V. ENVIRONMENTAL IMPACT ANALYSIS E. HAZARDS AND HAZARDOUS MATERIALS

INTRODUCTION

This section considers potential risks associated with hazards and hazardous materials resulting from developing residential land uses on the project site. The analysis considers potential risks to residents from on-site and off-site sources of hazards and hazardous materials.

Hazardous materials can threaten human health and/or the environment through routine emissions and/or accidental releases. Hazardous materials include materials that are toxic, corrosive, flammable, reactive, irritating and strongly sensitizing. According to the State of California, a hazardous material is defined as:

"a substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either: 1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating irreversible illness; or 2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, or disposed of or otherwise managed."

A Phase I Environmental Site Assessment (Phase I ESA) for the proposed project was prepared by California Environmental Geologists & Engineers, Inc. in August 2003. A summary of the Phase I ESA with respect to potential hazards and hazardous materials impacts is included below. The Phase I ESA, which is incorporated herein by this reference, is included in its entirety as Technical Appendix F to this Draft EIR.

The purpose of the ESA was to identify, to the extent feasible pursuant to the processes prescribed in American Society for Testing and Materials (ASTM) E1527-00, recognized environmental conditions in connection with the project site. "Recognized environmental conditions" are defined as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater or surface water of the property. The term includes hazardous substances and/or petroleum products even under conditions in compliance with laws. The term does not include de minimus conditions that generally do not present a material risk of harm to public health or the environmental and that generally would not be the subject of

an enforcement action if brought to the attention of appropriate governmental agencies.¹ The Phase I ESA included records review, site reconnaissance, interviews and report preparation.

ENVIRONMENTAL SETTING

The project site is composed of two irregularly shaped parcels consisting of approximately 6.19-acres of land. The project site is located at 22241 and 22251 Mulholland Drive within a mixed use area comprised of single-family homes to the north and east, a private parochial high school and convent to the south-east and commercial development to the south-west. The site is bound by San Feliciano Drive to the north, Mulholland Drive to the south, Girard Reservoir to the east and single-family residences to the west (see Figures III-2 and III-3).

The proposed project site is currently occupied by a vacant, derelict two-story single-family residence, shed and kennel. These structures are located in the east-central portion of the proposed project site along Mulholland Drive. The remaining portion of property is undeveloped open space occupied by various native and non-native trees (i.e., coast live oak, California black walnut and Mexican fan palm), shrubs and low-lying ruderal vegetation.

Properties to the north, east and west of the proposed project site are predominately one- and two-story single-family residences. The City of Los Angeles Department of Water and Power (LADWP) Girard Reservoir, which was drained ca. 1989 and currently remains empty, and a LADWP Pumping Station are also located to the northeast of the proposed project site. The properties to the south of the proposed project site consist of a private parochial high school and convent, undeveloped land, a two-story commercial building with a surface parking lot and a strip mall.

Oil and Gas Field Map

The Phase I ESA included the review of the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, Regional Wildcat Map W1-2, dated June 1988. No active or plugged and abandoned oil or gas wells were identified onsite. In addition, no evidence of oil or gas wells or oilfield-related facilities are known to occur within a one-quarter mile radius of the project site.

Historical Use Information on the Project Site

The Phase I ESA also included the review of the available historical information on the project site. These references were reviewed for evidence of activities that would suggest the potential presence of

American Society for Testing and Materials, ASTM, 2000, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, Designation E1527-00, May 10, 2000.

hazardous substances at the project site and to evaluate the potential for the project site to be impacted by offsite sources of contamination. Table V.E-1 and the following paragraphs are a chronological summary of the review.

Aerial Photographs and Historical Topographic Maps

Historical aerial photographs and topographical maps were reviewed for information regarding past project site uses. Aerial photographs were reviewed for the following years: 1928, 1940, 1952, 1965, 1976, 1989, 1994 and 2003. Historical topographic maps were reviewed for the following years: 1903 and 1952.

Table V.E-1 Historical Land Use

Time Period	Land Use	Reference
1903 to 1927	Undeveloped, vacant land.	Historical Topographic Map
1928 to 1951	 Project site is developed with a structure and bounded on the south by Mulholland Drive. LADWP (Girard) Reservoir visible to the east. 	Aerial Photographs
1952 to 1964	 Project site is developed with two structures and bounded on the south by Mulholland Drive. LADWP (Girard) Reservoir visible to the east. Louisville High School visible to the south, across Mulholland Drive. 	Aerial PhotographHistorical Topographic Map
1965 to 1988	 Project site is developed with two structures and bounded on the south by Mulholland Drive. LADWP (Girard) Reservoir visible to the east. Louisville High School visible to the south, across Mulholland Drive. San Feliciano Drive and residences visible to the north Areas surrounding the project site to the north, east and west consists of residential property 	 Aerial Photographs Historical Topographic Map
1989 to present	 Project site is developed with two structures (currently vacant) and bounded on the south by Mulholland Drive. LADWP (Girard) Reservoir visible to the east, reservoir appears to be dry. Louisville High School visible to the south, across Mulholland Drive. San Feliciano Drive and residences visible to the north Areas surrounding the project site to the north, east and west consist of residential property 	 Aerial Photographs Site Reconnaissance

On the 1903 historical topographic map, reprinted in 1913, the project site and all adjacent property are represented as undeveloped.

In the 1928 aerial photograph, the project site is developed with one structure. The remainder of the property is undeveloped. The site is bounded to the south by Mulholland Drive. The LADWP (Girard) Reservoir is visible to the east. Immediate adjacent properties were observed as undeveloped, vacant land.

In the 1940 and 1952 aerial photographs, no land use changes from the 1928 aerial photograph were observed on the project site or surrounding properties.

On the 1952 historical topographic map (Canoga Park 7.5-mintue USGS quadrangle), revised in 1967, the project site is shown developed with two structures. The remainder of the property is undeveloped. The site is bounded to the south by Mulholland Drive, with Louisville High School present across the street. The LADWP (Girard) Reservoir is visible to the east. A USGS-designated blue line stream trending north-south across the western portion of the property is shown. The blue line stream has been modified on-site and off-site, since the 1967 revision, such that northerly flows are now intercepted under Mulholland Drive and conveyed into a subdrain and no longer flow onto the project site. San Feliciano Drive is present to the north, with residential development beyond and to the west.

In the 1965 aerial photograph, the project site is shown developed with two structures. The remainder of the property is undeveloped. The site is bounded to the south by Mulholland Drive, with Louisville High School present across the street. The LADWP (Girard) Reservoir is visible to the east. San Feliciano Drive is present to the north, with residential development beyond and to the west.

In the 1976 aerial photograph, no land use changes from the prior aerial photograph were observed on the project site or surrounding properties.

In the 1989 aerial photograph, no land use changes from the prior aerial photograph were observed on the project site or surrounding properties, except that the LADWP (Girard) Reservoir appears to be dry.

In the 1994 and 2003 aerial photographs, the project site and surrounding properties were observed to be in the present-day configuration.

Sanborn Maps

Environmental Data Resources, Inc. (EDR) was contacted to determine if any Sanborn Maps included coverage of the project site. Sanborn Maps (or fire insurance maps) are detailed city plans showing building footprints, construction details, use of structure, street address, etc. The maps were designed to assist fire insurance agents in determining the degree of hazard associated with a particular property.

Sanborn Maps have been produced from approximately 1867 to the present for commercial, industrial and residential sections of approximately 12,000 cities and towns in the United States. According to EDR, no coverage exists for the project site.

Site Reconnaissance

On July 28, 2003, a reconnaissance-level visit was conducted of the project site. The site reconnaissance consisted of the observation and documentation of existing site conditions and the nature of the neighboring property development, including the completion of an Environmental Field Reconnaissance Questionnaire.

Field Reconnaissance Observations

Use of Hazardous Substances

No evidence of the past use, treatment, storage, disposal or generation of hazardous substances was observed on the project site.

Storage Tanks

No evidence of existing underground storage tanks (USTs), clarifiers, sumps, grease interceptors or aboveground storage tanks (ASTs) was observed on the project site.

Containers of Hazardous or Unidentified Substances

One empty 55-gallon drum was observed in the vicinity of the abandoned kennel. The 55-gallon drum reportedly once contained drinking water for animals. No other evidence of containers of hazardous or unidentified substances was observed on the project site.

Polychlorinated Biphenyls (PCBs)

No visual evidence of PCB containing transformers or equipment was observed on the project site.

Solid Waste Disposal

No evidence of onsite disposal or landfill of solid waste material was observed on the project site.

Asbestos Containing Building Materials (ACM)

Sampling of suspect asbestos containing material (ACM) was not included in the scope of the Phase I ESA. However, due to the date of construction of the subject buildings, it is considered likely that the building materials contain ACM.

Wastewater Disposal Systems

An onsite sewage disposal (septic) system is located adjacent to the north side of the existing residence. No other evidence of wastewater treatment or disposal systems was observed at the project site.

Radon

Radon assessment was not included in the scope of the Phase I ESA. However, the EDR research report indicates the levels of radon at 63 sites located within Los Angeles County were below one picoCurie per liter (pCi/L). This concentration is well below the Federal Action Level of four pCi/L.

Lead

Sampling of suspect lead in paint was not included in the scope of the Phase I ESA. Lead content in paint was significantly reduced in 1977. However, due to the date of construction of the subject buildings, it is considered likely that lead-based paint was utilized onsite.

Onsite Wells

No evidence of dry wells, irrigation wells, abandoned wells, monitoring wells or other wells was observed on the project site.

Unusual Odors

No evidence of strong, pungent or noxious odors was noted on the project site.

Stressed Vegetation

No evidence of stressed vegetation, as a possible result of hazardous material releases, was observed on the project site.

Stained Soil or Pavement

No evidence of staining or residue was observed on the project site.

Pits, Ponds or Lagoons

No evidence of pits, ponds and/or lagoons was observed on the project site.

Potable Water Supply

Water is supplied to the project site by the City of Los Angeles Department of Water and Power.

Other Condition of Concern

No other conditions of environmental concern regarding potential sources for soil and/or groundwater contamination were observed on the project site.

Records Review

Standard Environmental Record Sources

A search of selected government databases was conducted using GeoCheck^R Report environmental database report system, prepared by Environmental Data Resources, Inc (EDR). The report meets the government records search requirements of Government Code 65962.5 and ASTM E1527-00 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process. The database listings were reviewed within the specified radii established by the ASTM E1527-00.

Project Site

The project site was not identified on the EDR report in any of the database listings.

Offsite

<u>Federal NPL List</u>: The Environmental Protection Agency's (EPA) National Priorities List (NPL) of uncontrolled or abandoned hazardous waste sites was reviewed for properties within a one-mile radius of the project site. To appear on the NPL, a property must have met or surpassed a predetermined hazard ranking system score, been chosen as a State's top priority site, pose a significant health or environmental threat, or be a site where the EPA has determined that remedial action is more cost effective than removal action. The database search did not identify any NPL sites within one mile of the project site.

<u>Federal CERCLIS List</u>: The EPA's Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) listings were reviewed to determine if sites within 0.50 mile of the project site are listed for investigation. The CERCLIS database identifies hazardous waste sites that require investigation and possible remedial action to mitigate potential negative impacts on human health or the environment. The database search did not identify any State equivalent CERCLIS facilities within 0.50 miles of the project site.

<u>Federal RCRA List</u>: The current Resource Conservation Recovery Act (RCRA) Notifiers List was reviewed to determine if RCRA treatment, storage, or disposal sites (TSDs) are located within 0.50 miles of the project site. The database search did not identify any RCRA TSD facilities within 0.50 miles of the project site.

The RCRA Corrective Action Sites List is maintained for sites which are undergoing "a corrective action." A corrective action order is issued when there has been a release of hazardous waste constituents into the environment from a RCRA facility. The database search did not identify any RCRA Corrective Action facilities within a mile of the project site.

The RCRA regulated hazardous waste generator notifiers list was reviewed to determine if RCRA generator facilities are located on any properties adjoining the project site. The database search did not identify any RCRA generators located adjacent to the project site.

<u>Federal RCRIS List</u>: The EPA's Resource Conservation and Recovery Information System (RCRIS) listings were reviewed to determine if sites within 0.25 mile of the project site are listed. The RCRIS database identifies hazardous waste sites that generate, store, treat or dispose of hazardous water as defined by the Act and as a part of on-going operations. The database search identified three RCRIS listings located at 22243, 22251 and 22295 Mulholland Highway respectively, approximately 0.25 miles south-east of the project site. The facility at 22243 Mulholland Highway is Village Cleaners, 22251 Mulholland Highway is Woodland 1 Cleaners and 22295 Mulholland Highway is a Shell Oil Company gas station. Due to the distance of the listed facilities from the project site, these facilities are unlikely to have the potential to adversely impact the project site and are not considered to be recognized environmental conditions.

Emergency Response Notification System (ERNS): The EPA's database of emergency response actions. The database search identified one ERNS listing located at Thomas Permutter & Associates, 22231 Mulholland Highway, approximately 0.25 miles south-east of the project site. Permutter & Associates use photochemicals, producing photoprocessing waste that is subsequently sent to an off-site transfer station for recycling. Due to the distance of the listed facility from the project site, this facility is unlikely to have the potential to adversely impact the project site and is not considered to be a recognized environmental condition.

<u>Toxic Release Inventory System (TRIS)</u>: The EPA's index of all facilities that have had or may be prone to toxic material releases. The database search did not identify any TRIS facilities within 0.125 miles of the project site.

<u>Department of Toxic Substances Control (CALSITES) Sites</u>: The Department of Toxic Substances Control (DTSC) CALSITES database contains potential or confirmed hazardous substance release properties. The database search did not identify any CALSITES facilities within a mile of the project site.

<u>Solid Waste Landfill Facilities</u>: This database, provided by the Department of Consumer and Regulatory Affairs, consists of open, closed and inactive solid waste disposal facilities and transfer stations (SWL). The database search did not identify any solid waste disposal facilities and/or transfer stations within a mile of the project site.

<u>Underground Storage Tank (UST) Sites</u>: The California State Water Resources Control Board (SWRCB) Underground Storage Tank inventory list was reviewed to determine if any USTs are located adjacent to the project site. The database search identified one UST listing located at the Shell gas station, 22295 Mulholland Highway, approximately 0.25 miles south-south-east of the project site. Due to the distance of the listed facility from the project site, this facility is unlikely to have the potential to adversely impact the project site and is not considered to be a recognized environmental condition.

<u>Leaking Underground Storage Tank (LUST) Sites</u>: The EPA maintains lists of information pertaining to reported leaking underground storage tanks (LUSTs) in the State. LUST facilities that have been closed by regulatory agencies are not described within the report. The database search did not identify any LUST sites within a mile of the project site.

Additional Environmental Record Sources

The following governmental agencies were contacted to determine if they had any records relating to the project site:

- California Regional Water Quality Control Board, Los Angeles Region;
- South Coast Air Quality Management District;
- City of Los Angeles Department of Building and Safety;
- County of Los Angeles, Health Department; and
- County of Los Angeles, Fire Prevention Unit.

The search disclosed that these agencies have no records on file for the project site address.

A letter was also sent to the Underground Service Alert of Southern California (Dig Alert) on October 19, 2005, requesting information regarding buried utilities and/or pipelines in the project vicinity. A listing received on October 20, 2005 indicates two pipelines which convey crude oil from oil fields in Ventura County south to refineries in the Wilmington area of Los Angeles County, run in the shoulder right-of-way of Mulholland Drive along the southern border of the project site. One is the 12-inch ConocoPhillips Torrey Oil pipeline; the other is the Crimson Pipeline. The locations of these pipelines in relationship to the project site are shown in Figure V.E-1. Warnings of the existence of the pipelines are posted in the Mulholland Drive right-of-way, adjacent to the project site (see Photograph S, Figure V.E-2). Recent erosion in the right-of-way has exposed an unidentified pipeline in the Mulholland Drive right-of-way (see Photograph T, Figure V.E-2). While it is possible the exposed pipeline is one of the two oil pipelines, it should be noted that there are various other domestic utilities such as water, natural gas and telecommunications located in the same general area.

Figure V.E-1, Pipeline Location Map

Figure V.E-2, Pipeline Photographs

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G to the CEQA Guidelines, the proposed project could have a significant environmental impact if it would:

- create a significant hazard to the public or the environment through the routine transport, use, handling, 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 handling of 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 material sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment;
- for a project located within an airport land use plan, within two miles of a public airport, or located within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area;
- for a project within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area;
- impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
- 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.

Hazards & Hazardous Materials Issues Not Analyzed Further

As discussed in the Initial Study (included in Appendix A), the proposed project includes development of residential uses. The types of hazardous materials associated with routine, day-to-day operation of the proposed project would include landscaping chemicals that would be used in quantities typical for landscaped residential developments and typical cleaning solvents used for janitorial purposes. Typically, residential landscaping materials and household cleaning supplies are approved for use by the State of

California, such that the transport, use and disposal of these materials would not pose a significant hazard to the public or the environment. Therefore, project impacts related to this issue would be less than significant, and no further analysis of this issue is required.

As discussed above, a search of selected government databases, has demonstrated that the proposed project site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, the project would not result in impacts related to being located on a site that is included on a list of hazardous materials sites. Thus, no further analysis of this issue is required.

As discussed in the Initial Study, the project site is not within an airport use plan, or within two miles of a public airport, public use airport, or private airstrip. Therefore, the project would not expose persons to a safety hazard related to airports. No further analyses of these issues are required.

As discussed in the Initial Study, the proposed project includes development of residential uses and is located in a mountain fire district and a Very High Fire Hazard Severity Zone (VHFHSZ) based on criteria that includes fuel loading, slope, fire weather, and other relevant factors. These areas must comply with the Brush Clearance Requirements of the County Fire Code. The project site consists of mostly level or gently sloping terrain. Additionally, the project site is surrounded by suburban development and is not immediately adjacent to wildlands. There are no severe site limitations that would restrict access for fire fighting equipment. Furthermore, water mains are available adjacent to the site. While the project site is located beyond the recommended 1.5 mile response distance from the nearest fire station, the requirement to provide automatic fire sprinkler systems would mitigate this concern. Take together these considerations suggest that the proposed project would not expose people or structures to a greater than average risk of loss, injury or death involving wildland fires. Therefore, project impacts related to this issue would be less than significant, and no further analysis of this issue is required.

Project Impacts

Construction Impacts of the Proposed Project

Asbestos-Containing Materials (ACMs)

Demolition of the buildings on site, which were built prior to the ban on use of asbestos as building insulation, could release asbestos-containing materials present in the structures. Exposure to workers or residents in the surrounding community to ACMs during demolition would be a significant impact.

Prior to the demolition activities, a complete asbestos survey must be conducted to identify all sources of asbestos. This activity is required by the USEPA National Emission Standard for Hazardous Air Pollutants (NESHAP) regulation and the South Coast Air Quality Management District's (SCAQMD's) Rule 1403.

Bulk samples of all materials which are suspected of containing asbestos will be collected and analyzed for asbestos content. Asbestos removal is stringently controlled by Federal Regulations and SCAQMD Rule 1403. Removal of asbestos in a building is not unusual and can be readily accomplished.

In accordance with the EPA's NESHAP regulation and SCAQMD's Rule 1403, all materials, which are identified as ACMs must be removed by a trained and licensed asbestos abatement contractor. The asbestos removal operations must be conducted in accordance with CAL-OSHA Asbestos for the Construction Industry Standard, SCAQMD and EPA rules and regulations and industry standards. The contractor selected for the removal process must be chosen based on experience, reputation and relationship with local agencies such as SCAQMD and OSHA regional offices.

Generally, asbestos removal operations are low risk. When following asbestos-related regulations, the possibility of exposure to airborne asbestos fibers from asbestos removal projects is limited. The SCAQMD has very specific regulations for asbestos emissions. Provided the removal and disposal of ACMs from the project site follows the various required guidelines described above, 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 ACMs (hazardous materials) into the environment. Therefore, demolition-related impacts relative to ACMs would be less than significant.

Lead-Based Paint (LBP)

Based on the age of the structures, the potential exists for such structures to contain lead-based paint. Exposure to workers to lead paint during demolition structures would be a significant impact. A qualified lead-paint abatement consultant would be required to comply with applicable state and federal rules and regulations governing lead paint abatement. Such regulations that would be followed during demolition include Construction Safety Orders 1532.1 (pertaining to lead) from Title 8 of the California Code of Regulations, and lead exposure guidelines provided by the U.S. Department of Housing and Urban Development (HUD). Provided that abatement rules and regulations are followed, hazardous materials impacts caused by exposure to lead-paint would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions. Therefore, demolition-related impacts relative to lead-based paint would be less than significant.

Oil Pipelines

There is a potential for the identified crude oil pipelines in the shoulder of Mulholland Drive to be ruptured during excavation and grading operations for the proposed project. Since such a rupture could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions (i.e., grading) involving the release of hazardous materials (i.e., crude oil) into the environment, this is a potentially significant impact. However, there are standard operating procedures for construction in the vicinity of known pipelines, generally consisting of notification and marking

requirements, and including contacting Underground Service Alert of Southern California (Dig Alert) a minimum of two full working days (48-hours) prior to the commencement of earthmoving activities on the project site to obtain a listing of underground services and utilities. With contractor compliance with these standard, established procedures, the project's construction activities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the potential risk pipeline rupture.

Operational Impacts of the Proposed Project

Oil Pipelines

Of the three major means of transporting crude oil from the oil field to the refinery (i.e., pipeline, ocean going tankers or trains), pipelines have by far the best safety record. Pipelines are regularly monitored by the owner/operators using a combination of remote sensing and visual inspection. Also, most pipelines are fitted with computer monitored and operated check valves that can automatically shut down the flow of crude should a leak or rupture occur, thus minimizing the quantity of crude that might be released to the environment. The Crimson Pipeline has been located in the Mulholland Drive right-of-way adjacent to the project site since at least 1944 (see Figure V.E-1), while the Union Oil pipeline has been in place since at least 1956 (see Figure V.E-1). Based on these considerations, a major leak or rupture of the adjacent pipelines in the vicinity of the project site is considered to be only of a remote possibility. Furthermore, these pipelines run from Ventura County to refineries in the Wilmington area, through a variety of residential communities. There is nothing unique in either the proposed project or project site that would cause the future residents to be exposed to greater hazards or risk of upset than the residents of surrounding communities through which these pipelines also run. Therefore, the operational risk of upset would be considered less than significant.

CUMULATIVE IMPACTS

Development of the proposed project in conjunction with the development of the 27 related projects in the area would result in the development of residential and commercial uses. None of the related projects is industrial or involve other related uses that typically use, store, transport or treat hazardous materials. Rather the related projects would be expected to utilize common household products that, while potentially hazardous, have typically been approved as safe by the State of California when used according to instructions. Thus, cumulative impacts related to risk of upset from release of hazardous materials would be expected to be less than significant. Only related projects Nos. 24 – 27 are similarly located in close proximity to a wildland fire area that may combine with the proposed project to create cumulative wildfire hazards. All of the other related projects are located in more developed areas and would not be expected to be subject to wildland fires. Both the proposed project and related projects Nos. 24 –27 would be required by their respective local jurisdictions to mitigate their individual impacts by compliance with standard Fire Department requirements. Therefore, no significant cumulative impacts would be anticipated.

PROJECT ENHANCEMENTS

With the project's compliance with standard procedures for handling ACMs and lead-based paints, the project would not result in significant hazard-related impacts and mitigation measures are not required. Nevertheless, the standard procedures for handling ACMs and lead-based paints are reiterated here for clarification purposes:

Code Required

- **E-1** Prior to the issuance of the demolition/renovation permits, the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant that no ACMs are present in the buildings. If ACMs are found to be present, they shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403, as well as other state and federal regulations.
- **E-2** Prior to issuance of permits for any demolition/renovation activity involving a particular structure, a lead-based paint assessment of each existing structure shall be conducted. Lead-based paint found in any buildings shall be removed and disposed of as a hazardous waste in accordance with all applicable regulations.

The following project enhancement is recommended to ensure that grading activities will not accidentally rupture the crude oil pipelines that are located in the Mulholland Drive right-of-way:

E-3 A minimum of two full working days (48-hours) prior to the commencement of earthmoving activities on the project site, the grading contractor shall contact Underground Service Alert of Southern California (Dig Alert) to obtain a listing of underground utilities in the vicinity of the project site. The location of all pipelines in the vicinity of proposed grading shall be clearly marked prior to commencement of grading activities.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts associated with hazards and hazardous materials would be less than significant.