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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### D. HAZARDS AND HAZARDOUS MATERIALS

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#### INTRODUCTION

This Section is based upon the analysis and conclusions of the following technical reports prepared for the Project Site. These reports compose Appendix D of this Draft EIR, and are available for review at Santa Monica College Bundy Campus, located at 3171 S. Bundy Drive, Room 120, Los Angeles, California 90066.

- Phase I/II Environmental Site Assessment, BAE Systems 3171 Bundy Drive, Los Angeles, California (Phase I/II ESA), prepared by Arcadis Geraghty & Miller, June 2001.
- Review of Environmental Documentation BAE Systems - 3171 S. Bundy Drive, Los Angeles, California (Review of Environmental Documentation), prepared by West Coast Environmental and Engineering, November 21, 2001.
- BAE Systems Property, 3171 South Bundy Drive, Los Angeles, California (Appraisal Report), prepared by Buss-Shelger Associates, November 30, 2001.
- Limited Assessment of Soil and Groundwater Conditions BAE Systems - 3171 S. Bundy Drive, Los Angeles, California (Limited Soil and Groundwater Assessment), prepared by West Coast Environmental and Engineering, December 1, 2001.
- Companion Sampling of Soil and Groundwater BAE Systems - 3171 S. Bundy Drive, Los Angeles, California (Companion Soil and Groundwater Sampling), prepared by West Coast Environmental and Engineering, January 21, 2002.
- Supplemental Geotechnical Investigation, Proposed Driveway and Retaining Walls, 3171 S. Bundy Drive, Los Angeles, California (Geotechnical Investigation), prepared by Geolabs - Westlake Village, August 19, 2003.
- Bulk Sampling for Asbestos, Lead East Building (2 Story), 3171 S. Bundy Drive, Santa Monica, California (Asbestos and Lead Report), prepared by Ellis Environmental Management, Inc., December 11, 2003.

#### ENVIRONMENTAL SETTING

##### Existing Bundy Campus

The approximately 10.4-acre Bundy Campus is located at 3171 S. Bundy Drive in the City of Los Angeles, adjacent to the Santa Monica Airport. The Bundy Campus is primarily bounded by Bundy Drive to the east, residential uses along Stewart Avenue to the west, residential uses along Stanwood

Place to the south, and commercial/industrial uses fronting Airport Avenue to the north. The northern side of the Bundy Campus falls along the boundary between the Cities of Los Angeles and Santa Monica.

The Bundy Campus was purchased by SMC in December 2001 from BAE Systems, a major defense contractor. For approximately 50 years prior to its purchase by SMC, BAE Systems and the previous owner, Lear Siegler Services, Inc., used the Project Site as a manufacturing and research and development facility.

Since the purchase of the Bundy Campus, several improvements have been made by SMC pursuant to an Initial Study/Mitigated Negative Declaration (IS/MND) adopted in early 2004. Such improvements included the demolition of all previously existing structures except for the four-story West Building and two-story East Building. The West Building was renovated for 16 classrooms along with multi-purpose rooms, offices, and student services functions. An internal roadway, a 10-foot soundwall along the southern and western property boundaries, and approximately 609 surface parking spaces were also constructed. The East Building was not addressed in the previous IS/MND and remains vacant.

The East Building consists of a basement, first floor with main lobby, second floor, and penthouse. The East Building is constructed of concrete masonry with cast in-place floors and a roof deck covered with an elastomeric coating. The exterior walls consist of aluminum and glass curtain panel windows with brick accent panels. Retaining and remodeling the East Building was determined not to be cost-effective based on the fact that the building does not meet code requirements and the existing column structure within the building does not support the typical configuration required for 30-seat classrooms.

### **Existing Surrounding Uses**

The Bundy Campus is located in an urbanized area of the City of Los Angeles and is surrounded by a mix of residential and airport-related commercial/industrial land uses. Single-family residences are located east of the site across Bundy Drive, west of the site along Stewart Avenue, and south of the site along Stanwood Place. Commercial/industrial uses and surface parking associated with the Santa Monica Airport front Airport Avenue just north of the Bundy Campus. On the northern side of Airport Avenue is the Santa Monica Airport.

Surrounding uses that would be considered sensitive receptors with respect to hazardous material exposure (i.e., areas with potential to contain children under 14, the elderly over 65, or the sick/disabled) would include the single-family residences located immediately adjacent to the Bundy Campus along the southern and western property boundaries (e.g., fronting Stanwood Place and Stewart Avenue, respectively). The Bundy Campus currently provides community college classes within the West Building. The Bundy Campus also provides community services for high school students and other community members, which at times include children under 14, the elderly over 65, and the sick/disabled. Thus, the Bundy Campus itself would also be considered a sensitive receptor. Other than uses discussed herein, there are no additional schools, playgrounds, hospitals, retirement homes, or other known areas in the project vicinity which would be identified as sensitive receptors.

## **Topography and Geology**

The Bundy Campus is located in the northwestern portion of the Los Angeles Basin, approximately seven miles south of the Santa Monica Mountains and 2.5 miles east of the Pacific Ocean. The Bundy Campus is underlain by faulted Tertiary and Pleistocene age sediment with recent alluvium composed of fine to medium sands, silt, and clay near the surface soil. The Bundy Campus' topographic elevation is approximately 140 feet above mean sea level (msl) and slopes slightly toward the west.

The Geotechnical Investigation prepared for the Bundy Campus in 2003 determined that terrace deposits at the site contain generally fine sand with trace silt, in a dense moist condition. The upper 18 to 24 inches of the terrace deposits are typically weathered (slightly moist, porous, and containing roots and rootlets). The soil beneath the Bundy Campus contains varying depths of fill, up to a maximum of five feet below ground surface (bgs), consisting of silty to clayey sand in loose to medium dense and dry to moist conditions.

## **Hydrology**

The Bundy Campus lies within the Santa Monica Ground Water Basin. The Phase I/II ESA included a review of previous studies, which concluded that groundwater in the project area is encountered at depths that range between 39 and 68 feet bgs, and flows in a southwesterly direction. During borings conducted as part of the Limited Soil and Groundwater Assessment, groundwater was encountered beneath the Bundy Campus at a depth generally between 67 feet and 68 feet bgs. No open bodies of water or wetlands exist on the Bundy Campus. The nearest open body of water to the Bundy Campus is the Pacific Ocean, which is located approximately 2.5 miles to the west.

## **Historic Use of Project Site**

### ***Database Search for Project Site***

The Phase I/II ESA included a search of regulatory agency hazardous materials database listings for the Project Site. The Project Site is listed on the Right-to-Know Facility Index System (FINDS), Resource Conservation and Recovery Information System (RCRIS), and Hazardous Waste Information System (HAZNET), generally in association with the storage and/or use of hazardous material onsite. Additional information on hazardous materials used and stored onsite is provided under the "Project Site Reconnaissance" discussion.

### ***Historic Operations at Project Site***

The Phase I/II ESA included information provided in an interview with BAE Systems representatives. Until its closure, BAE Systems manufactured primarily electronic control systems for the aerospace industry on the Project Site. Several wastes were generated over this period and BAE Systems retained the United States Environmental Protection Agency (USEPA) ID number CAD008285736. BAE Systems provided a list of chemicals most frequently used and disposed of on the Project Site under its operation:

- 1,1,1-trichloroethane (1,1,1-TCE);<sup>1</sup>
- methyl ethyl ketone (MEK);
- prozone solvent;
- lead solder;
- tuolene;
- xylenes;
- isopropyl alcohol; and
- hexavalent chromium (chromic acid).

Manufacturing operations formerly occurred in a BAE building in the center of the site which was demolished by SMC pursuant an IS/MND adopted in 2004. Adjacent to this former manufacturing building was a circuit board cleaning area that discharged wastewater through above-ground piping to the onsite wastewater treatment plant (WWTP) prior to discharge into the City of Los Angeles sewer (under a formal City of Los Angeles Public Works Department discharge permit). The WWTP contained an evaporator and a four-stage clarifier. Various Notice-of-Violations (NOVs) for exceedance of allowable concentrations of metal and solvents were recorded during BAE Systems' operation. Another clarifier located outside along the southeast corner of the former manufacturing building was backfilled with gravel and concrete in 1994. Waste was disposed of or recycled at off-site facilities permitted to accept hazardous waste. Prior to 1992, hazardous waste was stored along the southwest side of the former manufacturing building.

### ***Historic Use of East Building***

The Appraisal Report prepared for the Project Site describes the existing East Building as built in 1961, 33,055 square feet in area, and formerly used as an office-building with mechanical equipment in the basement. The Phase I/II ESA describes the East Building as constructed in 1963, approximately 32,000 square feet in area, and formerly used as office space.

### **Historic Use of Surrounding Properties**

#### ***Database Search for Surrounding Properties***

The Phase I/II ESA included a search of regulatory agency hazardous materials database listings for sites within the American Society for Testing Materials (ASTM)-designated search radius (i.e., generally one, one-half, or one-quarter mile radius) of the Project Site. The search revealed two Comprehensive Environmental Response, Compensation, and Liability Information System-No Further Remedial Action Planned (CERCLIS-NFRAP) sites; four RCRIS-Small Quantity Generators (SQG) sites; one Cal-Site; four California Hazardous Material Incident Report System (CHMIRS) sites; six Hazardous Waste Substance (CORTESE) sites; five Leaking Underground Storage Tank (LUST) sites; two Underground Storage Tank (UST) sites; one State Facility Inventory Database (CA FID) site; and six HAZNET sites within the survey area.

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<sup>1</sup> Prior to 1995.

### ***Surrounding Properties of Environmental Concern***

Of the aforementioned hazardous material sites identified in the vicinity, the Phase I/II ESA concluded that surrounding properties that could be of concern to the Project Site included two Santa Monica Airport sites and one Shell Oil Company site. Groundwater located beneath these properties was known to have been contaminated. A review of environmental files provided by the Los Angeles Regional Water Quality Control Board (LARWQCB) provided the following information associated with the two Santa Monica Airport properties.

#### *Santa Monica Airport Administrative Building*

The Santa Monica Airport Administrative Building is located northwest of the Bundy Campus at 3223 Donald Douglas Loop South in the City of Santa Monica. Deep aquifer groundwater at the Administrative Building is encountered at depths between 139 and 155 feet bgs and flows in a southeasterly direction. Shallow aquifer groundwater beneath the Administrative Building encountered at a depth approximately 39 feet bgs, was impacted with petroleum hydrocarbons (TPH), including phase-separated hydrocarbons (PSH) and dissolved phase hydrocarbons (benzene, toluene, ethylbenzene, and xylenes (BTEX)). The lateral extent of the groundwater contamination was reportedly limited.

Soil impacted with hydrocarbons was present at the subsurface. A Soil Vapor Extraction system was installed and operated at the Administrative Building property between July 1996 and July 1997. A subsequent Human Health Risk Assessment (HHRA) was prepared which concluded site closure with no further action recommended. Therefore, it was determined that the Administrative Building property does not present a significant risk to the health and safety of employees, faculty, or students at the Bundy Campus.

#### *Santa Monica Residual Property*

The Santa Monica Residual Property is located northwest of the Bundy Campus at 3000 Airport Avenue in the City of Santa Monica. Deep aquifer groundwater at the Santa Monica Residual Property is encountered at a depth between 109 and 112 feet bgs and flows in a southeasterly direction. PSH was discovered in approximately 0.5 feet of the deep aquifer and in approximately one foot of the shallow aquifer (located at a depth of 64 to 66 feet bgs). Wells downgradient of this property did not contain any detectable concentrations of petroleum hydrocarbons or volatile organic compounds (VOCs).

Soil impacted with hydrocarbons was present at the subsurface, exceeding Los Angeles County Action Levels. Soil tests also indicated a relatively low presence of 2-butanone, for which no action limit was established. No further information was available; however, the City of Santa Monica has been identified as the party responsible for this release.

### **Project Site Reconnaissance**

The Phase I/II ESA included site reconnaissance for hazardous materials and substances on the BAE site on April 19, 2001. None of the following were observed on the BAE site during the site reconnaissance:

foundations of former structures; odors; pools of liquid; electrical or hydraulic equipment known or likely to contain polychlorinated biphenyls (PCBs); unidentified substance containers; stained soil or pavement; corrosion or degradation of floors and walls; pits, ponds, or lagoons; stressed vegetation; wells; septic systems; or evidence of existing USTs. While no USTs were observed on the Project Site, a former UST may have been located near the northern property boundary, and may have been removed in the 1970s. (No formal documentation exists to verify this activity.) Following is a discussion of the hazardous materials and substances that were identified on the Project Site.

### ***Utility Lines***

The Phase I/II ESA observed three pole-mounted transformers outdoors on the southeast portion of the Project Site, owned and maintained by the City of Los Angeles Department of Water and Power (LADWP). The Geotechnical Investigation prepared for the Project Site observed a number of utility lines, both active and abandoned. These included three 0.25-inch air hoses, a one- to two-inch plastic pipe, an above-ground metal water line, a 2.25-inch metal pipe (possibly a gas line), a four- to six-inch pipe (possible a storm drain), and an eight- to 10-inch metal pipe (possibly a water line).

### ***Radon***

Radon is an odorless, radioactive gas that occurs naturally in soil, rock and building materials. It results from the natural radioactive decay of radium. High radon levels are commonly associated with areas near foothills and above granite rock. In outdoor air, radon is generally diluted to such low concentrations that it is not usually of concern. In enclosed spaces, such as homes or offices, radon can accumulate and pose an environmental concern. Indoor levels of radon depend on a building's construction and the concentration of radon in the underlying rock. A radon concentration greater than four picocuries per liter (pCi/L) is considered elevated. According to the Phase I/II ESA, the average radon gas concentration measured at locations within the project area is less than 0.711 pCi/l.

### ***Hazardous Waste Storage***

The Phase I/II ESA observed three on-site areas where hazardous waste was previously stored, including a former hazardous waste storage area, former paint storage area, and former satellite waste storage area. All areas where hazardous waste was stored had a secondary containment. Secondary containment of hazardous materials is an effective means of reducing risks associated with accidental spills or other releases of such materials.

### ***Clarifier***

The Phase I/II ESA indicated that, in 2001, BAE Systems maintained an active four-stage clarifier along the south side of the former manufacturing building and a former clarifier near the southeast corner of the former manufacturing building. The active clarifier that was observed was constructed of concrete with cast iron drains feeding the clarifier. The clarifiers were used under BAE Systems operations to treat wastewater from the site before it entered the City of Los Angeles sewer system. The former manufacturing building was demolished by SMC pursuant an IS/MND adopted in 2004.

### ***Asbestos-Containing Materials***

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

The Phase I/II ESA included a limited asbestos survey on April 19, 2001 of the buildings located on the BAE site at the time (including the existing East Building). The Phase I/II ESA observed asbestos in floor tile mastic under tiles, the acoustic ceiling throughout the first floor, and the penthouse pipe elbows of the East Building. The floor tiles and friable acoustic ceiling were generally in good condition. The Phase I/II ESA concluded that these ACMs could be effectively managed through an operations and maintenance (O&M) program; however, prior to impact by renovation or demolition activities, ACMs must be removed.

An additional asbestos inspection of the East Building was conducted in 2003 as part of the Asbestos and Lead Report. The Asbestos and Lead Report included observations of all friable and non-friable ACMs,<sup>2</sup> with the exception of wall, ceiling, and carpet areas, which were not demolished in order to gain completed visual access. Friable ACMs were detected in the sprayed-on acoustic ceiling, pipe elbow and hanger insulation (TSI), and interior plaster on cinder block perimeter walls. Non-friable ACMs were identified in the flooring and mastic throughout the building, mastic underneath the carpet, wallboard and joint compound, roof penetration mastic, and duct joint tape. ACMs were also assumed to be present in pipe insulation and exterior fire door insulation.

### ***Lead-Based Paint***

Lead-based paint (LBP), which can result in lead poisoning when consumed or inhaled, was widely used by the construction industry in the past to coat and decorate buildings. Lead poisoning can cause anemia and damage to the brain and nervous system, particularly in children. Like ACMs, LBP generally does

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<sup>2</sup> *Friable asbestos material, if disturbed improperly, can be broken down using normal hand pressure, thereby releasing airborne dust. Non-friable asbestos material cannot be broken down using normal hand pressure.*

not pose a health risk to building occupants when left undisturbed; however, deterioration, damage, or disturbance will result in hazardous exposure. In 1978, the use of LBP was federally banned by the Consumer Product Safety Commission. Therefore, buildings built before 1978 are likely to contain LBP, as well as buildings built shortly thereafter, as the phase-out of LBP was gradual.

The Asbestos and Lead Report prepared for the East Building assumed lead to be present beneath the fireproofing on “red iron” metal beams. No LBP in excess of 0.06 percent lead by weight was identified. No damaged LBP was identified. Prior to renovation or demolition, the Asbestos and Lead Report recommended stabilization of peeling and flaking LBP.

### **Subsurface Contamination**

The Phase I/II ESA included a limited Phase II subsurface investigation, which concluded that low concentrations of VOCs and hexavalent chromium were present in the subsurface at the BAE site, to a depth of approximately 15 feet bgs. The reported concentrations were below the respective industrial Preliminary Remediation Goals (PRGs) provided by the USEPA and soil screening criteria provided by the LARWQCB. The Phase I/II ESA did not recommend further investigation and/or remediation. Nonetheless, the Review of Environmental Documentation concluded that while the Phase I/II ESA identified concentrations below regulatory guidance levels, additional evaluation of groundwater conditions underneath the active clarifier was advisable as the previous subsurface testing was not sufficiently close to the active clarifier, which has a long history of discharge into the City sewer system.

Subsequent analysis in the form of a Limited Soil and Groundwater Assessment, prepared by West Coast Environmental and Engineering, consisted of evaluating soil samples adjacent to the former hazardous waste storage area, adjacent to the active clarifier, and upgradient from the clarifier. Groundwater was encountered at 68 feet bgs at the hazardous waste storage area boring location but not within 114 or 104 feet bgs at the other two boring locations. Levels of tetrachloroethene (PCE) and trichloroethene (TCE) in the groundwater at the hazardous waste storage area exceeded the California Code of Regulations, Title 22, Maximum Contaminant Levels and the County of Los Angeles Public Health Goals. Levels of lead and hexavalent chromium in water and soil were below detection limits. Petroleum hydrocarbons were not detected in soil samples. West Coast Environmental and Engineering recommended further sampling beneath the active clarifier, or, if necessary, sampling of the deep aquifer.

West Coast Environmental and Engineering conducted a Companion Soil and Groundwater Sampling at three locations including one boring adjacent to the former clarifier along the south side of the former manufacturing building, at the southwest corner of the former manufacturing building, and near the northeast corner of the former manufacturing building. The Companion Soil and Groundwater Sampling confirmed the presence of PCE and TCE in water samples above Title 22 levels and County goals. Levels of lead and hexavalent chromium in water were below detection limits. Groundwater was encountered at depths between 67 feet and 68 feet bgs. West Coast Environmental and Engineering proposed the removal of contaminants through Soil Vapor Extraction.



Under Soil Vapor Extraction, a vacuum is used to remove volatile and some semi-volatile organic contaminants from polluted soil. Soil Vapor Extraction would not remove any contaminants that have reached the deep aquifer.

### **Hazard Zones**

The Bundy Campus is not located in a City of Los Angeles Methane Zone,<sup>3</sup> Landslide Inventory, Area Susceptible to Liquefaction, Brush Fire Hazard Area or Mountain Fire District, or Fire Buffer Zone.<sup>4</sup> Therefore hazards typically associated with these designations would not pose a threat to employees, faculty, or students utilizing the Bundy Campus.

The Bundy Campus is located in a City of Los Angeles Hillside Grading Area.<sup>5</sup> Hillside Grading Areas in the City of Los Angeles are generally subject to the City's Hillside Development Guidelines. In addition, single- and multi-family homes in Hillside Grading Areas are required to implement the specific erosion and grading measures.

The Bundy Campus is located immediately adjacent to a public airport, the Santa Monica Airport. As such, new development on the Bundy Campus is subject to the Los Angeles County Airport Land Use Commission (ALUC)'s Comprehensive Land Use Plan (CLUP), which identifies Runway Protection Zones (RPZs) and noise contours for land uses surrounding the airports throughout the County.<sup>6</sup> RPZs are trapezoidal areas beyond the end of a runway designed to enhance the protection of people and property on the ground. RPZs are generally subject to stricter height limits for buildings and trees as well as limitations on land uses.

## **ENVIRONMENTAL IMPACTS**

### **Thresholds of Significance**

The District has not yet adopted thresholds of significance for assessing whether potential environmental impacts are significant for purposes of CEQA. Therefore, in accordance with Appendix G to the State CEQA Guidelines, a proposed project would have a significant impact on the environment if it would:

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<sup>3</sup> City of Los Angeles Department of City Planning, *Parcel Profile Report, 3200 S Stewart Ave, 3171 S Bundy Dr, 3185 S Bundy Dr, February 16, 2005.*

<sup>4</sup> City of Los Angeles, *City of Los Angeles Environmental and Public Facilities Maps, September 1996.*

<sup>5</sup> City of Los Angeles Department of City Planning, *Parcel Profile Report, 3200 S Stewart Ave, 3171 S Bundy Dr, 3185 S Bundy Dr, February 16, 2005.*

<sup>6</sup> County of Los Angeles Airport Land Use Commission, *Comprehensive Los Angeles County Airport Land Use Plan, adopted for the Santa Monica Airport in 1991.*

- (a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- (b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- (c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- (d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment;
- (e) For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area;
- (f) For a project located within the vicinity of a private airport strip, result in a safety hazard for people residing or working in the project area;
- (g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
- (h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residence are intermixed with wildlands.

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

The District has not yet adopted thresholds of significance for assessing whether potential environmental impacts are significant for purposes of CEQA. Consequently, this EIR uses those thresholds of significance set forth by the City of Los Angeles pursuant to Public Resources Code Section 21082. As set forth in the City of Los Angeles' Draft L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following factors:

- (a) The regulatory framework;
- (b) The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance;
- (c) The degree to which the project may require a new, or interfere with an existing emergency response evacuation plan, and the severity of the consequences; and

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

## **Project Characteristics**

### ***Interim Phase***

As discussed in Section II (Project Description), the Interim Phase of the Master Plan would involve expanded use of the four-story West Building from 16 to up to 20 classrooms and potential use of the existing two-story East Building for offices, student services, community education, storage or leased for other purposes consistent with current zoning. The Interim Phase would provide a new Northeast Bundy Driveway to accommodate the new traffic signal at the northeast corner of the campus, with a new internal drive that would turn sharply to the south upon entering the Bundy Campus and connect to the existing drive along the south side of the campus. Fourteen onsite parking spaces near Bundy Drive would be eliminated to accommodate the Northeast Bundy Driveway, with 594 parking spaces remaining. Because the Interim Phase would involve the same uses that would ultimately occur under Master Plan buildout, it is assumed that impacts that would occur in the Interim Phase would be less than or equal to those evaluated for Master Plan buildout. As such, the Interim Phase is not discussed in detail in this Section.

### ***Master Plan Buildout***

As discussed in Section II (Project Description), buildout of the Master Plan calls for the retention of the existing four-story (approximately 64,000 sf) West Building, and proposes the eventual demolition of the two-story East Building (approximately 33,055 sf) and its replacement with a building of similar size to be located to the immediate east of the West Building. The proposed two-story New Building would be approximately the same height as the existing East Building. The New Building will be located within the center of the Bundy Campus, creating a pedestrian-friendly campus green space in between the two buildings. The total developed floor area envisioned for the Bundy Campus would be approximately 100,000 sf. The proposed Site Plan depicting this vision is provided in Figure II-3 in Section II (Project Description).

## **Project Impacts**

### ***Routine Transport, Use, or Disposal of Hazardous Materials***

The Master Plan involves the demolition/removal of the existing approximately 33,055 sf East Building and the construction of a two-story, approximately 38,205 sf New Building adjacent to the existing West Building. The New Building will provide additional classroom and administrative space.

While operations at the Bundy Campus would continue to use minimal amounts of hazardous materials for routine cleaning, maintenance, and landscaping associated with normal campus operations, the Master Plan would not require the routine transport, use, or disposal of substantial amounts of potentially

hazardous materials. Therefore, potential impacts associated with the routine transport, use, and disposal of hazardous materials would be less than significant.

### ***Accidental Release of Hazardous Materials***

#### *Construction*

##### Asbestos-Containing Material

Construction of the Master Plan would involve the removal of the existing East Building, which contains friable and non-friable ACM in the sprayed-on acoustic ceiling, pipe elbow and hanger insulation (TSI), interior plaster on walls, flooring and mastic throughout the building, mastic underneath the carpet, wallboard and joint compound, roof penetration mastic, duct joint tape, and presumably the pipe insulation and exterior fire door insulation. As such, prior to mitigation, construction workers and occupants within the existing West Building would have the potential to be exposed to airborne ACM from the removal of interior wall, floor, and ceiling coverings during demolition of the East Building, resulting in a potentially significant impact.

##### Lead-Based Paint

Construction of the Master Plan would involve the removal of the existing East Building, which likely contains LBP beneath the fireproofing on “red iron” metal beams. As such, prior to mitigation, construction workers and visitors to the Bundy Campus could have the potential to be exposed to peeling or flaking LBP during wall demolition, resulting in a potentially significant impact.

##### Other Hazardous Materials

The Phase I/II ESA concluded the BAE site does not contain any of the following: foundations of former structures; odors; pools of liquid; electrical or hydraulic equipment known or likely to contain PCBs; unidentified substance containers; stained soil or pavement; corrosion, or degradation of floors and walls; pits, ponds, or lagoons; stressed vegetation; wells; septic systems; or evidence of existing USTs. Therefore, no hazardous materials beyond the ACM and LBP discussed above would have the potential to expose the public to accidental releases during the construction phase of the Master Plan.

#### *Operation*

The Master Plan involves the construction of a new two-story, approximately 38,205 sf New Building adjacent to the existing West Building to provide additional classroom and administrative space. The Master Plan would not expose students, faculty, staff, or other visitors to risks associated with ACM or LBP, which would be removed prior to the construction of the proposed New Building.

##### Use of Hazardous Materials

As discussed previously, the Bundy Campus would continue to use hazardous materials in relatively small quantities for routine cleaning, maintenance, and landscaping. The Master Plan would not require

the routine transport, use, or disposal of substantial amounts of such materials. Therefore, there would be no substantial risks associated with accidental releases of hazardous materials and a less-than-significant impact would occur.

#### Subsurface Contamination

As discussed previously, subsurface investigation of the BAE Systems site conducted during the Limited Soil and Groundwater Assessment and Companion Soil and Groundwater Sampling showed levels of PCE, TCE, and some of their breakdown products that exceed the Title 22 levels and County of Los Angeles Public Health goals in groundwater at depths of 67 to 68 feet bgs beneath the former clarifier. Soil sampling conducted as part of the Phase I/II ESA subsurface investigation encountered low concentrations of VOCs and hexavalent chromium up to 15 feet bgs at the BAE Systems site.

In addition, two Santa Monica Airport sites and one Shell Oil Company site in the project vicinity were identified that are known to be associated groundwater contamination. While the Santa Monica Airport Administrative Building site has a closure status and is not likely to be of environmental concern to the Bundy Campus, no additional information was available for the Santa Monica Residual Property or the Shell Oil Company sites. Nonetheless, the levels of PCE, TCE, and breakdown products in groundwater beneath the Bundy Campus are all expected to be correlated to former uses of the site itself under BAE operations.

If the Master Plan were to include any on-site wells or groundwater pumping, or excavation to the groundwater level (generally between 67 and 68 feet bgs on the Bundy Campus), a potentially significant effect related to groundwater contamination could occur. The Master Plan would only require excavation to a depth approximately 15 to 20 feet bgs to accommodate the one-level subterranean parking structure, and would not involve any on-site wells or groundwater pumping. Therefore, the Master Plan would not have the potential to expose students, faculty, staff, visitors, or neighbors to the effects of contaminated groundwater associated with the former uses of the site under BAE Systems. As such, a mitigation measure has been included to further reduce any less-than-significant impact that could occur in association with subsurface contamination.

#### ***Airport Hazards***

The Bundy Campus is located adjacent to and south of several commercial and airport-related facilities, followed by the Santa Monica Airport. The nearest runway is approximately 0.25 mile from the Bundy Campus, north of Airport Avenue.<sup>7</sup> As such, the Master Plan could potentially expose students, faculty, staff, and other site visitors to hazards associated with airport operations. Nonetheless, the Bundy

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<sup>7</sup> City of Santa Monica, Santa Monica Airport, SMO Airport Diagram, website: <http://santa-monica.org/airport/PDF%20Files/airport%20diagram.pdf>, October 4, 2005.

Campus would not fall within the Santa Monica Airport RPZ as identified in the CLUP.<sup>8</sup> Pursuant Federal Aviation Regulation (FAR) Part 91.119, in congested areas, aircraft is required to maintain a minimum altitude of 1,000 feet above the highest obstacle within a 2,000 foot radius of the aircraft. As a result of the 1984 Airport Agreement, the Santa Monica Airport has presented pilots with requested flight paths for arrival and departures on Runway 21 (the primary runway for arrivals and departures to the west) and Runway 3 (used only a couple of days a year during Santa Ana wind conditions). Neither of the requested flight paths pass over the Bundy Campus, but instead circle the project area and approach or depart the Santa Monica Airport from either the east or west.<sup>9</sup> The Master Plan involves the demolition of an existing two-story building and construction of a new two-story building at a lower elevation. Therefore, the Master Plan would not introduce building heights that do not already exist at the Bundy Campus. As such, the construction and operation of the Master Plan would have a less-than-significant impact with respect to airport hazards.

### ***Emergency Response Plans***

#### *Construction*

The removal of the existing East Building and the construction of the New Building would generally occur within the property boundaries of the Bundy Campus. Although Bundy Drive is a designated City-selected transportation route for disasters, no pedestrian or vehicular public right-of-way closures are anticipated during the construction phase.<sup>10</sup> Furthermore, as the construction of the Master Plan would primarily take place within the Bundy Campus boundaries, traffic impacts during construction would be anticipated to be less than significant. As such, the construction of the Master Plan would not substantially impede public access or travel upon a public right-of-way or interfere with an adopted emergency response or evacuation plan, and impacts would be less than significant.

#### *Operation*

As discussed in Section IV.J (Transportation and Traffic), implementation of the Master Plan would result in a less-than-significant impact after mitigation at 23 of the 27 intersections and 19 of the 22 roadway segments studied under all Access Alternatives. The Master Plan would not involve any other activities during the operational phase that would impede public access or travel upon public right-of-way or would interfere with an adopted emergency response or evacuation plan. Furthermore, the Bundy Campus would implement those emergency access recommendations made by the City of Los Angeles Fire Department (LAFD) and listed in Section IV.I (Public Services), and would maintain the Stewart

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<sup>8</sup> County of Los Angeles Airport Land Use Commission, *Comprehensive Los Angeles County Airport Land Use Plan, adopted for the Santa Monica Airport in 1991.*

<sup>9</sup> City of Santa Monica, *Santa Monica Airport, Requested Flight Paths, Runway 21 and Runway 3, website: [http://santa-monica.org/airport/n\\_flight\\_paths.aspx](http://santa-monica.org/airport/n_flight_paths.aspx), October 4, 2005.*

<sup>10</sup> City of Los Angeles, *City of Los Angeles Environmental and Public Facilities Maps, September 1996.*

Avenue gate at the southwest corner of the Bundy Campus as additional access to be used only in the case of emergencies or necessary wall maintenance. Therefore, impacts related to emergency response and evacuation plans during the operation of the Master Plan would be less than significant.

## **CUMULATIVE IMPACTS**

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

## **MITIGATION MEASURES**

The following mitigation measures are recommended to address the potential impacts associated with the release of hazardous materials into the environment during the construction and operation of the Master Plan:

- (D-1) Prior to demolition of the existing East Building, all asbestos-containing materials identified in Ellis Environmental Management, Inc.'s Asbestos Bulk Sampling for Asbestos, Lead East Building (2 Story), 3171 S. Bundy Drive, Santa Monica, California, prepared December 11, 2003, shall be abated in accordance with all applicable regulations.
- (D-2) Prior to demolition of the existing East Building, all lead-based paint identified in Ellis Environmental Management, Inc.'s Asbestos Bulk Sampling for Asbestos, Lead East Building (2 Story), 3171 S. Bundy Drive, Santa Monica, California, prepared December 11, 2003, shall be abated in accordance with all applicable regulations.
- (D-3) Implementation of the Master Plan shall not involve excavation to the depth of the underlying upper aquifer (approximately 67 to 68 feet below ground surface) or include wells or groundwater pumping of this aquifer.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

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