3.6 HAZARDS AND HAZARDOUS MATERIALS

This section describes the existing setting of the project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed project.

In the evaluation of potential impacts, this section discusses the potential for the proposed project to expose people to hazards and hazardous materials. The analysis contained within this section is based on the California Environmental Geologists & Engineers (California Environmental) report, *Soil Gas and Soil Assessment – Phase II for Commercial Properties APNs 4336-009-003, -004, -005, -006, -007 & 4336-010-005 645-681 (odds) N. Robertson Blvd & 648-668 (evens) N La Peer Drive, West Hollywood, CA 90069*, dated November 2014, and the Partner Engineering and Science Report (Partner) *Phase I Environmental Site Assessment Report for the Proposed Subterranean Parking Structure,* dated October 2015. California Environmental also prepared a Phase I assessment for the project site dated August 2014. These reports are on file at the City of West Hollywood City Hall and can be viewed at the Planning Counter during normal business hours. These reports are also included as Appendix F of this EIR.

3.6.1 Environmental Setting

Project Site Conditions

The project site is currently developed with four structures and two asphalt-paved parking areas and consists of six contiguous rectangular shaped parcels of land encompassing approximately 1.94 acres. Three of the existing structures (located at 645–657 Robertson Boulevard) were built in the early 1940s (major renovations occurred in 1980 and 2003–2004) and are commercial/retail spaces occupied by a furniture sales warehouse, hair salon, clothing store, and storage/office spaces. The fourth on-site structure (652 La Peer Drive) was built between 1929 and 1936 (alteration/renovation have occurred in the years since) and is a large multi-story warehouse that has been converted to a nightclub on the upper floors and a gym on the ground floor.

According to the Phase II Environmental Site Assessment (ESA) report prepared by California Environmental, the project site was historically developed with a machine shop in 1969 and an auto repair shop was contiguous with the property for approximately 30 years (1969–2000). A dry cleaning facility was also adjacent to the project site for approximately 23 years from 1990–2013. The Phase II report also details that on-site spray booths and a hazardous materials storage room historically operated on the subject property. In 2003, soil samples from six on site boring locations were analyzed for VOCs by BA Environmental and no detectable concentrations of VOCs were found or detected in the samples.

The project site is located at the north margin of the Peninsular Ranges Geomorphic Province near the south margin of the Santa Monica Mountains, within the Los Angeles Coastal Plain. The project site is underlain by older and recent alluvial deposits derived from the mountains located to the north. The project site is within the western portion of the Hollywood Groundwater Basin within the transition to the Santa Monica Groundwater Basin to the west. The regional direction of groundwater flow is expected to be towards the south–southwest.

The park site is currently occupied by West Hollywood Park for recreational use. The site contains a restroom structure, a playground, a grass area, and concrete-paved walkways. Construction of the Phase II Park Master Plan is anticipated to begin at the park site in early 2017. According to the Phase I ESA prepared for the site, the park site was formerly developed for residential and commercial use and occupied by single-family residences and lumber and cement storage sheds as early as 1926 until at least 1938 and redeveloped with West Hollywood Park from 1948 to the present. The immediately surrounding properties consist of West Hollywood Park to the north followed by The Abbey (692 Robertson Blvd); commercial buildings (662-666 North Robertson Blvd) and West Hollywood Park to the south; West Hollywood Aquatic Facility to the east; and a parking lot to the east across Robertson Boulevard.

Phase I and Phase II Environmental Site Assessments

In August 2014, a Phase I ESA was conducted for the project site by California Environmental to identify potential or existing environmental contamination on the site and in November 2014, a Phase II ESA was prepared by California Environmental to assist in assessing safety impacts through the collection and testing of soil and soil gas samples. During preparation of the Phase I ESA, both state and federal hazardous material databases were searched to determine if the project site contains/contained hazardous materials as a result of existing or past uses. An environmental database records (EDR) report was prepared for the subject property as part of the Phase I ESA and is included as Appendix IV to the Phase I ESA. In addition, California Environmental contacted several agencies involved in hazardous materials for records connected to the project site. These included the California Environmental Protection Agency, Department of Toxic Substances Control, the Los Angeles County Health Department, and the South Coast Air Quality Management District.

No evidence of current or historical use, storage, generation and/or disposal of hazardous substances was observed on site during site reconnaissance conducted by California Environmental in support of the Phase I ESA (Appendix F). Per the EDR, the subject property is not identified on the standard government databases researched. Several industrial waste files maintained at the Los Angeles County Department of Public Works Environmental Programs Division for the subject property were identified and are related to grease traps installed at current and former restaurants located on the project site. No underground tank permits for the project site were identified on the

standard government databases researched in the EDR. The nearest listed contaminated site to the project site is the former Ever-Rite Equipment / current Rolls Royce servicing facility located approximately 300 feet to the west. The site had a documented release of gasoline and received case closure in 2002. Based on the direction of groundwater flow and the distance from the project site, it is not considered likely that the soil and/or groundwater beneath the project site have been impacted from this off-site release (Appendix F).

Sampling of ACM and LBPs was not conducted for the Phase I ESA; however, suspect ACM was observed in the form of floor tiles, linoleum, ceiling tiles, joint compound, and wallboard of several buildings. Similarly, due to the age of construction of the buildings, LBPs are also expected to be present on site.

In support of the Phase II ESA, California Environmental implemented a screening soil and soil gas assessment at the subject property. The soil and soil gas assessment work did not identify evidence of significant releases of VOCs in the subsurface. Ten soil gas samples from depths of 5 and 15 feet below grade were taken and analyzed by California Environmental. Detectable concentrations of xylenes (5 and 15 feet below grade), tetrachloroethylene (5 and 15 feet below grade), ethylbenzene (15 feet below grade), and benzene (15 feet below grade) were identified during laboratory analysis of soil gas samples; however, all detected VOCs were well below their respective California Human Health Screening Levels (CHHSLs) for commercial development. As a result, future indoor air mitigation is not required for future commercial development of the subject property (see Appendix F for details regarding these measurements). All other VOCs in the soil gas samples were below the method detection limits. In addition to the soil gas samples, three soil samples were obtained and analyzed for VOCs and total petroleum hydrocarbon (TPH). All VOCs in the samples analyzed were below the detection limits. Detectable concentrations of TPH were found in one of three analyzed samples taken from the southwestern corner of the subject property; however, the TPH is likely related to small surface spills of motor vehicle oil. As such, further assessment of TPH was not recommended in the Phase II ESA (Appendix F).

In October 2015, a Phase I ESA was conducted for the park site by Partner to identify potential or existing environmental contamination on the site. During preparation of the Phase I ESA, both state and federal hazardous material databases were searched to determine if the park site contains/contained hazardous materials as a result of existing or past uses. An EDR report was prepared for the subject property as part of the Phase I ESA and is included as Appendix C to the Phase I ESA. In addition, Partner contacted several agencies involved in hazardous materials for records connected to the park site. These included the Los Angeles County Public Health Investigation, the Los Angeles County Fire Department, West Hollywood Building Department, Los Angeles County Assessor, and County of Los Angeles Department of Public Works. The park site was found to be listed on several government databases. It is listed on the HAZNET database, which contains data extracted from copies of hazardous waste manifests received each year by the

Department of Toxic Substance Control. It is also listed on the federal Emergency Response Notification System (ERNS) database, which records and stores information on reported releases of oil and hazardous substances. It is listed on the Los Angeles County Hazardous Materials System (HMS) and NPDES databases. The HAZNET listing is associated with generation of organic solids in 2011 by the City of West Hollywood Public Works. A second HAZNET listing is associated with generation of asbestos containing wastes in 1999 by the City's landscape services. The asbestos-containing wastes were transported off-site under manifest and disposed at a landfill facility. As stated in the Phase I ESA, HAZNET does not track violators, and the presence of a facility on the HAZNET database does not necessarily indicate that an environmental concern exists at that facility. Based on the reported limited hazardous waste generation, Partner determined that these HAZNET listings are not expected to represent a significant environmental concern. The ERNS database listing is associated with a release of acid in 2000 on the site. West Hollywood Park Pool (owned and operated by City of West Hollywood) was identified as the responsible party and conducted the cleanup. As described in the Phase I ESA, it appears that this release occurred at the aquatic center located within West Hollywood Park, southeast of the excavation area. Based on the location of the release and the reported cleanup, Partner determined that this listing is not expected to represent a significant environmental concern. The Los Angeles County HMS database lists the site as "Open" but does not provide further information. The NPDES database listing is associated with a permit that was issued to discharge wastewater generated from construction activities into the storm drains in 2011. The permit was terminated in 2013. Based on the absence of reported violations or releases, and the nature of the NPDES permit related to stormwater prevention associated with past construction activities, the Los Angeles County HMS and NPDES listings are not expected to represent a significant environmental concern, as determined by Partner.

Adjacent properties to the north, east, and south were also identified as HAZNET, ERNS, Los Angeles County HMS, and NPDES sites in the EDR. These listings are associated with the West Hollywood Park operations discussed in the above paragraph. No sites of concern were identified in the EDR. Listed sites within the specified search radius of the park site that appeared on local, state, or federally published lists of sites that have had releases of hazardous substances were determined to be of sufficient distance and/or situated hydrologically cross- or down-gradient such that impacts to the park site was determined to be unlikely.

3.6.2 Relevant Plans, Policies, and Ordinances

Federal

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as "Superfund," were enacted by Congress on December 11, 1980. This law

provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled the revision of the National Contingency Plan. The National Contingency Plan provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also established the National Priorities List, which is a list of contaminated sites warranting further investigation by the EPA. CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) on October 17, 1986 (EPA 2010b).

The Federal Toxic Substances Control Act of 1976 and Resource Conservation and Recovery Act of 1976

The Federal Toxic Substances Control Act of 1976 and RCRA (1976) established a program administered by the EPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle-to-grave" system of regulating hazardous wastes. The use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the Hazardous and Solid Waste Act (EPA 2010a).

State

Title 22 of the California Code of Regulations& Hazardous Waste Control Law, Chapter 6.5

The Department of Toxic Substances Control (DTSC) regulates the generation, transportation, treatment, storage, and disposal of hazardous waste under RCRA and the California Hazardous Waste Control Law. Both laws impose "cradle to grave" regulatory systems for handling hazardous waste in a manner that protects human health and the environment. CalEPA has delegated some of its authority under the Hazardous Waste Control Law to county health departments and other Certified Unified Program Agencies, including the San Diego County DEH.

California Safety and Health Code

In California, the handling and storage of hazardous materials is regulated by Division 20, Chapter 6.95 of the California Health and Safety Code. Under Sections 25500–25543.3, facilities handling hazardous materials are required to prepare a Hazardous Materials Business Plan. Hazardous Materials Business Plans contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of in the state.

Chapter 6.95 of the Health and Safety Code establishes minimum statewide standards for Hazardous Materials Business Plans. Each business shall prepare a Hazardous Materials Business Plan if that business uses, handles, or stores a hazardous material (including hazardous waste) or an extremely hazardous material in disclosable quantities greater than or equal to the following:

- 500 pounds of a solid substance
- 55 gallons of a liquid
- 200 cubic feet of compressed gas
- A hazardous compressed gas in any amount (highly toxic with a threshold limit value of 10 parts per million or less)
- Extremely hazardous substances in threshold-planning quantities

In addition, in the event that a facility stores quantities of specific acutely hazardous materials above the thresholds set forth by the California Health and Safety Code, facilities are also required to prepare a Risk Management Plan and California Accidental Release Plan. The Risk Management Plan and Accidental Release Plan provide information on the potential impact zone of a worst-case release and require plans and programs designed to minimize the probability of a release and to mitigate potential impacts.

Occupational Safety and Health Act

The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR 337–340). The regulations specify requirements for employee training, availability of safety equipment, accident prevention programs, and hazardous substance exposure warnings.

Local

City of West Hollywood General Plan – Safety and Noise Element

According to the Safety Element, West Hollywood is susceptible to fire, earthquakes, flooding, landslides and mudslides, subsurface gas, as well as potential exposure to hazardous materials. The City sits at the base of the Hollywood Hills where significant vegetation and brush drape the undeveloped areas between homes and neighborhoods and the City and surrounding Southland is located in a seismically active area. Lastly, the Safety Element discloses that common hazardous materials used in urbanized areas and prevalent throughout the City may include petroleum,

fertilizers, pesticides, motor oil and lubricants, cleaning products, high VOC paint and paint thinners, old batteries and other chemicals and products (City of West Hollywood 2011).

City of West Hollywood SEMS/NIMS Emergency Plan

The SEMS/NIMS Emergency Plan (City of West Hollywood 2006) is the City's plan to ensure the effective and economical allocation of resources in the time of emergency. In addition to other important items, the SEMS/NIMS Emergency Plan contains an evacuation routes map that identifies specific streets in West Hollywood that have been designated evacuation routes.

3.6.3 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. Based on these thresholds, implementation of the proposed project would have a significant adverse impact related to hazards and hazardous materials if it would:

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, 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

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

3.6.4 Methodology

Impacts in this section are based on the potential risks of human exposure to hazards and hazardous materials during construction and operation of the proposed project. The analysis contained within this section is based on the following reports, which are attached to this EIR as Appendix F:

- Environmental Site Assessment – Phase I for Commercial Properties APNs 4336-009-003, -004, -005, -006, -007 & 4336-010-005 645-681 (odds) N. Robertson Blvd & 648-668 (evens) N La Peer Drive, West Hollywood, CA 90069 (dated August 2014)
- Soil Gas and Soil Assessment – Phase II for Commercial Properties APNs 4336-009-003, -004, -005, -006, -007 & 4336-010-005 645-681 (odds) N. Robertson Blvd & 648-668 (evens) N La Peer Drive, West Hollywood, CA 90069 (dated November 2014)
- Phase I Environmental Site Assessment Report – Proposed Subterranean Parking Structure (dated October 2015)

To determine the location of schools in the region, the Los Angeles Unified School District's online Find A School feature (Los Angeles Unified School District 2015) was utilized and the City of West Hollywood General Plan Land Use and Urban Form Element was reviewed. Web-based aerial mapping services were also reviewed to identify school sites, and distances between the project site and nearby schools were approximated using Google Earth.

To determine the location of public airports and private airstrips in the region, the Los Angeles County Airport Land Use Commission (ALUC) website (Los Angeles County ALUC 2015a) was reviewed and distances between airports closest to the project site were approximated using Google Earth. Airport Influence Area (AIA) Maps for the airports closest to the project site were also reviewed to confirm the Project site's location within/outside of the AIA.

The City of West Hollywood General Plan Safety and Noise Element and more specifically, Figure 10-1: Wildland Fire Hazards, were reviewed to determine the location of California Department of Forestry and Fire Protection wildland fire hazard zones within and adjacent to City boundaries.

3.6.5 Impact Analysis

Threshold A: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

The proposed project includes the development of a contemporary high-end boutique hotel and an active, commercial open-air pedestrian paseo on a currently developed site in the City of West

Hollywood. The proposed project also includes construction of a subterranean parking garage beneath the project site and the park site, as well as a connecting tunnel underneath Robertson Boulevard. During construction, hazardous materials such as fuels and lubricants would be transported to and used on site in construction vehicles and equipment; however, the potential for use of these materials to result in significant hazards to the public or environment would be low. The project contractor and construction crews would be required to comply with all applicable regulations governing the use of hazardous materials. In addition, compliance with existing environmental regulations would ensure that the public and environment are protected through sound construction training programs and practices and through the installation of environmental protective measures/best management practices (BMPs) on the construction site. During operations, the proposed project would involve very little transport, storage, use, or disposal of hazardous materials associated with janitorial, maintenance, and repair activities (i.e., commercial cleaners, lubricants, or paints), and household cleaning supplies. Use of these materials would be limited, and transport, storage, use, and disposal of these materials would be subject to federal, state, and local health and safety requirements. Therefore, impacts associated with the routine transport, use, or disposal of hazardous materials during construction and operation of the proposed project would be **less than significant.**

Threshold B: Would the project 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?

Please see response to Threshold A, above. For the same reasons discussed above, construction and operation of the proposed project would not 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. Compliance with existing environmental regulations would ensure that the public and environment is protected through sound construction training programs and practices and through the installation of environmental protective measures/BMPs on the construction site. As described in Section 3.6.1, on-site soils on the project site were examined for contamination. While several types of VOCs were present, they were not detected in concentrations that exceed state health standards. As such, excavation activities on the project site are not anticipated to cause releases of hazardous materials into the environment. In the unlikely event that unexpected contaminated soils are encountered during excavation of the project site or park site, they would be tested, removed, and disposed of in accordance with applicable local, state, and federal regulations for proper treatment of contaminated soils. Furthermore, use of commercial cleaners, lubricants, or paints associated with janitorial, maintenance, and repair activities during hotel operations would be relatively limited and would be subject to federal, state, and local health and safety requirements.

Due to the age of on-site structures, there is the potential for ACM and LBP to be encountered during construction activities, which would involve demolition of several on-site structures and retention of several structures on the site. A preconstruction survey would be required to determine the presence of ACM and LBP. All ACM and LBP would be removed prior to the start of demolition and renovation activities in accordance with DTSC requirements for LBP and the SCAQMD requirements for ACM (Rule 1403). Per state law, the applicant must obtain proof of satisfaction of state and regional requirements prior to the start of demolition and renovation activities.

By adhering to existing requirements and regulations, impacts associated with reasonably foreseeable upset and accidental conditions involving the release of hazardous materials into the environment would be **less than significant.**

Threshold C: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The project site and park site are not located within one-quarter mile of an existing or proposed school. There are a total of four schools near the project site, all of which are located more than one-quarter mile away. Two public schools owned and operated by the Los Angeles Unified School District are located within 1 mile of the sites. West Hollywood Elementary (West Hollywood School) is located approximately 0.38 miles north of the sites at 970 North Hammond Street, and Rosewood Elementary School is located approximately 0.53 miles southeast of the sites at 503 North Croft Avenue. Pacific Hill School is located approximately 0.50 miles northeast of the sites at 8628 Holloway Drive. Pacific Hills School is an independent, co-education college preparatory school serving grades 6 through 12 (Pacific Hills School 2015). The Center for Early Education is located approximately 0.53 miles east of the project site. Because there are no existing or proposed schools within one-quarter mile of the project site or park site, **no impact** with respect to Threshold C and hazardous emissions or handling of hazardous or acutely hazardous materials, substances or waste would occur.

Threshold D: Would the project 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?

Per the EDR prepared for the proposed project, the subject property is not identified on standard government databases for hazardous materials sites (Appendix F). Several industrial waste files maintained at the Los Angeles County Department of Public Works Environmental Programs Division for the subject property were identified and are related to grease traps installed at current and former restaurants located on the subject property. No underground tank permits for the project site were identified on government databases researched in the EDR. Soil and soil gas

assessment work conducted by California Environmental in support of the Phase II ESA (Appendix F) did not identify evidence of significant releases of VOCs in the subsurface. Ten soil gas samples from depths of 5 and 15 feet below grade were taken and analyzed and while detectable concentrations of xylenes (5 and 15 feet below grade), tetrachloroethylene (5 and 15 feet below grade), ethylbenzene (15 feet below grade), and benzene (15 feet below grade) were identified during laboratory analysis, all detected VOCs were well below their respective state human health screening levels for commercial development. As a result, future indoor air mitigation is not required for future commercial development of the subject property (Appendix F). Detectable concentrations of TPH were found in one of three analyzed soils samples taken from the southwestern corner of the project site; however, the TPH is likely related to small surface spills of motor vehicle oil and would not require remediation. Because the project site is not located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and VOCs within soil and gas samples were below their respective state human health screening levels for commercial development, impacts with regard to Threshold D would be **less than significant** for the project site.

Regarding the park site, the site was listed on several hazardous materials sites databases, as described in Section 3.6.1. Hazardous wastes on the site were associated with standard park operations and are not considered to be a substantial environmental concern. For these reasons, impacts with regard to Threshold D would be **less than significant** for the park site.

Threshold E: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

The project site and park site are not located within an airport land use plan and are not situated within 2 miles of a public airport or public use airport. The nearest public airport, Bob Hope Airport, is located approximately 7.8 miles northeast of the sites in the San Fernando Valley and more specifically, the City of Burbank. The Van Nuys Airport is also located in the San Fernando Valley and is situated approximately 9.7 miles northwest of the sites. The sites are located outside of the Airport Influence Area of the Bob Hope Airport and the Van Nuys Airport (Los Angeles County ALUC 2015b, 2015c). As the sites are not located within an airport land use plan or within 2 miles of a public/public use airport, **no impacts** with regard to Threshold E and safety hazards for people residing or working in the project area would occur.

Threshold 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?

The project site and park site are located in urban West Hollywood and are not within the vicinity of a private airstrip. A heliport is located atop the Los Angeles County Sheriff – West

Hollywood Station which is located approximately 0.15 mile northeast of the project site at 780 North San Vicente Boulevard. Construction and operation of the proposed project would not result in conflicts with air traffic originating from or ending at the West Hollywood Station because development of similar mass and scale including the Pacific Design Center and Cedar-Sinai Medical Center is present in the project area. In addition, several tall office and hotel buildings are located approximately 0.60 mile northwest of the project site near the West Sunset Boulevard and Doheny Road intersection. Because the sites are not within the vicinity of a private airstrip and the proposed development would not create future conflicts with air navigation in the area, **no impact** with regard to Threshold F would occur.

Threshold G: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Access to all local roads would be maintained during construction and operation of the proposed project. Emergency procedures or design features required by City, state, or federal regulations would be implemented as appropriate during construction and/or operation. Maintaining access along all local roads during construction would minimize the potential for traffic conflicts with designated evacuation routes and implementation of emergency procedures would minimize the potential for interference with an adopted emergency response plan. While project construction would involve ingress/egress of trucks to the project site along Robertson Boulevard and La Peer Drive and could involve temporary lane restrictions along Robertson Boulevard for the proposed tunnel construction, neither Robertson Boulevard nor La Peer Drive are City-designated evacuation routes and as such, construction activities at the project site would not physically interfere with an adopted emergency evacuation plan. Therefore, impacts would be **less than significant**.

Threshold H: 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?

The northern boundary of the City is located at an urban-wildland interface due to its proximity to the Hollywood Hills. Wildland fire hazard areas are mapped by the City in the General Plan (Figure 10-1: Wildland Fire Hazards) and are categorized as "very high," "high," or "moderate" wildland fire hazard areas. The proposed project site is located over 0.5 mile from the southern boundary of the moderate wildland fire hazard area (City of Hollywood 2011). However, according to the General Plan Safety Element, urban fires within the City are possible and fire growth is typically related to building construction, water supply, fire department response times and resources, and building setbacks and fire breaks. The need for public or private fire hydrants and other fire protection systems would be identified during the LACFD plan check process, and plan approval from the LACFD is likely to be required prior to issuance of building permits.

Because the project site and park site would be buffered by existing urban uses situated between wildlands located north of the City boundary and because the proposed project would comply with all applicable fire codes and LACFD requirements, **no impacts** would occur.

3.6.6 Mitigation Measures

Impacts would be less than significant. No mitigation measures are required.

3.6.7 Significance after Mitigation

No mitigation measures are required; impacts related to hazards and hazardous materials would remain less than significant.

3.6.8 References

City of West Hollywood. 2011. *City of West Hollywood General Plan 2035.* Accessed June 14, 2015. http://www.weho.org/city-hall/download-documents/-folder-155.

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