
IV. ENVIRONMENTAL IMPACT ANALYSIS

H. HAZARDS AND HAZARDOUS MATERIALS

INTRODUCTION

Except where footnoted otherwise, this Section is based upon the analysis and conclusions of the Phase I Environmental Site Assessment, Saint Regis Hotel, 2055 Avenue of the Stars, Los Angeles, California, 90067 (the “Phase I ESA”), prepared by IVI International, Inc. June 3, 2003. The Phase I ESA is incorporated as Appendix E to this Draft EIR.

ENVIRONMENTAL SETTING

Existing Project Site

The 3.8-acre project site is located at 2055 Avenue of the Stars in the City of Los Angeles. The project site is developed with a 318-foot-high existing hotel building containing three subterranean levels, and associated garden, parking/circulation, and pool/patio areas. The existing hotel building was constructed in 1984.

The hotel was formerly occupied with mechanical space, storage, housekeeping space, a meeting room, pump room, generator room, and ballroom within the three subterranean levels. The ground level provided a lobby, kitchen, meeting rooms, and restaurant/bar. The second through 31st floors provided 296 guest rooms. The 32nd floor provided a penthouse, mechanical and elevator machine rooms, and an emergency helicopter pad on the rooftop.

The existing structure is constructed of concrete and concrete masonry units (CMUs) in the subterranean levels and steel frame and concrete for the above-grade levels. Interior finishes consist of carpeted and tiled floors (ceramic, concrete, and marble tiles), and painted and papered walls and ceilings. The existing heating and cooling system is provided with steam and chilled water from an offsite central plant that provides these services to much of the Century City area. An emergency generator is located in the first subterranean level. The generator is powered by a 2000-gallon diesel underground storage tank (UST) in the landscaped southeast corner of the project site. The existing building contains eight elevators, including five geared traction elevators, which service all levels, and two hydraulic elevators, which service only the first three floors.

Existing Surrounding Uses

The project site is located in the highly urbanized Century City area of West Los Angeles. The project site is generally surrounded by high-density commercial and residential development, which includes: office and retail uses under construction across Avenue of the Stars north of the project site; office tower, condominium, and hotel uses across Olympic Boulevard east of the project site; condominiums immediately adjacent to the southwest of the project site; and office tower, hotel, and mall/retail uses

immediately adjacent to the northwest of the project site. No industrial or agricultural uses are located in the project vicinity.

Surrounding uses that would be considered sensitive receptors with respect to hazardous material exposure (i.e., areas with potential to contain children under 14, the elderly over 65, or the sick/disabled) would include the condominium development immediately southwest of the project site (i.e., Century Woods homes) and two condominium developments southeast of the project site along Olympic Boulevard (i.e., Park Place homes and Century Hills homes). Other than these residential uses, there are no schools, playgrounds, hospitals, retirement homes, or other areas in the project vicinity which would be likely to contain sensitive receptors. The nearest existing school to the project site is the Beverly Hills High School, located at 241 Moreno Drive in Beverly Hills, approximately 0.40 mile northeast of the project site.¹ The nearest existing Los Angeles Unified School District (LAUSD) schools are located over one mile from the project site.² No LAUSD schools are currently proposed in the project vicinity.³ The nearest private school is located over 0.65 mile from the project site.⁴

Topography

The project site is located in the western portion of the Los Angeles County Coastal Plain. The Coastal Plain is characterized by a deep northwest trending depositional basin bounded to the northeast by the Puente Hills and Whittier faults, to the southwest by the Newport-Inglewood fault zone, and to the southeast by the Santa Ana Mountains. The project site's topographic elevation is approximately 310 feet above mean sea level (msl). The project site is located on a hill, with surrounding properties generally located at lower elevations than the project site. The slope of the project site is generally toward the southwest.

Soils and Hydrology

Based on previous investigations summarized in the Phase I ESA, the project site contains generally silty sand and sand, with minor amounts of clay, silt, and gravel, to a depth of 150 feet below ground surface (bgs). A thin layer of clay underlies the existing hotel building. Groundwater was not encountered

¹ *Thomas Guide, Digital Edition 2003/4, State of California, Version 4.21.05.*

² *Los Angeles Unified School District, Local School District map, website: [http://notebook.lausd.net/pls/ptl/docs/PAGE/CA_LAUSD/LAUSDNET/DISCOVER/MAPS/LOCAL%20DISTRIC TS.pdf](http://notebook.lausd.net/pls/ptl/docs/PAGE/CA_LAUSD/LAUSDNET/DISCOVER/MAPS/LOCAL%20DISTRIC%20TS.pdf), July 29, 2005.*

³ *Los Angeles Unified School District, January 2005 Strategic Execution Plan: Exhibit D, website: <http://www.laschools.org/sep/sep-exhibit-d-project-list-by-district-opt.pdf>, July 29, 2005.*

⁴ *Thomas Guide, Digital Edition 2003/4, State of California, Version 4.21.05.*

during recent borings to a depth of 75 feet bgs.⁵ However, the historic high groundwater level for the site is reported by the California Geologic Survey at a depth of about 50 feet bgs.⁶ The nearest open body of water to the project site is Ballona Creek, which is located approximately 2.9 miles to the southeast at its nearest point to the project site.⁷

Historic Use of Project Site

The Phase I ESA included a review of historical photographs and previous reports for the project site. Based on this review, the Phase I ESA concluded that the project site was mostly vacant as recently as 1938. By 1953, the project site was being used as a “back lot” for 20th Century Fox Studios, providing storage and occasional studio space. In 1984, the existing hotel building and associated amenities were constructed on the project site.

Historic Surrounding Uses

The Phase I ESA also included a review of historical photographs and previous reports with respect to surrounding properties. Based on this review, the Phase I ESA concluded that two oil production wells were located on a property north of the project site, but were abandoned in 1916 and 1944. By 1953, most of the surrounding properties were being used as “back lots” for the 20th Century Fox Studios. Between 1964 and 1997, surrounding properties were developed, including the construction of Avenue of the Stars, Constellation Boulevard, Olympic Boulevard, the Century Plaza hotel northwest of the project site, the Park Place residences east of the project site, two office buildings across Avenue of the Stars north of the project site, a parking garage west of the project site, and residences south of the project site. Since 1966, a dry cleaning operation was in operation in the laundry facility of the adjacent Century Plaza hotel building.⁸

Database Review of Project Site and Surrounding Properties

The Phase I ESA included a search of regulatory agency hazardous materials database listings for the project site and sites within the American Society for Testing Materials (ASTM)-designated search radius (i.e., generally one, one-half, or one-quarter mile radius) of the project site, discussed below.

⁵ *MACTEC Engineering and Consulting, Inc., Report of Geotechnical Investigation Proposed Condominiums, 2055 Avenue of the Stars Century City District of Los Angeles, California, September 6, 2005.*

⁶ *Ibid.*

⁷ *Thomas Guide Digital Edition 2003/4, State of California, Version 4.21.05.*

⁸ *Dames & Moore, Report Phase I Environmental Site Assessment Updated, Century Plaza Hotel, 2025 and 2055 Avenue of the Stars, Los Angeles, California, January 22, 1999.*

Project Site

The project site is located on the Hazardous Waste Information System (HAZNET) database in association with waste removal from the diesel UST in the rear of the project site in 1998.

The project site is not listed on the Emergency Response Notification System (ERNS) list, the Right-to-Know Facility Index System (FINDS) index, or any of the other databases discussed below for the surrounding properties.

Surrounding Properties

The project site is not listed within the ASTM-designated one-mile radius of any National Priority List (NPL) sites; Resource Conservation Recovery Act Correction Action Activity (CORRACTS) sites; or CalSites Annual Work Plan (AWP), Department of Toxic Substance Control (DTSC), or Abandoned Sites Program Information System (ASPIS) sites. The project is not listed within the ASTM-designated one-half mile radius of any Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) listed sites; CERCLIS No Further Remedial Action Planned (NFRAP) sites; or RCRIS Treatment, Storage, Disposal (TSD) lists.

The project site is located adjacent to one RCRIS Generator site, the Century Park Hotel. The project site is listed within the ASTM-designated one-half mile radius of one Solid Waste Facilities (SWF) site, the 20th Century Fox Studios. The project site is listed within the ASTM-designated one-half mile radius of four California Leaking Underground Storage Tank (LUST) sites, including Central Plants, Inc., Arco #1251, Beverly Hills High School, and Chevron. The project site is listed within the ASTM-designated one-quarter mile radius of two California Facility Inventory (FID) sites, the Century Plaza Hotel and Fox Plaza.

Project Site Reconnaissance

The Phase I ESA included site reconnaissance for hazardous materials and substances. None of the following were observed on the project site during the site reconnaissance: above-ground storage tanks (ASTs); solid waste; wastewater discharge, hazardous waste streams; evidence of soil staining, stained pavement, or stressed vegetation; liquid discharges; pools of liquid; pits, ponds, or lagoons; dry wells, irrigation wells, injection wells, observation wells, monitoring wells, potable water wells, or recovery wells; strong odors; air emissions; mold; or friable Asbestos-Containing Material (ACM).⁹ Water at the

⁹ *Friable ACM is defined as any material containing more than one percent asbestos. Friable ACM is more likely to produce airborne fibers than non-friable ACM, and can be crumpled, pulverized, or reduced to power by hand pressure. Non-friable ACM is defined as any material containing one percent or less asbestos. Non-friable ACM cannot be crumpled, pulverized, or reduced to power by hand pressure.*

project site is not expected to contain elevated levels of lead. Radon levels in the Los Angeles County average 0.7 picocuries per liter (pCi/L) which is below the USEPA action level of 4.0 pCi/L.

Chemical Use/Storage

The site reconnaissance observed two 35-gallon containers of lube-oil, paint throughout the existing hotel building, and a 2000-gallon diesel fuel UST on the project site, discussed previously. The storage condition of these materials was considered satisfactory. The UST is approximately 11 years old and contains a leak detection system. The UST is registered with the County of Los Angeles Fire Department and the State HAZNET system, but is not identified in the LUST database.

Sump Pump

The site reconnaissance observed a sump pump on the lowest subterranean level of the existing hotel building, which was used to collect sanitary sewage from the building and pump it to the municipal sanitary sewer. No leaks or odors were observed in association with the pump.

Polychlorinated Biphenyls

Polychlorinated biphenyls (PCBs) are mixtures of chlorinated compounds which can exist as vapor, oily liquids, or solids. PCBs have been used as coolants and lubricants in transformers and other electrical equipment because they do not burn easily and are good insulators. When PCBs leak into the air, water, and soil, they can result in skin rashes and liver damage in humans. PCBs are also likely carcinogens. In 1977 the U.S. government banned the production of PCBs.

The site reconnaissance observed two hydraulic elevators onsite, and two hydraulic trash compactors and one hydraulic box crusher on the adjacent property, which were used by the former St. Regis Hotel. None of these machines are expected to contain PCB hydraulic fluid, as the existing building was built after the 1977 ban on the manufacturing of PCBs.

Asbestos-Containing Materials

Asbestos-containing materials (ACMs) are materials that contain asbestos, a naturally-occurring fibrous mineral that has been mined for its useful thermal properties and tensile strength. When left intact and undisturbed, these materials do not pose a health risk to building occupants. There is, however, potential for exposure when the ACM becomes damaged to the extent that asbestos fibers become airborne and are inhaled. These airborne fibers are carcinogenic and can cause lung disease. The principal federal government agencies regulating asbestos are the Occupational Safety and Health Administration (OSHA) and the Environmental Protection Agency (EPA). The age of a building is directly related to its potential for containing elevated levels of ACMs. Generally, all untested materials are presumed to contain asbestos in buildings constructed prior to 1981. The EPA recommends a proactive in-place management program be implemented wherever ACMs are found in a building; ACMs that are not damaged may

remain in place. The EPA also recommends that damaged ACMs be removed, repaired, encapsulated, or enclosed. Prior to any renovation or demolition activities, the EPA recommends that all ACMs be removed.

Based on a review of previous investigations, the Phase I ESA concluded that the existing hotel building does not contain any friable ACM, but does contain the following non-friable ACM: mastic; vinyl floor tiles; refrigerator sealant; elevator break shoe pads (suspect); and mirror and vanity mastic (assumed). The site reconnaissance observed all previously identified ACM to be in good condition.

Lead-Based Paint

Lead-based paint (LBP), which can result in lead poisoning when consumed or inhaled, was widely used in the past to coat and decorate buildings. Lead poisoning can cause anemia and damage to the brain and nervous system, particularly in children. Like ACMs, LBP generally does not pose a health risk to building occupants when left undisturbed; however, deterioration, damage, or disturbance will result in hazardous exposure. In 1978, the use of LBP was federally banned by the Consumer Product Safety Commission. Therefore, buildings built before 1978 are likely to contain LBP, as well as buildings built shortly thereafter, as the phase-out of LBP was gradual.

Methane Gas

The project site is located in a City of Los Angeles Methane Zone.¹⁰ The presence of methane gas in the subsurface is common within former oil production areas and other locations where organic material is present in the soil. Methane is generated by the biodegradation of organic matter in the absence of oxygen. Methane is not toxic; however, it is combustible and potentially explosive at concentrations above 53,000 parts per million (ppm) in the presence of oxygen. While non-pressurized methane is normally not problematic, if the gas accumulates to high concentrations and becomes pressurized, detectable levels may enter the interior of a structure through cracks or other penetrations present in floor slabs. In accordance with the City of Los Angeles Department of Building and Safety (LADBS) Methane Ordinance, the project site is subject to further subsurface investigation to determine the extent of methane beneath the proposed structures, and to develop an appropriate methane mitigation plan. As established under Sections 91.7101 et seq. of the LAMC, the LADBS has the authority to withhold permits on projects located within a Methane Zone or Methane Buffer Zone. Building permits may be issued upon submittal of detailed plans that show adequate protection against flammable gas incursion by providing the installation of suitable methane mitigation and monitoring systems.

¹⁰ City of Los Angeles Department of City Planning, *Parcel Profile Report: 2055 S Avenue of the Stars, June 30, 2005.*

Methane gas measurements were performed as part of the Report of Methane Soil Gas Testing Proposed Condominiums, 2055 Avenue of the Stars, Century City District of Los Angeles, California, MACTEC Project 4953-05-1852 (the “Methane Report”), prepared by MACTEC, August 22, 2005.¹¹ The Methane Report consisted of a total of 16 soil-gas samples taken on August 12-13, 2005. Eight of the 16 soil-gas samples were taken on August 12 at four gas boring locations on the project site, and the other eight soil-gas samples were taken at the same locations and depths on August 13. The soil-gas samples included two deep borings (i.e., B1 and B2), each at 45, 50, and 65 foot intervals bgs, and two shallow borings (i.e., B3 and B4) each at five feet bgs.

The two deep gas borings indicated design methane concentrations of 408,000 and 250,000 parts per million by volume (ppmv) and gas pressures of 0.61 and 0.7 inches of H₂O, for B1 and B2, respectively. (These were the highest of the measurements from the two sampling dates and of the three depths bored, at each of the B1 and B2 boring locations.)

The two shallow gas probes indicated design methane concentrations of 160,000 ppmv and 270,000 and gas pressures of 0.62 and 0.2 inches of H₂O, for B3 and B4, respectively. (These were the highest of the measurements from the two sampling dates at each of the B3 and B4 boring locations.)

According to Table 71 of Division 71 of the City of Los Angeles Building Code, design methane concentrations greater than 12,500 ppmv require Level V mitigation as outlined in the LADBS’s Standard Plan: Methane Hazard Mitigation.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, a project would have a significant effect on the environment if it would:

- (a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- (b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- (c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

¹¹ See Appendix G.

- (d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment;
- (e) For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area;
- (f) For a project located within the vicinity of a private airport strip, result in a safety hazard for people residing or working in the project area;
- (g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan;
- (h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residence are intermixed with wildlands.

As discussed in the Initial Study (see Appendix A), the proposed project would have no impact with respect to Thresholds (e) and (f), listed above. As such, no further analysis of these topics is required (see also Section IV.A of this Draft EIR).

Furthermore, as set forth in the City of Los Angeles Draft L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following factors:

- (a) The regulatory framework;
- (b) 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;
- (c) The degree to which the project may require a new, or interfere with an existing emergency response evacuation plan, and the severity of the consequences; and
- (d) The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance.

Project Impacts

Routine Transport, Use, or Disposal of Hazardous Materials

The proposed project involves the development of 147 luxury residential condominium units and resident-only amenities, including a business center, screening room, gym, concierge services, valet parking, outdoor swimming pool, spa and deck, and garden. In addition to the resident-only amenities,

the proposed project would incorporate additional amenities that include a 7,000 square foot restaurant and either (a) 27,000 square feet of specialty shops (i.e., shoe repair, salon, or art gallery) or (b) a 43,000-square-foot private membership facility.

While the proposed project would use minimal amounts of hazardous materials for routine cleaning, maintenance, and landscaping, the proposed project would not involve the routine transport, use, or disposal of substantial amounts of hazardous materials. Therefore, the potential impact associated with the routine transport, use, and disposal of hazardous materials would be less than significant.

Accidental Release of Hazardous Materials

Construction

The proposed project would have the potential to result in the accidental release of hazardous materials primarily during the construction phase. The following is a summary of these potential construction-related risks, based on the observations and conclusions of the Phase I ESA, as discussed under “Environmental Setting,” above.

Underground Storage Tank. As discussed previously, the project site contains one UST listed in the CalEPA HAZNET database and registered with the County of Los Angeles Fire Department. The 2000-gallon diesel tank is associated with the emergency power generator in the existing hotel building. Based on the existing leak detection system and the absence of the project site on the LUST database, which lists leaking USTs, the Phase I ESA does not recommend further investigation other than periodic monitoring of the leak detection system and ongoing verification of registration with the proper authorities.

Nonetheless, the construction of the proposed project would involve the removal of the existing UST, and replacement with a new approximately 1,200-gallon diesel UST serving a new emergency power generator in the proposed building. Though unlikely, the removal of the existing UST and its replacement with the new UST could have the potential to expose construction workers and neighboring sensitive receptors to an accidental release of diesel emissions. With the incorporation of Mitigation Measure H-1, identified below and through adherence to all applicable regulations governing USTs, potential impacts related to the existing and proposed USTs would be reduced to less-than-significant levels.

Asbestos-Containing Materials. As discussed previously, the existing hotel building contains the following non-friable ACM: mastic; vinyl floor tiles; refrigerator sealant; elevator break shoe pads (suspect); and mirror and vanity mastic (assumed). The site reconnaissance observed all previously identified ACM in good condition.

The construction of the proposed project would require the removal of the existing hotel building. The exterior wall enclosure would remain in place during “soft” demolition work (i.e., interior walls and equipment). As such, prior to mitigation, construction workers could have the potential to be exposed to airborne ACM during the removal of interior wall, floor, and ceiling coverings.

Other Hazardous Materials. No other hazardous materials beyond those discussed above would have the potential to expose the public to accidental risks during the construction phase of the proposed project. The Phase I ESA concluded the project site does not contain any of the following: ASTs; solid waste; wastewater discharge; hazardous waste streams; evidence of soil staining, stained pavement, or stressed vegetation; liquid discharges; pools of liquid; pits, ponds, or lagoons; dry wells, irrigation wells, injection wells, observation wells, monitoring wells, potable water wells, or recovery wells; strong odors; air emissions; mold; or friable ACM. The project site would not present risks for chemical exposure associated with the existing lube-oil containers and existing paint. The project site would not present risks for sanitary sewer leaks from the existing sump pump. The project site would not present risks associate with the existing hydraulic elevators, trash compactors, and box crusher. Therefore, the proposed project would have a less-than-significant impact with respect to accidental release of hazardous materials other than those associated with the UST and ACM, during the construction phase.

Operation

The proposed project involves the development of luxury residential units and additional amenities, as well as a restaurant and specialty shops or a private membership facility. The proposed project would not expose residents, employees, or visitors to risks associated with UST and ACM, which would be eliminated prior to the construction of the proposed building. The proposed project would not have the potential to expose persons to risks associated with potential for lead poisoning in water or radon exposure. The proposed project would use hazardous materials for routine cleaning, maintenance, and landscaping in small quantities that would not result in substantial risks due to accidental releases.

Methane Gas. As discussed previously, methane gas measurements at the project site in 1987 showed no methane problems as a result of historic oil production in the project vicinity. The updated Methane Report prepared for the project site indicated methane concentrations above 12,500 ppmv in all of the soil-gas samples collected.¹² These levels would therefore require Level V mitigation, based on Methane Mitigation Standards issued by the LADBS. As such, the Methane Report includes a Methane Hazard Mitigation Standard Plan. With the implementation of this Methane Hazard Mitigation Standard Plan, incorporated by reference into Mitigation Measure H-2, impacts related to the exposure of residents, employees, neighbors, and guests to methane gas would be reduced to less-than-significant levels.

¹² MACTEC, *Report of Methane Soil Gas Testing Proposed Condominiums, 2055 Avenue of the Stars, Century City District of Los Angeles, California, MACTEC Project 4953-05-1852 (Methane Report), August 22, 2005.*

Proximity to Schools

Construction

As discussed previously under “Environmental Setting,” the nearest existing and proposed schools are located over 0.25 mile from the project site. Furthermore, the proposed project would not generally pose a substantial risk with respect to the release of hazardous materials during the construction phase, with the exception of the identified UST and ACM.

Operation

As discussed previously under “Environmental Setting,” the nearest existing and proposed schools are located over 0.25 mile from the project site. Furthermore, during the operation of the proposed project, the proposed uses would require, at most, minimal amounts of hazardous materials for routine cleaning and therefore would not use, transport, or dispose of any substantial amount of hazardous substances. In addition, the proposed project would not generally pose a substantial risk with respect to the release of hazardous materials during the operational phase, with the exception of methane gas.

Listed Hazardous Material Sites

As discussed above under “Environmental Setting,” the project site is listed on the HAZNET database in association with waste removal from the diesel UST in the rear of the project site in 1998. The UST is also registered with the County of Los Angeles Fire Department. The project site was not listed on the ERNS list, FINDS index, or any of the other databases discussed below for the surrounding properties.

The project site was not located within the ASTM-designated search distance of any NPL sites, CORRACTS sites, AWP sites, DTSC sites, ASPIS sites, CERCLIS sites, CERCLIS NFRAP sites, or RCRIS TSD sites.

The project site is located adjacent to one RCRIS Generator site, a dry cleaning facility at the Century Park Hotel. The Century Park Hotel is located north of and downgradient from the project site, and there are no known violations associated with this site. Furthermore, preliminary test results in 1999 showed that low action levels of various contaminants were encountered to depths of eight feet below ground level at the dry cleaning facility, all below the action level. As such, this site is not expected to have an adverse effect on the project site.

The project site is located within the ASTM-designated one-half mile radius of one SWF site, at the 20th Century Fox Studios. This site is located approximately 1,800 feet (0.34 mile) southeast of and downgradient from the project site and maintains a status of “to be determined.” Based on the distance from the project site and the presumed directional groundwater flow, this site is not expected to have an adverse effect on the project site.

The project site is located within the ASTM-designated one-half mile radius of four LUST sites, including the Central Plants, Inc. site, Arco #1251, Beverly Hills High School, and Chevron. Both the Central Plants, Inc. site, located approximately 1,200 feet (0.23 mile) east of and crossgradient of the project site, and the Chevron site, located approximately 2,670 feet (0.51 mile) northeast of and downgradient from the project site, are listed as closed.¹³ Based on the closure status, these sites are not expected to have an adverse affect on the project site. The Arco #1251 site, located approximately 2,000 feet (0.38 mile) southwest and downgradient of the project site, is listed in association with a gasoline release in 1985 and is currently undergoing post-remedial action monitoring. Based on the distance from the project site, presumed directional groundwater flow, and regulatory status, this site is not expected to have an adverse effect on the project site. The Beverly Hills High School site, located approximately 2,280 feet (0.43 mile) northeast and downgradient of the project site, is listed for a suspected diesel leak related to a 1998 reported release. Based on distance from the project site, presumed directional groundwater flow, confined degree of contamination (restricted to the soil only), and regulatory status, this site is not expected to have an adverse affect on the project site.

The project site is located within the ASTM-designated one-quarter mile radius of two FID sites, the Century Plaza Hotel and Fox Plaza. The Century Plaza Hotel is located adjacent to and north of the project site, and is downgradient of the project site. The Century Plaza Hotel is listed as having an active 2,000-gallon diesel UST. However, no leaks or other contaminated conditions were identified. Therefore, this site is not expected to have an adverse effect on the project site. The Fox Plaza is located approximately 1,800 feet (0.34 mile) south of and downgradient of the project site. The Fox Plaza is listed as having one active UST; however, the UST is not listed in any other databases. Therefore, this site is not expected to have an adverse effect on the project site.

Overall, due to their distance, regulatory status, and location crossgradient or downgradient from the project site, none of these sites are expected to significantly impact the project site. As such, the proposed project would result in a less-than-significant impact related to known listed hazardous materials sites.

Emergency Response Plan

Construction

The removal of the existing hotel building and the construction of the proposed project would generally occur within the property boundaries of the project site. No pedestrian or vehicular public right-of-way closures are anticipated during the construction phase. Furthermore, the project site is not located along a

¹³ *Closure status is granted to those sites which either: do not exhibit levels of contamination requiring clean-up, have been remediated to the satisfaction of the State, or are not suspected to represent a significant threat to human health or the environment.*

City-selected disaster route.¹⁴ The project site is approximately 0.2 mile west of the (soon to be opened) Century City Doctors Hospital, located at 2070 Century Park East. In the unlikely case of a project construction-related interference along Avenue of the Stars, this would not be expected to affect emergency access to and from the hospital, as Century Park East is parallel to Avenue of the Stars. As such, the construction of the proposed project would not substantially impede public access or travel upon a public right-of-way or interfere with an adopted emergency response or evacuation plan, and impacts would be less than significant.

Operation

As discussed further in Section IV.N (Transportation and Traffic), with the implementation of the Mitigation Measures N-1 and N-2, traffic impacts during construction would be reduced to a less-than-significant level. Furthermore, as discussed in Section IV.N, traffic during operation of the proposed project would not result in a significant impact on any nearby roadways or intersections. The proposed project would not involve any other activities during the operational phase that would impede public access or travel upon public right-of-way or would interfere with an adopted emergency response or evacuation plan. Furthermore, the proposed project would implement those emergency access recommendations made by the City of Los Angeles Fire Department (LAFD) and listed in Section IV.M.1 (Fire Protection). Therefore, impacts related to emergency response and evacuation plan during the operation of the proposed project would be less than significant.

Wildland Fires

The project site is located in the highly urbanized Century City area and is surrounded by urban development for several miles in all directions. The project site does not contain wildlands, and is not located in a Fire Buffer Zone, Mountain Fire District, or proposed Very High Fire Hazard Severity Zone (VHFHSZ).¹⁵ The nearest wildlands are located approximately 1.5 miles north of the project site.¹⁶ As discussed further in Section IV.M.1 (Fire Protection), the project site is within the required fire protection distance for both the proposed residential and commercial uses.¹⁷ Based on the response distance from

¹⁴ City of Los Angeles Department of City Planning, *Environmental and Public Facilities Maps: Critical Facilities and Lifeline Systems in the City of Los Angeles*, September 1996.

¹⁵ City of Los Angeles Department of City Planning, *Parcel Profile Report: 2055 S Avenue of the Stars*, June 30, 2005.

¹⁶ City of Los Angeles Department of City Planning, *Environmental and Public Facilities Maps: Selected Wildfire Hazard Areas in the City of Los Angeles*, September 1996.

¹⁷ Written correspondence from William R. Bamattre, Fire Chief, City of Los Angeles Fire Department, September 21, 2005.

existing fire stations to the project site, it is expected that the proposed project would continue to be adequately served by existing fire protection services. As such, the construction and operation of the proposed project would not have any potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires.

CUMULATIVE IMPACTS

Development of the proposed project in combination with the 66 related projects has the potential to increase the use, storage, transport, and/or accidental release of hazardous materials during construction and operation. However, implementation of the recommended Mitigation Measures H-1 through H-3 would reduce the potential impacts associated with the accidental release of hazardous emissions during construction of the proposed project to less-than-significant levels. With respect to the 66 related projects, each of the related projects would require evaluation for potential threats to public safety, including those associated with routine transport, use, or disposal of hazardous materials; upset and accident conditions involving the release of hazardous materials into the environment; hazardous emissions in proximity to an existing or proposed school; hazardous materials site listing; and interference with an adopted emergency response or evacuation plan. Because hazardous materials and risk of upset conditions are largely site-specific, this would occur for each individual project affected, in conjunction with development proposals on these properties. Further, local municipalities are required to follow local, State, and federal laws regarding hazardous materials and other hazards. Therefore, with compliance with local, State, and federal laws pertaining to hazards and hazardous materials, cumulative impacts would be less than significant.

MITIGATION MEASURES

The following mitigation measures are recommended to address the potential impacts associated with the release of hazardous materials into the environment during the construction of the proposed project:

- (H-1) The existing 2000-gallon diesel underground storage tank (UST) located on the southern portion of the project site shall be removed in accordance with City and State regulations. The proposed new UST shall be designed and sited in accordance with all applicable regulations. The Project Applicant shall ensure that the new UST is registered with the following agencies: the County of Los Angeles Fire Department; the State Department of Toxic Substances Control; and any other applicable governmental agencies.
- (H-2) The Applicant shall follow those specifications identified in the City of Los Angeles Department of Building and Safety's Standard Plan: Methane Hazard Mitigation which is included in the Report of Methane Soil Gas Testing Proposed Condominiums, 2055 Avenue of the Stars, Century City District of Los Angeles, California, MACTEC Project 4953-05-1852, prepared by MACTEC, August 22, 2005 and incorporated as Appendix G to this Draft EIR.

- (H-3) Prior to demolition of all existing onsite structures, all ACM identified in the Asbestos Management Plan Century Plaza Hotel and Tower (2025 Avenue of the Stars) prepared by Harding Lawson Associates, December 10, 1998 and the Asbestos Documentation Review and Assessment Century Plaza Hotel and Tower (2025 Avenue of the Stars) prepared by Citadel, dated December 21, 1998 shall be abated in accordance with City and State regulations.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed project's impacts associated with hazards and hazardous materials would be reduced to less-than-significant levels with the implementation of the recommended mitigation measures.