PRELIMINARY CONSTRUCTION MANAGEMENT PLAN FOR THE 10000 SANTA MONICA BOULEVARD PROJECT

I. INTRODUCTION

The proposed project will provide up to 283 residential units in a building up to 39 stories and approximately 460 feet in height in the Century City area of the City of Los Angeles. The project will also include a smaller ancillary building up to 9-stories (approximately 90-feet) in height containing parking and recreation/site amenities for project residents, a large amount of ground-level landscaped open space, and a large landscaped recreation deck on top of the ancillary building. Under the project's proposed automated parking option, the ancillary building would be up to 4-stories (approximately 40 feet) in height.

The purpose of this Preliminary Construction Management Plan (the "Plan") is to provide a framework for public review of the proposed project's construction procedures that will be required to reduce environmental impacts to the surrounding community during construction of the proposed project. It is also intended to provide a guide for preparation of a Final Construction Management Plan that will be prepared in consultation with the project contractor at the time of project construction, when more details about the project's construction and scheduling are known.

The Plan will be implemented with oversight from an independent mitigation monitor, which will be required by the City of Los Angeles as a Condition of Approval. The mitigation monitor will be required to make periodic reports to the City of Los Angeles regarding the applicant's compliance with the provisions of the Plan. Further, as described below, a contact phone number for the project's construction relations officer shall be posted at the project site and during construction hours there would be an on-site construction manager responsible for construction activities.

II. CONSTRUCTION PRACTICES ESTABLISHED IN THE PROJECT'S DESIGN FEATURES AND MITIGATION MEASURES

This section of the Plan provides a topic by topic listing of the construction Project Design Features and Mitigation Measures identified in the project EIR. Project Design Features represent construction practices that were incorporated by the project Applicant into the design of the project and that will be required to be followed as Conditions of Approval for the project. The Mitigation Measures are construction practices that were identified in the environmental analysis of the project and recommended to reduce project impacts identified in those analyses.

A. Aesthetics/Visual Resources, Light/Glare, and Shading

Mitigation Measure A-1: The Applicant shall provide a 12-foot construction fence for neighborhood protection during construction of the project, which is covered with an aesthetic treatment.

Mitigation Measure A-2: The Applicant shall ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction

barriers or temporary pedestrian walkways, and that such temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period.

B. Air Quality

PDF B-1: All off-road diesel construction equipment remaining on-site for more than 15 work days shall be retrofitted with CARB verified Level 3 diesel particulate filters (DPF) or other control devices which achieve at least 85% reduction in particulate matter emissions, if commercially available. A list of currently available CARB verified DPFs are available on the CARB website.[1]

Mitigation Measure B-1: General contractors shall implement a fugitive dust control program pursuant to the provisions of SCAQMD Rule 403.

Mitigation Measure B-2: All construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

Mitigation Measure B-3: General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.

Mitigation Measure B-4: Construction emissions shall be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.

Mitigation Measure B-5: Electricity from power poles rather than temporary diesel- or gasoline-powered generators shall be used, if power poles are available.

Mitigation Measure B-6: All construction vehicles shall be prohibited from idling in excess of five minutes, both on- and off-site.

Mitigation Measure B-7: The Applicant shall utilize coatings and solvents that are consistent with applicable SCAQMD rules and regulations**.**

Mitigation Measure B-8: The Applicant shall moisten soil not more than 15 minutes prior to moving soil or conduct whatever watering is necessary to prevent visible dust emissions from exceeding 100 feet in any direction.

Mitigation Measure B-9: The Applicant shall apply non-toxic chemical stabilizers according to manufacturer's specifications to disturbed surface areas (completed grading areas) within five days of completing grading or apply non-toxic dust suppressants or vegetation sufficient to maintain a stabilized surface.

Mitigation Measure B-10: Exposed pits (i.e., gravel, soil dirt) with 5 percent or greater silt content shall be watered twice daily, enclosed, covered, or treated with non-toxic soil stabilizers according to manufacturer's specifications.

[1] *http://www.arb.ca.gov/diesel/verdev/level3/level3.htm*

Mitigation Measure B-11: The Applicant shall water excavated soil and debris piles hourly or cover them with tarps, plastic sheets or other coverings.

Mitigation Measure B-12: The Applicant shall water exposed surfaces at least three times a day under calm conditions. Water as often as needed on windy days when winds are less than 25 miles per hour or during very dry weather in order to maintain a surface crust and prevent the release of visible emissions from the construction site.

Mitigation Measure B-13: All trucks hauling dirt, sand, soil or other loose materials off-site shall be covered or wetted or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between the top of the material and the top of the truck). Wash mud-covered tires and under-carriages of trucks leaving construction sites.

Mitigation Measure B-14: The Applicant shall sweep adjacent streets, as needed, to remove dirt dropped by construction vehicles or mud that would otherwise be carried off by trucks departing the site.

Mitigation Measure B-15: The Applicant shall securely cover loads with a tight fitting tarp on any truck leaving the construction site.

Mitigation Measure B-16: The Applicant shall cease grading during periods when winds exceed 25 miles per hour.

Mitigation Measure B-17: During construction, the Project shall use contractors with haul trucks meeting either EPA Model Year 2010 or EPA Model Year 2007 NOx emissions levels when such equipment is reasonably available to achieve a goal that at least 33 percent of the haul truck fleet meets this standard.

Mitigation Measure B-18: On-site equipment greater than 250 horse power, which are on-site for six or more consecutive work days, shall meet Tier 3 or 4 emissions standards and be outfitted with BACT devices certified by CARB. If newer model year engines are not reasonably available, then older equipment engines may be retrofitted to meet Tier 3 or 4 emissions. A copy of each unit's certified tier specification and BACT documentation shall be available for inspection during construction.

Mitigation Measure B-19: Construction contractors supplying heavy duty diesel equipment, greater than 50 hp, shall be encouraged to apply for AQMD SOON funds. Information including the AQMD website shall be provided to each contractor which uses heavy duty diesel for on-site construction activities.

Mitigation Measure B-20: The Applicant shall reimburse Beverly Hills High School for the service needed to replace air filters along the northern side of the High School Science and Technology Center at three month intervals during project construction.

C. Cultural Resources

Mitigation Measure C-1: A qualified archaeologist shall be retained by the Applicant to review grading plans and geotechnical information and prepare a monitoring plan for all ground-

disturbing activities in previously undisturbed sediments. A qualified archaeologist is defined as an archaeologist meeting the Secretary of the Interior Professional Qualification Standards for Archaeology. Ground-disturbing activities include primary construction-related activities and any associated secondary activities for support services such as utilities. In the event that archaeological resources are identified during monitoring or unexpectedly during excavations in fill sediments, all work proximal to the discovery shall halt until the qualified archaeologist has evaluated the find. If the archaeologist determines that the find is significant or may qualify as significant, the archaeologist shall prepare a treatment plan. If the find is prehistoric or includes Native American materials, affiliated Native American groups shall be invited to contribute to the treatment plan. Results of monitoring and any archaeological treatment shall be reported in an appropriate technical report to be filed with the Applicant, the City, and the California Historical Resources Information System (CHRIS). The Applicant, in consultation with the Lead Agency and Archaeologist, shall designate repositories in the event that resources are recovered.

Mitigation Measure C-2: A qualified paleontologist shall be retained by the Applicant to perform periodic inspections of excavation and grading activities on the project site where excavations into the older Quaternary Alluvium may occur. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. If a potential fossil is found, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage. At the paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are donated to their final repository. Accompanying notes, maps, and photographs shall also be filed at the repository. Following the completion of the above tasks, the paleontologist shall prepare a report summarizing the results of the monitoring and fossil finds, if any, the methods used in these efforts, as well as a description of the fossils collected and their significance, if any. The report shall be submitted by the Applicant to the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies.

Mitigation Measure C-3: If human remains are unearthed during construction activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the County Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent of the deceased Native American, who shall then help determine what course of action shall be taken in dealing with the remains. The Applicant shall then take additional steps as necessary in accordance with CEQA Guidelines Section 15064.5(e) and Assembly Bill 2641.

E. Greenhouse Gas Emissions

PDF E-1: All off-road diesel construction equipment remaining on-site for more than 15 work days will be retrofitted with CARB verified Level 3 diesel particulate filters (DPF) or other control devices which achieve at least 85% reduction in particulate matter emissions, if commercially available. A list of currently available CARB verified DPFs are available on the CARB website. (This PDF is the same as PDF B-1)

PDF E-2: Recyclable materials shall be recycled consistent with City strategies aimed to achieve 70 percent recycling by 2020, thus exceeding LEED criteria which includes: diversion of 50 percent of the construction waste from land-fills; use of recycled or recycled-content material for at least 20 percent of the project's construction material total; and use of regionally-sourced material for at least 10 percent of the project's construction. Consistency with these goals shall be supported through the provision of a recycling area or room for onsite recycling activities, pursuant to City requirements.

F. Hazards and Hazardous Materials

Mitigation Measure F-1: If visual or olfactory indication of contamination is discovered during excavation or grading on-site, such activities shall be temporarily halted and redirected around the area. The City of Los Angeles and appropriate regulatory agencies shall be notified and the appropriate evaluation and response measures implemented so as to render the area suitable for excavation and grading activities to resume.

Mitigation Measure F-3: During subsurface excavation activities, including borings, trenching, and grading, Cal-OSHA worker safety measures shall be implemented as required to preclude an exposure to unsafe levels of soil gases, including but not limited to methane.

G. Hydrology and Water Quality

PDF G-1: In compliance with NPDES and City requirements, BMPs shall be implemented to address water quality issues during both construction and operation of the project. Construction BMPs shall include but not be limited to street sweeping and vacuuming, sand bag barriers, storm drain inlet protection, wind erosion control, and stabilized construction entrances and exits. Recommendations regarding appropriate construction BMPs for the project, pursuant to Appendix J, Attachment F of the City of Los Angeles Storm Water Program Handbook, are included in the Hydrology/Water Quality Study, Appendix F of the Draft EIR.

Mitigation Measure G-1: Prior to the start of construction, a Notice of Intent (NOI) and Stormwater Pollution Prevention Plan (SWPPP) shall be prepared in order to fulfill the California SWRCB Order No. 99-08-DWQ, NPDES General Permit No. CA000002 (General Construction Permit) and the City of Los Angeles SUSMP requirements as well as comply with the Los Angeles County Department of Public Works 2006 Hydrology Manual.

Mitigation Measure G-2: The project shall comply with the requirements of the applicable National Pollutant Discharge Elimination System (NPDES) permit for stormwater discharge and with all applicable requirements of the Regional Water Quality Control Board (RWQCB), Environmental Protection Agency (EPA), and local agencies including the City of Los

Angeles regarding water quality. As part of these requirements, the Applicant shall implement Standard Urban Stormwater Mitigation Plan (SUSMP) requirements during construction of the project and shall prepare a Stormwater Prevention Pollution Plan (SWPPP) prior to construction of the project.

I. Noise

PDF I-1: The project contractor(s) shall equip all construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards.

PDF I-2: All construction equipment shall be stored on-site.

PDF I-3: All heavy truck traffic and project workers shall enter and exit the project site via the Santa Monica Boulevard driveway near its northwest corner. Use of Moreno Drive as an entrance or exit shall be prohibited.

PDF I-4: An approximately 20-foot temporary noise barrier/wall capable of reducing noise by at least 15 dBA shall be erected along the southern edge of the project site adjacent to the Science and Technology Center, and a 12-foot sound wall shall be located along Moreno Drive.

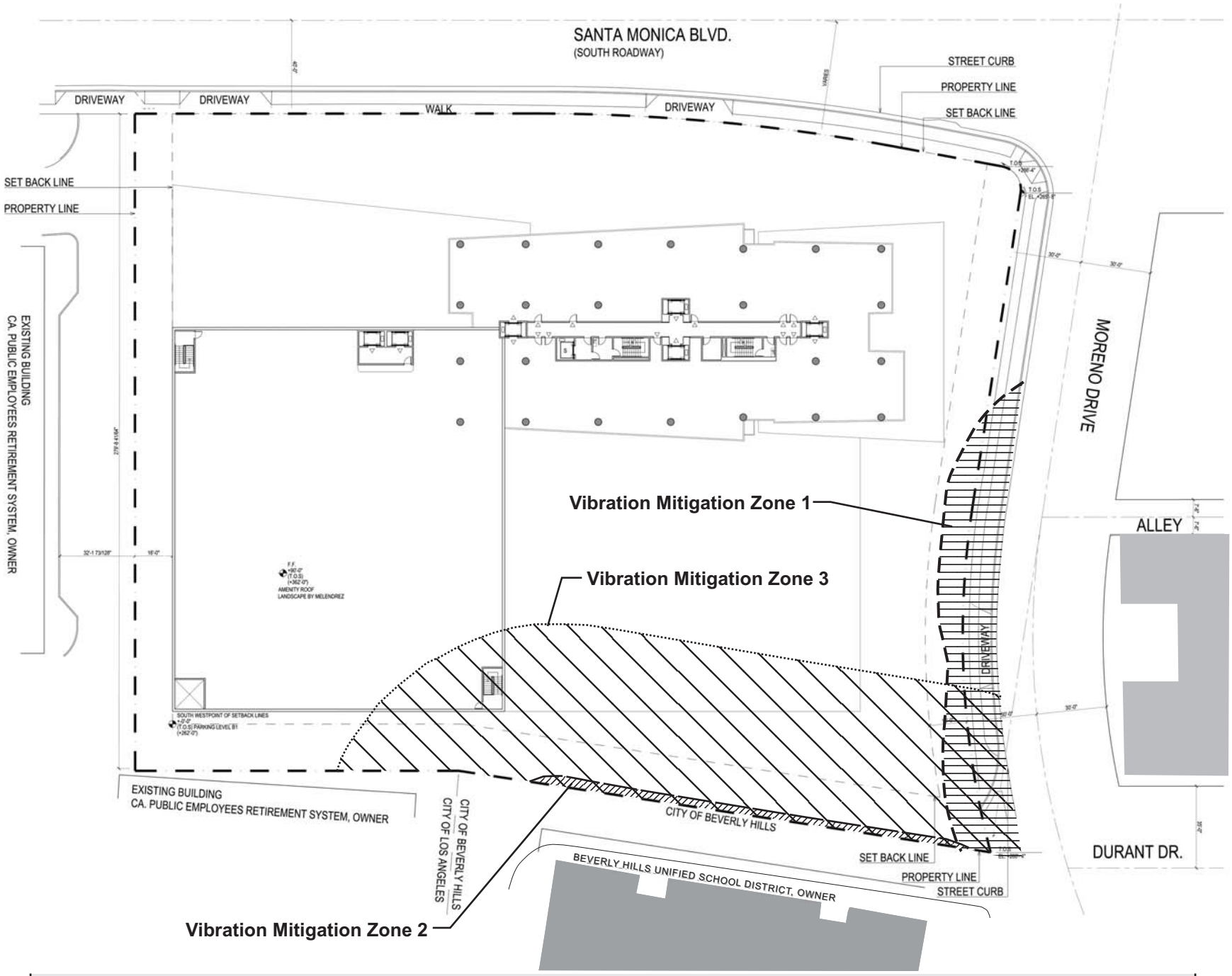
PDF I-5: The project shall limit construction hours to 7:00 A.M. to 9:00 P.M. on weekdays only, with no construction on weekends. Hauling shall be limited to the hours of 8:30 A.M. to 4:30 P.M. and shall be scheduled to alleviate congestion at peak school times.

Mitigation Measure I-1: Exterior on-site construction activities shall be limited to Monday through Friday from 7:00 A.M. to 9:00 P.M.

Mitigation Measure I-2: The construction staging area shall be located within the project site.

Mitigation Measure I-3: To avoid vibration impacts to the nearest residential unit to the project site, construction equipment within 75 feet of that unit (i.e. 15 feet within the project site) shall limit vibration equipment to machinery expected to generate no more than 85 VdB at 25 feet. (See Vibration Mitigation Zone 1 on **Draft EIR Figure IV.I-2**, *Vibration Mitigation Zones,* as copied below.)

Mitigation Measure I-4: The Applicant shall designate a construction relations officer to serve as a liaison with surrounding property owners including Beverly Hills High School. The liaison shall be responsible for responding to concerns regarding construction noise or vibration. The liaison's telephone number(s) shall be posted at multiple locations along the perimeter of the project site. In addition, the liaison shall coordinate with Beverly Hills High School administration in advance of, and throughout project construction to reduce disruption of class-room activities. The liaison shall work with the School administration to identify opportunities to reduce conflicts with school activities through work scheduling and the arrangement of construction activities on the project site.



PCR

0 64 Feet

Vibration Mitigation Zones

10000 Santa Monica Boulevard

Source: Handel Architects, LLP; PCR Services Corporation, 2011.

FIGURE
IV.I-2

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Mitigation Measure I-5: To avoid vibration impacts on student activity in the Science and Technology Center:

a) High vibration construction activities shall be avoided within 35 feet of the Science and Technology Center (i.e. along the southern 10 feet of the project site facing that building) during class-room sessions, when school is in session. (See Vibration Mitigation Zone 2 on **Draft EIR Figure IV.I-2**)

b) If based on consultation with the administrator at Beverly Hills High School it is determined that highly sensitive equipment, e.g. microscopes, are in use at the Science and Technology Center, high vibration activities within 100 feet of that building shall be coordinated through consultation between the construction relations officer and the school administrator to reduce impacts at times of equipment use through scheduling, staging and equipment control of construction activities. (See Vibration Mitigation Zone 3 on **Draft EIR Figure IV.I-2**)

J.1 Fire Protection

PDF J.1-1: During construction, the Applicant shall notify the LAFD of the times of day and locations of all temporary lane closures, and such closures shall be coordinated to reduce peak traffic period conflicts.

J.2 Police Protection

PDF: J.2-1 The proposed project shall include the following features to secure the site during project construction and limit circumstances that would require police services.

- Access to the site shall be highly controlled to prevent public access, particularly by Beverly Hills High School students.
- The project site shall be secured during construction by a minimum 12-foot high fence, with aesthetic treatment. Entries and exits shall be limited and monitored for access by security guards. All workers and vehicles shall be required to sign into and out of the project site.
- Background checks, including fingerprint verification, shall be performed for construction managers/supervisors and workers with potential student contact (e.g. flagmen, crossing-guards, etc.). Such potential workers having a prior felony record shall not be permitted to work at the project site.
- Construction employees, subcontractors, materials suppliers, and consultants shall be prohibited from having direct contact with school students.
- Crossing guards shall be provided during project construction to ensure safe pedestrian travel for students.
- In order, to further address safety issues, the project shall provide a community liaison to address safety concerns at the site. The name and contact info for the Community Liaison shall be posted in a public location. (This feature is also included within Mitigation Measure I-4.)

K. Transportation and Circulation

PDF K-1: The proposed project shall limit construction hours to 7:00 A.M. to 9:00 P.M. on weekdays only, with no construction on weekends. Hauling shall be limited to the hours of 8:30 A.M. to 4:30 P.M. and shall be scheduled to alleviate congestion at peak school times.

Mitigation Measure K-1: Off-site construction truck staging shall not be located on a residential street. Truck queuing shall not occur in front of retail uses. The haul route to and from the project site shall be as follows: Enter and exit the west side of the project site from Santa Monica Boulevard; and use Santa Monica Boulevard for transit to and from the I-405 Freeway. Trucks shall not be permitted to travel along other residential streets to the east and south of the project site nor along Moreno Drive south of Durant Drive adjacent to Beverly Hills High School.

Mitigation Measure K-2: A flagman shall be placed at the truck entry and exit from the project site onto Santa Monica Boulevard to control the flow of exiting trucks, to ensure that the exiting trucks do not turn onto Moreno Drive, and to coordinate the exiting trucks with the traffic signals at Moreno Drive and Santa Monica Boulevard.

Mitigation Measure K-3: Deliveries and pick-ups of construction materials shall be scheduled during non-peak travel periods and coordinated to reduce the potential of trucks waiting to load or unload for protracted periods of time.

Mitigation Measure K-4: All heavy truck traffic and project workers shall enter and exit the project site via Santa Monica Boulevard near its northwest corner. Use of Moreno Drive as an entrance or exit shall be prohibited. (This measure is the same as PDF N-3).

Mitigation Measure K-5: Access shall remain unobstructed for land uses in proximity of the project site during project construction.

Mitigation Measure K-6: Full-time lane closures are not anticipated for the project. Temporary lane closures, when needed, shall be scheduled to avoid peak commute hours and peak school drop-off and pick-up hours to the extent possible. Lane closures shall not occur during peak holiday traffic. In the event of a lane closure, a worksite traffic control plan, approved by the City of Los Angeles, shall be implemented to route traffic around any such lane closures.

Mitigation Measure K-7: A construction management plan shall be developed by the contractor and approved by the City of Los Angeles. The construction management plan shall include the measures identified above, which mitigate construction-related impacts, and other measures as may be deemed appropriate. The construction management plan shall identify the locations of the off-site truck staging and off-site worker parking to be provided and shall detail measures to ensure that trucks use the specified haul route, do not travel through nearby residential neighborhoods, and are scheduled to minimize conflict with peak drop-off and pick-up times for the adjacent Beverly Hills High School.