3.9 Hazards and Hazardous Materials

This section addresses the potential impacts to hazards and hazardous materials impacts associated with implementation of the proposed Project. This section includes a description of the existing hazardous materials conditions in the proposed Project area, a summary of applicable regulations related to hazards and hazardous materials, and an evaluation of the potential impacts of the proposed Project related to hazards and hazardous materials. Project Design Features include PDF-TRA-1: Construction Traffic Management Plan, PDF-TRA-2: Construction Staging Plan, PDF-TRA-3: Construction Traffic, PDF-TRA-4: Access to Parcels, PDF-TRA-5: Site-Specific Traffic Control and Transit Plan for Large Events, and PDF-WF-5.

Brush Clearing Activities. Impacts to hazards and hazardous materials were found to be less than significant, and no mitigation is required.

3.9.1 Environmental Setting

The discussion of the potential presence of hazardous materials in the proposed Project area is based on the results of the Phase I Environmental Site Assessment (Phase I) prepared for the proposed Project and included as Appendix I to this Draft EIR. The section below summarizes the results of the Phase I related to onsite hazardous materials and is followed by other hazards and hazardous materials topics, including schools and airports, emergency response, and wildland fires.

Onsite Hazardous Materials

Hazardous Materials Database Review

Federal, State, and local regulatory agencies publish databases of businesses and properties that handle hazardous materials or hazardous waste, including those properties with a known release of hazardous substances to soil and/or groundwater. A government database search was conducted for listings within the appropriate American Society for Testing and Materials (ASTM) standard minimum search distance (EnviroSite 2021). In general, reported or potential releases likely to affect a property include those located on or within a 1/8-mile (660-foot) radius of the subject property.

For the Phase I, listings in the proposed Project vicinity were evaluated with regard to the nature of potential chemicals of concern and the extent of known releases. Additional factors were also considered as part of the hazardous conditions evaluation, such as chemical properties, regional knowledge of the site vicinity, groundwater flow direction, and available past regulatory documentation, to determine if any of the three types of hazardous conditions, defined by ASTM Standard of Practice E1527-21, occur in the proposed Project area:

- **Recognized Environmental Conditions (RECs):** A REC is considered to be (1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment.
• **Historical Recognized Environmental Conditions (HRECs):** A HREC is considered to be a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).

• **Controlled Recognized Environmental Conditions (CRECs):** A CREC is a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).

According to the government database search, the proposed Project area includes an active Hazardous Waste Generator and Hazardous Material permit with the City of Los Angeles Fire Department (LAFD) (which is the local Certified Unified Program Agency [CUPA]) for the Silver Lake Chlorination Station that is used to store approximately 200 gallons of bleach and 100 gallons of sodium thiosulfate. In addition, the Silver Lake and Ivanhoe Reservoirs Aeration and Recirculation Systems Projects are listed as active sites, but are permitted uses under Clean Water Act Section 401. Based on the lack of reported spills, leaks, or violations from listings in the proposed Project area, these listings are not considered to represent a REC. No other listings were located within the proposed Project area.

Three former leaking underground storage tanks (LUSTs) are listed approximately 500 to 650 feet east of the proposed Project area; however, the sites were determined to not be RECs relative to the proposed Project area due to past remediation, monitoring, and subsequent case closures by the Los Angeles Regional Water Quality Control Board (RWQCB). Further, the former contamination sites have since been developed with residential uses, a library, and a bank, and no longer have the potential to contaminate the proposed Project area. Several other sites in the surrounding Silver Lake neighborhood are listed for the use, storage, and/or disposal of hazardous materials, but with no recorded violations or spills. For example, residential properties in the vicinity of the subject property are listed for the past removals of asbestos-containing materials.

**Site Reconnaissance and Agency Consultation**

The proposed Project area was inspected on October 18, 2021. Facilities at the proposed Project area including the Los Angeles Department of Water and Power’s (LADWP) modular office building, Silver Lake Chlorination Station, storage containers, the Silver Lake Recreation Facility, and an auxiliary storage building were observed for chemical spills, underground or aboveground storage tanks, waste pits or ponds, stained soil or floors, unusual odors, or stressed vegetation. No RECs, HRECs, or CRECs were noted in the proposed Project area relative to hazardous materials, hazardous waste, or chemical use, storage, or disposal.

Representatives from the LADWP Hazardous Substances Group provided responses to a questionnaire regarding hazardous materials use and storage at the subject property following the
site visit, which included the following information: A second chlorination station was previously maintained by LADWP in the proposed Project area and has since been taken out of service and deregistered from California Accidental Release (CalARP) and Risk Management Plan (RMP) requirements on June 17, 2014. There is no history of reported spills at the chlorination stations. Separately, on April 9, 2008, there was a contained automotive oil spill on the walking path around Silver Lake Reservoir, on the southwest side near an outlet tower, which did not enter any water way or storm drain. The spill was cleaned up by LADWP Hazardous Substances Group. LADWP’s Wastewater Quality and Compliance Group checked most recent spill records and no accidental spill reports were identified for the subject property. Other potentially hazardous conditions at the subject property were addressed in the interview documentation, including but not limited to: the use of pesticides and herbicides at the subject property via spray and bait boxes; pre-1980 buildings which may contain asbestos-containing materials (ACM) and lead-based paint (LBP); and, when reservoir fills beyond its capacity, the discharge of reservoir waters into a spillway that deposits into a storm drain system that connects to Ballona Creek. To LADWP’s knowledge, the subject property has never had above or below ground storage tanks and has no known history of hazardous materials spills.

**Schools**

Within a 2-mile radius of the proposed Project area, there are: 28 private and charter schools; 18 public elementary schools; 14 early childhood education and Head Start Schools; 3 public high schools; 3 public middle schools; and 3 special curriculum schools and programs; totaling 69 school facilities (ESRI 2022; County of Los Angeles 2022; ESA 2021). The Neighborhood Nursery School is located at 2700 Tesla Avenue, within the northeast boundary of the SLRC.

**Airports**

There are no airports or airstrips located within two miles of the proposed Project area, nor is the proposed Project area located within an airport planning boundary/airport influence area (AIA), as depicted in the Los Angeles County Airport Land Use Plan (ALUP) (Los Angeles County Airport Land Use Commission [ALUC] 2004). The nearest airport is the Bob Hope Airport, located approximately 8.5 miles northwest of the proposed Project.

**Emergency Preparedness**

City evacuation routes consist of major interstates, highways, and primary arterials in the proposed Project area. The City has developed a dynamic approach to evacuation response and potential evacuation routes will vary based on the type and location of hazard or disaster. Some potential evacuation routes have been pre-selected by the City based on a number of considerations (e.g., tsunami evacuation routes in coastal areas), while other routes are shared in real time depending on which disaster and suitable evacuation routes are identified. No evacuation routes are located in the vicinity of the Project area that have been pre-selected by the City for use during hazards or disasters. However, Silver Lake Boulevard trends in north-south direction along the southeast boundary of the proposed Project area and would be the most likely evacuation route that could be used during a natural hazard or disaster, as it is the only arterial roadway adjacent to the proposed Project area (City of Los Angeles 1996).
Due to existing hazardous materials handling and hazardous waste generation at the Silver Lake Chlorination Station, LADWP implements emergency response planning and training procedures for immediate response to a reportable or threatened release of hazardous materials at the Project site using a California Environmental Reporting System (CERS) Consolidated Emergency Response/Contingency Plan (CERC), which is regulated by the LAFD CUPA. The CERC includes procedures for preventing and mitigating hazardous materials releases, emergency evacuation, and worker training. In addition, the CERC lists on-site emergency equipment and includes existing arrangements for emergency services (LADWP 2020a).

**Wildfire**

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped areas of significant fire hazards throughout the State. The maps classify lands into fire hazard severity zones, based on a hazards scoring system that takes into account localized factors such as fuel, slope, fire weather, and winds to identify the degree of fire hazard throughout California (e.g. moderate, high, or very high). At the local level, the LAFD has designated most of the hilly and mountainous regions of the City as a Very High Fire Hazard Severity Zone (VHFHSZ). Lands within the LAFD VHFHSZ are generally designated for open space or low density residential development (City of Los Angeles 1996). While fire hazard severity zones do not predict when or where a wildfire will occur, they do identify areas where wildfire hazards could be more severe and therefore are of greater concern.

The proposed Project area lies entirely within a CAL FIRE Local Responsibility Area (LRA) VHFHSZ and within the City’s VHFHSZ (CAL FIRE 2012; LAFD 2022). However, review of CAL FIRE’s California Statewide Fire Map and Fire Resource Assessment Program (FRAP) database indicates that there is not a significant potential for wildfire near the proposed Project area (CAL FIRE 2021a, b). The proposed Project could be subject to the occasional wildfire encroachment, most likely originating from open space and forested areas like Griffith Park in the proposed Project vicinity. Please refer to Section 3.14, *Wildfire*, for additional details on fire conditions in the proposed Project area.

**3.9.2 Regulatory Framework**

Hazards and hazardous materials are subject to numerous federal, state, and local laws and regulations intended to protect health, safety, and the environment. The U.S. Environmental Protection Agency (USEPA), California Department of Toxic Substances Control (DTSC), Los Angeles Regional Water Quality Control Board (RWQCB), and the City of Los Angeles are the primary agencies enforcing these regulations.

State and local agencies often have either parallel or more stringent rules than federal agencies. In some cases, state law mirrors or overlaps federal law and enforcement of these laws is the responsibility of the state or of a local agency to which enforcement powers are delegated. For these reasons, the requirements of certain federal laws and their enforcement are discussed under either the state or local agency section. For example, local regulatory agencies enforce many federal and state regulations through the CUPA program. The LAFD is the designated CUPA responsible for implementing statewide standards to each facility that treats on-site waste,
generates hazardous waste, operates underground storage tanks, or stores hazardous materials within the City, as discussed below in the State and Local regulations sections.

**Federal**

Federal agencies with responsibility for hazardous materials management include the USEPA, Department of Labor (Federal Occupational Health and Safety Administration [OSHA]), and Department of Transportation (US DOT). Major federal laws and issue areas include the following statutes and regulations:

**Resources Conservation and Recovery Act (42 USC 6901 et seq.)**

Resources Conservation and Recovery Act (RCRA) is the principal law governing the management and disposal of hazardous materials. RCRA is considered a “cradle to grave” statute for hazardous wastes in that it addresses all aspects of hazardous materials from creation to disposal. RCRA applies to this proposed Project because RCRA is used to define hazardous materials. Offsite disposal facilities and the wastes each may accept are regulated under RCRA.

**Toxic Substances Control Act (15 USC 2601 et seq.)**

The Toxic Substances Control Act (TSCA) of 1976 was enacted by Congress to give the USEPA the ability to track the 75,000 industrial chemicals currently produced or imported into the United States. The USEPA repeatedly screens these chemicals and can require reporting or testing of those that may pose an environmental or human-health hazard. The USEPA can ban the manufacture and import of those chemicals that pose an unreasonable risk.

**Comprehensive Environmental Response, Compensation, and Liability Act (42 USC 9601 et seq.)**

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as “Superfund,” was enacted by Congress on December 11, 1980. This law provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites, provides for liability of persons responsible for releases of hazardous waste at these sites, and establishes a trust fund to provide for cleanup when no responsible party can be identified. CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) on October 17, 1986.

**Emergency Planning and Community Right-to-Know Act (EPCRA from SARA Title III)**

EPCRA improved community access to information regarding chemical hazards and facilitated the development of business chemical inventories and emergency response plans. EPCRA also established reporting obligations for facilities that store or manage specified chemicals. EPCRA applies to this proposed Project because contractors using hazardous materials (e.g., fuels, paints and thinners, solvents, etc.) would be required to prepare and implement written emergency response plans to properly manage hazardous materials and respond to accidental spills.
US DOT Hazardous Materials Transportation Act of 1975 (49 USC 5101)

The US DOT, in conjunction with the USEPA, is responsible for enforcement and implementation of federal laws and regulations pertaining to transportation of hazardous materials. The Hazardous Materials Transportation Act of 1974 directs the U.S. DOT to establish criteria and regulations regarding the safe storage and transportation of hazardous materials. Code of Federal Regulations (CFR) 49, 171–180, regulates the transportation of hazardous materials, types of material defined as hazardous, and the marking of vehicles transporting hazardous materials.

The Federal Motor Carrier Safety Administration (49 CFR Part 383-397)

The Federal Motor Carrier Safety Administration, a part of the US DOT, issues regulations concerning highway transportation of hazardous materials, the hazardous materials endorsement for a commercial driver’s license, highway hazardous material safety permits, and financial responsibility requirements for motor carriers of hazardous materials.

Occupational Safety and Health Administration (OSHA; 29 USC 15)

OSHA is the federal agency responsible for ensuring worker safety. These regulations provide standards for safe workplaces and work practices, including those relating to hazardous materials handling.

State

The primary state agencies with jurisdiction over hazardous chemical materials management are DTSC, State Water Quality Control Board (SWQCB), and Los Angeles RWQCB. Other state agencies involved in hazardous materials management are the Department of Industrial Relations (State OSHA implementation), State Office of Emergency Services (CalOES)—CalARP implementation, California Air Resources Board (CARB), California Department of Transportation (Caltrans), California Highway Patrol (CHP), State Office of Environmental Health Hazard Assessment (OEHHA—Proposition 65 implementation) and California Integrated Waste Management Board (CIWMB). Hazardous materials management laws in California include the following statutes and regulations.

Senate Bill 1082 - Unified Hazardous Materials/Waste Program: Local Implementation

In 1993, the State Legislature passed Senate Bill (SB) 1082 to streamline the permitting process for those businesses that use, store, or manufacture hazardous materials. The passage of SB 1082 provided for the designation of a local CUPA that would be responsible for the permitting process and collection of fees. A CUPA is a local agency that has been certified by CalEPA to implement the Unified Program at the local level, which serves to consolidate, coordinate, and make consistent the administrative requirements, permits, inspections, and enforcement activities for the following six environmental and emergency management programs:

- Hazardous Materials Release Response Plans and Inventory (Business Plan) Program
- California Fire Code Hazardous Material Management Plans and Hazardous Material Inventory Statements
• CalARP Program
• Underground Storage Tank Program
• Aboveground Petroleum Storage Act Requirements for Spill Prevention, Control and Countermeasure (SPCC) Plans
• Hazardous Waste Generator and On-Site Hazardous Waste Treatment (tiered permitting) Programs

LAFD is the designated CUPA responsible for implementing the above-listed program elements in the proposed Project area and the greater City of Los Angeles. Specific responsibilities of the LAFD in its capacity as the City CUPA are summarized below in the Local regulations section.


The Business Plan Act requires preparation of hazardous materials business plans and disclosure of hazardous materials inventories, including an inventory of hazardous materials handled, plans showing where hazardous materials are stored, an emergency response plan, and provisions for employee training in safety and emergency response procedures (California Health and Safety Code, Division 20, Chapter 6.95, Article 1). Statewide, DTSC has primary regulatory responsibility for management of hazardous materials, with delegation of authority to local jurisdictions that enter into agreements with the state. Local agencies are responsible for administering these regulations.

Several state agencies regulate the transportation and use of hazardous materials to minimize potential risks to public health and safety, including the California Environmental Protection Agency (CalEPA) and the California Emergency Management Agency. The California Highway Patrol and Caltrans enforce regulations specifically related to the transport of hazardous materials. Together, these agencies determine container types used and license hazardous waste haulers for hazardous waste transportation on public roadways.

The Business Plan Act applies to this proposed Project because contractors would be required to comply with its handling, storage, and transportation requirements that would reduce the possibility of spills, and to prepare an emergency response plan to respond to accidental spills.

**Hazardous Waste Control Act (HWCA; California Health and Safety Code, Section 25100 et seq.)**

The HWCA is the state equivalent of RCRA and regulates the generation, treatment, storage, and disposal of hazardous waste. This act implements the RCRA “cradle-to-grave” waste management system in California but is more stringent in its regulation of non-RCRA wastes, spent lubricating oil, small-quantity generators, transportation and permitting requirements, as well as in its penalties for violations. HWCA applies to this proposed Project because contractors would be required to comply with its hazardous waste requirements that would reduce the possibility of spills.
California Accidental Release Prevention (CalARP) Program

The purpose of the CalARP is to prevent accidental releases of substances that can cause serious harm to the public and the environment, to minimize the damage if releases do occur, and to satisfy community right-to-know laws. This is accomplished by requiring businesses that handle more than a threshold quantity of a regulated substance listed in the regulations to develop a Risk Management Plan (RMP). An RMP is a detailed engineering analysis of the potential accident factors present at a business and the mitigation measures that can be implemented to reduce this accident potential. The RMP contains safety information, hazards review, operating procedures, training requirements, maintenance requirements, compliance audits, and incident investigation procedures (CalIOES 2019).

California Division of Occupational Safety and Health (Cal/OSHA)

California OSHA (Cal/OSHA) is responsible for developing and enforcing workplace safety standards and assuring worker safety in the handling and use of hazardous materials. Among other requirements, Cal/OSHA requires many entities to prepare injury and illness prevention plans and chemical hygiene plans and provides specific regulations to limit exposure of construction workers to lead. OSHA applies to this proposed Project because contractors would be required to comply with its handling and use requirements that would reduce the possibility of spills, and to prepare an emergency response plan to respond to accidental spills.

Hazardous Waste and Substances Sites (Cortese List)

Government Code Section 65962.5, amended in 1992, requires the CalEPA to develop and update annually the Hazardous Waste and Substances Sites (Cortese List), which is a list of hazardous waste sites and other contaminated sites. The Cortese List is a planning document used by the State, local agencies, and developers to comply with California Environmental Quality Act (CEQA) requirements pertaining to providing information about the location of hazardous materials release sites. While the Cortese List is no longer maintained as a single list, the following databases provide information that meet the Cortese List requirements:

1. List of Hazardous Waste and Substances sites from the DTSC Envirostor database (HSC Sections 25220, 25242, 25356, and 116395);
2. List of open and active leaking underground storage tank (LUST) Sites by County and Fiscal Year from the SWRCB GeoTracker database (HSC Section 25295);
3. List of solid waste disposal sites identified by the SWRCB with waste constituents above hazardous waste levels outside the waste management unit (Water Code Section 13273[e] and 14 CCR Section 18051);
4. List of “active” Cease and Desist Orders and Cleanup and Abatement Orders from the SWRCB (California Water Code [CWC] Sections 13301 and 13304); and
5. List of hazardous waste facilities subject to corrective action pursuant to HSC Section 25187.5, identified by the DTSC.

NPDES Construction General Permit

Dischargers whose project disturbs one or more acres of soil, or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more
acres, are required to obtain coverage under the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, or Construction General Permit (Order 2009-0009-DWQ, NPDES No. CAS000002; as amended by Orders 2010-0014-DWQ and 2012-006-DWQ). Construction activities subject to this permit include clearing, grading, grubbing, and other disturbances to the ground such as excavation and stockpiling, but do not include regular maintenance activities performed to restore the original line, grade, or capacity of a facility. The Construction General Permit requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that includes specific Best Management Practices (BMPs) designed to prevent sediment and pollutants from contacting stormwater from moving off site into receiving waters. The BMPs fall into several categories, including erosion control, sediment control, waste management, and good housekeeping, and are intended to protect surface water quality by preventing the off-site migration of eroded soil and construction-related pollutants from the construction area.

**Summary of Hazardous Building Materials Regulations**

From the above-listed regulations, the use of hazardous building materials is subject to the following regulations specific to the demolition and renovation of structures:

- **Asbestos-containing materials**: CFR Title 40, Part 61, Subpart M (Asbestos National Emission Standards for Hazardous Air Pollutants [NESHAP]); California Code of Regulations (CCR) Title 8, Sections 1529 and 5208; and South Coast Air Quality Management District (SCAQMD) Regulation 14, Rule 1403.

- **Lead-based paint**: Title IV, Toxic Substances Control Act, Sections 402, 403, and 404; 8 CCR Section 1532.1; and SCAQMD Regulation 14, Rule 1402.


- **Mercury and/or PCBs in light tubes and switches**: 22 CCR Sections 66262.11, 66273 et seq., and 67426.1 through 67428.1

- **Freon (chlorofluorocarbon and hydrochlorofluorocarbon refrigerants)**: HSC, Sections 25143.2 and 25143.9

**California Fire Code**

The California Fire Code, Article 80, includes specific requirements for the safe storage and handling of hazardous materials. These requirements reduce the potential for a release of hazardous materials and for mixing of incompatible chemicals, and specify the following design features to reduce the potential for a release of hazardous materials that could affect public health or the environment:

- Separation of incompatible materials with a noncombustible partition.
- Spill control in all storage, handling, and dispensing areas.
- Separate secondary containment for each chemical storage system. The secondary containment must hold the entire contents of the tank, plus the volume of water needed to supply the fire-suppression system for a period of 20 minutes in the event of a catastrophic spill.
The California Fire Code, Article 79, includes specific requirements for the safe storage and handling of flammable and combustible liquids. Specific requirements address fire protection; prevention and assessment of unauthorized discharges; labeling and signage; protection from sources of ignition; specifications for piping, valving, and fittings; maintenance of aboveground tanks; requirements for storage vessels, vaults, and overfill protection; and requirements for dispensing, using, mixing, and handling of flammable and combustible liquids.

**California Vehicle Code Section 38366**

The California Vehicle Code, Section 38366, requires spark-arresting equipment on vehicles that travel off-road. This code applies to the proposed Project because the vehicles that construct proposed facilities in off-road areas would be required to have spark-arresting equipment to reduce the risk of wildfires.

**Local**

**Certified Unified Program Agency**

As the CUPA for the City, LAFD maintains the records regarding location and status of hazardous materials sites in the City and administers programs that regulate and enforce the transport, use, storage, manufacturing, and remediation of hazardous materials. By designating a CUPA, the City has accurate and adequate information to plan for emergencies and/or disasters and to plan for public and firefighter safety.

At the local level, LAFD in their role as the CUPA monitors the storage of hazardous materials for compliance with local requirements. Specifically, businesses and facilities that store more than threshold quantities of hazardous materials as defined in California HSC Code Chapter 6.95 are required to file an Accidental Risk Prevention Program with LAFD. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. LAFD also has the authority to administer and enforce federal and state laws and local ordinances for USTs. Plans for the installation, modification, upgrade, and removal of USTs are reviewed by LAFD inspectors.

In addition, the LA FD CUPA oversees and addresses issues relating to the presence and handling of contaminated soils that may be present at the proposed Project area. Any such hazardous materials that may be encountered would be managed (using tools, such as a Soil Management Plan [SMP]) in accordance with all relevant and applicable federal, state, and local laws and regulations that pertain to the use, storage, transportation and disposal of hazardous materials and waste. The SMP, if required, would describe the methodology to identify and manage (reuse or off-site disposal) contaminated soil during soil excavation and/or construction; provide protocols for confirmation sampling, segregation and stockpiling, profiling, backfilling, disposal, guidelines for imported soil, and backfill approval from the City’s Department of Building and Safety (DBS); and describe the methodology to manage underground features that may be encountered during construction. The LA FD may consult with other agencies (e.g., DTSC and the Los Angeles RWQCB) if the nature of the contamination warrants the involvement of these agencies.
The LAFFD also administers the applicable sections of the Los Angeles City Fire Code, including Division 8, Hazardous Materials Disclosures. Those businesses that store hazardous waste or hazardous materials must submit a Certificate of Disclosure to the LAFFD.

**City of Los Angeles Emergency Management Department (EMD) and Emergency Operations Organization (EOO)**

The City of Los Angeles EMD leads the City's effort in the development of citywide emergency plans, revises and distributes the Emergency Operations Plan and Master Procedures and Annexes and updates and disseminates guidelines for the emergency response and recovery plans. The City EMD has five divisions compromised of administrative staff and specialists that work with City departments, municipalities, and community-based organizations to ensure that the City and its residents have the resources and information needed to prepare, respond, and recover from emergencies, disasters and significant events.

The EOO is the operational department of the City responsible for the City's emergency preparations (planning, training and mitigation), response, and recovery operations. The EOO comprises all agencies of the City's government, and centralizes command and information coordination. Each City agency, in turn, has operational protocols, as well as plans and programs, to implement EOO protocols and programs (EMD 2022).

**Emergency Operations Plan**

The Emergency Operations Plan (EOP) for the City of Los Angeles, including Appendices and Annexes, addresses the City’s response from small- to large-scale emergency situations associated with natural disasters or human caused emergencies. The EOP describes the methods for carrying out emergency operations, the process for rendering mutual aid, the emergency services of governmental departments and agencies, how resources are mobilized, how the public will be informed and the process to ensure continuity of government during an emergency or disaster (EMD 2018).

**2018 City of Los Angeles Local Hazard Mitigation Plan**

The City EMD prepares and updates the City’s Local Hazard Mitigation Plan (LHMP), which assesses risks posed by natural hazards and develops a mitigation action plan for reducing the risks to people, property, economy, and the environment in the City. The current LHMP was adopted in 2018 and is due to be updated in 2024. The LHMP complies with federal and state hazard mitigation planning requirements to establish eligibility for funding under the Federal Emergency Management (FEMA) grant programs. Section 4.9 of the LHMP outlines legal and regulatory resources for hazard mitigation (City of Los Angeles 2018).

**General Plans**

The available General Plans for jurisdictions in the proposed Project area have been reviewed for objectives and policies relevant to the proposed Project. Select goals and policies are highlighted below. General Plan documents typically also include programs/implementation measures (e.g., hazards mitigation plans, emergency preparedness plans) to ensure the prevention of hazards and
hazardous materials impacts. The proposed Project would be required to ensure compliance with General Plan goals and policies listed below.

City of Los Angeles General Plan
The Safety Element of the City of Los Angeles General Plan (City of Los Angeles 1996) provides a contextual framework for understanding the relationship between hazard mitigation, response to a natural disaster and initial recovery from a natural disaster. Relevant goals, objectives, and policies of the General Plan include:

**Goal 1:** A city where potential injury, loss of life, property damage and disruption of the social and economic life of the City due to fire, water related hazard, seismic event, geologic conditions, or release of hazardous materials disasters is minimized.

**Objective 1.1** Implement comprehensive hazard mitigation plans and programs that are integrated with each other and with the City’s comprehensive emergency response and recovery plans and programs.

**Policy 1.1.1 Coordination:** Coordinate information gathering, program formulation and program implementation between City agencies, other jurisdictions and appropriate public and private entities to achieve the maximum mutual benefit with the greatest efficiency of funds and staff.

**Policy 1.1.2 Disruption reduction:** Reduce, to the greatest extent feasible and within the resources available, potential critical facility, governmental functions, infrastructure, and information resource disruption due to natural disaster.

**Policy 1.1.3 Facility/systems maintenance:** Provide redundancy (back-up) systems and strategies for continuation of adequate critical infrastructure systems and services so as to assure adequate circulation, communications, power, transportation, water and other services for emergency response in the event of disaster related systems disruptions.

**Policy 1.1.4 Health/environmental protection:** Protect the public and workers from the release of hazardous materials and protect City water supplies and resources from contamination resulting from accidental release or intrusion resulting from a disaster event, including protection of the environment and public from potential health and safety hazards associated with program implementation.

**Policy 1.1.5 Risk reduction:** Reduce potential risk hazards due to natural disaster to the greatest extent feasible within the resources available, including provision of information and training. [All programs that incorporate current data, knowledge, and technology in revising and implementing plans (including this Safety Element), codes, standards and procedures that are designed to reduce potential hazards and risk from hazards potentially associated with natural disasters implement this policy.]

**Policy 1.1.6 State and federal regulations:** Assure compliance with applicable state and federal planning and development regulations, e.g., Alquist-Priolo Earthquake Fault Zoning Act, State Mapping Act and Cobey-Alquist Flood Plain Management Act.
Goal 2 A city that responds with the maximum feasible speed and efficiency to disaster events so as to minimize injury, loss of life, property damage and disruption of the social and economic life of the City and its immediate environs.

Objective 2.1 Develop and implement comprehensive emergency response plans and programs that are integrated with each other and with the City’s comprehensive hazard mitigation and recovery plans and programs.

Policy 1.1.6 Standards/fire. Continue to maintain, enforce, and upgrade requirements, procedures, and standards to facilitate more effective fire suppression. [All peak load water and other standards, code requirements (including minimum road widths, access, clearances around structures) and other requirements or procedures related to fire suppression implement this policy.]

Silver Lake-Echo Park-Elysian Valley Community Plan

The goal of the Silver Lake-Echo Park-Elysian Valley Community Plan (Community Plan) is to promote an arrangement of land uses, streets, and services which encourage and contribute to the economic, social, and physical health safety, welfare and conveniences of the people who live and work in the community (City of Los Angeles 2004). Part of this plan includes providing adequate services in response to a variety of emergencies, including fires. Relevant goals and policies of the Community Plan include:

Goal 1-6: Limit the density of residential development in hillside areas to that which can reasonably be accommodated by infrastructure and natural topography.

Policy 1-6.2: Ensure the availability of adequate sewers, drainage facilities, fire protection services and facilities and other public utilities to support development within hillside areas.

3.9.3 Significance Thresholds and Criteria

The significance criteria used to evaluate the proposed Project impacts to hazards and hazardous materials are based on Appendix G of the CEQA Guidelines. According to Appendix G of the CEQA Guidelines, the proposed Project would have a significant impact if it would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or 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. (Refer to Impact 3.9-1)
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. (Refer to Impact 3.9-2)
- 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, create a significant hazard to the public or the environment. (Refer to Impact 3.9-3)
- 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 or excessive noise for people residing or working in the proposed Project area. (Refer to Impact 3.9-4)
• Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. (Refer to Impact 3.9-5)

• Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. (Refer to Impact 3.9-6)

In addition, the 2006 L.A. CEQA Thresholds Guide holds that the determination of significance shall be made on a case-by-case basis after considering the following factors:

Risk of Upset/Emergency Preparedness

• The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; (Refer to Impact 3.9-1)

• The degree to which the project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences; and (Refer to Impact 3.9-5)

• The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance. (Refer to Impact 3.9-1)

Human Health Hazards

• The probable frequency and severity of consequences to people from exposure to the health hazard; and (Refer to Impact 3.9-1)

• The degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard. (Refer to Impact 3.9-1)

Methodology

The Phase I for the proposed Project was conducted in accordance with the ASTM Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E1527-21), as well as with the USEPA Final Rule regarding Standards and Practices for All Appropriate Inquiries (70 Federal Register [FR] 66070, November 1, 2005; 40 Code of Federal Regulations [CFR] Part 312) (AAI Rule).

Tasks performed for the Phase I included (1) site reconnaissance at the SLRC to verify current proposed Project area conditions and check for visible evidence of previously disposed and/or currently present hazardous waste, surface contamination, underground storage tanks (USTs), aboveground storage tanks (ASTs), and other environmental hazards; (2) review of currently and readily available documents, including maps, aerial photographs, governmental databases of known hazardous waste sites and USTs, other consultant reports (if any), fire insurance maps, and other accessible records; and (3) consultation with appropriate governmental agencies having jurisdiction related to past history of the proposed Project site, complaints, or incidents in the immediate area and permits that may have been issued.

Information for this assessment of impacts relative to emergency response, wildfire, and airport hazards is based on a review of literature research (e.g., General Plan documents, fire severity zone maps provided by CAL FIRE). The proposed Project would be regulated by the laws, regulations, and policies summarized in Section 3.9.2, Regulatory Framework. Compliance by the proposed Project with applicable federal, state, and local laws and regulations is assumed in this
analysis, and local and state agencies would be expected to continue to enforce applicable requirements to the extent that they do so now.

### 3.9.4 Project Design Features

The following Project Design Features (PDF) would be implemented for the proposed Project.


### 3.9.5 Impacts and Mitigation Measures

#### Hazardous Materials

**Impact 3.9-1:** Would the proposed Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or 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?

**Construction**

As described in Section 2.6, *Project Construction*, construction activities within the proposed Project area would include demolition, mass grading, excavation, trenching, new building construction, asphalt paving, architectural coating, piling within reservoir beds, and landscaping. The construction activities described above would require the use of heavy equipment such as trucks, bulldozers, concrete mixers, and excavators, and deliveries of fuel would occur daily to refuel equipment in staging and stockpiling areas. These construction activities would involve the temporary transport, storage, use, and disposal of hazardous materials, which could include, but not be limited to, fuels, oils and lubricants, solvents and cleaners, cements and adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures. In addition, LADWP currently stores water treatment chemicals (i.e., sodium thiosulfate and bleach) at the existing Silver Lake Chlorination Station, in the vicinity of the proposed construction areas. Accidental release of these materials could potentially impact construction workers, contaminate soil, and/or affect nearby groundwater bodies, or surface water bodies, including the on-site reservoirs. Further, the use of potentially flammable and explosive materials during construction would temporarily increase the probable frequency and severity of consequences to workers or property in the event of an accidental release or ignition.

Once an operator has been determined, the operator and the City would be required to implement emergency response planning and training procedures at the proposed Project site in accordance with a Consolidated Emergency Response/Contingency Plan (CERC) regulated by the LAFD CUPA. The CERC includes procedures for preventing and mitigating hazardous materials releases, emergency evacuation, and worker training, lists on-site emergency equipment, and includes existing arrangements for emergency services (LADWP 2020a). At the discretion of the LAFD CUPA, LADWP may be required to revise the CERC to incorporate proposed changes to
hazardous materials handling and waste generation at the Project site, or submit new emergency response, contingency, and/or evacuation plans. Continued compliance with applicable CUPA program requirements would ensure that impacts to workers, the public, and the environment related to hazardous materials release from the Silver Lake Chlorination Station would remain less than significant.

Proposed upgrades to the existing Silver Lake Recreation Center in the South Valley zone would require demolition of 8,200 square feet of building material. As the Silver Lake Recreation Center originally built in the 1930s and was expanded in the mid-1980s, demolition of existing structures would potentially generate hazardous waste that would require disposal including ACM and LBP. Other hazardous debris would potentially be generated during removal of hardscapes throughout the proposed Project site. If improperly handled, hazardous materials containing ACM and LBP could result in significant impacts to human health or contamination of the surrounding environment.

All construction activities would be required to comply with various hazardous materials regulations (See Section 3.9.2, Regulatory Framework) designed to ensure that hazardous materials are transported, used, stored, and disposed of in a safe manner to protect worker safety, and to reduce the potential for a release of construction-related fuels or other hazardous materials into the environment. Construction projects that disturb one acre of land or more are required to obtain coverage under the NPDES Construction General Permit (see Section 3.9.2, Regulatory Framework). The SWPPP required by the NPDES Construction General Permit would include spill prevention measures to avoid and, if necessary, clean up accidental releases of hazardous materials. Compliance with all NPDES Construction General Permit requirements including the preparation and implementation of a SWPPP and associated BMPs would minimize the potential for mishandling and/or the release of hazardous materials. Examples of BMPs include controlling runon and runoff from the site; avoiding overtopping construction equipment fuel tanks; routine maintenance of construction equipment; and proper disposal of discarded containers of fuels and other chemicals. During ground disturbing activities in proximity to the reservoir, it is anticipated that BMPs to contain soils and materials from dumping or spreading into the reservoirs would involve removal of hardscape above the water line, replanting/installation of terraces, and installation of netting. In addition, California Code of Regulations (CCR) Title 8 requires hazardous building materials, such as ACM and LBP, to be removed from the proposed Project site prior to the start of demolition activities.

Compliance with applicable federal, state, and local standards is required; therefore, construction impacts related to the transport, use, or disposal of hazardous materials or accidental release of hazardous materials, and construction impacts to the frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of hazardous substances, would be less than significant.

**Mitigation Measures:**

None Required
Significance Determination:

Less than Significant Impact

Operation

Once constructed, the proposed Project would be a public park with facilities and improvements throughout all seven park zones including embankment enhancement, habitat terraces, seating terraces, and lookouts around the reservoirs; walking paths, play areas, ornamental gardens, lawn areas, picnic grove, new and enhanced habitat areas, new Education Center; and at the South Valley a new Multi-Purpose Facility along with relocated or expanded Recreation Center and other associated facilities including parking, and a renovated Dog Park. The proposed Project site would be operated similar to existing conditions. No facilities are proposed that would require substantial amounts of new hazardous materials being transported, stored, or used within the proposed Project area. As discussed in Section 2.7, Project Operations and Maintenance, the proposed Project would require routine cleaning and maintenance of park spaces and park facilities, clearing paths and walkways, trash removal, and cleaning of park facilities such as the proposed Education Center, Multi-Purpose Facility, and restrooms. Thus, minimal amounts of hazardous materials such as fuels and oils associated with maintenance vehicles and equipment would be transported to the SLRC and used in the proposed Project area. Maintenance activities for the proposed habitat areas and ornamental gardens may involve periodic use of herbicide to remove invasive species and/or light applications of compost or fertilizer. However, herbicide application would not include the use of neonicotinoids, which have been linked to bee deaths and are also harmful to humans.

The proposed Project is required to comply with applicable federal, state, and local standards and would implement BMPs for handling hazardous materials. As stated above in the discussion of construction impacts, once an operator has been determined, the operator and the City would update its CERC or develop new emergency plans and procedures for mitigating hazardous materials releases, emergency evacuation, and worker training. Therefore, operation related impacts related to the transport, use, or disposal of hazardous materials or accidental release of hazardous materials would be considered less than significant. In addition, since the proposed Project would include limited changes to hazardous materials use and storage at the Project site compared to existing operations, less-than significant impacts would occur with regard to the frequency or severity of a potential accidental release or explosion of a hazardous substance during operations.

The proposed Project would construct wetland terraces and floating wetlands that would have the potential to support substantial vector populations capable of transmitting diseases or causing nuisances to people, such as mosquitoes. Significant management problems related to mosquito control could occur if the wetland habitats do not also provide habitat for beneficial predators that feed on mosquito adults and larvae, such as birds, frogs, fish, and insects. The City would prepare Wetlands Management Plan section to be included as part of the Operation and Maintenance Plan (Refer to Section 2.7.1, Operations and Maintenance Plans). The plan would outline methods and procedures to ensure design and maintenance of wetland habitats provide for a healthy array of predator species to reduce potential mosquito populations. Therefore, impacts related to the
exposure of people to health hazards due to vector populations are considered less than significant.

**Mitigation Measures:**

None Required

**Significance Determination:**

Less than Significant Impact

### Hazardous Materials Near Schools

**Impact 3.9-2:** Would the proposed Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

**Construction**

As discussed in Impact 3.9-1, construction of the proposed Project and offsite improvements would require the routine transport, use, storage, and/or disposal of the hazardous materials. Materials that would be transported on nearby haul routes would include fuels, oils and lubricants, solvents and cleaners, cements and adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures. In addition, demolition of existing structures in the Project area would potentially generate hazardous waste that would require disposal including ACM and LBP. The materials that would be used during construction are not acutely hazardous. However, the routine transport, use, storage, and/or disposal of the hazardous materials listed above in proximity to existing schools would have the potential to impact the probable frequency and severity of consequences to students, staff, as well as the general public as a result of a potential accidental release or explosion of hazardous substances, or health hazards. As discussed in Section 3.3, *Air Quality*, children are most sensitive to hazardous emissions containing high levels of particulate matter, and exposure to lead in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

The nearest school in the vicinity of the proposed Project is the Neighborhood Nursery School (2700 Tesla Avenue, Los Angeles) at the northeast boundary of the SLRC. Other schools that are located approximately one-quarter mile from the proposed Project site along roads that may be construction haul routes include: St. Theresa of Avila Elementary (2215 Fargo Street, Los Angeles), southeast of the proposed Project site along Glendale Boulevard; Camelot Kids Preschool (2880 Rowena Avenue), north of the proposed Project site; and Ivanhoe Elementary School (2828 Herkimer Street, Los Angeles), north of the proposed Project site along Rowena Avenue. It is anticipated that construction equipment and vehicles transporting hazardous materials to the proposed Project area would enter/exit the site from existing access points along Silver Lake Boulevard at Armstrong Avenue or the Dog Park. The primary route that would be used for construction trips would be northeast of the proposed Project site, and involve transport of materials along Silver Lake Boulevard, Glendale Boulevard, and Fletcher Drive before accessing State Route 2 (SR-2) and Interstate-5 (I-5) freeways. Based on the anticipated route of travel, the proposed construction haul routes would not transport hazardous materials in the vicinity of an existing or proposed schools.
Potential impacts of the proposed Project related to the exposure of sensitive receptors, including children at nearby schools, to hazardous air emissions are discussed in Section 3.3, *Air Quality*. The analysis concluded that the proposed Project would not cause or contribute to the exposure of sensitive receptors to ground-level particulate matter concentrations in excess of health-protective level during short-term and temporary construction activities. In addition, Title 8 of the CCR requires hazardous building materials including LBP, to be removed from the proposed Project site prior to the start of demolition activities.

It should be noted that water treatment chemicals are also currently stored in the Silver Lake Chlorination Station within the LADWP-owned portion of the SLRC. However, since these areas would not be demolished or otherwise affected as part of construction, and the water treatment chemicals would continue to be stored and used similar to existing conditions, new impacts related to accidental release of water treatment chemicals would not occur.

Construction activities for the proposed Project and offsite improvements would comply with federal, state, and local regulations to reduce the probable frequency and severity of consequences to nearby schools as a result of a potential accidental release or explosion of hazardous substances, or health hazards. Compliance all applicable regulations is required and would ensure impacts would remain less than significant.

**Mitigation Measures:**
None Required

**Significance Determination:**
Less than Significant Impact

**Operation**
As discussed above for Impact 3.9-1, operation of the proposed Project would require transport and use of minimal amounts of hazardous materials, such as fuels and oils associated with vehicles and equipment during routine maintenance activities. Existing storage of water treatment chemicals at the Silver Lake Chlorination Station and water treatment activities, which are outside of the proposed Project area, but within the SLRC would continue similar to existing conditions, and no new impacts associated with accidental release of water treatment chemicals are anticipated.

As discussed above for Impact 3.9-1, the City would prepare a Wetlands Management Plan as part of the Operations and Maintenance Plan (Refer to Section 2.7.1, *Operations and Maintenance Plans*). The plan would outline methods and procedures to ensure design and maintenance of wetland habitats to minimize vectors including mosquito populations. Therefore, impacts to human health are considered less than significant.

No other facilities are proposed that would require substantial amounts of hazardous materials being transported, stored, used, or disposed of at the SLRC. Compliance with applicable federal, state, and local standards for handling hazardous materials during operations is required.
Therefore, operational impacts to schools within one-quarter mile of the proposed Project would be less than significant.

**Mitigation Measures:**
None Required

**Significance Determination:**
Less than Significant Impact

### Hazardous Material Site Listing

**Impact 3.9-3:** Would the proposed 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 it create a significant hazard to the public or the environment?

**Construction**

According to the Phase I prepared for the proposed Project, the SLRC includes two sites that are on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (See Appendix I to this Draft EIR). The Silver Lake Chlorination Station, which stores bleach and sodium thiosulfate for reservoir water treatment, is listed as an active Hazardous Waste Generator and is permitted with the local CUPA. In addition, the Silver Lake and Ivanhoe Reservoirs Aeration and Recirculation Systems Project is listed as a permitted use under Clean Water Act Section 401. Based on the lack of reported spills, leaks, or violations from the site listings, these sites have been determined to not pose a material threat of a future release of hazardous materials. In addition, all of these listed facilities are located outside of the proposed Project area and within the LADWP-managed areas. The proposed Project would not include physical alterations to the listed facilities, nor would it involve activities that could increase the likelihood of hazardous materials release from the sites into the Project area. Therefore, no impact would occur.

**Mitigation Measures:**
None Required.

**Significance Determination:**
No Impact.

**Operation**

As described above, two hazardous materials sites in the proposed Project area are included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Operation of the proposed Project would not include activities that would affect transport, use, or storage of hazardous materials at the listed sites. Compliance with applicable federal, state, and local standards for transport, use, and disposal of hazardous materials is required. Therefore, no impact would occur.

**Mitigation Measures:**
None Required
Significance Determination:
Less than Significant Impact

Safety Hazards Near Airport
Impact 3.9-4: 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 proposed Project result in a safety hazard or excessive noise for people residing or working in the proposed Project area?

Construction/Operation
The proposed Project area would be located outside of the AIAs for the operational airports in Los Angeles County, and would not be located within two miles of a public airport or a public use airport (ALUC 2004). The nearest airport is Bob Hope Airport, located approximately 8.5 miles northwest of the proposed Project area. Therefore, the proposed Project would not result in an airport-related safety hazard for people residing or working in the proposed Project area. No impact would occur.

Mitigation Measures:
None Required

Significance Determination:
No Impact

Emergency Preparedness
Impact 3.9-5: Would the proposed Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Construction
As stated in the discussion for Impact 3.9-1, LADWP implements emergency response planning and training procedures at the proposed Project site in accordance with a CERC regulated by the LAFD CUPA. At the discretion of the LAFD CUPA, LADWP may be required to revise the CERC to incorporate proposed changes to hazardous materials handling and waste generation at the Project site, or submit new emergency response, contingency, and/or evacuation plans. Continued compliance with applicable CUPA programs regulating emergency response and emergency evacuation planning is required. Therefore, the proposed Project would not impair implementation of or physically interfere with the CERC.

City evacuation routes consist of major interstates, highways, and primary arterials in the proposed Project area. Some potential evacuation routes have been pre-selected by the City based on a number of considerations (e.g., tsunami evacuation routes in coastal areas), while other routes are shared in real time depending on which disaster and suitable evacuation routes are identified. The City’s All-Hazard Mitigation Plan, EOP, and Safety Element do not identify any specific evacuation routes in the vicinity of the proposed Project area (City of Los Angeles 2018, 1996; EMD 2018). However, while there are no evacuation routes have been pre-selected by the
City for use during hazards or disasters, Silver Lake Boulevard is the nearest arterial roadway and would be the most likely evacuation route that could be used during a natural hazard or disaster.

Construction activities would be confined primarily to within the perimeter of the SLRC and would not impact surrounding roadways or restrict access for emergency vehicles. However, during construction of offsite improvements, such as trenching of drainage and underground utilities, and restriping along Silver Lake Boulevard for the addition of parking spaces and/or bike lanes, partial road closures would be required that would temporarily affect emergency response times. These closures would be temporary, lasting approximately 2.5 weeks. The proposed Project would include implementation of PDF-TRA-1 and PDF-TRA-2, requiring the implementation of a traffic management plan and construction staging plan which would include detour routes and BMPs, as well as coordination with and advance notice to local emergency providers. In addition, PDF-TRA-3 would require construction trips to be scheduled during off-peak hours, and PDF-TRA-4 would ensure that temporary access shall be provided to any parcels that may be impacted by construction (Refer to Section 3.16, Transportation). Impacts would be considered less than significant.

**Mitigation Measures:**
- None Required

**Significance Determination:**
- Less than Significant Impact

**Operation**

It is expected that visitorship to the proposed Project area would increase at the completion of construction once each park zone is finalized. As described in Chapter 2, Project Description, visitorship within each park zone would increase as detailed in Tables 2-7 and 2-8. Operation and maintenance activities within the proposed Project area would be similar to current conditions respective to emergency response and evacuation. A small number of daily vehicle trips for new workers and security personnel (approximately five workers daily) would travel on roadways to the proposed Project area. During public events PDF-TRA-5 would ensure that event permittees develop a site-specific traffic control plan to minimize congestion and vehicle miles traveled. Traffic control strategies for events will include inbound/outbound flex lanes and sheriff-controlled intersections. Traffic control plans will also identify nearby public parking facilities and identify passenger pick-up/drop-off locations. Permittees will be required to consider the cumulative traffic impacts of their event in relation to other events in the Project area. The traffic control plans will also identify emergency services egress and access. Therefore, the anticipated increases to visitorship and traffic volumes during operation of the proposed Project would not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan (Refer to Section 3.16, Transportation). Impacts would be considered less than significant.

**Mitigation Measures:**
- None Required
Significance Determination:
Less than Significant Impact

Wildland Fires
Impact 3.9-6: Would the proposed Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Construction
The proposed Project would be located within an LRA VHFHSZ. As discussed in Impact 3.19-2 in Section 3.19, Wildfire, the operation of construction equipment and vehicles and use of combustible materials, such as diesel fuel, could pose a wildfire risk to people and property with possible ignition sources such as internal combustion engines, gasoline-powered tools, and equipment that could produce a spark, fire, or flame during construction. However, all personnel within the proposed Project area would be required to comply with PRC Sections 4427, 4428, 4431, and 4442, which are regulations relating to the handling of combustible fuels and equipment that can exacerbate fire risks. During construction, adherence to existing State and local fire hazard regulations would ensure that any risk to exacerbate wildfire would be remain less than significant. Additionally, all construction activities and crews must comply with fire protection and prevention requirements specified by the CCR and Cal/OSHA. This includes various measures such as easy accessibility of firefighting equipment, proper storage of combustible liquids, no smoking in service and refueling areas, and worker training for firefighter extinguisher use. The risk of construction-based ignition events could also be exacerbated by Santa Ana winds, which are known to occur in the proposed Project region. However, through compliance with federal, State, and local regulations as discussed above, impacts would be considered less than significant.

As discussed in Section 3.14, Public Services, fire protection services, and emergency response services (including ambulance services) would be met with existing facilities and staff levels. Project areas, including the proposed buildings would be equipped with a fire protection system. The firewater supply and pumping system would provide the code-required quantity of firefighting water to yard hydrants, hose stations, and water spray and sprinkler systems. Therefore, the proposed Project would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility, and proposed Project construction would not adversely affect existing service ratios, response times, or other performance objectives. Impacts would be less than significant.

Mitigation Measures:
None Required

Significance Determination:
Less than Significant Impact

Operation
Once operational, the proposed Project would become a public park and recreation center and would largely resemble existing conditions for wildfire. Operation-related activities would
involve the use of a limited number of maintenance trucks for inspections and material delivery, and new staff vehicles. These trucks and personal vehicles would be limited to established access roads and parking lots, which have a low potential of producing sparks, fire, or flame, which could result in uncontrolled spread of wildfire. Furthermore, the majority of the proposed Project area would include the existing reservoirs, which would pose little risk to exacerbate wildfire, and the proposed Project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

As discussed in Section 2.7.1, *Operations and Maintenance Plans*, the City would prepare a Brush Clearance Plan to be included as part of the Operations and Maintenance Plan and would comply with PDF-WF-5 which outlines brush clearing activities. The proposed Project would continue to allow the City and the County of Los Angeles Fire Departments to use the reservoir water for firefighting purposes, similar to existing conditions. The City would coordinate with LAFFD to ensure the Project area is maintained in accordance with the Brush Clearance Plan and the Fire Code (L.A.M.C. 57.322) on all native brush, weeds, grass, trees, and hazardous vegetation within 200 feet of any structures/buildings, and within 10 feet of any combustible fence or roadway/driveway used for vehicular travel. The Operations and Maintenance Plan would identify evacuation routes and protocols that are consistent with existing evacuation routes and protocols identified by RAP and LAFFD for the proposed Project area. The proposed Project would not expose people or structures to significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

**Mitigation Measures:**
None Required

**Significance Determination:**
Less than Significant Impact

**Safety Hazards Near Private Airstrip**

**Impact 3.9-7:** Would the proposed Project be located within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the Project area?

**Construction/ Operation**

As discussed above for Impact 3.9-4, the nearest airport to the proposed Project would be Bob Hope Airport, located approximately 8.5 miles to the northwest. No private airstrips would be located in the vicinity of the proposed Project. Therefore, the proposed Project would not result in an airport-related safety hazard for people residing or working in the proposed Project area. No impact would occur.

**Mitigation Measures:**
None Required

**Significance Determination:**
No Impact
Cumulative Impact

Impact 3.9-8: Would the proposed Project construction and operation, when considered with related projects in the geographic scope, result in a cumulatively considerable impact to hazards and hazardous materials?

Table 3-2 identifies thirteen related projects that are planned or are under construction within the Project area. The geographic scope of analysis for cumulative hazards and hazardous materials impacts is limited to the Project site and its immediately adjacent area. This is because impacts relative to hazards and hazardous materials are generally site-specific. For example, hazardous materials incidents tend to be limited to a smaller and more localized area surrounding the immediate spill location and extent of the release, and could only be cumulative if two or more hazardous materials releases spatially overlapped. Two of the thirteen related projects listed in Table-3-2 are adjacent to the proposed Project. Related Project 13 includes water infrastructure improvements within Silver Lake and Ivanhoe Reservoirs at Project site and Related Project 14 would involve sidewalk repairs along roadways located adjacent to the Project site. Construction activities for the projects would require temporary use, storage, and transport of hazardous materials (e.g., equipment, oils, and fuel) and staging in rights of way that would have the potential to result in impacts related to the accidental release of hazardous materials and emergency access. Once constructed, Related Projects 13 and 14 would not involve substantial hazardous materials use (LADWP 2020b; City of Los Angeles 2019). Thus, operational impacts of the related projects are considered less than significant.

The Project would have no impact with respect to proximity to airports. Accordingly, the Project could not contribute to cumulative impacts related to this topic and this topic is not discussed further. To minimize the potential for hazards, all construction and operational activities would be required to comply with hazardous materials regulations designed to ensure that hazardous materials are transported, used, stored, and disposed of in a safe manner to protect worker safety, and to reduce the potential for a release of construction-related fuels or other hazardous materials into the environment (See Section 3.9.2, Regulatory Framework). Construction contractors would be required to implement BMPs for handling hazardous materials during construction activities, including following manufacturers’ recommendations and regulatory requirements for: use, storage, and disposal of chemical products and hazardous materials used in construction; avoiding overtopping construction equipment fuel tanks; routine maintenance of construction equipment; and proper disposal of discarded containers of fuels and other chemicals. The California Fire Code would also require measures for the safe storage and handling of hazardous materials.

The proposed Project would also include implementation of PDF-TRA-1 and PDF-TRA-2, requiring the implementation of a traffic management plan and construction staging plan which would include detour routes and BMPs, as well as coordination with and advance notice to local emergency providers. In addition, PDF-TRA-3 would require construction trips to be scheduled during off-peak hours, and PDF-TRA-4 would ensure that temporary access shall be provided to any parcels that may be impacted by construction (Refer to Section 3.16, Transportation).
Therefore, based on compliance with these requirements, the proposed Project would not contribute considerably to a cumulative impact related to hazards and hazardous materials. This impact would be less than significant.

**Mitigation Measures:**
None Required

**Significance Determination:**
Less than Significant Impact

### 3.9.6 Summary of Impacts

**Table 3.9-1** summarizes the impact significance determinations and lists mitigation measures related to hazards and hazardous materials.

<table>
<thead>
<tr>
<th>Impact</th>
<th>Mitigation Measure</th>
<th>Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.9-1: Hazardous Materials</td>
<td>None Required</td>
<td>LTS</td>
</tr>
<tr>
<td>3.9-2: Hazardous Materials Near Schools</td>
<td>None Required</td>
<td>LTS</td>
</tr>
<tr>
<td>3.9-3: Hazardous Material Site Listing</td>
<td>None Required</td>
<td>NI</td>
</tr>
<tr>
<td>3.9-4: Safety Hazards Near Airport</td>
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<td>NI</td>
</tr>
<tr>
<td>3.9-5: Emergency Preparedness</td>
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<tr>
<td>3.9-6: Wildland Fires</td>
<td>None Required</td>
<td>LTS</td>
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<tr>
<td>3.9-7: Safety Hazards Near Private Airstrip</td>
<td>None Required</td>
<td>NI</td>
</tr>
<tr>
<td>3.9-8: Cumulative</td>
<td>None Required</td>
<td>LTS</td>
</tr>
</tbody>
</table>

**NOTES:**
NI = No Impact, no mitigation proposed
LTS = Less than Significant, no mitigation proposed
LTSM = Less than Significant Impact with Mitigation Incorporated
SU = Significant and Unavoidable

### 3.9.7 References


