management Plan shall be prepared, which includes the following (at a minimum):

- All parking related to construction would be accommodated on site (i.e., no on-street parking) or at an approved off-site construction staging/employee parking area (as established in an approved Construction Management Plan);
- Haul routes and delivery schedules would be identified; and
- Location of construction equipment and materials storage would be identified on-site.

Prior to the issuance of any building permit and consistent with LCF standard practice, a Construction Management Plan would be prepared and submitted to the City Engineer and Los Angeles County Fire Department for review and approval. (Refer to Mitigation Measure M-1 in Section IV.M, Transportation/Traffic, of the Draft EIR.) The Construction Management Plan would address the project-specific management of construction vehicles on local roadways, including the use of flagmen to assist with the management of construction vehicles on local residential roadways, to minimize temporary partial lane closures. In addition, the Construction Management Plan for each major Specific Plan development project would incorporate provisions for fire safety that include proper use and storage of combustible construction materials and equipment and establishment of appropriate brush clearance in active work areas. Through implementation of the Construction Management Plan, the Project's construction activities would not substantially impair or interfere with emergency response/evacuation plan for the Project area. Therefore, Project construction impacts related to this issue would be less than significant.

Operation

No aspect of the Specific Plan buildout would alter existing roadway capacity or design. Emergency vehicle access the FSHA Campus buildings is currently provided primarily from St. Katherine Drive. The Administration Building is accessible directly from St. Katherine Drive, as is the current Parking Lot C (and future Parking Facility) across from the Administration Building. Other upper campus buildings are

accessible from the main driveway leading to the Arts Center Building, High School Building and Student Activity Center. Cottages 1 through 6, which are built on the slope behind the Arts Center Building, are indirectly accessible from the upper campus lots, as well as the Lot C parking area.

As improvements within the upper campus are implemented under the Specific Plan, the drive aisle within Parking Lots D and F would be reconfigured and widened to 26 feet to accommodate emergency vehicles and allow for their ability to turn around within the upper lot area.

The existing service access road that extends from the southeast corner of the High School Building counterclockwise to the north end of the building would be improved and widened to a finished width of 20 feet so as to accommodate emergency fire response vehicles.

Final placement and sizing of the retaining walls for the emergency access road would be determined through recommendations of a Geotechnical Report and the final Grading Plan. The access road around the back of the High School Building would be designed so that retaining walls are limited to a maximum height of 15 feet in order to minimize visibility from surrounding properties.

Existing and proposed circulation and drop-off improvements are included as part of the FSHA Campus Plan. Student drop-off and pick-up areas shall be located on the Campus, so that vehicle queuing and roadway congestion along St. Katherine Drive is avoided. Figures III-10 and III-11 show circulation and access to the Campus in the context of the local public roadway. One drop-off/pick-up is located at the high school parking lot (Lot D) and another in the lower campus parking area (Lot C). An interim drop off/pick up area may be located in Lot A (at the Palmerstone Property) when that lot is utilized for interim parking.

In accordance with the Transportation Demand Management Program (the “TDM Program”) as discussed in Section II (Environmental Setting) and Appendix C to the Specific Plan included in Appendix A of this EIR, parents and students would be directed to a specific drop off location based on their direction of arrival to access the FSHA Campus. On-campus queuing would be managed within the Lot C/Parking Facility parking area, initially within the surface lot configuration and subsequently at the rooftop level of the Parking Facility, so that vehicles would be required to drive to the far end of the Parking Facility allowing for maximum queue spacing. The drop-off plan, as required within the Conditions of Approval of the amendment to CUP 185 approved by the City in early 2016, would provide adequate queuing of vehicles at both the high school (Lot D) lot and lower Lot C parking lots. Once the Parking Facility is completed, the rooftop level of the parking structure would serve as a drop-off and pick-up point for commuting students.

Additionally, the Specific Plan would not allow for an increase in student enrollment and as such, no increase in operational traffic would occur as part of the Specific Plan. Traffic generated by the school would continue to be subject to the TDM Program, which limits the school’s daily operational traffic to

344 vehicle trips (in and out) during the a.m. peak hour and 275 vehicle trips (in and out) during the FSHA p.m. peak hour, during a normal school day, and to minimize school event traffic. For School-Related FSHA Campus Events, FSHA would continue to use a combination of measures to minimize parking and vehicle trip conflicts. Such measures could incorporate use of a shuttle service (between a pre-designated off-site parking location and FSHA) and preferential parking arrangements for high ridership vehicles. Need for TDM and parking arrangements for Minor School-Related Events would continue to be determined on a case-by-case basis specific to the anticipated attendance, day of week and time of any particular event, and contemporaneous parking availability. All Major School-Related Events would be required to utilize TDM and Parking Program measures to ensure that all vehicles are legally parked in a designated parking area on-campus and that vehicle trips are minimized by encouraging carpooling and use of available shuttle services (as appropriate).

Implementation of the FSHA-sponsored TDM and Parking Programs for Non-School-Related Events would be considered on a case-by-case basis and coordinated with the Non-School-Related Event sponsor. In this situation, it is anticipated that traffic control and parking requirements would be specified and conditioned in the Temporary Use Permit(s) issued by the City.

The Construction Management Plan, the proposed circulation and drop-off improvements, and the TDM Program are important design features of the FSHA Campus Specific Plan and would reduce queuing on St. Katherine Drive and keep roadways clear for any potential emergency vehicle access. For all the reasons stated above, operation of the Specific Plan would not substantially impair or interfere with emergency response/evacuation plan for the Project area. Therefore, Project operation impacts related to this issue would be less than significant.

Wildland Fires

The Specific Plan would allow for the expansion of the existing Arts Center and High School Buildings, development of a new parking structure, development of a new athletic area, and other landscaping improvements. However, the number of students and faculty at the FSHA Campus would not change. As such, the general amount of human activity (normally the cause of wildland fires) would not increase as a result of the Specific Plan when compared to the existing condition.

Existing fire flow for the FSHA Campus is provided through a series of existing fire hydrants located in the public right-of-way along adjacent roadways and that tap into the existing 16-inch and 8-inch water lines in St. Katherine Drive and 6-inch high pressure water line in Wendover Road, as well as an existing 8-inch water line in Palmerstone Drive. As implementation of the FSHA Specific Plan occurs, fire-flow improvements to the water delivery system would be needed to accommodate current fire code and safety requirements. (Fire Protection requirements are discussed in more detail, below.) Fire-flow requirements related to the water distribution system and water supply are discussed below.

Implementation of the FSHA Specific Plan would require the fire service within the FSHA Campus to be upgraded. This includes the addition of several on-site fire hydrants within the FSHA Campus grounds. To meet the Los Angeles County Fire Department required fire flow and water pressure for the new on-site hydrants, the existing fire service would be upgraded.

Fire service enhancements involve implementation of a system of privately-installed water pumps and fire hydrants throughout the FSHA Campus to establish adequate fire-flow pressure and an internal distribution network for fire flow within the FSHA Campus grounds. The Specific Plan requires that fire service enhancements would be implemented prior to a net increase in building square footage (refer to Mitigation Measure H-2).

Anticipated improvements include installation of a minimum of two fire pumps (to be located at the existing pump house west of the Student Activities Center), and placement of a minimum of four new fire hydrants throughout the FSHA Campus grounds. Location of the fire hydrants would be coordinated with the Los Angeles County Fire Department to ensure that their placement meets criteria for access and building proximity. This fire service system would be privately supported and maintained by FSHA.

The Conceptual Landscape Plan incorporates a plant palette of drought-tolerant and native species that serve to reduce water use and serve as a sufficient buffer between FSHA Campus development areas and surrounding native vegetation and brush. As required, the Landscape Plan and ongoing maintenance and operation of the FSHA Campus would be in compliance with the “Fuel Modification Plan Guidelines,” published by the County of Los Angeles Fire Department. To ensure compliance with existing and continued fuel modification and setback planning requirements, the draft landscape plan prepared for each major FSHA Campus improvement would be reviewed and approved by the Los Angeles County Fire Department (refer to Mitigation Measure H-2).

For the reasons stated above, the Project would not 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. Therefore, Project impacts related to wildland fires would be less than significant.

Southern California Edison Sub-Transmission Pole/Line Replacement

Prior to implementation of the Specific Plan development projects, approximately eight existing 66-kV sub-transmission poles would be replaced, and approximately five new 66-kV sub-transmission poles would be installed. One existing H-Frame Structure located approximately 100 feet southeast of Highland Drive and approximately three existing 4-kV distribution poles located to the east of the FSHA Campus could be removed. Approximately four new 16-kV distribution poles would be installed – one at the intersection of Inverness Drive and St Katherine Drive and three north of the FSHA Campus.

Due to lack of accessibility as a result of topography and vegetation, replacement of four of the poles would require the use of a helicopter to transport the poles from a staging area to the location of the pole installation. The anticipated staging area would be the Palmerstone Property and/or at the intersection of Inverness Drive and Normandy Drive. Once the area for the pole installation has been prepped, a helicopter would fly from its station of origin to the staging area, where the pole would be attached to lines and would be carried by the helicopter to the location of pole installation. It is possible that the poles would be installed in two pieces, requiring two helicopter trips per pole. No poles would be carried over homes by the helicopter.

It is an FAA regulation for helicopters conducting external load operations in populated/developed areas to submit a Congested Area Plan to the FAA and obtain approval prior to any work with helicopters begin. Generally, the FAA requires five working days advanced notice for the CAP. The CAP is developed by the owner/operator of the helicopter conducting the work. FAA regulations require the helicopter owner/operator to secure the Operational Area, which is an area unoccupied on the surface by the nonparticipating public. The Operational Area is not part of the operation, but persons within this area could sustain injuries, or property could sustain damage, by the external load or by the attaching means (load, cables, hooks, etc.). The Operational Area is defined by using the length of the longline suspended under the helicopter, plus any rigging, plus the length of the load itself (i.e., 100-foot longline + 10-foot rigging + 75-foot pole = 185-foot minimum distance laterally from the helicopter from pick up location to set location). SCE Aircraft Operations tries to adhere to a 300-foot Operational Area for company owned helicopters during external load operations. Contract helicopter companies shall determine their own distance requirements based on the equipment they decide to use for the Project that could exceed 300 feet. Structures are required to be unoccupied, if the required distances cannot be maintained during the flight. If any poles are located within the minimum lateral distance of homes, it is anticipated that flight paths for the pole replacement would require residents to temporarily vacate their homes during flight operations. Pole 3, located northwest of the termination of Normandy Court) is located within 300 lateral feet of 22 Normandy Court and 211 Inverness drive). Pole 4, located northeast of the intersection of Inverness Drive and St. Katherine Drive, is located within 300 lateral feet of 211 and 244 Inverness Drive. Pole 9, located south of 312 Inverness Drive, is located within 300 lateral feet of 206, 250, 300, 309, 312, and 321 Inverness Drive (refer to Figure III-18 in Section III, Project Description). Thus, SCE would coordinate with potentially affected residents to minimize the duration of the necessary work and any resulting inconvenience. With implementation of the Congested Area Plan (Mitigation Measure H-3), risks to people living in the vicinity of the pole replacement locations would be less than significant.

Access to the other pole locations would occur from adjacent roadways and public rights-of-way. For some of the pole installations and rewiring, temporary partial lane closures and/or roadway closures would be required, including the following:

- 210 Freeway: Momentary/intermittent closure would be required for wire stringing operations across the freeway. SCE would coordinate with Caltrans and the California Highway Patrol

(CHP) for this operation to obtain permits necessary for traffic control and for stringing the new line across the freeway. Traffic on the freeway would be stopped by CHP between approximately exists 22A and 22B for approximately five minutes at a time over a duration of an hour during a time of low traffic volume (such as sunrise on a Sunday morning).

- Highland Avenue: Partial lane closure or roadway closure between Berkshire Avenue and the Foothills Freeway Overpass would be required to for foundation construction, pole installation, and wire stringing operations. The closure would occur during working hours and could occur over a three-day period (maximum). During this timeframe, detour signage would be placed to reroute traffic until the operations have been completed.
- Inverness Drive at Katherine Drive: Partial lane closure on or roadway closure would be required to for equipment and material storage. The closure would occur during working hours and could occur over a three-day period (maximum). During this timeframe, detour signage would be placed to reroute traffic until the operations have been completed.
- Inverness Drive at Normandy Drive: Entire closure of Inverness Drive for equipment and material storage. The closure would occur during working hours (maximum eight hours) and could occur over a three-day period (maximum). During this timeframe, detour signage would be placed to reroute traffic until the operations have been completed.

The pole replacement/installation process would take place over approximately two months. The sequence of pole replacement/installation is not known at this time and would be dependent on the contractor assigned to the job. SCE would be required to apply for and obtain a construction permit from the City, which would require SCE to prepare a Traffic Control Plan for review and approval by the City and the Los Angeles County Fire Department.³ All activities would occur in accordance with traffic control measures imposed by the City and Los Angeles County Fire Department and published in the California Joint Utility Traffic Control Manual to ensure that emergency access to the Project area would not be substantially impaired. With the exception of minimal amounts of fuel for construction vehicles, no hazardous materials would be used as part of the pole/line replacement project. For these reasons, impacts associated with hazards and hazardous materials as a result the pole/line replacement/installation project would be less than significant.

³ SCE has a standard Traffic Control Plan that they typically implement for these types of projects. An example of this plan is included in Appendix F for informational purposes. It should be noted that the City and/or County could require specific changes and/or additions to the Traffic Control Plan to meet the specific needs of the proposed pole/line replacement/installation project.

CUMULATIVE IMPACTS

The geographic extent of the Project's environmental impacts would be limited to the Project site and would not contribute to any other potential environmental impact that may occur beyond the Project site boundaries. All related projects would be subject to discretionary or ministerial review by their respective jurisdictions, which would be responsible for assessing potential hazards risks associated with those related projects, and if necessary, the applicants of those projects would be required to implement measures appropriate for the type and extent of hazardous materials present and the land use proposed to reduce the risk associated with the hazardous materials to an acceptable level. As stated previously, with mitigation, the Project would not result in any significant impacts related to hazards and hazardous materials. Therefore, no significant cumulative impacts related to hazards and hazardous materials would occur.

MITIGATION MEASURES

To ensure that impacts related to hazards and hazardous materials would be less than significant, the following mitigation measures are required:

- H-1: As required as part of the Specific Plan, the proposed fire service enhancements shall be implemented prior to a net increase in building square footage.
- H-2: As required as part of the Specific Plan, the Landscape Plan and ongoing maintenance and operation of the FSHA Campus shall be in compliance with the "Fuel Modification Plan Guidelines," published by the County of Los Angeles Fire Department. To ensure compliance with existing and continued fuel modification and setback planning requirements, the draft landscape plan prepared for each major FSHA Campus improvement shall be reviewed and approved by the Los Angeles County Fire Department.
- H-3: Prior to any helicopter external load operations, a Congested Area Plan shall be prepared and approved by the FAA. The need for short-term road closures, if any, shall be identified in the Congested Area Plan and shall be coordinated with the appropriate jurisdictions as described in Section IV.M, Transportation/Traffic.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measures H-1 through H-3, impacts related to hazards and hazardous materials would be less than significant.