

## CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY

The Department of Toxic Substances Control (DTSC) has completed the following document for this project in accordance with the California Environmental Quality Act (CEQA) [Pub. Resources Code, div. 13, § 21000 et seq] and accompanying Guidelines [Cal. Code Regs., tit. 14, § 15000 et seq].

PROJECT TITLE: Union Pacific Railroad Beverly Hills Removal Action Workplan		CALSTARS CODING: 301247
PROJECT ADDRESS: 9315 Civic Center Drive	CITY: Beverly Hills	COUNTY: Los Angeles
PROJECT SPONSOR: Union Pacific Railroad Company (UPRR)	CONTACT: Kristen Stevens Union Pacific Railroad	PHONE: (562) 756-0076

APPROVAL ACTION UNDER CONSIDERATION BY DTSC:			
<input type="checkbox"/> Initial Permit Issuance	<input type="checkbox"/> Permit Renewal	<input type="checkbox"/> Permit Modification	<input type="checkbox"/> Closure Plan
<input checked="" type="checkbox"/> Removal Action Workplan	<input type="checkbox"/> Remedial Action Plan	<input type="checkbox"/> Interim Removal	<input type="checkbox"/> Regulations
<input type="checkbox"/> Other (specify):			

STATUTORY AUTHORITY:
<input type="checkbox"/> California H&SC, Chap. 6.5 <input type="checkbox"/> California H&SC, Chap. 6.8 <input checked="" type="checkbox"/> Other (specify): H&SC 25355.5 (a)(1)(C)

DTSC PROGRAM/ ADDRESS: Department of Toxic Substances Control Site Mitigation and Restoration Program 9211 Oakdale Avenue Chatsworth, California 91311	CONTACT: Sara Vela	PHONE: (818) 717 - 6618
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<p><b>PROJECT DESCRIPTION:</b></p> <p>The California Department of Toxic Substances Control (DTSC), pursuant to authority granted under Chapter 6.8 Section 25355.5 (a)(1)(C) of the Health and Safety Code (H&amp;SC), is considering approval of a draft Removal Action Workplan (RAW) for the proposed project hereinafter the "Site" or "Project Area" or "Area of Potential Effect" (APE), as submitted by the Jacobs Engineering Group, Inc. (Jacobs) on behalf of the Union Pacific Railroad Company (UPRR). The purpose of the project is to minimize human exposure to elevated levels of arsenic in soil that exceeds the project-specific cleanup levels for potential commercial, multi-use, and multiple unit housing purposes at the Site.</p> <p>The RAW evaluates removal action alternatives and identifies a preferred removal action based on comparative analysis of alternatives. The preferred removal action (Alternative #5) for the Site includes excavation and disposal of 4,400 cubic yards of arsenic-impacted soil up to 2 feet below ground surface (bgs) and disposal of contaminated soil at an appropriately permitted landfill and establishment of a 2-foot soil cover. Up to approximately 4,400 cubic yards of clean imported soil may be used to backfill the excavations. However, if approved development of the Site is conducted concurrently with remedial excavation activities, some areas may not be backfilled to accommodate development plans. Results from previous investigations (CH2M HILL, Inc., 2006) indicate that concentrations of arsenic in soil range from 16 to 996 mg/kg, with the highest concentrations observed in soil (primarily within fill material) from 0 to 5 feet bgs along the center of the Site, which is a former railroad right-of-way. The proposed project is anticipated to commence following approval of the RAW and would take approximately 6 weeks to complete.</p> <p>Upon completion of the RAW, a Land Use Covenant (LUC) in the form of deed restrictions/Institutional Controls (IC's) will be implemented and filed with the property deed at the County Recorder's Office to prohibit future soil disturbances unless conducted and managed in accordance with a DTSC-approved Soil Management Plan, prohibit the use of the property as a single-family residences, hospital, school, daycare center and limit the Site use to commercial, multi-use, and multiple unit housing purposes.</p>
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DTSC is overseeing the Removal Action at the Site under a Voluntary Cleanup Agreement (VCA) (Docket No. HSA 04/05-066) with the UPRR. Information on the site is available on DTSC's website at <http://www.envirostor.dtsc.ca.gov/public/>.

DTSC's Envirostor database number for this Site is 19400017, and the site code is 301247.

## PROJECT BACKGROUND

From 1926 to approximately 1998, the Site was occupied by the railroad right-of-way (CH2M HILL, Inc., 2006). Aerial photographs indicate that the railroad, operated by the Pacific Electric Railway Company, was active from 1928 until between 1971 and 1979 (Lindmark, 1998). Aerial photographs from years 1952, 1969, 1970, 1979, 1986, 1988, 1990, 1993, 1995, and 1998, do not indicate evidence that the Site had been used for any purpose other than a railroad right-of-way (either active or inactive).

Union Pacific Railroad Company (UPRR), the successor in interest to Pacific Electric Railway Company, transferred the Site to the Beverly Hills Land Company (BHLC) in 1998. BHLC is the current owner of the Site.

The Site is currently designated as a "Railroad" in the City's General Plan Land Use Map and is zoned "T-1". A "T-1" zoning allows for railroad-related uses, and certain other uses as provided in Title 10 (Land Use and Zoning) of the Beverly Hills Municipal Code. The actual future development and use of the Site will require compliance with applicable laws (including zoning and land use) that are in effect at such time.

Previous environmental investigations at the Site were conducted from 1998 through 2010. Sampling for several contaminants (for example, VOCs, metals, TPH, SVOCs, herbicides, PCBs, and creosote) identified soil contamination from arsenic. Results from previous investigations indicate that concentrations of arsenic in soil range from 16 to 996 mg/kg, with the highest concentrations observed in soil (primarily within fill material) from 0 to 5 feet bgs along the center of the former railroad right-of-way. With few exceptions, the highest concentrations of arsenic in soils are within the shallow soils along the centerline of the Site and decrease in concentrations away from the centerline of the Site. The source of elevated concentrations of arsenic present in shallow soils along the centerline of the Site is unknown. Human receptors may be exposed to arsenic in soil through ingestion of soil and dermal contact with the soil.

Groundwater has been encountered at depths from 45-52 feet bgs and is not impacted with arsenic from the Site.

## STAGING AND MOBILIZATION

Prior to conducting field activities, applicable permits will be obtained. The contractor will delineate the equipment staging areas, access routes, and temporary soil stockpile locations as necessary. Site preparation activities include: marking of excavation boundaries, utility clearance, installation of barriers and/or privacy fencing), and installation of traffic control features. All necessary equipment and personnel will be mobilized to the Site prior to the initiation of remedial excavation activities.

The Site will be fenced during the removal actions. The existing fence will serve to separate the work zones from the surrounding community, provide protection for the equipment, allow site control for a safe working environment, and prevent unauthorized entry into the work zone.

During work activities, site access will be limited to authorized personnel. Equipment and truck access and egress to and from Lots 12 and 13 during the removal action will be from Civic Center Drive. A lane closure will likely be required on Santa Monica Boulevard for staging of equipment and trucks to complete the removal action for the Triangle Section. During off-work hours, access to the Site will be restricted by locking the gate.

Construction equipment will be mobilized to the Site to conduct the excavation and transportation activities. A typical list of equipment to be utilized includes, but is not limited to the following, with the contractor responsible for ultimate selection based on their preferred means and methods:

- Hydraulic excavator with buckets, sheep's foot, tampers, rollers, etc.
- Water trucks and water tanks
- Front end loader
- Haul trucks
- Erosion control, dust control, and stockpile management materials

Soil will be stockpiled or loaded into hauler trucks or roll-off bins. Truck boxes or roll-off bins will be covered with a secured tarp before they leave the Site. Field activities during the proposed remedial action are not expected to exceed City of Beverly Hills noise ordinance guidelines. Soil removal activities will take place only between the City of Beverly Hills permitted construction hours of 8:00 a.m. and 6:00 p.m. Monday through Friday. Excavation will

consist of removing 6,600 tons (4,400 cubic yards) of impacted soil in trucks with a capacity of 20 tons per load, requiring an estimated 330 truckloads of soil to leave the Site. It is estimated that up to 11 trucks per day will be leaving the Site during an approximate 6-week period. Up to 6,600 tons (4,400 cubic yards) of clean backfill may be imported in trucks with a capacity of 25 tons per load, requiring an estimated 264 truckloads of soil to enter the Site. It is estimated that up to 9 trucks per day will be entering the Site during an approximate 6-week period. Open-top trailers will be covered before leaving the Site. Truck traffic through the City of Beverly Hills will be limited to between 7:30 a.m. and 4:00 p.m. Truck traffic will be managed through implementation of a Traffic Management Plan that will maintain traffic circulation and safety.

## **PROJECT ACTIVITIES**

The remedial activities proposed in the RAW include the following:

- Soil Excavation consisting of removing 6,600 tons (4,400 cubic yards) of arsenic-impacted soil from several areas within the Site:
- Excavation will be performed in accordance with the guidelines presented in California Occupational Safety and Health Administration, Title 8, California Code of Regulations (CCR) (i.e., 8 CCR), Division 1, Chapter 4, Subchapter 4, Article 6 – Excavations (Sections 1539 through 1541).
- Excavations for the removal action will be up to 2 feet bgs.
- Removal will be accomplished with a backhoe or excavator. Soil stockpiling will be conducted in accordance with the remediation waste staging requirements in HSC, Division 20, Chapter 6.5, Article 2, Section 25123.3[b][4][B]).
- The stockpiles will be composite sampled for arsenic and other analytes as required by the disposal facilities for profiling for disposal will be collected for every 500 cubic yards of stockpiled material. For the first 500 cubic yards of excavated soils, two samples will be taken for every 100 cubic yards, after 500 cubic yards has been sampled then one sample per every 500 cubic yards will be taken for waste disposal classification. The profiling analytical data will be reviewed to determine the appropriate soil classification (non-hazardous, non-RCRA hazardous or RCRA hazardous) and to select the appropriate disposal facility. However, the soil is expected to be non-hazardous. DTSC will be notified and will approve the proposed determination and disposal facility.
- Upon selection of the appropriate disposal facility, soil will be loaded into trucks for transport to the disposal facility. Loading will be conducted with a front end loader. Dust control during loading will be implemented by limiting the drop height from the loader and with water spray. All trucks will be tarped and dry brushed prior to leaving the Site.
- Stockpile areas will be inspected for contamination and remediated as necessary within 30 days after the last stockpile is removed.
- Confirmation sampling and analysis for arsenic will be conducted to determine residual concentrations remaining at the Site and whether the removal goals have been met.
- At completion of excavation activities, the excavations will be backfilled with up to 4,4000 cubic yards or approximately 264 truckloads of imported clean soil (approximately 9 truckloads per day), and the backfilled soil will be compacted. If approved development of the Site is conducted concurrently with remedial excavation activities, some areas may not be backfilled to accommodate development plans.
- During the proposed excavation, no unauthorized persons will be allowed within the working exclusion and control zones on-site. The Site is currently surrounded by an existing permanent fence with gates that are locked after business hours. Additionally, barrier fences will be installed to restrict access to sensitive areas such as exclusion zones.
- Clean backfill material and surrounding remaining soil with concentrations below the removal action goals will establish a 2-foot soil cover to reduce exposure to arsenic-impacted soil remaining below 2 feet bgs.
- Soil cover inspection will be conducted in accordance with a maintenance and monitoring plan.

## **LAND USE COVENANTS (LUC)/INSTITUTIONAL CONTROLS**

In addition to the physical elements described above, the preferred alternative would include Land Use Controls (LUC) and Institutional Controls (IC's) formally adopted that restrict the following activities at the Site:

- A deed notice will be recorded to notify the public about the existence of the contamination. ICs will be implemented that would restrict single family residential development, and soil disturbance without DTSC approval.
- A plan will be developed to specify the roles and responsibilities for implementing, monitoring, and enforcing the ICs.
- Five-year reviews and reporting will be conducted to ensure the continued effectiveness of the ICs.

As part of the RAW, a maintenance and monitoring plan would be prepared to specify all monitoring requirements associated with the remediation. Monitoring would ensure that the remedy remains in place and be effective.

#### **PERMITS AND NOTIFICATIONS:**

Prior to excavation activities, grading permits will be obtained for the project. The work will conform to applicable codes for dust control, erosion control, and disposal.

Permits will be available at the Site throughout the duration of the project.

Notification to the California Division of Occupational Safety and Health of the excavation activities to be performed at the Site.

#### **SUPPRESSION OF FUGITIVE DUST EMISSIONS**

Dust control measures will include: wet suppression of exposed soil during excavation, loading and unloading of contaminated soil, and backfill operations; trucks transporting impacted soil will be covered with tarps and the covers secured prior to leaving the Site; trucks will be cleaned prior to leaving the site; reduce speed on unpaved areas, and limit on-site traffic speed; cover and secure stockpiles and exposed areas at the end of each workday; and post signs on the fence surrounding the property, with DTSC contact information, for community use in the event of dust or other site-related issues during non-work hours. These dust control measures are consistent with the rules and Best Management Practices requirements of the South Coast Air Quality Management District (SCAQMD).

#### **AIR MONITORING**

Air monitoring will be conducted for the protection of nearby residents, on-site workers and the general public. Perimeter air monitoring will consist of air sampling at the Site boundaries routinely during excavation activities to verify the effectiveness of the dust control measures. Air sampling for inhalable contaminants using real-time, data logging aerosol monitors will be conducted during the earth movement work.

The proposed excavation areas and stockpile areas will not be adjacent to any off-site residence. Excavation areas will be controlled with physical barriers (e.g., perimeter fencing with wind screen) and air monitoring will be conducted throughout the duration of excavation, transportation activities, and backfill operations to ensure that dust levels do not exceed the fence line community action level. Removal action activities are expected to take approximately six weeks.

#### **PROJECT COMPLETION**

Temporary impacts resulting from project construction activities, including noise, dust, and traffic, are expected to last up to six weeks. During the excavation work, confirmation sampling will be conducted to verify that all soils containing arsenic have been properly removed at the Site. Excavation will continue until arsenic in Site soils are found to be less than corresponding removal action goals. Excavation areas will be backfilled with clean soil and the site will be seeded.

#### **PROJECT SCHEDULE:**

The Removal Action (excavation with off-site disposal and soil cover) will be completed within six weeks.

Figures:

Figure 1 – Site Location

Figure 2 – Site Map

Attachments:

## Attachment 1 - Air Quality Analysis

**ENVIRONMENTAL IMPACT ANALYSIS:****1. Aesthetics**

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: The Project Site is a vacant undisturbed open space located along a paved, urbanized residential/commercial area, devoid of scenic vistas and surrounded by public roads with Santa Monica Boulevard bordering the Site on the northern site boundary. No aesthetic or scenic resources or vistas are present in the vicinity of the Site. The Site is a relatively flat open area with no/few trees or opportunities for scenic views adjacent to the Site. Project activities will not obstruct scenic resources or degrade the existing visual character of the area, including, but not limited to, trees, rock outcroppings, or historic buildings and will remain equivalent to existing conditions. No aesthetics impacts will occur from project activities no changes to visual appearance of the Site will result from project activities. No change to the visual appearance of the Site will occur because no designated scenic or county highways are in the vicinity of the Site (California Scenic Highway Mapping System, 2019). No rock outcroppings or historic buildings within a state scenic highway would be affected because no such resources are present on or near the Site. Implementation of the proposed project will not contribute to additional light within the Site area. The proposed project activities will take place during daylight hours and no changes in lighting will result from project activities, no impacts will occur to aesthetics from lighting. Because no aesthetics impacts would occur from project activities, no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

- a. Have a substantial adverse effect on a scenic vista.

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and historic buildings within a state scenic highway.

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Impact Analysis:

## Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

## References used:

- RAW, 2019.
- Google Earth;
- California Department of Transportation Scenic Highway Mapping System, Website accessed 2019.
- [http://www.dot.ca.gov/hq/LandArch/scenic\\_highways/](http://www.dot.ca.gov/hq/LandArch/scenic_highways/)

## 2. Agricultural and Forestry Resources

### Project Activities Likely to Create an Impact: None.

Description of Baseline Environmental Conditions: The Site is vacant undisturbed land, located within an urban commercial/residential setting. No agricultural activities will occur onsite or near the Site. The Site is located on land previously used by the Pacific Electric Railway Company. None of the soils identified on the Site are designated by the California Department of Conservation (CDC) to be Prime Farmland. The CDC has determined that the soils within the Site are designated as either Other Land or Urban and Built-Up Land. Project activities will not convert prime farmland, unique farmland or farmland with statewide importance, Farmland Mapping and Monitoring Program of the California Resources Agency, or conflict with the existing zoning, agricultural or the Williamson Act. The proposed project involves the removal of contaminated soil at property located within an urbanized environment, surrounded by residential and commercial land uses, and devoid of agricultural resources. The proposed project will not require any modification to the property that would convert the classification of farmland to a non-agricultural use or conflict with zoning for agricultural use or a Williamson Act contract. Therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

## Impact Analysis:

## Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Conflict with existing zoning or agriculture use, or Williamson Act contract.

## Impact Analysis:

## Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).

## Impact Analysis:

## Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated

- Less Than Significant Impact  
 No Impact

d. Result in the loss of forest land or conversion of forest land to non-forest use.

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

References:

- City of Beverly Hills 2010, General Plan  
<http://www.conservation.ca.gov/dlrp/lca/Pages/Index.aspx>
- City of Beverly Hills Zoning Map
- California Department of Conservation California Important Farmland Finder. 2019. Website accessed October 14, 2019: [http:// https://maps.conservation.ca.gov/dlrp/ciff/](http://https://maps.conservation.ca.gov/dlrp/ciff/)

### 3. Air Quality

Project Activities Likely to Create an Impact:

- Presence and operation of excavation and construction equipment (may include excavator, backhoe, and/or front-end loader) and field staff vehicles;
- Generation of fugitive dust and particulates at the excavation zone, decontamination areas, general work areas, stockpile areas;
- Truck loading areas, truck staging/parking areas, and truck routes;
- Excavation of impacted soil by using appropriate construction equipment, and loading excavated soil and debris onto dump trucks;
- Transportation of impacted soil to appropriate off-site permitted disposal facilities;
- Transportation of clean fill material from off-site locations onto the project Site; and
- Backfill of excavated areas using clean fill materials.

Description of Baseline Environmental Conditions: The project is located within the South Coast Air Basin (SCAB), a 6,600 square-mile area which consists of the non-desert portions of the Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The SCAB is generally characterized as having mild climate with cool breezes, occasionally interrupted by periods of extremely hot weather, winter storms, or Santa Ana winds. The SCAB is an area of high air pollution potential and is under the jurisdiction of the SCAQMD. The SCAB has been designated a nonattainment area for federal and/or state standards for ozone (O<sub>3</sub>), particulate matter with aerodynamic diameter less than or equal to 10 microns (PM<sub>10</sub>), and particulate matter with aerodynamic diameter less than or equal to 2.5 microns (PM<sub>2.5</sub>). SCAQMD monitors air quality in Los Angeles, Orange and Riverside Counties and has adopted an Air Quality Management Plan (AQMP) to reduce air pollution to healthy levels.

The U.S. Environmental Protection Agency established national ambient air quality standards (NAAQS) pursuant to adoption of the federal Clean Air Act. The California Air Resources Board (CARB) established California ambient air quality standards (CAAQS) under the mandate of the Mulford-Carrell Act. CAAQS have been established for O<sub>3</sub>, carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), PM<sub>10</sub>, PM<sub>2.5</sub>, lead, sulfates, hydrogen sulfide, vinyl chloride and visibility reducing particles. Local control in air quality management is provided by the State through air pollution control districts or air quality management districts, including the SCAQMD for the Site area. SCAQMD monitors air

quality in the SCAB and has adopted an AQMP to reduce air pollution to healthful levels. A summary of NAAQS and CAAQS is provided in Table 1 and potential health effects in Table 2.

The annual average temperature for the Site area is 63.5 degrees Fahrenheit (°F) with a mean daily maximum temperature of 71.6 °F and a mean daily minimum temperature of 55.5 °F. Prevailing winds are relatively light to moderate breezes from both the easterly and westerly directions. Normal winds rarely exceed 12 miles per hour (MPH). Greatest wind velocities are generally associated with the Santa Ana Winds season, typically in late October through November, and can reach 80+ MPH.

Analysis as to whether or not project activities would:

- a. Conflict with or obstruct implementation of the applicable air quality plan.

Impact Analysis: The Site is located in the SCAQMD's Northwest Coastal Los Angeles (Area 2) area. The proposed soil removal activities, as listed above, will not conflict with or obstruct implementation of the applicable air quality plan. The proposed project activities (e.g., excavation and backfilling) might cause potential short-term (estimated to be approximately 6 weeks) emissions of particulate matter and/or equipment exhaust. Stationary and mobile sources of air emissions and odor include excavation of impacted soil and backfilling of clean soil using appropriate construction equipment, which may include excavators, backhoes, and loaders; loading impacted soil into trucks; and unloading clean soil at the Site.

SCAQMD has two rules which address excavation (Rules 1150 and 1166) and two rules which addresses fugitive dust (Rule 403 and 1466). Rule 1150 applies to the excavation of sanitary landfills and does not apply to this project. Rule 1166 applies to the excavation of soils containing volatile organic compounds (VOCs). VOCs are not a COC at the Site; therefore, Rule 1166 does not apply to this project.

Elements of Rule 1466, applies to any owner or operator conducting earth-moving activities of soil with applicable toxic air contaminant(s) as defined in paragraph (c)(15) of the rule that have been identified as contaminant(s) of concern at a site. The rule focuses on the toxic air contaminants listed in Table I of the rule. The provisions in Rule 1466 include ambient PM<sub>10</sub> monitoring, dust control measures, notification, signage, and recordkeeping requirements. Rule 1466 allows for alternative dust control measures, ambient dust concentration limits, and other provisions provided they are approved by the Executive Officer. The rule does not apply to earth-moving activities of soil with applicable toxic air contaminant(s) of less than 50 cubic yards. Protocols for control of potential dust emissions, have been incorporated into the project. Excavation, backfilling, loading/unloading, and transport of impacted and clean soils will follow Rule 1466 prevention, reduction, and control measures for dust emissions. However, notification to the SCAQMD is required only for large operations (disturbing more than 50 acres or moving more than 5,000 cubic yards per day). Therefore, no notification or filing of a Fugitive Dust Emission Control Plan is required due to the project size.

Air quality impacts are determined according to the criteria set by the federal, state and local pollution standards. The short term impacts of the criteria air pollutants (i.e., VOC, CO, NO<sub>2</sub>, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>) emitted by the fugitive dust and construction equipment during construction activities have been analyzed. Control measures will be instituted to prevent excessive amounts of fugitive dust and vehicle emissions, as necessary, during all phases of project implementation. The SCAQMD Guidelines describe such measures.

**Table 1. Federal and State Ambient Air Quality Standards**

Pollutant	Averaging Time	NAAQS	CAAQS
Ozone (O <sub>3</sub> )	8 Hour	0.07 ppm (137 µg/m <sup>3</sup> )	0.070 ppm (137 µg/m <sup>3</sup> )
	1 Hour	—	0.09 ppm (180 µg/m <sup>3</sup> )
Carbon Monoxide (CO)	8 Hour	9 ppm (10 mg/m <sup>3</sup> )	9 ppm (10 mg/m <sup>3</sup> )
	1 Hour	35 ppm (40 mg/m <sup>3</sup> )	20 ppm (23 mg/m <sup>3</sup> )
Nitrogen Dioxide (NO <sub>2</sub> )	Annual Arithmetic Mean	0.053 ppm (100 µg/m <sup>3</sup> )	0.030 ppm (57 µg/m <sup>3</sup> )
	1 Hour	0.100 ppm (188 µg/m <sup>3</sup> )	0.18 ppm (339 µg/m <sup>3</sup> )
Sulfur Dioxide (SO <sub>2</sub> )	24 Hour	—	0.04 ppm (105 µg/m <sup>3</sup> )
	3 Hour	0.5 ppm (1,300 µg/m <sup>3</sup> )	—
	1 Hour	0.075 ppm (196 µg/m <sup>3</sup> )	0.25 ppm (655 µg/m <sup>3</sup> )
Respirable Particulate Matter (PM <sub>10</sub> )	Annual Arithmetic Mean	—	20 µg/m <sup>3</sup>
	24 Hour	150 µg/m <sup>3</sup>	50 µg/m <sup>3</sup>
Fine Particulate Matter (PM <sub>2.5</sub> )	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	12 µg/m <sup>3</sup>
	24 Hour	35 µg/m <sup>3</sup>	—
Sulfates (SO <sub>4</sub> )	24 Hour	—	25 µg/m <sup>3</sup>
Lead	30 Day Average	—	1.5 µg/m <sup>3</sup>
	Rolling 3-Month Average	0.15 µg/m <sup>3</sup>	—
Hydrogen Sulfide (H <sub>2</sub> S)	1 Hour	—	0.03 ppm (42 µg/m <sup>3</sup> )
Vinyl Chloride (chloroethene)	24 Hour	—	0.01 ppm (26 µg/m <sup>3</sup> )
Visibility Reducing Particulates	8 Hour	—	Extinction coefficient of 0.23 per kilometer—visibility of 10 miles or more due to particles when relative humidity is less than 70 percent.

SOURCE: California Air Resources Board, Ambient Air Quality Standards, <http://www.arb.ca.gov/research/aaqs/caaqs/caaqs.htm>, accessed October 23, 2019

**Table 2. Potential Health Effects of Air Pollutants**

Air Pollutant	Primary Source	Primary Health and Welfare Effects
Lead (Pb)	Contaminated soil	Behavioral and hearing disabilities in children; Nervous system impairment
Sulfur Dioxide (SO <sub>2</sub> )	Combustion of sulfur-containing fossil fuels; Smelting of sulfur-bearing metal ores; Industrial processes	Aggravation of respiratory diseases (asthma, emphysema); Reduced lung function
Carbon Monoxide (CO)	Incomplete combustion of fuels and other carbon-containing substances, such as motor vehicle exhaust; Natural events, such as decomposition of organic matter	Aggravation of some heart diseases (angina); Reduced tolerance for exercise; Impairment of mental function; Impairment of fetal development; Death at high levels of exposure
Nitrogen Dioxide (NO <sub>2</sub> )	Motor vehicle exhaust; High-temperature stationary combustion; Atmospheric reactions	Aggravation of respiratory illness

<b>Air Pollutant</b>	<b>Primary Source</b>	<b>Primary Health and Welfare Effects</b>
Ozone (O <sub>3</sub> )	Atmospheric reaction of organic gases with nitrogen oxides in sunlight	Aggravation of respiratory and cardiovascular diseases; Reduced lung function, Increased cough and chest discomfort
Fine Particulate Matter (PM <sub>10</sub> and PM <sub>2.5</sub> )	Stationary combustion of solid fuels; Construction activities; Industrial processes; Atmospheric chemical reactions	Reduced lung function; Aggravation of respiratory & cardio-respiratory diseases; Increases in mortality rate; Reduced lung function growth in children

SOURCE: South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, adopted May 6, 2005, <https://www.aqmd.gov/home/research/guidelines/planning-guidance/guidance-document>, accessed October 23, 2019.

In an effort to monitor the various concentrations of air pollutants throughout the SCAB, the SCAQMD has divided the region into 38 source receptor areas (SRA). The Site is located within SRA 2, which covers Northwest Coastal Los Angeles County. SCAQMD maintains an air quality monitoring station in this area. Criteria pollutants monitored at this station include CO, NO<sub>2</sub>, and O<sub>3</sub>. Table 3 shows a three year summary (2016 to 2018) of data collected at this station and identifies the corresponding CAAQS, if those standards are exceeded.

<b>Pollutant</b>	<b>Pollutant Concentration &amp; Standards</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
Ozone (O <sub>3</sub> )	Maximum 1-hr Concentration (ppm)	0.085	0.099	0.094
	Days > 0.09 ppm (State 1-hr standard)	0	1	0
	Maximum 8-hr Concentration (ppm)	0.073	0.077	0.073
	Days > 0.07 ppm (State 8-hr standard)	2	3	2
Carbon Monoxide (CO)	Maximum 1-hr Concentration (ppm)	2.2	2.0	1.6
	Maximum 8-hr Concentration (ppm)	1.1	1.2	1.3
Nitrogen Dioxide (NO <sub>2</sub> )	Maximum 1-hr Concentration (ppm)	0.0545	0.0557	0.0647
	Annual Arithmetic Mean Concentration (ppm)	0.0116	0.0102	0.0126
Sulfur Dioxide (SO <sub>2</sub> )	Maximum 1-hr Concentration (ppm)	N/A	N/A	N/A
	Maximum 24-hr Concentration (ppm)	N/A	N/A	N/A
PM <sub>2.5</sub>	Maximum 24-hr Concentration (µg/m <sup>3</sup> )	N/A	N/A	N/A
	Annual Arithmetic Mean Concentration (µg/m <sup>3</sup> )	N/A	N/A	N/A
PM <sub>10</sub>	Maximum 24-hr Concentration (µg/m <sup>3</sup> )	N/A	N/A	N/A
	Annual Arithmetic Mean Concentration (µg/m <sup>3</sup> )	N/A	N/A	N/A
Particulates	Maximum 24-hr Concentration (µg/m <sup>3</sup> )	N/A	N/A	N/A
	Annual Arithmetic Mean Concentration (µg/m <sup>3</sup> )	N/A	N/A	N/A
Lead	Maximum Monthly Average Concentration (µg/m <sup>3</sup> )	N/A	N/A	N/A
	Maximum Quarterly Average Concentration (µg/m <sup>3</sup> )	N/A	N/A	N/A
Sulfate	Maximum 24-hr Concentration (µg/m <sup>3</sup> )	N/A	N/A	N/A

SOURCE: South Coast Air Quality Management District, Air Quality Data Tables, <http://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year>, accessed October 23, 2019.

N/A - Pollutant not monitored

Air quality impacts are determined according to the criteria set in the federal, State, and local pollution standards/regulations. Impacts would be considered significant if the proposed project emissions exceeded any of the criteria in Table 4:

<b>Table 4. Air Quality Significance Thresholds (Mass Daily)</b>	
<b>Pollutant</b>	<b>Construction Threshold (lbs/day)</b>
Volatile Organic Compounds (VOCs) [Reactive Organic Gases (ROGs)]	75
Carbon Monoxide (CO)	550
Nitrogen Oxides (NO <sub>x</sub> )	100
Sulfur Dioxide (SO <sub>2</sub> )	150
Fine Particulate Matter (PM <sub>2.5</sub> )	55
Respirable Particulate Matter (PM <sub>10</sub> )	150
Lead	3

SOURCE: South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>, accessed October 23, 2019.

Excavation, backfilling, loading/unloading, and transport of impacted and clean soils will follow applicable or relevant and appropriate requirements, including Rule 1466 prevention, reduction, and mitigation measures for fugitive dust emissions. However, notification to the SCAQMD is required only for large operations (disturbing more than 50 acres or moving more than 5,000 cubic yards per day). The RAW site area is approximately 5 acres and the entire project is expected to move approximately 8,800 cubic yards total of soil (including clean import soil) during a 6-week period. Therefore, no notification or filing of a Fugitive Dust Emission Control Plan is required due to project size. The SCAQMD is responsible for regulating sources of air pollution to ensure that the project activities maintain the CAAQS and NAAQS. The SCAQMD has developed regulations to control emissions. At a minimum, the project will evaluate and control potential emissions of particulate matter per Rule 1466 and visible emissions per Rule 401, as applicable.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?

Impact Analysis: The Final 2016 SCAQMD AQMP (Appendix II, page II-S-1) states: "In the Basin, Ozone (O<sub>3</sub>) and fine particulate matter (PM<sub>2.5</sub>, particles less than 2.5 microns in diameter) are the pollutants of primary concern. For these, the U.S. EPA has designated the Basin as a nonattainment area for the NAAQS. The Basin had the highest number of days exceeding the federal ozone NAAQS of any urban area nationwide in 2015. State standards for ozone, PM<sub>2.5</sub>, and PM<sub>10</sub> are also not met in the Basin. The Basin is in attainment of the lead (Pb) NAAQS, with the final near-source monitoring location below the standard throughout the 2012 through 2015 time period. The District will request that U.S. EPA re-designate the Los Angeles County portion of the Basin as attainment for lead." SCAQMD Guidelines provide that construction projects using typical construction equipment that emit precursors of O<sub>3</sub> are accommodated in the emission inventories of State and federally-required air plans and would not have a significant impact on the attainment and maintenance of O<sub>3</sub>. Similarly, projects that do not exceed the thresholds of significance for PM<sub>10</sub> and PM<sub>2.5</sub> would not be expected to have a significant impact on the attainment and maintenance of PM<sub>10</sub> and PM<sub>2.5</sub>.

As discussed above, potential emissions during the project construction activities would be monitored within the work area and the perimeter of the Site to ensure that applicable SCAQMD threshold limits for air pollutants would not be exceeded, particularly for the nonattainment pollutants PM<sub>10</sub> and PM<sub>2.5</sub>, and to comply with applicable provisions of SCAQMD regulations. Additionally, the proposed removal action will not include the construction of stationary sources requiring an Authority to Construct or Permit to Operate and will incorporate a number of project control measures.

The primary potential air quality project impacts would be dust emissions (generated from excavating and backfilling activities) and vehicle emissions (associated with operations of gasoline and diesel powered heavy-duty mobile construction equipment, haul trucks, and passenger vehicles). As discussed below, maximum regional and localized emissions would not exceed the SCAQMD daily significance thresholds. The emissions associated with the proposed RAW project included emissions during site preparation, excavation, backfilling, and transportation. The proposed project will not have a significant adverse impact on air quality, and therefore requires no mitigation measures. The following best management practices will, however, be implemented during the removal action, where feasible, to minimize project emissions.

- Individual truck idling in excess of five consecutive minutes will be prohibited, unless allowed under Title 13 of the California Code of Regulations §2485 (CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling).
- Suspend the use of all construction equipment during first-stage smog alerts.
- Electricity or alternative fuels for on-site mobile equipment will be used instead of diesel equipment to the extent feasible.
- Electric equipment will be used to avoid emissions from gas or diesel equipment in portions of the project Site where electricity is available.
- Diesel-power construction equipment shall use low-sulfur diesel fuel, as defined in SCAQMD Rule 431.2.
- Suspend any excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 MPH.
- Minimize disturbed areas during construction.
- Minimize the drop height during soil stockpiling and loading/unloading operations.
- Ensure that all construction equipment is properly tuned and maintained prior to and for the duration of construction.
- Portable engines and portable engine-driven equipment units used at the project work Site, with the exception of on-road and off-road motor vehicles, require CARB Portable Equipment Registration or a SCAQMD permit.
- Dry brush equipment and trucks to remove soil prior to exiting the Site.
- Provide adequate ingress and egress to minimize vehicle idling and traffic congestion.
- All contractors will comply with all applicable SCAQMD rules (including Rule 1466) and regulations in carrying out project activities.
- To reduce the potential for significant hazardous air emissions, the following project controls are included in the RAW:
  - Maintain slow speeds with all vehicles
  - During dumping, minimize soil drop height into transportation trucks or stockpiles
  - During transport, cover or enclose trucks transporting soils
  - Increase freeboard requirements, and repair trucks exhibiting spillage due to leaks
  - Place stockpiled soil in areas shielded from prevailing winds
  - Maintain equipment engines in good condition
  - Cover soil stockpiles during non-work hours to abate dispersion by wind and rain
- Contractors will implement feasible measures, as necessary, to reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines and activities that generate fugitive dust. Specific control measures include:
  - Ensure that all construction equipment is properly serviced and maintained in good operating condition
  - Restricting engine idle time, to the extent practical, to no more than five minutes per Title 13 of the California Code of Regulations §2449 (CARB's Regulation for In-Use Off-Road Diesel-Fueled Fleets)
- Excavation areas will be controlled with physical barriers (e.g., perimeter fencing with tarps), soil wetting and air monitoring (at property perimeter and work area) to avoid or control dust generation. Water will be used periodically to control any fugitive dust from blowing onto other properties. In times of high wind conditions (e.g., wind speed in excess of 25 MPH), all excavation areas will be securely covered to prevent excessive amounts of dust. The areas that require excavation and earth-moving operation will be minimized to prevent excessive amounts of dust.
- As soil is excavated, it will be temporarily stored in staging areas on-site until off-site transportation and disposal are available. At the staging areas, all excavated soils will be placed on an impermeable barrier and covered with tarps or other proper materials to prevent any runoff and /or dust generation. During non-excavation hours, excavated soil stockpiles will be covered with plastic sheeting or other physical barriers that minimize movement of

materials from the Site by wind, water, or any other mechanism. The temporary on-site storage of excavated soil wastes will be secured and properly labeled with hazardous waste signs until off-site transportation and disposal are ready.

- All excavated or import fill materials will be shipped in trucks covered with tarps.

Several elements of Rule 1466, such as protocols for mitigation of potential fugitive dust emissions, will be implemented. Specific measures will be applied, as follows:

- Particulate dust monitoring to be protective of both worker health and the surrounding community so as not to exceed a total dust action level of 0.05 mg/m<sup>3</sup>
- A dust monitoring program that will include meteorological monitoring, real-time monitoring using portable aerosol monitors, and confirmation sampling using PM<sub>10</sub> high-volume samplers
- Additional dust-suppression techniques such as: applying water on haul roads or paths, wetting equipment and excavation faces, spraying water on excavation-equipment buckets, covering excavated areas and material after excavations cease, and increasing the frequency of misting roads and stockpiles
- Suspension of work if additional suppression techniques fail to reduce particulate levels
- Misting may also be used on soil placed in the transport trucks. After the soil is loaded into the transport trucks, the soil will be covered with a tarp to prevent soil from spilling out of the truck during transport to the disposal facility.
- While on the site, all vehicles will maintain slow speeds (i.e., less than 5 MPH) for safety purposes and for dust control measures. Prior to departure, transport and dump trucks will be cleaned of loose debris clinging to the sides and/or wheels to minimize off-site contaminants.

Daily construction-related regional emissions for the project are presented in the table below (Table 5). As shown, maximum regional emissions would not exceed the SCAQMD daily significance thresholds for ROG, nitrogen oxides (NO<sub>x</sub>), CO, SO<sub>2</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub>. The emissions associated with the proposed RAW project included emissions during site preparation, excavation, backfilling, and transportation. The Maximum Estimated Emissions presented in Table 5 and Table 6 were generated using CalEEMod (Attachment 1).

RAW Activities	Maximum Estimated Emissions (pounds per day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>2.5</sub>	PM <sub>10</sub>
Site Preparation, Excavation, Backfilling, and Transport	1.9	25.5	13.2	0.1	0.9	1.9
Maximum Regional Emissions Total	1.9	25.5	13.2	0.1	0.9	1.9
Regional Significance Threshold	75	100	550	150	55	150
Exceeds Threshold?	No	No	No	No	No	No

SOURCE: CalEEMod, Version 2016.3.2 and South Coast Air Quality Management District, Air Quality Significance Thresholds, <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>, accessed on October 23, 2019.

Note: Assumptions used with CalEEMod: 4,400 cubic yards excavated, 4,400 cubic yards imported, 5 acres graded; 32 miles one-way trip to closest disposal facility and source of backfill within SCAQMD.

Daily construction-related localized emissions for the RAW project are presented in Table 6. As shown, maximum localized emissions would not exceed the SCAQMD daily significance thresholds for NO<sub>x</sub>, CO, PM<sub>2.5</sub>, and PM<sub>10</sub>. Localized Significance Thresholds are not applicable for ROG and SO<sub>2</sub>. The emissions associated with the proposed RAW project included emissions during site preparation, excavation, and backfilling.

RAW Activities	Maximum Estimated Emissions (pounds per day)			
	NO <sub>x</sub>	CO	PM <sub>2.5</sub>	PM <sub>10</sub>
Site Preparation, Excavation, and Backfilling	17.2	11.2	0.7	1.2
Maximum Localized Emissions Total	17.2	11.2	0.7	1.2

Localized Significance Threshold	103	562	3	4
Exceeds Threshold?	No	No	No	No
SOURCE: CalEEMod, Version 2016.3.2 and South Coast Air Quality Management District, Mass Rate Localized Significance Threshold Look-up Tables, <a href="http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-1st-look-up-tables.pdf?sfvrsn=2">http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-1st-look-up-tables.pdf?sfvrsn=2</a> , accessed on October 23, 2019. Assumed 1 acre with a 25 meter receptor distance.				

O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are the nonattainment pollutants for the project area. The proposed removal action is not expected to result in a cumulatively considerable net increase of O<sub>3</sub> because it will utilize typical construction equipment, presumed to be accommodated in the emission inventories of State and federally-required air plans. Similarly, the project is not expected to result in a cumulatively considerable net increase of PM<sub>10</sub> or PM<sub>2.5</sub> because the project's daily construction-related emissions, presented in Tables 5 and 6, will not exceed the SCAQMD's regional and localized significance thresholds and will implement a number of fugitive dust control measures required by Rule 1466.

b. Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

c. Expose sensitive receptors to substantial pollutant concentrations.

Impact Analysis: The removal action does not expect to expose sensitive receptors to substantial pollutant concentrations. To control emissions of contaminants during remediation activities, air monitoring and dust control measures will be implemented. Air monitoring will be conducted in the work zone and at the Site perimeter, and control measures will be implemented to limit potential impact of contaminant exposure to sensitive receptors, as well as on-site workers and the general public.

The perimeter of the Site is currently enclosed with chain-linked fencing. Entrance to the site will be monitored during working hours. During off-work hours, access to the Site will be restricted by chain-link fence and padlock. Truck boxes or roll-off bins will be covered with a secured tarp before they leave the Site and, at the staging areas, all excavated soils will be placed on an impermeable barrier and covered with tarps or other proper materials to prevent any runoff and /or dust generation. During non-excavation hours, excavated soil stockpiles will be covered with plastic sheeting or other physical barriers that minimize movement of materials from the site by wind, water, or any other mechanism.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

d. Result in other emissions (such as those leading to odors adversely affecting a substantial number of people).

Impact Analysis: The removal action does not expect to emit any objectionable odor to the surrounding community. The proposed project (removal action) will not have a significant adverse impact on air quality. The dust and odor control measures to be implemented at the Site, such as soil wetting during excavation and backfilling, will control potential objectionable odors that may affect a substantial number of people.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

References Used:

- SCAQMD Rule 401 – Visible Emissions
- SCAQMD Rule 1466 – Particulate Emissions from Soil
- SCAQMD Rule 403 – Fugitive Dust
- SCAQMD Rule 431.2 – Sulfur Content of Liquid Fuels
- SCAQMD Rule 1150 – Excavation of Landfill Sites
- SCAQMD Rule 1166 – Volatile Organic Compounds Emissions from Decontaminations of Soil
- 13 CCR 2449 – Regulation for In-Use Off-Road Diesel-Fueled Fleets
- 13 CCR 2485 – Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

- Final Program EIR for the City of Beverly Hills, Community Development. Section 5.5, [http://www.cityofbeverlyhills.com/depts/dev\\_serv/general\\_plan\\_update/final\\_program\\_eir.asp](http://www.cityofbeverlyhills.com/depts/dev_serv/general_plan_update/final_program_eir.asp).
- Air Emission Estimates using CalEEMod, Version 2016.3.2
- Remedial Investigation Reports dated April 2013 and June 6, 2013
- SCAQMD, Final 2016 AQMP, Appendix II – <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-ii.pdf?sfvrsn=4>
- SCAQMD, Air Quality Data Tables - <http://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year>
- SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, adopted May 6, 2005, <https://www.aqmd.gov/home/research/guidelines/planning-guidance/guidance-document>, accessed October 23, 2019.
- CARB, Ambient Air Quality Standards - <http://www.arb.ca.gov/research/aaqs/caaqs/caaqs.htm>
- SCAQMD, Air Quality Significance Thresholds - <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>
- SCAQMD, Localized Significance Thresholds - <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2>

#### 4. Biological Resources

Project Activities Likely to Create an Impact: None.

Description of Baseline Environmental Conditions: The Site is located within a highly disturbed, developed, urbanized area, devoid of biological resources with no suitable wildlife habitat present. The surrounding area is comprised of residential and commercial land uses. The Site does not include any native vegetation or other resources that could support sensitive species or utilized as a migration corridor for species movement. Based on the site conditions, no potential exists for movement of species or impediments to native wildlife nursery sites. The proposed soil removal will occur in several areas within the 5 acre Site. No habitat is present for either wildlife or plant resources within the project area. The California Department of Fish and Wildlife's Natural Diversity Database (CNDDDB) was queried on August 5, 2020 to identify species reported within 1-mile of the project site. The CNDDDB identified one occurrence of Busck's gall moth (*Carolella busckana*) and one occurrence of hoary bat (*Lasiurus cinereus*), both of which overlap the project site; however, the Busck's gall moth occurrence was last observed in 1929 and is identified by the CNDDDB as extirpated. While both species are tracked by CNDDDB as 'Special Animals', neither species has any protection under federal or state regulations. No jurisdictional waters of the United States of State of California are present onsite or would be affected offsite by the soil excavation and removal, or result in a take of habitat, disrupt breeding or migration patterns, or affect wetlands/riparian resources as none are located at the Site. There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan identified for the area of the project area. Because there are no impacts to biological resources, no further analysis is deemed necessary. Analysis as to whether or not project activities would:

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

Impact Analysis: See b. above.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- e. Conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Impact Analysis

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

#### References Used:

- California Department of Fish and Wildlife's California RareFind 5 and Bios 5 Natural Diversity Database (CNDDDB), accessed October 14, 2019.
- City of Beverly Hills, Zoning Map: <http://gis.cityofbeverlyhills.com/giszoning/default.aspx>.

## 5. Cultural Resources

Project Activities Likely to Create an Impact: None.

Description of Baseline Environmental Conditions: The Site is located in a highly disturbed, developed, and urbanized residential and commercial area since 1938. The Site itself has been previously disturbed by subsurface activities associated with development, and operational activities. The removal action will not cause a permanent adverse change in the significance of a historical, archaeological, or other cultural resources. The Site is located within residential and commercial areas and surrounded by similar land uses. No unique paleontological resources or geologic features are known to exist onsite. No formal cemetery is located on-site or in close proximity to the property. Aerial photographs from years 1952, 1969, 1970, 1979, 1986, 1988, 1990, 1993, 1995, and 1998 do not indicate evidence that the Site had been used for any purpose other than a railroad right-of-way (either active or inactive).

A Sacred Lands search request was sent to the Native American Heritage Commission (NAHC). The NAHC responded on June 6, 2013 and stated that the presence of Native American traditional cultural places were not identified in the project area. A list of tribal contacts was provided by NAHC who may have an interest or knowledge of cultural resources in or near the project area.

As part of the consultation process, the NAHC recommends that local governments and project developers contact the listed tribal governments to determine if any cultural places could be impacted by project activities. Tribal project notification letters were sent to contacts on May 27, 2015. One response was received from the listed tribes. They requested that a Native American monitor be available in case anything was uncovered or discovered during the remediation activities. This has been incorporated into the RAW. There are no known prehistoric or historic archaeological structures in the general Site area, or any Native American cultural resources. Project activities will be conducted in a highly disturbed, urbanized industrial area with no known historical resources within the Site. No information from any previous development or site disturbance activities were found that would warrant a search of the Registry of Sacred Sites.

Site activities will, however, comply with 7050.5 of the California Health and Safety Code:

“In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the Site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains.”

(c) If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

- a. Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5.

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Cause a substantial adverse change in the significance of an archeological resource pursuant to 15064.5.

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- c. Disturb any human remains, including those interred outside of formal cemeteries.

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

References Used:

- Community Develop Plan for the City of Beverly Hills:  
[http://www.ci.beverlyhills.ca.us/downloads\\_large/comm\\_dev/10\\_TablesandExhibits\\_BuiltEnv.pdf](http://www.ci.beverlyhills.ca.us/downloads_large/comm_dev/10_TablesandExhibits_BuiltEnv.pdf).
- City of Beverly Hills Community Development Site:  
[http://www.cityofbeverlyhills.com/depts/dev\\_serv/planning/\\_historic\\_beverlyhills\\_.asp](http://www.cityofbeverlyhills.com/depts/dev_serv/planning/_historic_beverlyhills_.asp).
- Significant Historical Properties in the City of Beverly Hills:  
<http://www.cityofbeverlyhills.com/civicax/filebank/blobdload.aspx?blobid=2475>.
- Native American Historic Commission. 2013. Request for Sacred Lands File Search and Native American Contacts list for the “Draft Removal Action Plan for Beverly Hills, Lot 12 & 13;” located in Los Angeles County, California. June 6. 2013.

## 6. Energy

Project Activities Likely to Create an Impact: None.

Description of Baseline Environmental Conditions: The Site is located in a highly disturbed urban, industrial and commercial area. Topography at the Site is relatively flat, the land surface is covered with soil and vegetation. The surrounding property area consists of residential and commercial use. No housing is in close proximity to the Site or will be affected by the proposed removal action. No activities of the project will affect population growth, existing housing, or create the need for additional housing. The proposed project is a removal action to clean up contaminated soil. The project would not result in any new population and housing resources at the Site and would not add any infrastructure that would yield indirect growth. The project Site does not contain any existing residential users. Therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

- a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

References Used:



## 7. Geology and Soils

Project Activities Likely to Create an Impact:

- Excavation of impacted soils using appropriate construction equipment (i.e., excavator, backhoe, and/or front end loader), and loading excavated soil and debris onto dump trucks;
- Conduct dust suppression activities during excavation and backfilling activities; and
- Backfill of all excavated areas using clean soils.

Description of Baseline Environmental Conditions: The Site is located in a highly disturbed and developed, capped, urbanized residential/commercial area within Southern, California. It is bounded by the northern portion of the Peninsular Ranges Geomorphic Province and in the southern portion of the Los Angeles Basin on the Southern California Coastal Plain. Southern California is an area of known seismic activity. Structures must be designed to comply with the Uniform Building Code (UBC) requirements if they are located in a seismically active area. The UBC is considered to be a standard safeguard

against major structural failures and loss of life. The UBC bases seismic design on minimum lateral seismic forces (“ground shaking”). The UBC requirements also consider liquefaction potential and establish stringent requirements for building foundations in areas potentially subject to liquefaction. The proposed project involves the removal of 3,550 cubic yards of arsenic contaminated soil from the 5 acre property. No buildings, structures or infrastructure will be part of the project that would be affected by seismic activity, liquefaction, expansive soils, or unstable geologic units. Further, the project itself will not cause geologic impacts to surrounding structures or facilities.

The project area comprises non-native fill material, the depth of which ranges from approximately 5 feet below ground surface at the northeastern portion of the Site to 10 feet below ground surface at the southwestern portion of the Site. The soil, including both fill and native material, is primarily silty or clayey sand, with a few isolated clay lenses. The soil beneath the Site is consistent with deposits in the recent alluvium, which is known to be present throughout the Hollywood Basin. The Site is relatively flat and slopes with the surrounding area. Ground elevations range from 255 feet above mean sea level (amsl) at the southwestern end of the Site to 235 feet amsl at the northeastern end, with the Site gently sloping from the south to the north.

Analysis as to whether or not project activities would:

- c. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42).
  - ii. Strong seismic ground shaking.
  - iii. Seismic-related ground failure, including liquefaction.
  - iv. Landslides.

Impact Analysis: According to the most recent Alquist-Priolo Earthquake Fault Zoning Map, the nearest Special Studies Zone according to the map is approximately 3.0 miles southeast of the Site. Within this Zone, there are several NW-SE trending fault traces characterized as an active section of the Newport-Inglewood fault system. The surface soil in the vicinity of the Site is part of the Yolo association and consists of alluvial materials associated with the nearby Dominguez Channel drainage system. These soils have moderate permeability. Soils observed during past investigations (CH2M HILL, Inc., 2006) included mostly silt, silty and clayey sand. For excavation areas deeper than 5 feet below ground surface, the sidewalls will be sloped if needed. The Site is relatively flat with little potential for soil erosion. Excavation depths are anticipated up to 5 feet bgs, and excavation will be conducted to maintain a 1:1 or flatter slope for excavation deeper than 5 feet bgs; project activities would not result in potential for landslides.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- d. Result in substantial soil erosion or the loss of topsoil.

Impact Analysis: The Site is almost flat and will not cause soil erosion. The shallow soils at the Site are fill material mixed with railroad ballast, and no topsoil exists onsite. The proposed project will not affect the stability of soils. Because no unstable geologic units or soils are onsite and because excavation methods will maintain appropriate slope ratios, no impacts will occur. The proposed project comprises soil removal, no buildings, structures or infrastructure will be constructed, and no changes in grade will occur.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- e. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

Impact Analysis: The proposed remedial action will not impact soil stability. During the remedial action, the excavation sides will either be shored or sloped for stability as needed. The proposed remedial action includes excavating soil that contains concentrations of arsenic above the cleanup goals.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- f. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

Impact Analysis: Expansive soils are generally found in areas that historically were in a flood plain or lake area or hillside areas. The project area is not within or characterized by such locations and is in a flat and highly disturbed urbanized area. No expansive soils have been encountered at the Site. Therefore, the project would not create a risk to life or property. The proposed project will not affect, or be affected by, the presence or absence of expansive soils.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- g. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of water.

Impact Analysis: No septic tanks or alternative non-sewer systems are proposed for the project, which is defined by the excavation of contaminated soils. The proposed project does not include any requirements to build infrastructure to support a wastewater disposal system or septic tanks and, therefore, no impact to waste disposal systems would occur.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- h. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Impact Analysis: No unique paleontological resources or geologic features are known to exist onsite.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

#### References Used:

- City of Beverly Hills "GoZone Map: <http://gis.cityofbeverlyhills.com/giszoning/default.aspx>
- Final EIR for City of Beverly Hills, section 5.7, Geology and Soils.
- California Department of Conservation, Seismic Hazard Zone Report (1998).
- California Department of Conservation, Mapping potentially asbestos-bearing rocks using imaging Spectroscopy. [http://speclab.cr.usgs.gov/PAPERS/eldorado/Swayze\\_et\\_al\\_AVIRIS\\_asbestos\\_Geology\\_paper.pdf](http://speclab.cr.usgs.gov/PAPERS/eldorado/Swayze_et_al_AVIRIS_asbestos_Geology_paper.pdf).
- Draft Removal Action Work Plan (Jacobs, 2019).
- California Division of Mines and Geology, 1997, Fault-Rupture Hazard Zones in California, Special Publication 42, 1997.

## 8. Greenhouse Gas Emissions

### Project Activities Likely to Create an Impact:

- Presence and operation of excavation and construction equipment (may include excavator, backhoe, and/or front-end loader) and field staff vehicles;
- Truck loading areas, truck staging/parking areas, and truck routes;
- Excavation of impacted soil by using appropriate construction equipment, and loading excavated soil and debris onto dump trucks;
- Transportation of impacted soil to appropriate off-site permitted disposal facilities;
- Transportation of clean fill material from off-site locations onto the project Site; and
- Backfill of all excavated areas using clean fill materials.

**Description of Baseline Environmental Conditions:** Diesel equipment used during excavation and backfilling (e.g., excavator, backhoe, and/or front end loader) has the potential to generate greenhouse gas (GHG) emissions at the excavation zone, decontamination zone, general work areas, stockpile areas, truck loading/unloading, truck staging/parking areas and along truck routes.

GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants (TACs), which are pollutants of regional and local concern. Pollutants with localized air quality effects have relatively short atmospheric lifetimes (about 1 day), whereas GHGs have long atmospheric lifetimes (1 year to several thousand years). GHGs persist in the atmosphere for long time periods that enable them to be dispersed around the globe. Although the exact lifetime of any particular GHG molecule is dependent on multiple variables and cannot be determined, more carbon dioxide (CO<sub>2</sub>) is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, and other forms of sequestration.

Similarly, GHG impacts are global in nature, and the quantity of GHGs that would result in climate change is not precisely known. No single project would measurably contribute to a noticeable incremental change in the global average temperature, or to global, local, or micro climate. For CEQA review purposes, GHG impacts to global climate change are considered as cumulative impacts.

The SCAQMD has recommended an interim GHG significance threshold that would apply to stationary source/industrial projects and would include direct and indirect emissions during construction and operation. Following the Tier 3 screening level approach, construction emissions would be amortized over the life of the project, typically defined as 30 years, and added to the operational emissions for comparison to the significance threshold of 10,000 metric tons of carbon dioxide equivalent (CO<sub>2</sub>e) per year. A project exceeding this threshold would be considered significant and require mitigation with regards to GHG emissions.

The GHG emissions resulting from the project's soil excavation, backfill, and transport activities were evaluated using the Tier 3 methodology recommended by SCAQMD. However, because there are no operational activities associated with this project, the project life was conservatively considered to be 1 year instead of 30 and the operational emissions were set to zero. The results are presented in Table 7 below.

RAW Activities	Maximum Estimated GHG Emissions (metric tons per year)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
Site Preparation, Excavation, Backfilling, and Transport	72.43	0.01	0.00	72.79
Maximum Regional Emissions Total	72.43	0.01	0.00	72.79
Regional Significance Threshold	N/A	N/A	N/A	10,000
Exceeds Threshold?	N/A	N/A	N/A	No

SOURCE: CalEEMod, Version 2016.3.2 and South Coast Air Quality Management District, Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2), accessed on October 23, 2019.  
 Note: Assumptions used with CalEEMod: 4,400 cubic yards excavated, 4,400 cubic yards imported, 5 acres disturbed; 32 miles one-way trip to closest disposal facility and source of backfill within SCAQMD.

Although the project's GHG emissions are expected to be minimal, Project controls that will be applied for the reduction of GHG emissions during construction activities are as follows:

- Use low-emissions or electric construction equipment or vehicles, where feasible
- Minimize unnecessary construction equipment or vehicle idling time
- Promote carpooling amongst construction workers
- Use properly sized construction equipment

- Maintain haul trucks according to the manufacturer's recommendations
- Train operators to properly operate construction equipment

Analysis as to whether or not project activities would:

- a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Impact Analysis: Although equipment used for removing contaminated soil has the potential to result in GHG emissions, these emissions are expected to be much less than the SCAQMD's significance threshold of 10,000 metric tons of CO<sub>2</sub>e per year, as demonstrated in Table 7. Therefore, these emissions will not contribute significantly, either directly or indirectly, to impacts on the environment. No stationary sources or operational emissions (e.g. GHG/CO<sub>2</sub>e) will be generated by the project.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Impact Analysis: The project will not conflict with an applicable plan, policy, or regulation adopted to reduce GHG emissions. The proposed project does not include the construction of permanent buildings, structures or facilities that would become long-term stationary sources of emissions, operational emissions or GHG emissions. Additionally, the minimal short-term construction GHG emissions will not interfere with the long-term goal of the Global Warming Solutions Act of 2006 (AB 32) to reduce GHG emissions to 1990 levels by 2020. The project also incorporates reduced vehicle and equipment idling time and carpooling, which are control measures identified by the California Air Pollution Control Officer's Association.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

References Used:

- Air Emission Estimates using CalEEMod, Version 2016.3.2
- SCAQMD, 2016 Final AQMP - <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>
- SCAQMD, Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans - [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2)
- SCAQMD, Mitigation Measures and Control Efficiencies - <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>

## 9. Hazards and Hazardous Materials

Project Activities Likely to Create an Impact:

- Generation of fugitive dust and particulates at the excavation zone, decontamination areas, general work areas, stockpile areas;
- Truck loading areas, truck staging/parking areas, and truck routes;
- Excavation of impacted soil by using appropriate construction equipment, and loading excavated soil and debris onto dump trucks;
- Transportation of impacted soil to appropriate off-site permitted disposal facilities;
- Transportation of clean fill material from off-site locations onto the project Site; and
- Backfill of all excavated areas using clean fill materials.

**Description of Baseline Environmental Conditions:** The Site is located in a highly disturbed and developed, capped, urbanized commercial and residential area. Hazards and hazardous materials at the Site are limited to arsenic contaminated soils. Refer to the “Project Background” and “Selection of Site Remedy” sections within the Project Description section of this Initial Study, which discuss the Site contamination and cleanup goals for the Site. As discussed in the Project Description Section of this IS, hazards and hazardous materials are limited to arsenic-contaminated soils. Approximately 4,400 cubic yards of contaminated materials will be handled, transported and disposed of at a licensed facility permitted to accept the material in accordance with local, state and federal regulations. Potential receptors include building occupants, workers and the local industrial and commercial population in the vicinity of the project. The nature and extent of contamination at Site are based on nine phases of environmental investigations that were implemented between 1988 and 2010. Data collected from these investigations includes laboratory testing of numerous soil, and groundwater samples, as well as detailed field observations and documentation. The collective data from these efforts have been analyzed and presented in the Remedial Investigation Report (RI Report) dated August 2006. Based on the findings of the RI Report, arsenic has been identified as the chemical of concern (COC) present in site soils at concentrations up to 996 milligrams per kilograms (mg/kg), concentrations that could present potential risk to humans or environmental receptors (wildlife) if not addressed by further response. Chemical testing conducted during the remedial investigation process demonstrated that the elevated concentrations in soil were not soluble and not migrating. A groundwater investigation conducted in 2008 and 2009 confirmed these findings and demonstrated that arsenic had not migrated to groundwater.

As part of the RAW, remedial action objectives (RAOs) were developed to identify and screen remedial alternatives that protect human health and the environment and are consistent with reasonably anticipated land use. RAOs are media-specific (such as soil) goals for protecting human health and the environment that provide the foundation used to develop remedial alternatives. Excavation of COCs in soil would (1) ensure that exposure pathways would be eliminated for future commercial, multi-use, and multi-unit residential use, (2) prevent exposure to arsenic in soil to 2 to 5 feet below ground surface, and (3) reduce the potential for COCs in soil. The RAOs for the Site were developed for the reasonably anticipated future commercial and multi-unit residential land use consistent with the United States Environmental Protection Agency’s (US EPA’s) land use directive for Comprehensive Environmental Response and Liability Act (CERCLA) remedy selection.

The remedial goals (RG) for the Site were established based on DTSC’s determination of arsenic background in the area. The RGs established for the Site are to: a) protect public health and the environment from exposures to the COCs by inhalation, dermal contact and ingestion based on future industrial land uses, and for protection of construction workers; and b) meet all Applicable or Relevant and Appropriate Requirements (ARARs) for the Site cleanup.

The soil remedial goals established for the Site are as follows:

<b>COCs in Soil</b>	<b>Maximum Concentration (mg/kg)</b>	<b>Soil Remediation Goal milligrams per kilogram (mg/kg)</b>
Arsenic	996 mg/kg	0 to 2 feet < 25 milligrams per kilogram (mg/kg)

Analysis as to whether or not project activities would:

- a. Create a significant hazard to the public or the environment throughout the routine transport, use or disposal of hazardous materials.

**Impact Analysis:** The proposed remedial activities for the Site consist of site preparation, excavation of soil, confirmation soil sampling, transportation and disposal of soil to off-site permitted landfills, and site restoration. The proposed project would be implemented in accordance with applicable state and federal occupational and health safety standards as set forth in 29 Code of Federal Regulation (CFR) 1910 and 1926, California Health and Safety Regulations as set forth in Title 8, California Code of Regulations (CCR) 5192, for work at hazardous waste sites. A Health and Safety Plan (HASP) would be developed and implemented to minimize incidents, injury, and health risks associated with the remedial measures proposed at the Site. Additionally, the management of hazardous substances and/or potentially hazardous wastes, adherence to Site controls and plans, and the limited duration of the excavation activities (approximately 60 days) are anticipated to result in no significant hazard to the public or the environment from project activities. The HASP describes controls and procedures for health and safety risk monitoring during the implementation of project activities. For example, the HASP would include controls such as personal protective equipment that shall be used while performing work on the Site and procedures and engineering controls and safe work practices for the proper implementation of the work. In addition, the HASP includes health and safety air monitoring. Investigation-derived waste generated during performance monitoring activities is expected to be classified as nonhazardous. However, any remediation waste considered potentially hazardous would be properly managed in accordance with the Resource Conservation and Recovery Act (RCRA) and DTSC guidelines and transported for disposal off-site at a properly licensed hazardous waste

transportation contractor with appropriate hazardous waste manifest, in accordance with California Department of Transportation (DOT) guidelines. Only Class I and II landfills with liner systems would be considered acceptable for material containing VOCs. Wastes would be characterized and profiled for landfill acceptance according to protocols established by the landfill permits. Adherence to the health safety standards and applicable permits would safeguard the public and the environment and prohibit the potential creation of any significant hazards through the routine transport, use or disposal of hazardous materials.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- 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.

Impact Analysis: The proposed project would result in a small potential for short-term exposure of Site workers to COPCs during project-related activities. However, exposure to contaminated soil at the Site is not expected as long as engineering and institutional controls are in place to maintain surface cover to prevent direct soil exposure to on-site industrial and commercial/office workers. As previously mentioned, the proposed project would be performed in accordance with applicable state and federal occupational and health safety standards. The site-specific HASP describes health and safety procedures, including emergency response, intended to minimize incidents, injury, and health risks associated with the remedial measures proposed at the Site. The potential for short-term exposure to on-site workers would be reduced. Overall, the proposed project is protective of human health and the environment by reducing the concentration of COCs in Site Soils.

Significant hazard to the public is not expected to occur based on the substantive nest management practices during excavation and transport of materials offsite.

Impacts from dust and particulates at the excavation zone will be minimized through use of dust suppression activities, including:

- slowing the rate of work,
- restricting the rate of onsite travel to 5 miles per hour
- application of water or other dust suppressants,
- or the cessation of work until dust levels have returned to below the action level.

Excavation areas will be established with additional chain-link fence with attached visual barrier. Dust monitoring equipment will be used, and the on-site health and safety officer will provide visual monitoring. Air quality monitoring equipment will consist of handheld instruments calibrated to record real-time total dust concentrations.

Licensed haulers will transport excavated materials in accordance with Department of Transportation regulations and safety protocols when hauling hazardous materials. All driver will be trained on spill control, containment and failure procedures, who to contact in case of emergency while transporting the materials (e.g. California Highway Patrol), and how the truck is to be labeled to ensure the consistent communication of information to first responders.

If an accidental spill were to occur on the highway, Department of Transportation regulations for spills will be implemented. If a spill occurs, the driver of the truck will notify the local authorities for implementation of cleanup activities. Because the trucks will be appropriately labeled, any waste spill clean-up workers will be able to adequately don the appropriate protective gear to deal with this waste.

If an emergency or spill occurs during transport to the treatment facility, the driver of the hauling truck will use the following procedures:

- Park the vehicle in the most secure area available, away from homes, traffic, waterways, and businesses
- Stay with the vehicle until appropriate support has arrived; move a safe distance away from the vehicle or spill material if danger exists
- Notify the appropriate emergency contacts

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school.

Impact Analysis: No acutely hazardous materials will be handled at the Site. The Site will be fenced, and access limited to authorized personnel only. The proposed air monitoring and pollution controls will reduce air impacts to the surrounding areas.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- 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 it create a significant hazard to public or the environment.

Impact Analysis: The DTSC Envirostor™ database was searched for sites undergoing investigation and cleanup activities regulated by the agency. The Site was not included on the list of hazardous materials compiled pursuant to Government Code Section 65962.5.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

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

Impact Analysis: The project is not located in within the area covered by an airport land use plan or within 2 miles of an airport. The Los Angeles International Airport is approximately 10 miles away from the Site. The project activities will not result in impacts to the airport.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- f. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

Impact Analysis: Project activities will not interfere with or impair the implementation of any emergency response or evacuation plan. A project-specific health and safety plan will be prepared for the project that will identify emergency response procedures.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Impact Analysis: The project is on a highly disturbed and commercial/residential area where wildlands are not present and intermixed with residences. Excavation and removal activities of contaminated soils would not result in activities posing a risk of wildland fires.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

## References Used:

- City of Beverly Hills Zoning Maps <http://gis.cityofbeverlyhills.com/giszoning/default.aspx>.
- City of Beverly Hills, Traffic Plan: [http://www.ci.beverlyhills.ca.us/depts/engineering/traffic\\_engineering\\_n\\_signals/traffic\\_maps.asp](http://www.ci.beverlyhills.ca.us/depts/engineering/traffic_engineering_n_signals/traffic_maps.asp).
- California Environmental Protection Agency, 20 Aprils 2014. Cortese List Data Resources web site, Cortese List Section 65962.5(a).
- DTSC Envirostor™, April 2014 search
- Draft Removal Action Work Plan (Jacobs, 2019)

## 10. Hydrology and Water Quality

### Project Activities Likely to Create an Impact:

- Excavation equipment (i.e., excavator, backhoe, and/or front-end loader), and loading of excavated soil and debris onto dump trucks;
- Placement of protective measures at a storm drain around the excavation areas and stockpile areas, if needed, to divert surface water flow if present; and
- Dust suppression activities such as misting of excavation areas and equipment.

Description of Baseline Environmental Conditions: The Site is located in a highly disturbed and developed, capped, urbanized commercial and residential zoned area within the Coastal Plain of Los Angeles County, in the northwestern portion of the Central Groundwater Basin. The Central Groundwater Basin is bounded on the north and east by the Hollywood Basin and a series of low-lying hills, on the west by the Santa Monica Basin, and on the south by the Los Angeles-Orange County line. The project area is relatively flat with limited slopes and has an elevation of approximately 255 feet above mean sea level (amsl).

The surrounding property area consists of commercial use. Project activities will be conducted on developed land in areas containing either hardscape or concrete/asphalt; the completed project will be restored as its current condition with no structures built. The project is not located on or near the coast or any surface water bodies and is not a groundwater recharge area. Groundwater underlying the Site is replenished by percolation of precipitation and by subsurface flow from alluvial channels originating in the Santa Monica Mountains to the north. The regional groundwater flow near the Site is generally to the south-southeast, because of the orientation of the alluvial channels and general slope of the watershed from the Santa Monica Mountains in the area. Groundwater is at approximately 45 to 52 feet bgs.

Project water use for decontamination and dust suppression would be from a municipal water supply, and wastewater produced (decontamination water) will be properly disposed in accordance with applicable regulations. The Site is developed with existing drainage patterns, and implementation of RAW activities will not significantly impact existing drainage patterns. Dust suppression activities involving water (e.g., misting) will not be implemented to the extent of creating puddles or runoff.

A groundwater investigation was conducted at the Site in 2008 and 2009 that indicated that groundwater is not impacted with arsenic from the Site. Groundwater has been encountered at depths from 45-52 feet bgs. The investigation was conducted to assess if arsenic in soil at the Site had impacted groundwater. The maximum arsenic concentration in groundwater was 1.2 micrograms per liter (µg/L). The California Maximum Contaminant Level in groundwater is 10 µg/L. Soil sampling indicated arsenic in soils is not a threat to groundwater quality (DTSC, 2010).

The proposed project involves the excavation and removal of contaminated soil. No alternations to existing drainage or hydrology of the Site will occur and, therefore, no impacts are anticipated to occur to hydrology or water quality. No construction of buildings, structures or facilities is would occur and, therefore, no structures will be placed within a flood zone, expose people to a significant risk of loss, substantially degrade water quality, or alter the course of a stream or river.

Project activities are proposed to occur during the dry weather season. Nevertheless, the following best management practices will be implemented to minimize possible storm water runoff:

- Covering of soil stockpiles during non-work hours to abate dispersion by wind and rain

- Periodic street sweeping to clean soil tracked onto City streets, and
- Placement of protective measures at a storm drain around the excavation areas and stockpile areas, if needed, to divert surface water flow if present

Analysis as to whether or not project activities would:

- a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

Impact Analysis: The project will not result in a deterioration of water quality. Waste discharge requirements are not anticipated because the project activities will not establish any point discharges. Project activities are proposed to occur during the dry weather season (summer). Nevertheless, best management practices will be implemented to minimize storm water runoff issues at the Site in accordance with state and federal laws.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

Impact Analysis: Water for dust suppression activities will be obtained from the local municipal water supply and not groundwater. There are no groundwater wells at the Site and municipal supplies are available from a nearby hydrant. At the time of construction, the contractor will obtain a permit for water use from the hydrant, install a meter and purchase water from the municipal supply. Quantities of water needed for dust control and equipment decontamination are minimal, applied only as needed so as not to cause run-off, and will evaporate shortly after application. As groundwater will not be used groundwater supplies will not be deleted or interfere with groundwater recharge.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- result in substantial erosion or siltation on or off-site;
- substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
- create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
- impede or redirect flood flows

Impact Analysis: There are no adjacent surface water bodies to the Site. The proposed project does not include any site drainage features or planned stormwater drainage. Quantities of water needed for dust control and equipment decontamination during the implementation of the RAW are minimal and will be provided from the municipal water supply. No erosion or alteration of the existing drainage pattern of a stream or river would result on or off-site.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

Impact Analysis: The Site is not located within or adjacent to a flood zone. The Site is not located in an area subject to inundation by sieche, tsunami or seiche zones. Quantities of water needed for dust control and equipment decontamination during the implementation of the RAW are minimal. No erosion or alteration of the existing drainage

pattern of a stream or river would result during site restoration. Applicable erosion and sediment control measures shall be employed within the project area during the duration of the work in accordance with Stormwater Pollution Prevention Plan (SWPPP) requirements. Erosion and sediment control is achieved by implementing BMPs that are specific to this removal action.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact Analysis: The project does not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

References Used:

- City of Beverly Hills Zoning Maps <http://gis.cityofbeverlyhills.com/giszoning/default.aspx>.
- Draft Removal Action Work Plan (Jacobs, 2019)
- City of Beverly Hills, 2012. Public Safety Element of General Plan. Accessible online at: <http://www.ci.beverlyhills.ca.us/generalplan/documents/PublicSafety.pdf>.
- *Final EIR for the City of Beverly Hills - section 5.8, Hydrology and Water Quality* [http://www.cityofbeverlyhills.com/depts/dev\\_serv/general\\_plan\\_update/final\\_program\\_eir.asp](http://www.cityofbeverlyhills.com/depts/dev_serv/general_plan_update/final_program_eir.asp).
- FEMA 100-year flood zone mapper ([http://maps3.arcgisonline.com/ArcGIS/rest/services/A-16/FEMA\\_100-Year\\_Flood\\_Zones\\_in\\_the\\_USA/MapServer](http://maps3.arcgisonline.com/ArcGIS/rest/services/A-16/FEMA_100-Year_Flood_Zones_in_the_USA/MapServer))

## 11. Land Use and Planning

Project Activities Likely to Create an Impact:

- IC's to prohibit the use of the property as a single family residences, hospital, school, daycare center and limit the Site use to commercial, multi-use, and multiple unit housing purposes.

Description of Baseline Environmental Conditions: The Site is approximately 5 acres and located on a vacant highly disturbed land, within an urban commercial/residential setting and is currently designated as a "Railroad" in the City's General Plan Land Use Map and is zoned "T-1". A "T-1" zoning allows for railroad-related uses, and certain other uses as provided in Title 10 (Land Use and Zoning) of the Beverly Hills Municipal Code. Because the Site is located in an area arsenic-impacted soil, implementation of removal actions may not allow for unrestricted reuse of the Site. Therefore, ICs will be filed with the appropriate County offices to prohibit future soil disturbances unless conducted and managed in accordance with a DTSC-approved Soil Management Plan. The IC would also prohibit the use of the property as a single family residences, hospital, school, daycare center and limit the Site use to commercial, multi-use, and multiple unit housing purposes. The proposed project is bordered by Civic Center Drive to the south, Santa Monica Boulevard to the north, Alpine Drive to the west and Doherty Drive to the east and divided by Beverly Boulevard between Lots 12 and 13. The split of Santa Monica Boulevard from two way traffic into two one way streets separates the Triangle Section from Lot 13. The Site is surrounded on all sides by public roadways, with Santa Monica Boulevard to the north serving as a high-traffic corridor.

Analysis as to whether or not project activities would:

- a. Physically divide an established community.

Impact Analysis: The project will be within the current Site boundary and will not divide any community. The proposed project would be consistent with the existing land use designation. As part of the project operation, IC's would be filed with the appropriate County offices to prevent single family residential home use at the Site (Refer to the proposed project activities section of this Initial Study).

## Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Impact Analysis: The project will be within the current Site boundary and will not have any conflict with the current land use plan, policy, or regulation. The proposed project would be consistent with the existing land use designation. As part of the project operation, IC's would be filed with the appropriate County offices to prevent single family residential home use at the Site (Refer to the proposed project activities section of this Initial Study).

## Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

## References:

- City of Beverly Hills Zoning Maps <http://gis.cityofbeverlyhills.com/giszoning/default.aspx>.
- Draft Removal Action Work Plan (Jacobs, 2019)
- City of Beverly Hills 2012 General Plan

## 12. Mineral Resources

### Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: The Site is designated as a Mineral Resource Zone 1 (MRZ-1), indicating no mineral resources are present. A review of the City of Beverly Hills 2012 General Plan did not reveal the Site to contain any mineral resources. Hence, the proposed remediation program will not remove or affect any known mineral resources. Therefore, no further analysis of mineral resources is deemed necessary

Analysis as to whether or not project activities would:

- a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

## Impact Analysis:

## Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

## Impact Analysis:

## Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

## References:

- Surface Mining and Reclamation Act of 1975
- City of Beverly Hills 2012. General Plan

### 13. Noise

#### Project Activities Likely to Create an Impact:

- Excavation equipment (i.e., excavator, backhoe, and/or front-end loader), and loading of excavated soil and debris onto dump trucks;
- Transportation of impacted soil and debris to appropriate off-site permitted disposal facilities; and
- Transportation of clean fill material from off-site locations.

Description of Baseline Environmental Conditions: The Site is located in a highly disturbed and developed, urbanized residential and commercial area, immediately adjacent to Santa Monica Boulevard, CA State Highway Route 2, which is recognized as a major source of highway noise (80 Community Noise Equivalent Level) by the City of Beverly Hills Noise Element. The Beverly Hills Municipal Code Section 5-1-205 (Title 5, Article 2, Specific Noise Sources and Regulations, Construction) outlines the City's noise policies requiring hearing protection be provided to employees exposed to noise levels above 80 dBA or more on an eight-hour time-weighted average basis. The City's General Plan does not specify noise levels for industrial land use but noise exposure up to 80 dBA Community Noise Equivalent Level (CNEL) is normally acceptable (City of Beverly Hill, 2012). Existing noise in the project area primarily includes vehicle traffic and nearby industrial operations. The primary source of noise generated from the proposed project would be related to short-term excavation and construction activities. Noise during remedial activities would be consistent with noise levels in industrial area. The Site work area is located in an area where the noise level is generally 80 dBA. Noise Best Management Practices (e.g., limiting traffic speed, enclosing system blowers, using equipment with mufflers, earplugs, etc.) would ensure that project activities will not expose workers and people in the general vicinity of the proposed project to noise levels in excess of 80 dBA restrictions on construction activities between the 8:00 p.m. and 6:00 a.m. of any day, or at any time on a Sunday or public holiday unless such person has been issued an after-hours construction permit issued pursuant to subsection C of this section. In addition, no person shall engage in such work within a residential zone, or within five hundred feet (500') of a residential zone, at any time on a Saturday unless such person has been issued an after -hours construction permit issued pursuant to subsection C of this section.

Analysis as to whether or not project activities would result in:

- a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Impact Analysis: Exterior noise standard for sensitive noise receptors is above 80 dBA, respectively, in the Noise Element of the Beverly Hills General Plan. The City regulates ambient noise via the City of Beverly Hills Code of Ordinances (Code Section 5-1-205 (Title 5, Article 2, Specific Noise Sources and Regulations, Restrictions On Construction Activity). A high level of ambient noise exists in the project vicinity current traffic and commercial activities. The project activities will be temporary and will not contribute to cumulative noise impacts as project activities are expected to be below the acceptable 80 dBA CNEL. The primary noise source in the project area is traffic noise from major streets serving the Site area. The proposed remedy will not cause an increase in existing noise levels nor will it expose people to severe noise levels.

Activities will be conducted between the hours of 8:00 a.m. and 6:00 p.m. for five days, Monday through Friday, which is in accordance with the Beverly Hills Municipal Code for noise. Noise monitoring will be conducted to assure compliance with the City of Beverly Hills Noise Ordinance. The use of haul trucks and heavy equipment (e.g., excavators, loaders, and dozers) associated with project activities would result in minor increases in ambient noise levels in the vicinity of the project site. Each anticipated piece of construction equipment at 50 feet is estimated to produce 75-80 dBA on average.

Conclusion:

- Potentially Significant Impact  
 Potentially Significant Unless Mitigated  
 Less Than Significant Impact  
 No Impact

- b. Generation of excessive groundbourne vibration or groundbourne noise levels.

Impact Analysis: The excavation is unlikely to generate any significant ground borne vibration or noise and would be limited to excavation of soils and loading and transport offsite to a permitted landfill. Proposed project could generate minor ground borne vibration from use of heavy equipment and haul trucks. Construction equipment such as excavators,

backhoes and haul trucks, would not generate vibrations that could result in ground borne noise or vibration above the industrial use standards for the area. There are no residential receptors near the Site. The nearest residential area is approximately 4.0 mile north of the Site. Vibration levels greater than 0.1 in/sec could be perceptible and possibly annoying to a human. Vibration producing equipment for this project is anticipated to have vibration levels of 0.035 to 0.089 inches per second (in/sec) at 25 feet from the source. Excessive ground borne vibration and/or ground borne noise (i.e., ground borne vibration or noise greater than 0.3 in/sec) are not anticipated during remedial or operational activities. Workers will be wearing appropriate hearing protection.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- c. For a project within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose other people residing or working in the project area to excessive noise levels?

Impact Analysis: This issue is not applicable to this Site. There is no airport land near the Site. There are no private airstrips within 5 miles of the Site

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

References Used:

- City of Beverly Hills Municipal Code 15.90.
- Final EIR for the City of Beverly Hills – Section 5.6, Noise:  
[http://www.cityofbeverlyhills.com/depts/dev\\_serv/general\\_plan\\_update/final\\_program\\_eir.asp](http://www.cityofbeverlyhills.com/depts/dev_serv/general_plan_update/final_program_eir.asp).
- City of Beverly Hills – Noise Ordinance  
[http://www.amlegal.com/nxt/gateway.dll/California/beverlyhills/californiamunicipalcode/title15zoning/chapter1590noisestandardsandregulation?f=templates\\$fn=altmain-nf.htm\\$q=15.90%20\\$x=server\\$3.0#LPHit1](http://www.amlegal.com/nxt/gateway.dll/California/beverlyhills/californiamunicipalcode/title15zoning/chapter1590noisestandardsandregulation?f=templates$fn=altmain-nf.htm$q=15.90%20$x=server$3.0#LPHit1).
- City of Beverly Hills 2012, General Plan
- Bolt, Beranek and Newman, Noise from Construction Equipment and Operations building Equipment, and Home Appliances. Prepared for the U.S. Environmental Protection Agency, Office of Noise Abatement and Control, Washington, D.C., 1971.

## 14. Population and Housing

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: The Site is located in a highly disturbed urban, industrial and commercial area. Topography at the Site is relatively flat, the land surface is covered with soil and vegetation. The surrounding property area consists of residential and commercial use. No housing is in close proximity to the Site or will be affected by the proposed removal action. No activities of the project will affect population growth, existing housing, or create the need for additional housing. The proposed project is a removal action to clean up contaminated soil. The project would not result in any new population and housing resources at the Site and would not add any infrastructure that would yield indirect growth. The project Site does not contain any existing residential users. Therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

- a. Induce substantial unplanned population growth in area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

Impact Analysis:

Conclusion:

- Potentially Significant Impact

- Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

References:

- Draft Removal Action Work Plan (Jacobs, 2019)

## 15. Public Services

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: The City of Beverly Hills and the County of Los Angeles are responsible for operation and maintenance of the existing public service infrastructure at the Site, including maintenance of public roads surrounding the Site and the operation of the public water supply and sewer system. No schools or daycare facilities are located near the project area. Public services are provided to the Site by local municipalities and regional providers (e.g., Southern California Edison, Southern California Gas.) No permanent structures, buildings or facilities are part of the proposed project that will require public services or cause an impact on existing public services.

Implementation of the proposed project will involve use of the excavation equipment, trucks and/or bins, and a number of workers trained to handle the contaminated soil that is excavated and transported for disposal at permitted off-site landfills over approximately 6 weeks. No permanent or business structures are being built as a part of this remediation project. Work areas will be fenced to restrict access to the Site. Emergency vehicles and first responders will have adequate access to the Site via Santa Monica Boulevard, Alpine Drive or Doherty Drive.

Analysis as to whether or not project activities would:

- a. Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:
- Fire protection. The Beverly Hills Fire Department Headquarters is located at 445 N. Rexford Drive, within a half mile of the Site. The Beverly Hills Fire Department Station #3 is located at 180 S. Doherty Drive, approximately one and a quarter miles from the Site. Emergency vehicles will enter and exit the Site from access gates to be located along Civic Center Drive.
  - Police protection. The Beverly Hills Police Department is located at 464 N. Rexford Drive, within one third of a mile from the Site. Emergency vehicles will enter and exit the Site from access gates to be located along Civic Center Drive.
  - Schools The Rodeo Elementary School is located at 605 Whittier Drive, 1.4 miles west of the Site. The Beverly Hills Unified School District is located at 205 S. Lasky Drive, 1.3 miles southwest of the Site. The Good Shepard Catholic School is located at 148 S. Linden Drive, 1.3 miles southwest of the Site.
  - Parks. A City park is located approximately one quarter of a mile west of the Site on the north side of Santa Monica Boulevard.

- Other public facilities.

Impact Analysis: The County of Los Angeles and the City of Beverly Hills provide Public Services and facilities in the Site area. The public services provided include sewer service, water supply, storm drains, electricity, gas, telephone, fire protection, police protection, schools, and refuse collection. The project activities will not require, involve, or result in a change in the need for, or availability of, public services. There are no daycares, nursery's or schools located near the project area. .

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

References:

- Draft Removal Action Work Plan (Jacobs, 2019)
- City of Beverly Hills, Public Facilities: [http://www.ci.beverlyhills.ca.us/about/city\\_services.asp](http://www.ci.beverlyhills.ca.us/about/city_services.asp)

## 16. Recreation

Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: The Site is located in a highly disturbed and developed, urbanized residential and commercial area. Topography at the Site is relatively flat, the land surface is covered with soil and vegetation. The surrounding property area consists of residential and commercial use. Project activities will be conducted on undeveloped land in areas containing landscaping or soil. The proposed project will not impact existing recreational facilities, nor require the construction of additional recreational facilities. Beverly Gardens Park is located approximately 400 feet southwest of the Site. West Hollywood Park is located approximately 1,000 feet northeast of the Site. Project activities will have no impact on parks or recreational facilities. Therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

- a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Does the project include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

References:

- Draft Removal Action Work Plan (Jacobs, 2019)

## 17. Transportation

Project Activities Likely to Create an Impact:

- Construction-related traffic mobilization;
- Transportation of impacted soil and debris to appropriate off-site permitted disposal facilities; and
- Transportation of clean-fill material from off-site locations to on-Site locations.

Description of Baseline Environmental Conditions: The Site is located in a highly disturbed and developed, urbanized residential and commercial area. Transportation and disposal activities will be performed in accordance with applicable Federal, State and local laws, regulations, and ordinances. During soil transport activities, trucks will enter from Civic Center Drive for Lots 12 and 13. During loading operations, trucks will be staged adjacent to Triangle Section in a lane closed to traffic on Beverly Boulevard. A flag person will be located at each site to assist the truck drivers to safely enter and exit the Site. Transportation will be coordinated in such a manner that at any given time, onsite trucks will be in communication with the site trucking coordinator. In addition, all vehicles driving onsite will be required to maintain slow speeds (i.e., less than 5 miles per hour) for safety and for dust control purposes. Prior to exiting the Site, vehicles will be swept to remove any extra soil from areas not covered or protected. A cleanup/decontamination area will be set up as close to the loading area as possible to minimize spreading the impacted soil. Prior to the off-site transport, the site manager will be responsible for inspecting each truck to check that the payloads are adequately covered, that the trucks are cleaned of excess soil and properly placarded, and that the truck manifests have been completed and signed by the generator (or its agent) and the transporter. As the trucks leave the Site, the flag person will assist the truck drivers to safely merge with traffic on Civic Center Boulevard.

Traffic flow patterns will be coordinated to ensure safe flow of traffic along Santa Monica Blvd and Civic Center Drive. These traffic flow patterns will be established through portable traffic signs or flag persons posted at the Site entrance and exit. Excavated soils will be hauled by a qualified (licensed/registered and insured) waste hauler in tarped trucks under manifests or proper shipping documents to a proper treatment/disposal facility. Approximately 330 trucks trips will be required to transport the contaminated soil from the Site. The number of truck trips will not exceed the significance threshold of 350 heavy-duty truck round trips per day. The traffic Level of Service (LOS) is a professional industry standard by which the operating conditions of a given roadway segment or intersection are measured; LOS is defined on a scale of A-F; the intersection of Santa Monica Blvd and Wilshire Blvd, located approximately ½ miles southwest of the Site, has a LOS of F (forced and breakdown flow) during peak hours.

Analysis as to whether or not project activities would:

- a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Impact Analysis: The project will require approximately 10 trucks (330 truck trips) to transport contaminated soil from the Site and 10 trucks (264 truck trips) to transport clean backfill soil to the Site. This activity will take approximately 6 weeks. It is not expected that the trucks will cause an impact to the local facilities because entering and exiting the Site will be staggered throughout the day. Truck routes will avoid using interior residential streets as much as possible to minimize impact. Applicable City permits will also be obtained.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).

Impact Analysis: The Site is within and surrounded by residential and commercial land uses. The Site is bounded by two major roads in close proximity. The Level of Service (LOS) for the intersection of Santa Monica Blvd and Wilshire Blvd, located approximately ½ miles southwest of the Site, has a LOS of F (forced and breakdown flow) during peak hours. Truck traffic from this project will avoid peak commute hours to minimize traffic impacts for the project area. There will not be any long term traffic impact. The increase in truck traffic will not exceed the LOS for this area.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Impact Analysis: The project does not include changes to City streets. There will be no substantial increase in hazards due to design features or incompatible uses. Traffic flow patterns will be coordinated to ensure safe flow of traffic along Santa Monica Blvd and Civic Center Blvd. These traffic flow patterns will be established through portable traffic signs or flag persons posted at the Site entrance and exit. The project does not include design features to change or alter the existing setting.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- d. Result in inadequate emergency access.

Impact Analysis: The project will not alter or change the existing emergency access routes at Santa Monica Blvd and Civic Center Blvd.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

#### References:

- Building News Incorporated Work Area Traffic Control Handbook, 2006
- Google Earth, accessed 20 January 2015;
- City of Beverly Hills, December, 2012 revision. General Plan – Circulation Element (originally adopted 2 February 1998). Orange County Transportation Authority, 2013. Congestion Management Program.
- Draft Removal Action Work Plan (Jacobs, 2019)
- City of Beverly Hills – Traffic Plan:  
[http://www.ci.beverlyhills.ca.us/depts/engineering/traffic\\_engineering\\_n\\_signals/traffic\\_maps.asp](http://www.ci.beverlyhills.ca.us/depts/engineering/traffic_engineering_n_signals/traffic_maps.asp)

## 18. Tribal Cultural Resources

Project Activities Likely to Create an Impact: None.

Description of Baseline Environmental Conditions: The Site is located in a highly disturbed, developed, and urbanized residential and commercial area since 1938. The Site itself has been previously disturbed by subsurface activities associated with development, and operational activities. The removal action will not cause a permanent adverse change in the significance of a historical, archaeological, or other cultural resources. The Site is located within residential and commercial areas and surrounded by similar land uses.

A Sacred Lands search request was sent to the Native American Heritage Commission (NAHC). The NAHC responded on June 6, 2013 and stated that the presence of Native American traditional cultural places were not identified in the project area. A list of tribal contacts was provided by NAHC who may have an interest or knowledge of cultural resources in or near the project area.

DTSC's Office of Environmental Justice and Tribal Affairs (EJTA) contacted the Native American Heritage Commission (NAHC) about this Site Tribal project notification letters were sent to contacts on May 27, 2015. One response was received from the listed tribes. They requested that a Native American monitor be available in case anything was uncovered or discovered during the remediation activities. This has been incorporated into the RAW. There are no known prehistoric or historic archaeological structures in the general Site area, or any Native American cultural resources. Project activities will be conducted in a highly disturbed, urbanized industrial area with no known historical resources within the Site. No information from any previous development or site disturbance activities were found that would warrant a search of the Registry of Sacred Sites.

As a precaution, the Removal Action Workplan (RAW) includes the following recommendation: If any potential pre-historic or historic-era materials are discovered during excavation activities, all work in that area will be halted or diverted until a

qualified archaeologist can evaluate the nature and significance of the finds. If the materials are found to be Native American in origin, immediately contact any of the Tribal Contacts on the list provided by NAHC to alert them of the discovery. DTSC staff and property owner are also to be immediately notified and informed of this situation. After discussion with any of the Tribal Contacts and/or their respective Cultural Resources Managers and in collaboration with DTSC (including the Office of Environmental Justice and Tribal Affairs) and the property owner, implement any measures deemed necessary to record and/or protect the pre-historic or historic resources.

In addition, the contractors performing the remedial activities on the Site are to be alerted to be observant and aware that they may encounter potential Native American cultural or archaeological resources and/or human remains.

In the event of accidental discovery or recognition of any human remains during ground disturbing activities, excavation or disturbance of the Site or any nearby area shall stop immediately, and the County Coroner notified to determine its origin. The coroner will determine disposition within 48 hours. If the remains are Native American, the coroner will be responsible for contacting the NAHC within 24 hours. The NAHC will identify and notify the person(s) who might be the most likely descendent (MLD) who will make recommendations for the appropriate and dignified treatment of the remains (Public Resources Code, section 5097.98). The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the Site (CEQA Guidelines, CCR section 15064.5(e); HSC section 7050.5).

In the event of accidental discovery of potential cultural or archaeological resources, immediately suspend excavation activities in the immediate area and surrounding 50 feet until a qualified archaeologist can evaluate the nature and significance of the discovery. Immediately contact any of the Tribal Contacts on the list provided by NAHC to alert them of the discovery. DTSC staff and property owner are also to be immediately notified and informed of this situation. After discussion with any of the Tribal Contacts and/or their respective Cultural Resources Managers and in collaboration with DTSC (including the Office of Environmental Justice and Tribal Affairs) and the property owner, implement any measures deemed necessary to record and/or protect the cultural or archaeological resources.

Analysis as to whether or not project activities would:

- a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
- b.
  - i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Impact Analysis: No significant Tribal Cultural Resources have been identified at the Site. The Native American Heritage Commission identified several potential Native American Tribes interested in the Site. Tribal project notification letters were sent to contacts on May 27, 2015. One response was received from the listed tribes. They requested that a Native American monitor be available in case anything was uncovered or discovered during the remediation activities. DTSC will consult with any Native American Tribe requesting consultation on the Site. If requested by one of the tribes, tribal monitoring will be present during project activities. If any archaeological resources are uncovered during Site work, project activities will be halted and a Tribal representative(s) and/or a qualified archaeologist will be contacted immediately. Finding archeological resources is unlikely, so no impact is expected.

## Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

## References Used:

- Significant Historical Properties in the City of Beverly Hills:  
<http://www.cityofbeverlyhills.com/civicax/filebank/blobdload.aspx?blobid=2475>.
- Native American Historic Commission. 2013. Request for Sacred Lands File Search and Native American Contacts list for the "Draft Removal Action Plan for Beverly Hills, Lot 12 & 13," located in Los Angeles County, California. June 6, 2013.

**19. Utilities and Service Systems**Project Activities Likely to Create an Impact:

- Minimal runoff from dust suppression activities

**Description of Baseline Environmental Conditions:** The project does not involve use of existing wastewater infrastructure. Water for dust suppression will be obtained from municipal water supplies. No water treatment facilities will be constructed. Site is located in a highly disturbed and developed, urbanized residential and commercial area. Topography at the Site is relatively flat, the land surface site is covered with vegetation and soil. The surrounding property area consists of residential and commercial use. The proposed project is planned at property currently undeveloped. The proposed project involves a removal action associated with contaminated soil. No buildings, structures or infrastructure will be built or added to the property as a result of the project. In addition, remediation activities are expected to be temporary, and will not generate the need for additional utilities or service systems. The project is not expected to generate wastewater. The project activities will not require the construction of new wastewater treatment facilities or expansion of existing facilities. Existing facilities will be sufficient to carry out the project. The project will not require new construction or expansion of storm water drainage. Existing drainage will be sufficient to carry out the project. Excavated soils will be managed as potentially hazardous wastes and transported by trucks to permitted landfills for disposal; actual determination of waste classification will be based on profile samples collected from soils to be disposed prior to or during implementation of the proposed project.

Analysis as to whether or not project activities would:

- a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board (RWQCB).

**Impact Analysis:** Waste waters generated from the planned removal action include equipment decontamination waste waters and sanitary waste waters contained within portable toilets. Waste waters generated by decontaminating equipment will be stored in a portable poly tank and disposed of off-site. A contractor will be retained to provide, maintain and remove the portable sanitary toilets required during construction activities. No permits associated with these waste waters will be required by the RWQCB.

## Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

**Impact Analysis:** None required.

## Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Impact Analysis: No stormwater drainage facilities will be constructed or expanded.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.

Impact Analysis: Water use will be limited to dust suppression and vehicle decontamination onsite. Volumes projected for use are minimal and will not require new or expanded entitlements.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- e. Result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments.

Impact Analysis: Waste water generated will be limited to water use for vehicle decontamination, which will be collected onsite then taken off-site for disposal. As stated above, short-term workers would be on-site during construction activities; as a result, limited wastewater would be generated. Temporary port-a-pots would be utilized by construction workers, and emptied for off-site transport by a managing company. Therefore, no change to the existing wastewater treatment provider's capacity will be needed.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- f. Be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs.

Impact Analysis: The proposed project is not expected to generate solid waste (e.g. municipal refuse) in an amount that would require the transportation and disposal to a Class III non-hazardous landfill. Any excavated material or debris accumulated during the Removal Action will be transported to a licensed facility permitted to accept the material. Only licensed disposal facilities that have current solid waste facility permits, have permits to accept the material as profiled, and have sufficient capacity to accept the material will be used.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- g. Comply with federal, state, and local statutes and regulations related to solid waste.

Impact Analysis: The project will comply with all applicable statutes and regulations related to solid waste generation and disposal pursuant to California Public Resources Code, Title 27, Division 2, Sections §40000-40002, and 40508.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

## References:

- Draft Removal Action Work Plan (Jacobs, 2019)
- City of Beverly Hills – Traffic Plan:  
[http://www.ci.beverlyhills.ca.us/depts/engineering/traffic\\_engineering\\_n\\_signals/traffic\\_maps.asp](http://www.ci.beverlyhills.ca.us/depts/engineering/traffic_engineering_n_signals/traffic_maps.asp)

**20. Wildfire**Project Activities Likely to Create an Impact: None

Description of Baseline Environmental Conditions: The Site is located in a highly disturbed, developed, and urbanized residential and commercial area with little or no trees. The Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Therefore, no further analysis is deemed necessary.

Analysis as to whether or not project activities would:

- a. Substantially impair an adopted emergency response plan or emergency evacuation plan.

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- c. 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.

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Impact Analysis:

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

## References Used:

- Draft Removal Action Work Plan (Jacobs, 2019)

## 21. Mandatory Findings of Significance

- a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

- c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

Conclusion:

- Potentially Significant Impact  
 Less Than Significant With Mitigation Incorporated  
 Less Than Significant Impact  
 No Impact

References Used:

- Draft Removal Action Work Plan (Jacobs, 2019)

### **Determination of Appropriate Environmental Document:**

Based on evidence provided in this Initial Study, DTSC makes the following determination:

The proposed project **COULD NOT HAVE** a significant effect on the environment. A **Negative Declaration** will be prepared.

The proposed project **COULD HAVE** a significant effect on the environment. However, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **Mitigated Negative Declaration** will be prepared.

The proposed project **MAY HAVE** a significant effect on the environment. An **Environmental Impact Report** is required.

The proposed project **MAY HAVE** a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **Environmental Impact Report** is required, but it must analyze only the effects that remain to be addressed.

The proposed project **COULD HAVE** a significant effect on the environment. However, all potentially significant effects (a) have been analyzed adequately in an earlier Environmental Impact Report or Negative Declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier Environmental Impact Report or Negative Declaration, including revisions or mitigation measures that are imposed upon the proposed project. Therefore, nothing further is required.

**Certification:**

I hereby certify that the statements furnished above and in the attached exhibits, present the data and information required for this initial study evaluation to the best of my ability and that the facts, statements and information presented are true and correct to the best of my knowledge and belief.

<i>Sara Vela</i>		09/11/2020
Preparer's Signature		Date
Sara Vela	Environmental Scientist	(818) 717-6618
Preparer's Name	Preparer's Title	Phone
		09/15/2020
Branch or Unit Chief Signature		Date
Haissam Y. Salloum, P.E.	Supervising Hazardous Substances Engineer II	(818) 717-6538
Branch Chief Name	Branch Chief Title	Phone

## Acronyms and Abbreviations

amsl	above mean sea level
bgs	below ground surface
BHLC	Beverly Hills Land Company
BMP	Best Management Practice
Cal-EPA	California Environmental Protection Agency
CCR	California Code of Regulations
CDC	California Department of Conservation
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CNEL	Community Noise Equivalent Level
DTSC	Department of Toxic Substances Control
DWR	California Department of Water Resources
EPA	U. S. Environmental Protection Agency
HASP	health and safety plan
HCP	Habitat Conservation Plan
HHRA	Human Health Risk Assessment
HSC	California Health and Safety Code
mg/kg	milligram(s) per kilogram
mg/L	milligram(s) per liter
ND	Negative Declaration
OSHA	Occupational Safety and Health Administration
PPE	personal protective equipment
RAW	Removal Action Work Plan
RCRA	Resource Conservation and Recovery Act
ROW	right-of-way
SCAQMD	South Coast Air Quality Management District
Site	Beverly Hills Land Company site
UPRR	Union Pacific Railroad
USFWS	United States Fish and Wildlife Service
VCA	Voluntary Cleanup Agreement
VOC	volatile organic compound
WDR	water discharge requirement

# ATTACHMENT 1

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