
IV. ENVIRONMENTAL IMPACT ANALYSIS

K. RISK OF UPSET

ENVIRONMENTAL SETTING

The 5.5-acre West Campus project site is occupied by three residential buildings and associated ancillary buildings. The structures have been identified as former bunkhouses for the Sunshine Ranch Company, which were originally constructed in 1917. In 1917, the Sunshine Company purchased approximately 4,200 acres from the San Fernando Mission Land Company. The land was subsequently cultivated with citrus fruit trees, grain and alfalfa. The land supported cattle, hogs and poultry uses as well. The direct use of the project site to cultivate agricultural crops is not likely because the project site was developed with the bunkhouses and original barn house during the Sunshine Ranch era. All three main buildings face Shoshone and appear to have been converted from bunkhouses into single-family residences in the 1940s. No known hazardous or potentially materials are historically known to be generated, stored, or disposed of on the project site.

Evaluation of Risks

Petroleum Activity

The California Department of Conservation Division of Oil and Gas and Geothermal Resources (DOGGR) regulates the drilling, operation, and abandonment of gas and oil wells throughout the State of California. If an active, idle, or abandoned well is located on or adjacent to a proposed construction site, DOGGR requires a site plan review prior to issuing a building permit. Abandoned oil wells must meet the current regulatory standards. The Los Angeles Environmental and Public Facilities Map, Oil Field & Oil Drilling Areas was reviewed to determine the location of petroleum activity in the area of the property. According to the map review, no oil fields are located on the project site or any adjacent sites. The closest oil field to the project site is the abandoned Mission Oil Field, approximately two miles northwest of the project site.

Asbestos Potential

Because of its acoustical and tensile qualities, resistance to fire and chemicals and relative abundance, asbestos has been used extensively in building materials since the 19th century. As defined by the United States Occupational Safety and Health Administration (OSHA), the term "asbestos" includes chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, actinolite asbestos, and any of these minerals that have been chemically treated and/or altered.¹ The term "asbestos-containing

¹ U.S. Department of Labor, OSHA Regulations (Standards - 29 CFR)Asbestos.-1915.1001.

material, (ACM)" is defined by OSHA as any material containing more than one percent asbestos. Airborne particles of ACMs have been found to be hazardous to human health.

Management and handling of ACMs are regulated by the EPA, OSHA, and the State of California. The Federal Toxic Substances Control Act of 1976 established controls on asbestos and prohibited future use of asbestos in all new construction. The National Emissions Standards for Hazardous Air Pollutants (NESHAP) sets standards for the use, removal, and disposal of ACM's. At the local level, SCAQMD Rule 1403 regulates asbestos as a toxic material and specifies requirements to limit asbestos emissions associated with building demolition and renovation.

The structures on the project site were constructed in 1917, and converted from bunkhouses into single-family residences in the 1940s, prior to the regulation of ACMs. As such, it is possible that the structures were constructed with materials likely to contain ACMs. Therefore, although no site specific testing for ACMs has been conducted, the potential for the presence of ACM's on the project site does exist.

Lead Based Paint

Lead-based paint is considered a health threat to people and particularly to children. Lead was a major ingredient in house paint used throughout the country, prior to 1980 when it was discontinued under federal law. Similar to regulations for ACMs, California law requires that all residential buildings constructed on or before January 1, 1979 or schools constructed on or before January 1, 1993 must be presumed to contain lead-based paint.² Because the structures on-site were originally constructed and modified as residential uses prior to 1979, these structures have the potential to contain lead based paint and pose a hazard to children and persons on the project site.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

Hazardous materials impacts would be considered significant if the use, production, or disposal of hazardous materials from the proposed project results in a considerable hazard to people, animal, or plant populations in or near the area affected by the proposed project. Impacts related to asbestos and lead-based paint in existing buildings on-site would be significant if demolition of any structure found to contain such materials would occur prior to appropriate stabilization and/or removal of the materials in accordance with applicable regulations.

² California Code of Regulations (CCR) Title 17, Division 1, Chapter 8, Section 35043.

Project Impacts

Development of the proposed project would involve demolition and/or removal of the existing residential structures and ancillary buildings located on the project site. As mentioned previously, due to their age of construction and remodeling, these structures have the potential to have been constructed with building materials containing lead-based paint and/or ACMs. The residential structures were constructed prior to the federal banning of ACMs. However, none of the structures on the project site were sampled and/or tested for ACMs. Thus, a demolition level asbestos survey by a licensed contractor shall be conducted for residential structures that require demolition activities. If the survey reveals that these structures contain ACMs, the structures shall be stabilized, removed, and disposed of in accordance with applicable regulations including, but not limited to, SCAQMD Rule 1403 and Cal/OSHA requirements during demolition activities.

The proposed project involves the expansion of an existing school use and would itself be considered a sensitive receptor in terms of exposure to hazardous materials. The proposed project would be designed, constructed, and operated to ensure the health and safety of children, families and employees alike. With the exception of common household cleaning solvents, paints, landscape fertilizers, and pesticides typically used in institutional settings, the proposed project would not involve the use, transport, or disposal of hazardous materials. Although such materials are considered potentially hazardous, they would be utilized and stored on site in limited quantities and would be handled in accordance with all applicable rules and regulations associated with school settings. Due to the limited use and storage of these materials on-site, they would be disposed of in accordance with the City's household hazardous waste requirements and would not require routine transport to or from the project site. The Hillcrest Christian School's West Campus operations will continue to operate in a manner consistent with existing operations employed on the East Campus that ensures the safety of its students, staff and visitors. Therefore potential impacts associated with risk of upset would be less than significant.

CUMULATIVE IMPACTS

Potential impacts resulting from implementation of unknown future projects would result from new developments using or generating hazardous materials in the course of their production/service provision process, and the proximity of new developments to existing facilities which generate or have generated, hazardous materials. The immediate project site and surrounding area is already developed and is generally comprised of residential neighborhoods. There are no industrial or manufacturing uses in the nearby vicinity. None of the uses associated with the proposed project involve construction of uses that generate substantial quantities of hazardous materials. Based on existing regulations dealing with the use, storage, transport, and disposal of hazardous materials and the location and nature of surrounding land uses, no significant cumulative impacts would occur.

MITIGATION MEASURES

The following mitigation measure is required to reduce potentially significant impacts relative to exposure of humans to lead paint to an insignificant level:

1. Prior to the issuance of the demolition permit, the applicant shall provide a letter to the Department of Building and Safety from a qualified lead paint abatement consultant that no lead paint is present in onsite buildings. If lead paint is found to be present on buildings to be demolished or renovated, it shall need to be abated in compliance with applicable state and federal rules and regulations governing lead paint abatement.
2. Prior to the issuance of the demolition permit, the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant that no ACM are present in the building. If ACM are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other state and federal rules and regulations.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of the mitigation measures listed above project impacts regarding risk of upset would be less than significant.