

**ADDENDUM TO ITEM NO. 4A**

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**CITY COUNCIL OF MONTEREY PARK  
AND THE CITY COUNCIL ACTING ON BEHALF OF THE SUCCESSOR AGENCY  
OF THE FORMER REDEVELOPMENT AGENCY**

**AGENDA**

**THIS IS A JOINT SPECIAL AND REGULAR CITY COUNCIL MEETING  
BOTH MEETINGS WILL BE CALLED TO ORDER AT 6:30 P.M.  
(THE REGULAR MEETING WILL NOT BE SEPARATELY CALLED TO ORDER)**

**THE SPECIAL MEETING AND REGULAR MEETING WILL BE COMBINED  
FOR PURPOSES OF ACTION TAKEN AND OFFICIAL MINUTES**

**Wednesday**

**July 1, 2020**

**6:30 p.m.**

**EXECUTIVE ORDER NO. N-29-20**

These meetings will be conducted pursuant to Section 3 of Executive Order No. N-29-20 issued by Governor Newsom on March 17, 2020.

Accordingly, Councilmembers will be provided with a meeting login number and conference call number; they will not be physically present at council chambers.

Pursuant to the governor's order, the public may provide public comment utilizing the methods set forth below.

Note that city hall is currently closed to the public. You will not be admitted to city hall.

**MISSION STATEMENT**

The mission of the City of Monterey Park is to provide excellent services to enhance the quality of life for our entire community.

**GENERAL INFORMATION**

Documents related to an Agenda item are available to the public in the City Clerk's Office located at 320 West Newmark Avenue, Monterey Park, CA 91754, during normal business hours and the City's website at <http://www.montereypark.ca.gov/AgendaCenter/City-Council-17>.

The public may watch the meeting live on the city's cable channel MPKTV (AT&T U-verse, channel 99 or Charter Communications, channel 182) or by visiting the city's website at <http://www.montereypark.ca.gov/133/City-Council-Meeting-Videos>.

This Agenda includes items considered by the City Council acting on behalf of the Successor Agency of the former Monterey Park Redevelopment Agency which dissolved February 1, 2012. Successor Agency matters will include the notation of "SA" next to the Agenda Item Number.

**PUBLIC PARTICIPATION**

In accordance with Executive Order No. N-29-20 and guidance from the California Department of Public Health on gatherings, remote public participation is allowed in the following ways:

Via Email

Public comment will be accepted up to an hour before the meeting via email to [mpclerk@montereypark.ca.gov](mailto:mpclerk@montereypark.ca.gov) and read into the record during public comment, when feasible. We request that written communications be limited to not more than 50 words.

Via Telephone

Public comment may be submitted via telephone during the meeting, before the close of public comment, by calling (888) 788-0099 or (877) 853-5247 and entering Zoom Meeting ID: 972 7712 7559 then press pound (#). When prompted to enter participation ID number press pound (#) again. If participants would like to make a public comment they will enter “\*9” then the Clerk’s office will be notified and you will be in the rotation to make a public comment. Participants are encouraged to join the meeting 15 minutes before the start of the meeting. You may speak up to 5 minutes on Agenda item. Speakers will not be allowed to combine time. The Mayor and City Council may change the amount of time allowed for speakers. As part of the virtual meeting protocols, anonymous persons will not be allowed to provide public comment.

Important Disclaimer

When a participant calls in to join the meeting, their name and/or phone number will be visible to all participants. Note that all public meetings will be recorded.

**CALL TO ORDER** Mayor

**FLAG SALUTE** Mayor

**ROLL CALL** Peter Chan, Hans Liang, Henry Lo, Fred Sornoso, Yvonne Yiu

**AGENDA ADDITIONS, DELETIONS, CHANGES AND ADOPTIONS**

**PUBLIC COMMUNICATIONS:**

While all comments are welcome, the Brown Act does not allow the City Council to take action on any item not on the agenda. The Council may briefly respond to comments after Public Communications is closed. Persons may, in addition to any other matter within the City Council’s subject-matter jurisdiction, comment on Agenda Items at this time. If you provide public comment on a specific Agenda item at this time, however, you cannot later provide comments at the time the Agenda Item is considered.

**[1.] PRESENTATION**

**1-A. FIREWORKS UPDATE**

**[2.] OLD BUSINESS**

**2-A. CONSIDERATION AND POSSIBLE ACTION REGARDING IMPLEMENTING A BUSINESS RECOVERY PROGRAM FOR RESTARTING THE LOCAL ECONOMY (CONTINUED FROM JUNE 17, 2020)**

It is recommended that the City Council consider:

- (1) Planning Agency restructure:
  - A. Adopting an uncodified Urgency Ordinance upon 4/5s vote implementing the Planning Agency restructure; and
  - B. Introducing and waiving first reading of an uncodified Ordinance implementing the Planning Agency restructure.
- (2) Business Recovery Program Phase I:
  - A. Adopting an uncodified Urgency Ordinance upon 4/5s vote implementing the Planning Agency restructure; and
  - B. Introducing and waiving first reading of an uncodified Ordinance implementing the Planning Agency restructure
- (3) Business Recovery Program Phase II: Choosing temporary land use regulations to be considered during a July 15, 2020 public hearing based upon this staff report and City Council direction.
- (4) Or, taking such additional, related, action that may be desirable.

CEQA (California Environmental Quality Act):

The proposed Planning Agency and Business Recovery Program Phase I Ordinances were reviewed pursuant to the California Environmental Quality Act (Public Resources Code §§ 21000, *et seq.*, “CEQA”) and the regulations promulgated thereunder (14 Cal. Code of Regulations §§15000, *et seq.*, the “CEQA Guidelines”). Based upon that review, these Ordinances are exempt from further review pursuant to CEQA Guidelines § 15269(a) because the protection of public and private property is necessary to maintain service essential to the public, health and welfare.<sup>1</sup> Additionally, these Ordinances are exempt pursuant to CEQA Guidelines §15061(b)(3) because it can be seen with certainty that there is no possibility that the Ordinances may have a significant effect on the environment.

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<sup>1</sup> CEQA findings regarding an anticipated imminent emergency are valid (see *CalBeach Advocates v. City of Solana Beach* (2002) 103 Cal.App.4th 529).

**[3.] CONSENT CALENDAR ITEMS NOS. 3A-3C**

**3-A. WAIVE FURTHER READING AND ADOPT AN ORDINANCE AMENDING THE MONTEREY PARK MUNICIPAL CODE GOVERNING HOTEL/MOTEL GUEST REGISTRIES**

It is recommended that the City Council:

- (1) Waive the second reading and adopt the draft proposed ordinance; or
- (2) Alternatively, take such additional related action that may be desirable.

**3-B. WAIVE FURTHER READING AND ADOPT AN ORDINANCE AMENDING MONTEREY PARK MUNICIPAL CODE (“MPMC”) 2.04.010 TO CHANGE THE REGULAR MEETING TIME**

It is recommended that the City Council:

- (1) Waive second reading and adopt the draft proposed ordinance; or
- (2) Alternatively, take such additional related action that may be desirable.

**3-C. AUTHORIZING THE DIRECTOR OF PUBLIC WORKS / CITY ENGINEER OR DESIGNEE TO EXECUTE ALL DOCUMENTS AND AGREEMENTS FOR PROJECTS FUNDED THROUGH THE STATE OF CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS) ON BEHALF OF THE CITY OF MONTEREY PARK**

It is recommended that the City Council:

- (1) Authorize the Director of Public Works / City Engineer or designee to sign all documents related to federally funded grants for capital improvement projects on behalf of the City of Monterey Park; and
- (2) Take such additional, related, action that may be desirable.

**[4.] PUBLIC HEARING**

**4-A. APPEAL OF PLANNING COMMISSION RESOLUTION NO. 20-01, ADOPTED ON MAY 12, 2020, APPROVING A CONDITIONAL USE PERMIT (CUP-19-13) TO ALLOW A RETAIL EATING ESTABLISHMENT WITH A DRIVE-THROUGH IN THE S-C (SHOPPING CENTER) ZONE – 1970 SOUTH ATLANTIC BOULEVARD**

It is recommended that the City Council consider:

- (1) Opening a public hearing to consider the appeal;
- (2) Taking testimonial and documentary evidence;
- (3) Closing the public hearing;
- (4) After considering the evidence, determine whether to uphold, amend, or overturn Planning Commission Resolution No. 01-20; and
- (5) Taking such additional, related, action that may be desirable

**[5.] NEW BUSINESS**

**5-A. CONSIDERATION AND DIRECTION REGARDING PLACING A PROPOSITION ON THE NOVEMBER 3, 2020 BALLOT TO ADOPT THE LAND USE ELEMENT TO THE MONTEREY PARK GENERAL PLAN**

It is recommended that the City Council consider:

- (1) Adopting the following resolutions:
  - A. A resolution calling for a special election on November 3, 2020 for consideration of a ballot proposition;
  - B. A resolution requesting that Los Angeles County consolidate the special election with the general presidential election scheduled for the same date;
  - C. Adopting a resolution adding a proposition entitled the “Revised Monterey Park 2040 Land Use Element Proposition” to the previously called November 3, 2020 ballot;
  - D. Adopting a resolution requesting that the City Attorney prepare an impartial analysis for the Revised Monterey Park 2040 Land Use Element Proposition; and
  - E. Adopting a resolution authorizing ballot arguments regarding the Revised Monterey Park 2040 Land Use Element Proposition.
- (2) If desirable, direct that the City Manager draft a resolution for City Council consideration on a future meeting agenda supporting the Revised Monterey Park 2040 Land Use Element Proposition;
- (3) If desirable, designate one or more Councilmembers to draft an argument in favor of the Monterey Park 2040 Land Use Element Proposition; and
- (4) Taking such additional, related, action that may be desirable.

**5-B. CONSIDERATION AND POSSIBLE ACTION REGARDING ADOPTION OF A RESOLUTION ELECTING TO BECOME SUBJECT TO THE UNIFORM PUBLIC CONSTRUCTION COST ACCOUNTING ACT AND AMENDING CHAPTER 3.100 “PUBLIC WORKS CONTRACTS” OF THE MONTEREY PARK MUNICIPAL CODE**

It is recommended that the City Council consider:

- (1) Adopting Resolution No. \_\_\_\_ declaring the City’s intent to become subject to the Uniform Public Construction Cost Accounting Act.
- (2) Introducing and waiving first reading of an Ordinance amending Chapter 3.100 to Title 3 of the Monterey Park Municipal Code (“MPMC”) to extend the City’s election under the Uniform Public Construction Cost Accounting Act to all forms of “public projects” as defined in Public Contract Code section 22002(c); and/or
- (3) Taking such additional, related, action that may be desirable

CEQA (California Environmental Quality Act):

The proposed Ordinance is exempt from additional review under the California Environmental Quality Act (Public Resources Code §§ 21000, et seq., “CEQA” and CEQA Guidelines (14 California Code of Regulations §§ 15000, et seq.) because it establishes rules and procedures in compliance with State law; does not involve any commitment to a specific project which could result in a potentially significant physical impact on the environment; and constitutes an organizational or administrative activity that will not result in direct or indirect physical changes in the environment. Accordingly, the Ordinance does not constitute a “project” that requires environmental review (see specifically CEQA Guidelines § 15378(b)(2, 5).

**[6.] COUNCIL COMMUNICATIONS AND MAYOR/COUNCIL AND AGENCY MATTERS**

**[7.] CLOSED SESSION (IF REQUIRED; CITY ATTORNEY TO ANNOUNCE)**

**ADJOURN**

June 25, 2020

**VIA E-MAIL**

Members of the Monterey Park City Council  
Monterey Park City Hall  
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Re: Raising Cane's Response to Appeal AP-20-01 (Conditional Use Permit CU-19-13)

Dear Honorable Members of the Monterey Park City Council:

Our firm represents Raising Cane's Restaurants, LLC ("Raising Cane's") in connection with its application for a Conditional Use Permit ("CUP") to allow for the construction and operation of a restaurant at 1970 South Atlantic Boulevard, Monterey Park, California (the "Property"), which is currently a vacant lot. In its application (CU-19-13), Raising Cane's seeks a CUP to construct a 1,790 square foot restaurant with a drive-through, a covered outdoor seating area, and 18 parking space on a 17,863 square foot lot (the "Project"). Raising Cane's submitted the Project application on December 5, 2019. On May 12, 2020, Monterey Park (the "City") Planning Commission conducted a public hearing and voted to approve the Project's CUP application. On May 22, 2020, an appeal of that decision (the "Appeal") was filed by Rafael and Gina Casillas (the "Appellants"). This correspondence addresses the contentions raised in the Appeal, all of which lack legal merit and factual support. **To remove any doubt as to the Project's zoning consistency, we are respectfully requesting that the hearing on the Appeal be continued for a period of time sufficient for City Council to consider the pending zoning regulations, including reducing setback requirements for drive-through aisles on commercially zoned properties.**

**1. Executive Summary**

In their 49-page Appeal, Appellants have thrown the kitchen sink of arguments at the Planning Commission's approval of the Project CUP. They advance one theory after another in

an attempt to sow doubt and confusion about the Project, the CUP approval, and the City's decision to exempt the Project from the California Environmental Quality Act ("CEQA"). Their theories are without any legal basis and are unsupported by evidence in the administrative record and as further set forth in this response to the Appeal.

The Project's CUP approval is robustly supported by substantial evidence. This evidence demonstrates that each of the required CUP findings can be made, that the Project will be fully consistent with all applicable zoning regulations, and that the Project is properly exempt from CEQA. Unless Appellants can successfully demonstrate that the Planning Commission acted without substantial evidence for its findings, the Project's CUP approval must be upheld. As addressed herein, Appellants cannot make such a showing, and their Appeal must be denied.

**2. Planning Commission's May 12, 2020 approval of the Project's CUP was proper.**

a. *The City followed proper procedure in its approval of the Project CUP.*

Appellants argue that the May 12, 2020 Planning Commission action granting the Project CUP is invalid (and illegal) because the Project was not entitled to a second hearing before the Planning Commission. Appellants summarize the process for appeals from the Planning Commission to City Council and suggest that the Project's second hearing in front of the Planning Commission was actually an appeal. This mischaracterizes the procedural posture by which the Project was approved by the Planning Commission.

On March 10, 2020, the Planning Commission took up the Project CUP application. The Planning Commission voted to approve the Project, with two votes to approve and one to deny. However, the California Government Code requires a majority vote of the total membership of the body to pass a resolution. In the case of the Monterey Park Planning Commission, this would require three affirmative votes. Because it only received two, the motion to approve the Project CUP did not pass. Pursuant to City Municipal Code section 21.32.100, the Planning Commission ordinarily has 40 days after the conclusion of a hearing to render a decision. During this period of time, a matter could come back to the Planning Commission for further deliberation and reconsideration.

Shortly after the March 10, 2020 Planning Commission meeting, the City (and the world) was turned upside due to the outbreak of the COVID-19 pandemic. For the next two months, cities around the world (including the City) worked to figure out how to stop the spread of the virus and how to keep their communities safe. Understandably, this meant that the City's Planning Commission actions on land use projects were put on hold. In response to the COVID-19 pandemic, the City declared a local emergency on March 11, 2020. Correspondingly, the City Manager tolled all deadlines for land use applications and cancelled all public events through the end of May. This action was later confirmed by City Council via Resolution No. 12151.

As discussed, under normal circumstances, a project applicant would have the opportunity to return to the Planning Commission for a formal decision on its application within 40 days of its hearing. For the Project, that would have required the Planning Commission to take up the item by April 19, 2020. This deadline was properly tolled pursuant to Resolution No. 12151. By early May, the City was ready to continue processing land use applications and scheduled the Project to be heard at the May 12, 2020 Planning Commission meeting. The Planning Commission timely re-heard the item on May 12, 2020 and voted to approve the Project CUP by a 5-0 vote.

Appellants claim that, “[p]er the Municipal Code” it was improper to have a second hearing on the Project’s CUP application. (Appeal, p. 16).<sup>1</sup> However they point to no specific code section that the Planning Commission’s action supposedly violates. Pursuant to City Municipal Code section 21.32.100, Raising Cane’s had the right to request that the matter be reheard by the Planning Commission. And in approving this request and the Project’s CUP application, the City followed the letter of the Municipal Code and City Council’s emergency resolution.

Appellants also argue that their due process rights were violated because they were not supplied with sufficient information about the Project before the Planning Commission hearing. Appellants base this contention on their assertion that the City’s website “does not include the entire Project file,” only the March 10, 2020 and May 12, 2020 Staff Reports. (Appeal, p. 10). This argument has no legal basis and is unsupported by any factual evidence. On the contrary, the CUP application item properly appeared on the May 12, 2020 Planning Commission meeting agenda, which included over 200 pages of documents related to the Project. Appellants cannot argue that notice was in any way insufficient.

*b. There is no evidence of bias by the Planning Commission or City staff.*

Appellants claim that the Planning Commission’s approval of the Project CUP was “predetermined,” and that the Planning Commission was “biased toward the developers.” (Appeal, p. 5). But Appellants offer no factual proof or evidence to support such an assertion. Instead, Appellants cite Raising Cane’s’ appeal after it first came before the Planning Commission, in which Raising Cane’s expresses optimism that the Project “has substantial support from City staff members and PC to be approved at a hearing where all members are present.” This is not evidence that the Planning Commission is biased or that the Planning Commission was predetermined to approve the Project. This is simply Raising Cane’s assessment of staff and community support for the Project. Moreover, City staff routinely support or recommend projects that come before the Planning Commission. This is in no way improper, nor does it prove partiality or bias. Absent factual evidence of any actual bias in favor of the Project application, Appellants’ assertion has no merit.

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<sup>1</sup>All references to the Appeal refer to the page number of Appellants’ full PDF Appeal packet, not Appellants’ Statement of Circumstance.

- c. *The Planning Commission's approval of the CUP is supported by substantial evidence in the administrative record.*

In order to grant Project's CUP application, the Planning Commission must have found that substantial evidence in the administrative record supports each required CUP finding. As evidenced in the Planning Commission's resolutions approving the Project CUP and City staff's detailed Staff Reports, ample evidence supports each finding.

Aside from Appellants' procedural arguments, Appellants' attacks on the Project's approval by the Planning Commission fall into two categories: 1) assertions that the Project does not comply with the City's applicable Municipal Code regulations and 2) that the Project may have significant environmental impacts. On these bases, Appellants' conclude that the required CUP findings cannot be made. Instead of articulating why the specific findings cannot be made, Appellants summarily conclude that:

“[T]he Project Site is inadequate in size, shape, and topography for the proposed Project; the Project Site has insufficient access to streets and highways and is inadequate in width; the Project proposed use is inconsistent with the General Plan, including Goal 5.0 and Policy 5.1.4; the Project will have an adverse and detrimental effect on the public health, safety, and general welfare; and the Project use is not one authorized by the CUP pursuant to the Municipal Code.” Appeal, p. 5 (pdf p. 9).

Simply listing the required CUP findings and concluding with a general sweeping statement that they cannot be met does not make it so. Presumably, the alleged defects that Appellants attempt to highlight throughout their Appeal constitute the basis for their assertion that the CUP findings cannot be made. However, Appellants do not bridge the analytical gap – they merely list a bevy of issues that they have with the Project's CUP approval (addressed herein) and conclude based on those issues that the CUP findings are deficient. In fact, substantial evidence supports the required CUP findings, as documented in the administrative record and herein.

**3. The Project fully complies with all applicable Municipal Code requirements.**

Throughout their Appeal, Appellants contend that the Project does not comply with the Municipal Code. Appellants' primary point of contention is that the Project conflicts with the City's drive-through regulations, set forth in Municipal Code section 21.10.040.I. Among other things, Appellants contend that the Project is too big to qualify as a “retail eating establishment,” the Project “does not accommodate a minimum of 6 cars behind each menu board,” and does not have the required minimum 25-foot setback from the drive-through aisles and the parking to the ultimate curb face. (Appeal, p. 6).

Appellants provide scant (if any) backup for their assertions. For example, they repeatedly claim that the Project will not accommodate a minimum of six cars behind each menu board, but

they provide no actual proof that this is the case. Instead, they state this assertion as if it is a fact. This does not meet the evidentiary burden required to prove their point. On the contrary, the only substantial evidence in the record demonstrates that the Project will fully comply with all applicable Municipal Code regulations. Kimley-Horn, the Project's engineering firm, has prepared a technical letter in response to Appellants' claims (the "Kimley-Horn Response Letter", attached hereto as Attachment A). The Kimley-Horn Response Letter dispels any notion that the Project is somehow inconsistent with the Municipal Code. (Kimley-Horn Response Letter, pp. 1-2).<sup>2</sup>

Appellants' principal attack on the Project's consistency with the City's Municipal Code is that the Project does not have a minimum 25-foot setback from the parking and drive-through aisle to the ultimate curb face. In so asserting, Appellants disregard the nuances of the Project's approval and City staff's efforts to ensure that the Project will be consistent with all applicable drive-through regulations prior to operating.

In its Staff Report for the March 11, 2020 Planning Commission meeting, City staff explained that the City's drive-through regulations are "generally outdated" and that it is "in the public interest" to consider updating the regulations. Specifically, staff notes that "it is unclear why a setback of 25 feet" is required. City staff point to the City's General Plan, Goal 2.0 – Business Attraction and Retention, which indicates that the City should continue providing incentives to encourage new businesses to locate in Monterey Park. City staff believes that updating the City's "outdated regulations, including setback requirements" will assist with business attraction and retention. Because of this, City staff recommends that City Council amend the drive-through regulations to allow a 15-foot setback from the ultimate curb face for parking areas and drive-through aisle instead of a 25-foot setback. (See Staff Report, March 10, 2020, p. 3).

We understand that City Council will be considering this along with several other changes to the zoning regulations in the coming weeks to bring Monterey Park in line with its peer cities and create a more business friendly environment. The Project, as approved by the Planning Commission, is specifically conditioned upon these zoning changes and once these changes are approved, the Project will be fully consistent with all requirements of the City's Municipal Code. **Out of an abundance of caution, we respectfully request that City Council defer final decision on this Appeal until after such time as City Council has fully considered and acted upon these recommended changes.**

Even without City Council's approval of proposed changes to the City's zoning regulations, the Project will ultimately be consistent with the City's Municipal Code. The Project's approval is conditioned on the successful amendment of the Municipal Code to allow a 15-foot

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<sup>2</sup> In part, the Kimley-Horn Response Letter notes that even if the Project did not qualify as a "retail eating establishment," it would nonetheless qualify as a "restaurant," which is similarly permitted in the Project's zoning district. Moreover, the Kimley-Horn Response Letter notes that the Project has a dual drive-through design with double stacking, which would allow a minimum of six cars.

setback instead of 25-foot setback. Specifically, the Project's Condition of Approval Number 6 requires that the Project be consistent with the Municipal Code before the City issues a Certificate of Occupancy for the Project.

By its nature, Condition Number 6 will ensure consistency with all zoning regulations before the Project becomes operational and open to the public. Put another way, if City Council adopts the anticipated zoning regulation amendment, the Project will be consistent with the Municipal Code. If, for some reason, the City Council does not adopt the amendment, then the Project will not receive its Certificate of Occupancy, and it will not be permitted to operate. Consequently, Appellants' claim that the Project will not meet the City's zoning regulations (despite an explicit condition requiring it to do so) carries no weight.

#### **4. The Project is properly exempt from CEQA.**

Under state law, 33 classes of projects are categorically exempt from CEQA because they have been found to not have a significant effect on the environment. One such categorical exemption is for infill development projects that meet the requirements set forth in Public Resources Code section 21084 and CEQA Guidelines section 15532. If a project qualifies for a categorical exemption, no formal environmental evaluation is required. *City of Pasadena v State* (1993) 14 Cal.App.4th 810; see also *Association for Protection of Env't'l Values v City of Ukiah* (1991) 2 Cal.App.4th 720, 726 (A project that is categorically exempt from CEQA may be implemented without any CEQA compliance).

The City properly determined that the Project is exempt from CEQA because it plainly qualifies as an infill development project that meets all requisite requirements. Appellants have advanced a litany of arguments to call into question the Project's eligibility for this CEQA exemption. However, as shown below (and in the administrative record), substantial evidence supports the finding that the Project is properly exempt from CEQA.

As a threshold matter, Appellants improperly apply the "fair argument" standard throughout their Appeal. Appellants suggest that "where a fair argument exists," a categorical exemption is inappropriate. (Appeal, p. 18). This is an incorrect statement of law. On review, a court applies the **substantial evidence** test to an agency's factual determination that an exemption applies, not the less deferential fair argument standard as suggested by Appellants. *Comm. to Save the Hollywoodland Specific Plan v. City of Los Angeles* (2008) 161 Cal. App. 4th 1168, 1187. Specifically, Appellants repeatedly (and incorrectly) attack the required prongs of the CEQA exemption using the fair argument standard (e.g., "A fair argument exists as to substantial adverse impacts to traffic," Appeal, p. 18). However, an agency must only show that substantial evidence supports its finding that a project meets each prong of the CEQA exemption. It does not need to show that "no fair argument" can be made otherwise, as suggested by Appellants. Even if the less deferential fair argument standard was used to review of the CEQA exemption, Appellants' arguments would fail because they are without factual support.

Appellants present little evidence (let alone a “fair argument,” or the required “substantial evidence”) to support their attack on the categorical exemption as applied to the Project. Applying the correct standard, substantial evidence supports each prong of the exemption (set forth in CEQA Guidelines section 15332), and the City properly applied the exemption to the Project. Moreover, no evidence supports any exception to the properly applied exemption.

### **Class 32 CEQA Exemption Requirements**

- a) *The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.*

As previously discussed, the Project, a drive-through restaurant, is a conditionally permitted use in the Shopping Center (S-C) zone. As demonstrated by the Project’s site plans and discussed herein, the Project will fully comply with all applicable zoning regulations. Further, the Project’s proposed use is fully consistent with the City’s General Plan, which designates the Property as Commercial. An overarching goal of the City’s General Plan is “to create opportunities for new commercial business growth in areas of the city well served by the circulation network.” Located in one of the City’s primary business corridors, the Project would do just this.

Appellants claim that the Project “cannot meet the Municipal Code and zoning” requirements.” As addressed herein, this argument is unsupported by the facts in the administrative record. The Project will be consistent with the Municipal Code and any applicable zoning regulations. In fact, the Project cannot legally operate until it is consistent with such regulations.

Appellants further claim that there is a fair argument that the Project will have impacts relating to the “general plan designations and policies” (Appeal, p. 4). However, they fail to provide substantial evidence that this is the case. For example, Appellants suggest that the Project “physically divides an established community” but do not explain why this is so. Appellants further claim that the Project does not have “sufficient access to streets and highways with adequate width to carry the quantity and quality of traffic generated by the proposed Project use.” Yet again, Appellants provide no evidence demonstrating that this is the case. In another example, Appellants assert that the Project is inconsistent with the General Plan’s Goals and Policies relating to noise. This is discussed further below, but again, Appellants provide no proof of the inconsistency – they simply make an assertion. Appellants demonstrate no evidence to support an attack on this prong. On the contrary, substantial evidence exists in the administrative record to support a finding in favor of this prong.

- b) *The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.*

The Property is located within the City of Monterey Park. The Property's lot totals 17,863 square feet (approximately 0.41 acres). The Property is surrounded by urban uses: uses located directly north, south, and west of the Property include other one-story commercial buildings; uses located directly east of the Property include single-family dwellings. These are all, by definition, urban uses

The Appellants do not dispute this. Instead, Appellants suggest that the Property is "not an infill development because it is on a shallow island, which has an alley at its eastern and southern boundaries and it has Atlantic Blvd. at its western boundary." Why does this disqualify the Property from being properly classified as infill development? Appellants do not explain further. Substantial evidence supports finding in favor of prong (b).

- c) *The project site has no value, as habitat for endangered, rare or threatened species.*

The Property is located on a paved, fenced vacant lot that was previously used for commercial uses. It has no value as a habitat for endangered, rare or threatened species. Appellants do not dispute that the Project meets prong (c), nor could they.

- d) *Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.*

Appellants make a series of arguments to suggest that a fair argument exists as to a significant impact to all of the below. As discussed, Appellants inappropriately apply the fair argument standard to these areas. Further, their contentions are without merit and unsupported by substantial evidence in the administrative record.

- Traffic

Appellants claim that a fair argument exists as to substantial adverse impacts to traffic. In support of their contention, Appellants have provided a one-and-a-half-page letter from traffic engineer Jeffrey Lau. In his letter, Mr. Lau opines that the Project's traffic report is "deficient with errors and omissions," and goes on to make several claims about supposed problems with the Project's traffic report. However, he does not support these assertions with substantial evidence. The Kimley-Horn Response Letter addresses each traffic-related claim raised by Mr. Lau. (See Kimley-Horn Response Letter, pp. 2-3).

As discussed in the Kimley-Horn Response Letter, each of Appellant's contentions is unsupported by substantial evidence in the administrative record and are without merit. On the contrary, potential traffic impacts were thoroughly and properly evaluated, and substantial evidence demonstrates that the Project will not have significant traffic impacts.

- Noise

Appellants conclude that a fair argument exists that the Project will have a significant noise impact. Appellants base this claim on the fact that “the Project will generate a minimum of 800 trips, will include two drive-through lanes adjacent to a residential area...will have two, approximately 7-foot, menu boards that face the residences, and will have at least hundreds of people in and out” on a daily basis. Appellant Gina Casillas states that her home “is located at the top of the hill and sound travels easily through the air without buffers from trees or solid walls.” She further explains that she hears “traffic traversing along Atlantic Blvd.,” “car alarms,” conversations when customers “exit Shakey’s Pizzeria,” “power tools operating from the tire shop,” and more.

Appellant Gina Casillas concludes that noise levels from the Project will exceed allowable thresholds and will conflict with the City’s noise regulations and General Plan policies related to noise. She then cites various general facts as supposed evidence of the noise that the Project will create. These facts, many of which are unsupported (e.g., “According to the Howard Company, the leader manufacture of drive through menu board systems, ‘drive thru menu board systems create noise that range between 63 and 85 dBA”), are not specific to the Project. They are generalized statements about noise. Appellants provide no actual data, nor any expert testimony, that the Project will have noise impacts. The statements from Appellant Gina Casillas does not constitute substantial evidence.

Conversely, the Kimley-Horn Response Letter details actual evidence – acoustical assessments from similar Raising Cane’s locations in Southern California, including potential impacts from the drive-through and restaurant operations (menu board systems, queueing vehicles, the order counter, and outdoor customer dining area), mechanical equipment, and the electrical transformer. As detailed in the letter, the noise concerns listed within the appeal “will not be of concern for the Project.” (Kimley-Horn Response Letter, p. 4).

Even applying the less deferential “fair argument” standard (which does not apply), Appellants have failed to show any likelihood that the Project would have a significant effect relating to noise. On the contrary, substantial evidence supports a finding that the Project would not have a significant effect relating to noise.

- Air Quality

Appellants summarily conclude that a fair argument can be made that the Project will have an adverse impact on air quality. Putting aside the fact that Appellants apply the wrong standard of review, they also cite no facts to support this assertion. Appellants appear to claim that because the Property used to be a gas station (discussed below), and because automobiles will visit the Project (it is a drive-through restaurant), that the Project will significantly and adversely affect air quality. There is no evidence whatsoever that the Project will have a significant adverse impact on air quality. Conversely, substantial evidence supports a finding that the Project would not have a significant effect relating to noise.

Specifically, the Kimley-Horn Response Letter details an air quality assessment that was conducted for a Raising Cane's location in Southern California that is similar in development size and type to the Project. As it concludes, based on the applicable Southern California Air Quality Management District methodology, "significant impacts would not occur during construction activities or long-term operation." (Kimley-Horn Response Letter, p. 8).

- Water Quality

Here too, Appellants claim that a fair argument exists that the Project will have a significant adverse impact on water quality. Like air quality, Appellants advance several explanations (e.g., the Property's previous use as a gas station, the sufficiency of water utilities given California's droughts) to suggest that there is a significant impact, but provide no evidence. There is no evidence in the record that the Project will have a significant adverse impact on water quality.

*e) The site can be adequately served by all required utilities and public services.*

The Property is located on a vacant lot that was previously utilized for a commercial use. It is surrounded by urban uses. The Project will be fully served by available utilities and public services. Appellants suggest that "water utilities" should be addressed given that "California has had droughts over many years." But Appellants present no factual evidence to support the notion that the Project would somehow be inadequately served by all required utilities and public services.

**No Exception to the CEQA Exemption applies.**

CEQA sets forth a number of exceptions to the use of a CEQA exemption. (CEQA Guidelines, § 15300.2). If it can be shown that one of these exceptions exists, then a project will not qualify for a CEQA exemption. Appellants advance numerous theories to argue that exception applies, precluding use of the CEQA exemption. However, none of their arguments are compelling, and no exception to the infill development exemption applies.

- *The Property has no "unusual circumstances" that disqualifies it from a CEQA exemption.*

The CEQA Guidelines state that if, due to unusual circumstances, there is a reasonable possibility that a project will have a significant effect on the environment, then an agency may not find a project exempt. (CEQA Guidelines § 15300.2(c)). Courts apply the substantial evidence standard to review an agency's factual determinations as to whether a project presents "unusual circumstances." *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal. 4th 1086, 1114. If a court finds that unusual circumstances exist, then it applies the "fair argument" standard to determine whether a significant environmental impact might result from the unusual circumstances. *Id.* at 15. Despite Appellants' frequent invocation of the fair argument standard,

this is the only area in which it would be properly used for purposes of the Project’s CEQA exemption.

Appellants attempt to argue that unusual circumstances apply to the Project, and that due to those unusual circumstances the Project will have a significant effect on the environment. However, Appellants’ proclamation that there are unusual circumstances does not make it so. When a project challenger attempts to make an “unusual circumstances” argument, “it is not alone enough that there is a reasonable possibility that the project will have a significant environmental effect.” *Berkeley Hillside Preservation, supra*, at 1097-8. Instead, the challenging party must show that the project has some feature that distinguishes it from others in the exempt class, such as its size or location. *Id.* at 1105.<sup>3</sup>

Here, Appellants suggest that the Project has unusual circumstances because it is a former gas station. This is unpersuasive. The Property is located on a busy commercial street with many urban uses. In fact, several gas stations exist in close proximity to the Property – including a Shell station and a Chevron station less than half a mile away at the intersection of Avenida Cesar Chavez and Atlantic Boulevard. A former gas station on a commercial thoroughfare in an urban area is by no means “unusual circumstances.” Appellants cannot meet the standard to show that any unusual circumstances apply to the Project. Because of this, Appellants cannot use the “fair argument” standard to suggest that the Project, due to its unusual circumstances, would possibly have a significant effect on the environment. And, as discussed below, even if Appellants were to use the fair argument standard, they have not (and cannot) provide factual evidence to support a “fair argument” that the Project would possibly have a significant effect on the environment.

- *The Property’s former use as a gas station does not disqualify use of CEQA exemption.*

Appellants repeatedly argue that because the Property was formerly a gas station, the risk of hazardous materials at the Property should disqualify it from the CEQA exemption. However, Appellants provide very little evidence to support their claim. They have submitted a 2004 Los Angeles County Department of Public Works report suggesting the presence of certain substances in the soil, and they note that in 2004 the Property “was listed to contain hazardous substances...” (Appeal p. 7). These two pieces of information are heavily outweighed by the substantial evidence in the administrative record showing that: **1) since the 2004 County report, the Property has undergone substantial further environmental analysis, 2) the Property’s case is shown on the State Water Quality Control Board list as “Closed” and “Completed,” and 3) that the Property poses no significant hazardous substances risks going forward.**

Appellants cite a March 16, 2004 report by the Los Angeles County Department of Public Works which notes the presence of certain chemicals in the Property’s soil. But Appellants fail to mention anything that occurred after this 2004 report. Specifically, after the 2004 report, the

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<sup>3</sup> As the *Berkeley Hillside* court noted, allowing a project opponent to defeat the use of an exemption simply on the showing of a “fair argument that the project will have significant environmental effects” would be fundamentally inconsistent with the Legislature’s intent in establishing the categorical exemptions. 60 Cal. 4th at 1106.

Property underwent substantial further testing, the results of which were shared with the County. In 2007, the County reassessed the site and concluded that “no further action related to the petroleum release(s) at the site is required.” (See Closure Letter dated November 1, 2007, attached hereto as Attachment B). The further assessment and subsequent 2007 Closure Letter render the contents of the County’s 2004 report immaterial. The Property’s case with the County has been closed for over 12 years.

Similarly, although the Property does appear on the State Water Quality Control Board list as Case #253627, the case has been closed as of November 1, 2007, and the “Cleanup Status” is “Completed. (See printout from State Water Resources Control Board GeoTracker website, attached hereto as Attachment C). Suggesting that a site inherently poses a hazardous substances risk because it appears on the State Water Quality Control Board list (even though the case has been closed and completed for over a decade) is simply not compelling.

Finally, the only evidence in the administrative record regarding *current* conditions at the Property clearly demonstrates that the Property poses no hazardous materials risks. The Project’s environmental consultant, Terracon, has analyzed the Property to assess any potential hazardous substances risks. (See Terracon’s Summary of Environmental Conditions, attached hereto as Attachment D.) Terracon concludes that based on previous documented UST removal activities, regulatory closure, and the findings from Terracon’s prior subsurface investigations, **Terracon identified no significant environmental conditions that would warrant a response action.** (Summary of Environmental Conditions, p. 3.)<sup>4</sup>

Despite these findings, as a matter of good business practice, Raising Cane’s intends to operate pursuant to a Soil Management Plan, which would provide guidance during planned future earthwork activities in the unlikely event that petroleum hydrocarbon-impacted soils are encountered. Further, as is standard across Raising Cane’s locations, Raising Cane’s intends to install a vapor barrier below the proposed structure of the Project to provide additional assurances regarding any residual vapors that may remain at the Property.

- *Appellants cite no actual “cumulative effects” to disqualify the Project from the use of a CEQA exemption.*

Under CEQA Guidelines section 15300.2(b), if the cumulative impact of “successive projects of the same type in the same place” over time is significant, then a categorical exemption cannot be used. Because of the “same type” “same place” requirement, this “cumulative impacts” exception is narrower than the broad definition of cumulative impacts as applied elsewhere in CEQA. Appellants set forth no evidence demonstrating that the Project would have any cumulative impacts, nor do they suggest that successive projects of the same type as the Project in the same place as the Project would have cumulative impacts, as required by the exception. Appellants’ sole contention is that the “Traffic Report generally mentions two projects, but no

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<sup>4</sup> The Limited Site Investigation (LSI) report for the Property, which is referenced in Attachment D, is also attached hereto as Attachment E.

disclosure exists as to the past, present, and probable future projects.” (Appeal, p. 23). This does not constitute evidence of cumulative impacts.<sup>5</sup> All Appellants have done is cite language from case law and add a throwaway line about the traffic report’s supposed shortcomings and the need for an EIR. This cannot constitute a basis to disqualify the use of the CEQA exemption.

In sum, Appellants have offered no evidence (let alone substantial evidence) in support of an argument that the Project is not properly exempt under CEQA. On the contrary, substantial evidence supports each required prong of the infill development project CEQA exemption, and there are no applicable exceptions.

**6. Appellants’ additional assertions are similarly without factual support.**

Appellants attempt to make additional arguments to challenge the Project’s approval. These arguments have no legal merit and like Appellants’ other assertions, they have no basis in fact.

- *Appellants claim that the Property’s parcels must be identified to “confirm the Project location, lot size, and the building percentage of the lot area, among other things.”* Appellants provide no legal support for this alleged requirement. On the contrary, the administrative record associated with the Project provides sufficient information about the Property to make the required CUP findings.
- *Appellants claim that residents need to know the “Project’s light intensity.”* Again, Appellants cite no legal authority for this contention. Nor do Appellants assert that the Project’s “light intensity” will create a negative impact. They simply state that such information is required. Sufficient information about the Project’s features (including the fact that the Project will be designed to screen all service areas, restrooms, and mechanical equipment) exists in the administrative record, and this assertion lacks merit.
- *Appellants assert that nearby residences have been “disregarded” through the Project approval process, and that the Property is “like an island” with two additional businesses on the island.* As the Planning Commission’s Resolution states, properties located to the north and south of the Property are other one-story commercial buildings; properties west are one-story commercial buildings; and properties east are single-family dwellings (at the top of the hillside). Appellants do not point to any facts that nearby residences have been “disregarded” in the Project’s approval process, nor does

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<sup>5</sup> Even if Appellants provided actual evidence of other projects in the area that might have a cumulative impact, this would not meet the requirements of the exception. *See Hines v California Coastal Comm’n* (2010) 186 Cal.App.4th 830, 857 (noting that listing other projects in the area that might cause significant cumulative impacts is not evidence that the proposed project will have adverse impacts or that the impacts are cumulatively considerable).

this argument provide a legitimate basis for challenging the Project's approval. It is simply another assertion without legal or factual merit.

Appellants also attack several of the Project CUP's Conditions of Approval. However, their attacks are unsupported any (let alone substantial) evidence. Instead, each of the Conditions of Approval is appropriate and supported by substantial evidence.

- *Condition 6. Appellants assert that the Project does not comply with the City's zoning regulations. As discussed at length herein, this condition ensures that the Project will comply with all zoning regulations. As the condition states, the Project cannot operate without being fully consistent with all zoning regulations. Appellants' criticism of this condition has no merit.*
- *Condition 11. Appellants assert that the proposed hours for the Project are "not appropriate for the surrounding residential neighborhood and other businesses in the vicinity." Appellants provide no evidence for why this is the case – they simply state their opinion. This does not constitute substantial evidence. The only facts in the administrative record demonstrate that Raising Cane's has reduced its hours to be responsive to its neighbors. Appellants' criticism of this condition has no merit.*
- *Condition 13.c. Appellants again assert that the Project does not comply with the City's zoning regulations. This contention has been addressed exhaustively throughout this letter and merits no further response.*
- *Condition 13.g. Appellants again assert that the Project does not comply with the City's zoning regulations. This contention has been addressed exhaustively throughout this letter and merits no further response.*
- *Condition 14. Appellants assert that there is no space for a curb or slough wall of sufficient height because of the adjacent alley's width. Appellants offer no evidence to demonstrate why this condition cannot be complied with. Like the others, this point of opposition has no merit and is without support.*
- *Condition 24. Appellants claim that a utility plan must exist before any Project approval. Appellants cite no relevant authority to support this position. Instead, the condition requires such a plan before the City issues grading permits. This is a permissible condition, and Appellants assert no legal basis otherwise.*
- *Condition 26. Appellants claim that traffic impacts and hazards have been inadequately addressed by the City and must be addressed before any Project approval.*

*Appellants also claim that the required traffic plan must be developed before Project approval. Appellants contentions regarding traffic impacts have been thoroughly discussed herein and in the Kimley-Horn Response Letter and warrant no further response. The required traffic management plan is a permissible condition, and Appellants assert no legal basis otherwise.*

- *Condition 40. Appellants claim that “location and light intensity must be addressed” before Project approval. Appellants cite no relevant authority to support this position. Instead, this condition requires that the City approve plans for location and light intensity before the City issues a certificate of occupancy. This is a permissible condition, and Appellants assert no legal basis otherwise.*
- *Condition 41. Appellants question the legal authority for requiring surveillance cameras for the common areas of the Project, and question whether the City intends to “engage in government surveillance of the citizens.” Appellants cite no relevant authority to support this position, nor do they offer any evidence to prove that the City intends to engage in “surveillance of the citizens.” On the contrary, this condition is fully within the City’s right to require as a security measure.*
- *Condition 43. Similar to Condition 11, Appellants indicate that the Project should not be allowed to operate until 1:00 a.m. Appellants suggest that this is “contrary to law.” Appellants provide no authority demonstrating that the Project’s hours of operation are contrary to law. As such, this complaint has no merit and should be disregarded.*

Consistent with Appellants’ approach throughout their Appeal, they make several contentions about the Project’s Conditions of Approval. As demonstrated above, these contentions are unsupported by legal authority and completely unsubstantiated by any facts in the administrative record. The Project’s Conditions of Approval are appropriate and fully within the City’s discretion to require.

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Members of the Monterey Park City Council  
June 25, 2020  
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As discussed herein, each of Appellants' contentions lack merit. Their assertions are unsupported by substantial evidence and cannot constitute a basis for reversing the Planning Commission's approval of the Project CUP application. We respectfully urge you to deny the Appeal and uphold the Project CUP. Thank you for your consideration.

Sincerely,

Cox, Castle & Nicholson LLP



David P. Waite

#### Attachments

cc: Ron Bow, City Manager, City of Monterey Park  
Mark McAvoy, Director of Public Works / City Engineer, City of Monterey Park  
Vincent Chang, City Clerk, City of Monterey Park  
Karl Berger, Assistant City Attorney, City of Monterey Park  
Samantha Tewasart, Senior Planner, City of Monterey Park

# Attachment A



June 23<sup>rd</sup>, 2020

Kristen Roberts  
Raising Cane’s Restaurants, LLC  
6800 Bishop Road, Suite 210  
Plano, TX 75024-4275

**RE: *Appeal (AP-20-01) of City Planning Commission’s Approval of Raising Cane’s Conditional Use Permit (CU-19-13)***

This response letter is prepared in connection with an application for Conditional Use Permit CU-19-13 (the “CUP”) and the related appeal, AP-20-01 (the “Appeal”). The CUP, which was approved by the Planning Commission on May 12, 2020, would allow for a retail eating establishment with a drive-through aisle at 1970 South Atlantic Boulevard (the “Project”) in the City of Monterey Park.

Appellants Rafael and Gina Casillas (the “Appellants”) have raised a host of legal and factual contentions regarding the CUP. This letter addresses the concerns regarding the project having significant environmental impacts, specifically surrounding land use, traffic, noise and air quality. A summary of each concern listed by the Appellants, and our respective responses, is as follows:

**PLANNING AND LAND USE**

*Appellants claim that the Project should not qualify as a “new retail eating establishment” because such an establishment is defined as having a gross floor area of less than 1,500 square feet. [Project is 1,790 sf]*

Response: the classification of the Project as a “new retail eating establishment” with a drive-through service can be corrected to a “restaurant” with a drive-through service. However, it should be noted that both a “Retail Eating Establishment” and “Restaurant” within the Project zone are permitted uses per the Monterey Park Municipal Code, section 21.10.30 Table 21.10(A), and the drive-through is what triggers the requirement for the conditional approval. Therefore, even with the correction of the definition, it would not change the application being filed

*The Project does not accommodate a minimum of 6 cars behind each menu board*

Response: the section of the Monterey Park Municipal Code being referenced 21.10.040 Limitations, Special Standards, and Accessory Uses. Item (1)(5) of this code section states that “Drive-through aisles shall provide sufficient stacking area behind the menu board to accommodate a minimum of six cars”. The code does not specify that, for a dual drive-through operation, that a six-car minimum stacking is required for each menu board. To meet the code requirement, the dual drive-through design with the double stacking and menu boards was introduced so that the total stacking behind the menu board was a minimum of six cars. The dual menu-board concept allows cars to get through the ordering process much quicker than a single lane drive-through with one menu board, so therefore it was determined that the dual drive-through operation proposed satisfies this code requirement.

*Appellants claim that the Project requires a wall or fence due to the parking area abutting an R-zoned property, but that the Project cannot provide such a wall or fence because the alley is too narrow.*

Response: The Project is separated from the adjacent R-Zone by an existing public alley, so there is no direct connection from the commercially zone property to the adjacent residential zone that would warrant such a requirement. Additionally, there is a 40-foot grade difference between the Project and the existing residential developments. Therefore, the intended function of the wall (being to provide screening) would be rendered useless and the wall would be irrelevant.

**TRAFFIC**

*1. Intersection of Brightwood Street and the alleyway should have been studied.*

Response: The study area was determined in coordination with City of Monterey Park staff through the TIA (Traffic Impact Analysis) scoping agreement process. The project would contribute less than 5 peak hour trips to the intersection of Brightwood Street and the alleyway, which is considered nominal. Based on the Los Angeles County Congestion Management Program (CMP), an intersection Level of Service (LOS) analysis is not required if the project contributes less than 50 peak hour trips to an intersection. Therefore, an analysis at the intersection of Brightwood Street and the Alleyway is not required.

*2. Re: Figure 6 - not all inbound and outbound trips for the Project Site are accounted for as shown in Table 2, Summary of Project Trip Generation*

Response: A nominal amount of project trips (2 inbound, 1 outbound) are assumed to access the project site via the alleyway south of Brightwood Street.

*3. Drive Thru Queueing analysis in Appendix E is flawed. Analysis used three RC locations that are outside of the region. RC should have used locations within LA County (of which there are three)*

Response: As mentioned in the drive-through queuing analysis, the three RC sites were selected for data collection based on the following site characteristics that are similar to the proposed project:

1. An open Raising Cane’s restaurant with a drive-through lane
2. Located in Southern California
3. Sites are located within their own parcel adjacent to street access to determine potential impacts to the adjacent streets
4. The three referenced RC sites are considered high generators in terms of traffic and sales, and therefore were selected to try and capture a worst case scenario queuing situation.

As cited in the appeal, there are three existing sites currently open within LA County:

1. Pico Rivera, CA – this site is located within a shopping center – queuing is able to be contained within the shopping center and a vehicular cross access agreement is in place – making the site non-representative

2. Lakewood, CA - this site is located within a shopping mall – queuing is able to be contained within the shopping center and a vehicular cross access agreement is in place – making the site non-representative
3. Downey, CA – the site was a conversion of an existing Jack-in-the-Box building and was one of the first to be opened in Southern California – the site circulation, queuing configuration, menu board placements, and a-typical building footprint are not representative of a typical drive thru and queuing operation for Raising Cane’s – making the site non-representative.

*4. On site traffic circulation will be impacted by the drive-through queue during peak times. There is a possibility that the vehicle queue for the drive-through will spill onto Atlantic Boulevard and block the main drive aisle and prevent vehicles from backing out of parking stalls within the Project Site.*

Response: The drive-through has a capacity for 15-16 vehicles. The peak observed queue at the three observed sites was 17 vehicles for one 15-minute interval. It should be noted that the three sites have one drive-through lane, and the proposed site has dual lanes with dual order boards to increase efficiency through the drive-through. In addition to the empirical data, the drive-through queuing capacity was analyzed using queuing analysis formulas published in the ITE Transportation Planning Handbook (3<sup>rd</sup> Edition). Based on the formulas, the probability of the queue exceeding 17 vehicles during the peak hour is estimated to be 5.16%. In the event of a spillover outside the drive-through lane, the project site has on-site queuing capacity for an additional 3 vehicles before spilling over onto Atlantic Boulevard. In the unlikely event of a spill out into Atlantic Boulevard, restaurant staff will be properly trained to control the site queuing as to not allow a spill-over onto Atlantic Blvd.

*5. Traffic count was collected in 2018; traffic study data should not be more than 1 year old (traffic study is dated January 2020).*

Response: The original traffic study was completed in 2018. Based on coordination with City staff, 2018 counts were considered sufficient for Existing conditions, provided that an additional year of growth was applied to the counts collected in 2018 for Opening Year 2020 analyses.

*6. Appellants repeatedly refer to the Project’s 800 trips per day and the impact that this will have on LOS for adjacent intersections.*

Response: Intersection LOS is based on peak hour volumes, as they are more critical than daily volumes to determine impacts, and therefore for the purposes of the LOS analysis the daily volumes are not relevant.

**NOISE**

*Appellants claim that “if approved, the noise levels from this business will exceed the allowable thresholds established by code...,” referring to the menu board systems, queueing vehicles, the walk-up order counter, the outdoor customer dining area, and the mechanical equipment on the roof of the building and electrical transformer. They note that no noise study was conducted.*

Response:

The City of Monterey Park Municipal Code, Section 9.53.040, establishes noise standards as set forth below:

Noise Zone	Time	Allowable Noise Level - dBA
Residential	7 a.m. – 10 p.m.	55
	10 p.m. – 7 a.m.	50
Commercial	7 a.m. – 10 p.m.	65
	10 p.m. – 7 a.m.	55
Industrial	Anytime	70

The proposed restaurant is would be open seven (7) days a week from 9 am – 1 am. Originally, the proposed hours were 9 am – 1 am Sunday through Thursday and Friday/Saturday from 9 am – 3 am, however Raising Cane’s had agreed on the Planning Commission floor to reduce those hours. The agreed upon revised conditions of approval are as follows as it relates to noise:

- 11. The business hours of operation will be from 9:00 a.m. to 1:00 a.m. Monday through Sunday.
- 12. The drive-through speaker systems must not be audible above the daytime and nighttime ambient noise levels beyond the property boundaries.
- 47. The volume of the speaker boxes are to be turned down after 10:00 P.M. each night.
- 48. A Noise Mitigation Plan, submitted by the Applicant, must be approved by the City Planner, before a certificate of occupancy will be issued.

Raising Cane’s (and its consultants) have conducted two Acoustical Assessments for other projects in Southern California within the past 2 years:

- Raising Cane’s 382, Corona, CA – conducted November 2018
- Raising Canes 373, Foothill Ranch (Lake Forest), CA – conducted March 2019

Both assessments provide factual evidence that the noise level concerns listed within the appeal will not be of concern for this project.

### Drive Thru and Restaurant Operations (Menu Board Systems, Queuing Vehicles, Order Counter, and Outdoor Customer Dining Area)

The primary noise sources associated with the Raising Cane's restaurant would consist of drive-thru operations (including the ordering intercom and announcements from the public address system), outdoor dining and amplified speech, and vehicles idling/queuing, as expressed on the appeal letter.

The measured noise level associated with active drive-thru operations is 64 dBA at a distance of 20 feet. This measurement was determined from a noise sample collected by Kimley-Horn on August 17<sup>th</sup>, 2018 for an active Raising Cane's restaurant located at 26801 Aliso Creek Road, Aliso Viejo, CA. the same specification for the speakers is installed at this restaurant.

Vehicle circulation and queuing through the drive thru lane, outdoor dining, ordering at the intercoms, and public address announcements were modeled with the SoundPLAN noise modeling software. SoundPLAN allows computer simulations of noise situations, and creates noise contour maps using reference noise levels, topography, point and area noise sources, mobile noise sources, and intervening structures. SoundPLAN includes a comprehensive library of sound power and reference spectrum data based on a collection of reference noise levels and surveys. Inputs to the SoundPLAN model include ground topography and ground type, noise source locations and heights, receiver locations, and sound power level data.

Ordering at the drive thru intercoms were modeled as point sources and used the measured noise level at a representative Raising Cane's restaurant, as noted above. Vehicular circulation and queuing were modeled as line sources. Patrons dining at the outdoor patio as well as parking lot noise was modeled as area sources using SoundPLAN library data.

Distances from the respective site features having noise concerns are shown in Exhibit A. The closest sensitive receptors are located approximately 65 – 70 feet away from the project property line an approximately 99 feet away from the nearest proposed menu boards/intercoms. Additionally, a grade difference of approximately 40 feet exists between the proposed development (lower) and existing residential development (higher adjacent residential street grade).

### Mechanical Equipment (Roof Mounted)

Potential stationary noise sources include mechanical equipment. Mechanical equipment (e.g., HVAC equipment) typically generates noise levels of approximately 50 dBA at 50 feet. HVAC equipment is expected to be roof mounted at a minimum distance of approximately 110 feet from the adjacent residential use with a 40-foot vertical grade differential (see Exhibit A). Typical noise levels from HVAC equipment at 110 feet are approximately 45 dBA, which is below the City's 50 dBA nighttime noise standard. Additionally, mechanical equipment would be screened behind parapet walls and other screening enclosures that would further reduce noise levels. Operation of mechanical equipment is not expected to increase ambient noise levels beyond the acceptable compatible land use noise levels. Therefore, the mechanical equipment should have no significant impact for noise.

### Electrical Transformer

Potential stationary noise sources include the proposed electrical transformer. Transformers typically generate noise levels of approximately 55 dBA at 23 feet. The project transformer is expected to be at grade on a concrete slab at the parking lot elevation. The proposed transformer (per Exhibit A) is

expected to be at a minimum distance of approximately 71.4 feet from the adjacent residential use (see Exhibit A). Typical noise levels from transformers at 71.4 feet are approximately 46 dBA, which is below the City's 50 dBA nighttime noise standard. Additionally, the proposed transformer would be screen behind landscaping and facing away from the residential use that would further reduce noise levels. Operation of electrical transformers is not expected to increase ambient noise levels beyond the acceptable compatible land use noise levels. Therefore, the electrical transformer would not be noticeable and would have no significant noise impact. Note that there are existing power poles along the north side of the alley, adjacent to the residential use that are to remain, which also emit noise levels that likely exceed that of the proposed transformer.

It should be noted that Kimley-Horn has not had the opportunity to quantify the existing ambient noise levels in the project area, which may already be significantly high due to the proximity to other uses and Atlantic Boulevard.

## AIR QUALITY

*Appellants claim that emissions generated with the project (from vehicles and the restaurant's exhaust system) warrant an air quality evaluation.*

Response:

Raising Cane's (and its consultants) have conducted an Air Quality Assessments for other projects in Southern California within the past 2 years:

- Raising Cane's 382, Corona, CA – conducted November 2018

The project is consistent with the overall development size and type as analysis that was prepared for the Corona location. Therefore, this assessment provides factual evidence that the air quality level concerns listed within the appeal will not be of concern for this project.

The California Air Resources Board (CARB) divides the state into 15 air basins that share similar meteorological and topographical features. The proposed project is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, as well as all of Orange County. The basin is on a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean on the southwest and high mountains forming the remainder of the perimeter. The air quality in this area is determined by such natural factors as topography, meteorology, and climate, in addition to the presence of existing air pollution sources and ambient conditions.

The Project site is located within the SCAB, which is under the jurisdiction of the SCAQMD. The SCAQMD is required, pursuant to the FCAA, to reduce emissions of criteria pollutants for which the SCAB is in nonattainment. To reduce such emissions, the SCAQMD drafted the 2016 AQMP. The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state (California) and national air quality standards. The 2016 AQMP is a regional and multi-agency effort including the SCAQMD, the CARB, the SCAG, and the EPA. The plan's pollutant control strategies are based on the latest scientific and technical information and

planning assumptions, including SCAG’s 2016 RTP/SCS, updated emission inventory methodologies for various source categories, and SCAG’s latest growth forecasts. SCAG’s latest growth forecasts were defined in consultation with local governments and with reference to local general plans. The Project is subject to the SCAQMD’s AQMP.

The criteria for determining consistency with the AQMP are defined by the following indicators:

- **Consistency Criterion No. 1:** The proposed Project will not result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.
- **Consistency Criterion No. 2:** The proposed Project will not exceed the assumptions in the AQMP or increments based on the years of the Project build-out phase.

The violations to which Consistency Criterion No. 1 refers are CAAQS and NAAQS. As shown in the tables below, the Project would not exceed the SCAQMD’s short-term construction or long-term operational thresholds. The SCAQMD developed the construction and operational thresholds to determine if individual projects would cause, contribute, or increase the severity of criteria air pollutant exceedances of the CAAQS and NAAQS. As the Project would not exceed the SCAQMD’s thresholds, it would therefore not violate any air quality standards. Thus, no impact is expected, and the Project would be consistent with the first criterion.

Construction Year	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO <sub>x</sub> )	Carbon Monoxide (CO)	Sulfur Dioxide (SO <sub>2</sub> )	Fine Particulate Matter (PM <sub>2.5</sub> )	Coarse Particulate Matter (PM <sub>10</sub> )
2019	4.40	23.57	16.61	0.03	1.76	2.78
<i>SCAQMD Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>55</i>	<i>150</i>
<b>Exceed SCAQMD Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Notes: SCAQMD Rule 403 Fugitive Dust applied. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stock piles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. No mitigation was applied to construction equipment. Refer to Appendix A for Model Data Outputs.						
Source: CalEEMod version 2016.3.2.						

**Table 2: Long-Term Operational Emissions (Maximum Pounds Per Day)**

Source	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO <sub>x</sub> )	Carbon Monoxide (CO)	Sulfur Dioxide (SO <sub>2</sub> )	Fine Particulate Matter (PM <sub>2.5</sub> )	Coarse Particulate Matter (PM <sub>10</sub> )
<b>Summer Emissions</b>						
Area Source Emissions	0.11	0.00	0.00	0.00	0.00	0.00
Energy Emissions	0.03	0.30	0.25	0.00	0.02	0.02
Mobile Emissions	2.43	15.21	15.99	0.06	0.91	3.29
Total Emissions	2.58	15.51	16.25	0.06	0.94	3.31
SCAQMD Threshold	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No
<b>Winter Emissions</b>						
Area Source Emissions	0.11	0.00	0.00	0.00	0.00	0.00
Energy Emissions	0.03	0.30	0.25	0.00	0.02	0.02
Mobile Emissions	2.01	14.93	15.27	0.05	0.91	3.29
Total Emissions	2.15	15.23	15.53	0.05	0.94	3.31
SCAQMD Threshold	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No
Source: CalEEMod version 2016.3.2.						

Concerning Consistency Criterion No. 2, the AQMP contains air pollutant reduction strategies based on SCAG’s latest growth forecasts, and SCAG’s growth forecasts were defined in consultation with local governments and with reference to local general plans. The proposed Project is consistent with the land use designation and development density presented in the CGP and therefore would not exceed the population or job growth projections used by the SCAQMD to develop the AQMP. Thus, no impact would occur, as the Project is also consistent with the second criterion.

The adjacent single-family residential use is considered a sensitive receptor. The residential use, at its nearest point, is approximately 65 feet away from the project property line, of which a 20-foot wide existing public alley is already in place and will remain as part of any development of the site. Additionally, an approximately 40-foot grade difference exists between the proposed development and existing residential uses. Based on SCAQMD methodology, significant impacts would not occur during construction activities or long-term operation.

Please contact us should you have any further questions regarding this response.

Sincerely,



John Pollock, Associate  
P.E. (RCE 86160)  
714-786-6125  
[John.pollock@kimley-Horn.com](mailto:John.pollock@kimley-Horn.com)

# Attachment B



# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (626) 458-5100  
<http://dpw.lacounty.gov>

DONALD L. WOLFE, Director

ADDRESS ALL CORRESPONDENCE TO  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE  
REFER TO FILE

EP-1

007105-038358

007105-024707

November 1, 2007

Mr. David Harris  
ConocoPhillips Company  
P.O. Box 25376  
Santa Ana, CA 92799-5376

Dear Mr. Harris:

**HAZARDOUS MATERIALS UNDERGROUND STORAGE  
CLOSURE CERTIFICATION  
CLOSURE APPLICATION NO. 385644  
FACILITY LOCATED AT 1970 SOUTH ATLANTIC BOULEVARD, MONTEREY PARK**

This letter confirms the completion of a site investigation and corrective action for the underground storage tank (UST) formerly located at the above-described location. Thank you for your cooperation throughout this investigation. Your willingness and promptness in responding to our inquiries concerning the former UST are greatly appreciated.

Based on information in the above-referenced file and with the provision that the information provided to this agency was accurate and representative of site conditions, this agency finds that the site investigation and corrective action carried out at your UST site is in compliance with the requirements of subdivisions (a) and (b) of Section 25296.10 of the California Health and Safety Code (CH&SC) and with corrective action regulations adopted pursuant to Section 25299.3 of the CH&SC and that no further action related to the petroleum release(s) at the site is required.

This notice is issued pursuant to subdivision (g) of Section 25296.10 of the CH&SC.

Mr. David Harris  
November 1, 2007  
Page 2

If you have any questions, please contact Ms. Rani Iyer of this office at (626) 458-3560,  
Monday through Thursday, 7 a.m. to 5:30 p.m.

Very truly yours,

DONALD L. WOLFE  
Director of Public Works



TIM SMITH  
Senior Civil Engineer  
Environmental Programs Division

RI:my  
P:\eecharris C544969

cc: California Regional Water Quality Control Board, Los Angeles Region (Yue Rong)  
Delta Environmental Consultants, Inc. (Jay Badieli)  
Chapman W. Lew, Peter Share Wah Lew and Shiu L. Lew

# Attachment C

1970 ATLANTIC BLVD, S  
 MONTEREY PARK, CA 91754  
 LOS ANGELES COUNTY  
 LUST CLEANUP SITE (INFO)  
[PRINTABLE CASE SUMMARY / CSM REPORT](#)

CLEANUP OVERSIGHT AGENCIES  
 LOS ANGELES COUNTY (LEAD) - CASE #: 038358  
 CASEWORKER: [MANUEL R REGALADO](#)  
 LOS ANGELES RWQCB (REGION 4)  
 CASEWORKER: [YUE RONG](#)

[Summary](#) [Cleanup](#) [Action Report](#) [Regulatory Activities](#) [Environmental Data \(ESI\)](#) [Site Maps / Documents](#) [Community Involvement](#) [Related Cases](#)

**Regulatory Profile**

[PRINTABLE CASE SUMMARY](#)

**CLEANUP STATUS** - [DEFINITIONS](#)

COMPLETED - CASE CLOSED AS OF 11/1/2007 - [CLEANUP STATUS HISTORY](#)

**POTENTIAL CONTAMINANTS OF CONCERN**

GASOLINE

**FILE LOCATION**

**DWR GROUNDWATER SUB-BASIN NAME**

Coastal Plain Of Los Angeles - Central (4-011.04)

**POTENTIAL MEDIA OF CONCERN**

UNDER INVESTIGATION

**DESIGNATED GROUNDWATER BENEFICIAL USE(S)** - [DEFINITIONS](#)

MUN, AGR, IND, PROC

**CALWATER WATERSHED NAME**

Los Angeles River - Los Angeles (412.10)

**Site History**

No site history available

# Attachment D

June 24, 2020



Raising Cane's Restaurants, LLC  
6800 Bishop Rd Ste 210  
Plano, TX 75024-4275

Attn: Ms. Kristen Roberts  
P: (972) 769-3348  
E: [KRoberts@raisingcanes.com](mailto:KRoberts@raisingcanes.com)

Re: Summary of Environmental Conditions  
Proposed Raising Cane's Restaurant (RC 387) - Monterey Park  
1970 South Atlantic Boulevard  
Monterey Park, Los Angeles County, California  
Terracon Project No. 60187218A

Dear Ms. Roberts:

Per your request, Terracon Consultants, Inc. (Terracon) is pleased to submit this Summary of Environmental Conditions letter to assist with your responses to Conditional Use Permit (CUP) appeal for the referenced project.

Terracon completed a Phase I Environmental Site Assessment (ESA) on July 2, 2018 (Terracon Project No. 60187218) and Limited Site Investigation (LSI) report on July 24, 2018. Summary of findings of the Phase I ESA and the LSI are provided in the following paragraphs:

- The site is located at 1970 South Atlantic Boulevard in Monterey Park, Los Angeles County, California, and consists of three contiguous parcels (Designated as County of Los Angeles Assessor Parcel Numbers (APNs): 5266-002-032, -033 and -034) totaling approximately 0.41-acre. The site consists of a vacant asphalt/concrete paved lot.
- Historically, the site was occupied by Ott Frank E Jr. Union Service DLR, a service station, from at least 1957 through 1969. This service station was demolished and replaced by another service station that continued to operate on the site until 2003. Subsequent to the demolition of the former service station (1957-1969), two sets of Underground Storage Tanks (USTs) were installed at the site in 1969 and in 1990. These USTs were removed under regulatory oversight by the Los Angeles Department of Public Works, Environmental Program Division (LACDPW), due to discovery of petroleum hydrocarbon releases from the USTs, in 1990 and in 2003, respectively.
- Several subsurface assessments were performed by others to evaluate the release(s) from the former UST systems and associated automotive repairing underground features (i.e. clarifier and three in-ground hydraulic lifts) were conducted in 1990, 1997, 2003, 2005, and 2006, resulting in regulatory closure with no further action requirements in 1992 and in 2007.

Terracon Consultants, Inc. 1421 Edinger Avenue, Suite C Tustin, California 92780  
P (949) 261.0051 F (949) 261.6110 [terracon.com](http://terracon.com)

**Summary of Environmental Conditions**

Proposed Raising Cane's Restaurant (RC 387) - Monterey Park ■ Monterey Park, California

June 24, 2020 ■ Terracon Project No. 60187218A

- Terracon's Phase I ESA report identified significant data gaps in connection with former on-site service station facilities that occupied the site from 1957 through 1969, with no documentation of USTs. In addition, a significant data gap was identified in connection with inadequate soil assessment of a former waste oil UST at the site.
- Subsequent to the Phase I ESA and to evaluate the identified significant data gaps, Terracon completed an LSI, which included soil and soil gas sampling and analysis at the site.
- The LSI scope of work consisted of advancement of five soil borings (SB-1, SB-2, SB-3, SB-4, SB-7) to a maximum depth of 15 feet below grade surface (bgs). In addition, two borings (VP-5 and VP-6) were advanced to depths of approximately 5.0 feet bgs and converted into a vapor probe set at a depth of approximately 4.5 feet bgs. The soil samples were analyzed for TPH as gasoline range organics (GRO), diesel range organics (DRO), and Oil Range Organics (ORO) by United States Environmental Protection Agency (USEPA) Method 8015M and VOCs by USEPA Method 8260B. The soil gas samples were analyzed for VOCs by USEPA Method TO-15. The following summarizes findings of the LSI:
  - Analytical results for the soil samples collected from the site did not exhibit VOCs, TPH-GRO, and TPH-DRO at concentrations above their respective laboratory reporting limits. Concentrations of TPH-ORO were detected in soil borings SB-3, VP-6, and SB-7; however, the detected concentrations were well below the applicable screening levels.
  - The detected metals concentrations in soil samples were reported at concentrations below the applicable screening levels and/or background concentrations.
  - Analytical results for the soil gas samples exhibited VOC concentrations above their respective reporting limits (RL); however, below the applicable screening levels for residential and commercial land use at that time.
- Based on the findings of the LSI, additional investigation did not appear warranted. However, based on the historical site use, and typical redevelopment practices of the client, during site excavation activities (if needed) proper procedures will be followed with respect to worker health and safety, and potentially affected soils encountered will be properly characterized, treated, and/or disposed in accordance with applicable local, state or federal regulations.

It should be noted that regulatory screening levels are routinely evaluated and updated. Terracon compared the soil gas analytical results from the prior LSI (July 2018) to the current Environmental Screening Levels established by the San Francisco Bay Area, Regional Water Quality Control Board, also adopted by most regulatory agencies in California. The reported benzene concentration in one of the soil gas samples slightly exceeds the current ESLs for commercial

**Summary of Environmental Conditions**

Proposed Raising Cane's Restaurant (RC 387) - Monterey Park ■ Monterey Park, California

June 24, 2020 ■ Terracon Project No. 60187218A

land use; however, the remaining soil gas analytical results reported concentrations below the ESLs for commercial land use.

Based on the previous documented UST removal activities, regulatory closure, and the findings from Terracon's prior subsurface investigations, significant environmental conditions that warrant a response action were not identified. It should be noted that based on the findings of the Phase I ESA, the anticipated depth to groundwater in the site vicinity is greater than 150 feet below grade surface; and based on subsurface conditions is not considered threatened.

As a precautionary measure, and per typical redevelopment practices of the client for sites that have had a history of environmental impact, the on-site soils will be managed under a Soil Management Plan (SMP) to provide guidance during planned future earthwork activities in the unlikely event that petroleum hydrocarbon impacted soils are encountered.

Additionally, the client will install a voluntary Vapor Barrier below the proposed structure to provide additional assurances regarding residual vapors that may remain at the site. Based on the environmental review of the site conditions, the proposed SMP and Vapor Barrier are believed to be sufficient to mitigate potential soil and or vapor concerns.

If there are any questions regarding this letter or if we may be of further assistance, please do not hesitate to contact us.

Sincerely,

**Terracon Consultants, Inc.**

Islam (Sami) R. Noaman, E.I.T.  
Environmental Department Manager II

For Carl A. Parten  
Senior Principal

# Attachment E

# LIMITED SITE INVESTIGATION

Raising Cane's Restaurant (RC 387) – Monterey Park  
1970 South Atlantic Boulevard  
Monterey Park, Los Angeles County, California

July 24, 2018

Terracon Project No. 60187256



**Prepared for:**

Raising Cane's Restaurants, LLC  
6800 Bishop Road  
Plano, Texas

**Prepared by:**

Terracon Consultants, Inc.  
Tustin, California

[terracon.com](http://terracon.com)

**Terracon**

July 24, 2018

Raising Cane's Restaurants, LLC  
6800 Bishop Road  
Plano, Texas 75024

Attn: Ms. Kristen Roberts  
P: (972) 769-3348  
E: [KRoberts@raisingcanes.com](mailto:KRoberts@raisingcanes.com)

Re: Limited Site Investigation  
Raising Cane's Restaurant (RC 387) – Monterey Park  
1970 South Atlantic Boulevard  
Monterey Park, Los Angeles County, California 91754  
Terracon Project No. 60187256

Dear Ms. Roberts:

Terracon Consultants, Inc. (Terracon) is pleased to submit this Limited Site Investigation (LSI) report for the above referenced site. This investigation was performed in accordance with Terracon's Proposal No. P60187218A dated June 6, 2018.

We appreciate the opportunity to perform these services for Raising Cane's Restaurants, LLC. Please contact either of the undersigned at (949) 261.0051 if you have questions regarding the information provided in the report.

Sincerely,  
**Terracon Consultants, Inc.**

Prepared by:



Mary Louise K. Mrdjenovich  
Field Geologist

Reviewed by:



Fabio M. Minervini, P.G.  
Environmental Department Manager



Carl A. Parten  
Office Manager / Principal

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## APPENDICES

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**LIMITED SITE INVESTIGATION  
 RAISING CANE’S RESTAURANT (RC 387) – MONTEREY PARK  
 1970 SOUTH ATLANTIC BOULEVARD  
 MONTEREY PARK, LOS ANGELES COUNTY, CALIFORNIA  
 Terracon Project No. 60187256  
 July 24, 2018**

**1.0 INTRODUCTION**

**1.1 Site Description**

<b>Site Name</b>	Raising Cane’s Restaurant (RC 387) – Monterey Park
<b>Site Location/Address</b>	1970 South Atlantic Boulevard, Monterey Park, Los Angeles County, California, 91754
<b>General Site Description</b>	The site is located at 1970 South Atlantic Boulevard in Monterey Park, Los Angeles County, California of Assessor’s Parcel Numbers (APNs) 5266-002-032, -033 and -034 totaling approximately 0.41-acre of land. During the site reconnaissance, the site consisted of grassy undeveloped land.

A topographic map and site diagram are included as Exhibits 1 and 2 of Appendix A, respectively.

**1.2 Scope of Work**

Terracon conducted a Limited Site Investigation (LSI) at the Raising Cane’s Restaurant (RC 387) – Monterey Park site, located at 1970 South Atlantic Boulevard, Monterey Park, Los Angeles County, California (the site). The scope of work conducted at your request, was in response to Terracon’s Phase I Environmental Site Assessment (Terracon’s ESA Project No. 60187218), dated June 6, 2018. Terracon’s Phase I ESA identified the following Recognized Environmental Condition (REC):

- n **Historical service station:** Based on a review of historical information, in the early 1950s, a service station was developed. In 1969, this service station was demolished and a new service station and associated automotive repairing was developed and remained relatively unchanged until 2003, when the underground storage tank system was removed. By 2007, the automotive repairing building located on the eastern portion of the site and associated office was demolished and the site has remained vacant and continued to be vacant through the present.

The objective of the LSI was to evaluate the presence of total petroleum hydrocarbon (TPH) and volatile organic compounds (VOCs) above relevant laboratory reporting limits in soil, and VOCs in soil gas, beneath the site as a result of potential releases from the above REC. Groundwater is assumed to be at an approximate depth of 198 feet below ground surface (bgs); therefore, an evaluation of groundwater was not included in the proposed scope. Terracon understands that the expected future use of the site includes the construction of a proposed restaurant building.

## Limited Site Investigation Report

Raising Cane's Restaurant (RC 387) ■ Monterey Park, California

July 24, 2018 ■ Terracon Project No. 60187256



### 1.3 Standard of Care

Terracon's services were performed in a manner consistent with generally accepted practices of the profession undertaken in similar studies in the same geographical area during the same time period. Terracon makes no warranties, either express or implied, regarding the findings, conclusions, or recommendations. Please note that Terracon does not warrant the work of laboratories, regulatory agencies, or other third parties supplying information used in the preparation of the report. These LSI services were performed in accordance with the scope of work agreed with you, our client, as reflected in our proposal and were not restricted by ASTM E1903-97.

### 1.4 Additional Scope Limitations

Findings, conclusions, and recommendations resulting from these services are based upon information derived from the on-site activities and other services performed under this scope of work; such information is subject to change over time. Certain indicators of the presence of hazardous substances, petroleum products, or other constituents may have been latent, inaccessible, unobservable, nondetectable, or not present during these services, and we cannot represent that the site contains no hazardous substances, toxic materials, petroleum products, or other latent conditions beyond those identified during this LSI. Subsurface conditions may vary from those encountered at specific borings or wells or during other surveys, tests, assessments, investigations, or exploratory services; the data, interpretations, findings, and our recommendations are based solely upon data obtained at the time and within the scope of these services.

### 1.5 Reliance

This report has been prepared for the exclusive use of Raising Cane's Restaurants, LLC and any authorization for use or reliance by any other party (except a governmental entity having jurisdiction over the site) is prohibited without the express written authorization of Monterey Park, LLC and Terracon. Any unauthorized distribution or reuse is at the client's sole risk. Notwithstanding the foregoing, reliance by authorized parties will be subject to the terms, conditions, and limitations stated in the proposal, LSI report, and Terracon's Terms and Conditions. The limitation of liability defined in the terms and conditions is the aggregate limit of Terracon's liability to the client and all relying parties unless otherwise agreed in writing.

## 2.0 FIELD ACTIVITIES

Terracon's field activities were conducted on July 3, 2018, by a field geologist under the oversight of a California-licensed Professional Geologist with Terracon. A site-specific health and safety plan was followed by Terracon during field activities for all phases of this investigation.

## Limited Site Investigation Report

Raising Cane's Restaurant (RC 387) ■ Monterey Park, California

July 24, 2018 ■ Terracon Project No. 60187256



### 2.1 Pre-Mobilization

Prior to drilling activities, the soil boring locations were marked and an Underground Service Alert (Dig Alert Ticket No: A181761795-00A) service was requested by Terracon personnel for clearance of public underground utilities.

### 2.2 Geophysical Survey

To further evaluate the underground utilities at the site, a geophysical survey was performed in the vicinity of each of the boring locations where mechanical drilling was to be performed.

### 2.3 Soil Borings

Per the approved scope of work, five soil borings (SB-1, SB-2, SB-3, SB-4, and SB-7) were advanced at the site using a direct-push technology (DPT) drilling rig to a maximum depth of approximately 15 feet below ground surface bgs; with the exception of soil borings SB-1 and SB-4, which were terminated at a depth of approximately 13 feet (bgs) due to drilling equipment refusal. The approximate boring locations are shown on Exhibit 2 of Appendix A.

Drilling services were performed by a State-of-California C-57 licensed driller under the supervision of a Terracon environmental professional. Soil samples were collected using four-foot acetate sleeves. Drilling and sampling equipment were cleaned using an Alconox<sup>®</sup> wash and potable water rinse prior to the beginning of the project and before collecting each soil sample.

Soil samples were collected continuously and observed to document soil lithology, color, moisture content, and sensory evidence of impairment. The soil samples were field-screened using a photoionization detector (PID – miniRAE) to indicate the presence of total organic vapors (TOV).

During sample collection, the materials encountered to the maximum depth of exploration of approximately 15 feet bgs consisted mostly of sand with variable amounts of clay or sandy clay. Some gravel was encountered in the sandier material. Detailed lithologic descriptions are presented on the soil boring logs included in Appendix B.

No odors were observed in the soil samples collected from each soil boring. PID readings at background concentrations of less than 1 parts per million by volume (ppmv) TOV were detected in the soil samples collected from the borings. The PID readings are recorded on the soil boring logs and included in Appendix C.

Terracon's soil sampling program involved submitting one soil sample from each of the five soil borings to the laboratory for analysis. Soil samples submitted for laboratory analysis were collected from the interval with highest PID reading or from the interval of most likely environmental impact based on the field professional's judgment. Soil sample intervals for each

## Limited Site Investigation Report

Raising Cane's Restaurant (RC 387) ■ Monterey Park, California

July 24, 2018 ■ Terracon Project No. 60187256



boring are presented with the soil sample analytical results (Tables 1 and 2 of Appendix C) and are provided on the lithologic boring logs included in Appendix B.

Soil samples were collected in laboratory-provided glassware, sealed, properly labeled and placed on ice in a cooler for transportation to the laboratory. The sample cooler and completed chain-of-custody form were relinquished to Sun Star Laboratories, in Lake Forest, California, a State-of-California certified laboratory for analysis on a standard 5-day turnaround time.

After completion of soil sampling, the borings were backfilled to surface grade with hydrated bentonite chips.

### 2.4 Vapor Probe Installation and Soil Vapor Sampling

Two borings (VP-5 and VP-6) were advanced to depths of approximately 5.0 feet bgs and converted into a vapor probe set at a depth of approximately 4.5 feet bgs. Details of the installation and sampling procedures are provided below.

The vapor probes were constructed in general accordance with California Environmental Protection Agency (CAL-EPA), Department of Toxic Substances Control (DTSC), Los Angeles and San Francisco Regional Water Quality Control Board (LA- and SF-RWQCB) *Advisory – Active Soil Gas Investigation* guidance document, dated July 2015 (CAL-EPA/DTSC, July 2015), as follows:

- n At each vapor probe location, a ½-inch diameter probe tip approximately 1-inch long was installed at the target depth of 5.0 feet bgs. The probe tip was designed to be placed approximately half way through a 1-foot sand pack extending from ½-foot above to ½-foot below the probe tip. Therefore, approximately ½-foot of sand was added to the soil boring prior to installing the probe tip.
- n The sampling line connected to the probe tip was comprised of new dedicated 0.25-inch outer-diameter Nylaflow® tubing cut to length leaving approximately one foot of tubing extending from the surface at each probe. A gas tight three-way in-line check valve was fitted to the up-hole end of the tubing to prevent ambient air from infiltrating the probe installation through the sample line. The sample tubing was marked at the ground surface to indicate the probe location, depth, and time of installation.
- n Approximately ½-foot of sand was added after the installation of the probe tip to create a 1-foot sand pack surrounding the probe tip at the bottom of the boring. Approximately 1-foot of dry granular bentonite chips were used to fill the borehole annular space around the Nylaflow® sampling line, from the top of the sand pack to approximately 3.0 feet below grade. Hydrated granular bentonite chips were added from the top of the dry granular bentonite chips to the surface. Sufficient water was added to hydrate the bentonite to insure proper sealing, and care used in placement of the bentonite to prevent post-emplacment expansion which might compromise the probe seal.

## Limited Site Investigation Report

Raising Cane's Restaurant (RC 387) ■ Monterey Park, California

July 24, 2018 ■ Terracon Project No. 60187256



Following probe emplacement, soil vapor sampling was performed at least 2 hours following temporary vapor probe installation to allow the bentonite seal to cure and to allow for subsurface conditions to equilibrate. Terracon's soil vapor sampling program was conducted in general accordance with CAL-EPA, DTSC, soil vapor investigation guidance document (CAL-EPA/DTSC, July 2015), using the following procedures:

- n The temporary vapor probe was purged prior to sample collection. The purge volume of the probe was estimated as the summation of the volumes of the Nylaflo<sup>®</sup> sample line and the sand pack around the tip of the tubing. After waiting for at least 2 hours following probe installation, the sampling assembly was purged a standard three volumes by drawing the soil vapor from the probe using a disposable syringe and discharging it to ambient air. The flow rate during purging and sampling was 150 milliliters per minute (mL/min) to limit stripping of chemical compounds, to prevent ambient air from diluting the soil vapor samples, and to reduce the variability of purging and sampling rates.
- n A leak test was performed in conjunction with each collected soil vapor sample, to verify that ambient air was not diluting the sample or contaminating the sample with external contaminants. Prior to sample collection, the sampling train and soil vapor sampling point were tested for leaks using a shroud filled with 1,1-Difluoroethane. These locations included sample system connections and the surface bentonite seal.
- n Once the sampling assembly was purged and the leak detection test was conducted, a soil vapor sample was drawn from the sample line into a 1-Liter summa canister. The summa canister was immediately labeled and logged as described below. The soil vapor samples and the completed chain-of-custody form were relinquished to the laboratory for analysis. Samples were submitted for analysis on a standard 7-day turnaround time.

Following completion of sampling activities, the vapor probe materials were removed and the vapor probe backfilled with hydrated bentonite chips to the ground surface

## 2.5 Investigation Derived Waste

Following completion of the investigation activities, soil cuttings were temporarily stored in a 5-gallon plastic bucket. Due to the relatively small quantity of investigative derived waste (less than 5 gallons) and the absence of field evidence of impairment, the soil cuttings were transported offsite by ABC Drilling to be disposed at a later date under their general disposal permit.

## 3.0 LABORATORY ANALYTICAL METHODS

The soil and soil gas samples were analyzed by Sun Star Laboratories, in Lake Forest, California, a state-of-California certified lab. The soil and samples were analyzed for TPH as gasoline range organics (GRO), diesel range organics (DRO), and Oil Range Organics (ORO) by EPA Method

## Limited Site Investigation Report

Raising Cane's Restaurant (RC 387) ■ Monterey Park, California

July 24, 2018 ■ Terracon Project No. 60187256



8015M and VOCs by EPA Method 8260B. The soil gas samples were analyzed for VOCs by United States Environmental Protection Agency (USEPA) Method TO-15.

The laboratory analytical results for the soil samples are summarized in Tables 1 and 2 of Appendix C, and soil gas sample analytical results are summarized in Table 3 of Appendix C. The corresponding laboratory analytical report and executed chain-of-custody forms are provided in Appendix D.

## 4.0 DATA EVALUATION

### 4.1 Soil Samples

Analytical results for the soil samples collected from borings SB-1, SB-2, SB-3, SB-4, VP-5, VP-6, and SB-7 indicate that VOCs, TPH-GRO, and TPH-ORO were not detected above their respective laboratory reporting limits (RLs). TPH-ORO was detected in the samples collected from borings SB-3, VP-6, and SB-7 at concentrations of 180, 87, and 78 milligrams per kilogram (mg/kg), respectively.

The detected TPH-ORO concentrations were compared to the Los Angeles Regional Water Quality Control Board (LA-RWQCB, Region 4), Interim Site Assessment and Cleanup Guidebook (January 2005), Maximum Screening Levels (MSLs) for soils 20-150 feet above groundwater. The comparison revealed that the reported concentrations are significantly lower than the TPH-ORO MSL of 10,000 mg/kg.

Metals concentrations were detected in the soil samples collected at the site above their respective laboratory RLs. The detected metals concentrations were compared to the California Human Health Screening Levels (CHHSLs) and indicate that the reported concentrations do not exceed their respective CHHSLs for residential and commercial land use.

The value of the laboratory RL for arsenic of 5.0 mg/kg is higher than the CHHSLs of 0.07 and 0.24 mg/kg for residential and commercial land use, respectively. However, the Department of Toxic Substances Control (DTSC) established a regional background arsenic concentration in soil that can be used as a screening tool for sites throughout southern California. The term "background" collectively refers to both naturally occurring and anthropogenic concentrations in shallow soil. Statistical analysis of a large data set from school sites in Los Angeles County gave an upper-bound background arsenic concentration of 12 mg/kg. The analysis for 5 counties in southern California also gave an upper-bound background arsenic concentration of 12 mg/kg. The laboratory RL for arsenic is below this established background level; therefore, further evaluation of arsenic and other reported metals concentrations does not appear to be warranted at this time.

## Limited Site Investigation Report

Raising Cane's Restaurant (RC 387) ■ Monterey Park, California

July 24, 2018 ■ Terracon Project No. 60187256



A summary of the soil sample analytical results for VOCs, TPH, and metals is presented in Tables 1 and 2 of Appendix C. The laboratory analytical report and executed chain-of-custody forms are included in Appendix D.

### 4.2 Soil Vapor Samples

Analytical results for soil gas samples collected from soil vapor probes VP-5 and VP-6 indicate that various concentrations of VOCs including acetone, benzene, 2-butanone, carbon disulfide, chloroform, cyclohexane, ethylbenzene, heptane, styrene, tetrachloroethene (PCE), tetrahydrofuran, toluene, 1,2,4-trimethylbenzene and xylenes were detected above respective RLs.

The soil gas sample analytical results were compared to CAL-EPA, DTSC established Screening Levels calculated using USEPA Region 9 RSLs for residential/commercial indoor air and the CAL-EPA, DTSC Humana and Ecological Risk Office (HERO), Human Health Risk Assessment (HHRA) Note 3, Table 3 Screening Levels for Volatile Compounds in Ambient Air, dated January 2018 (CAL-EPA/DTSC, 2018) and applying attenuation factors of 0.002 and 0.001 for residential and commercial land use, respectively, for existing structures; and 0.001 and 0.0005 for residential and commercial land use, respectively, for future structures; per DTSC Vapor Intrusion Guidance, October 2011, Table 2. Comparison to the aforementioned screening levels indicate that the VOCs detected in the soil gas samples analyzed do not exceed the screening levels for residential or commercial land use, under existing or future structures scenario.

The tracer gas, 1,1-Difluoroethane (1,1-DFA), was not detected above the RL, indicating that soil gas samples were representative of subsurface conditions. A summary of the soil gas sample analytical results is presented in Table 3 of Appendix C and the laboratory analytical report is included in Appendix E.

## 5.0 FINDINGS AND CONCLUSIONS

The findings of the LSI are as follows:

- n Analytical results for the soil samples collected from the site did not exhibit VOCs, TPH-GRO, and TPH-DRO at concentrations above their respective laboratory reporting limits. TPH-ORO concentrations were detected in soil borings SB-3, VP-6, and SB-7 B-1; however, the detected concentrations are multiple orders of magnitude lower than the applicable screening levels.
- n The detected metals concentrations are below the applicable screening levels. The value of the arsenic RL is higher than the CHHSL but is below the established DTSC background level for southern California of 12 mg/kg. Therefore, further evaluation of arsenic and other reported metals concentrations does not appear to be warranted at this time.

## Limited Site Investigation Report

Raising Cane's Restaurant (RC 387) ■ Monterey Park, California

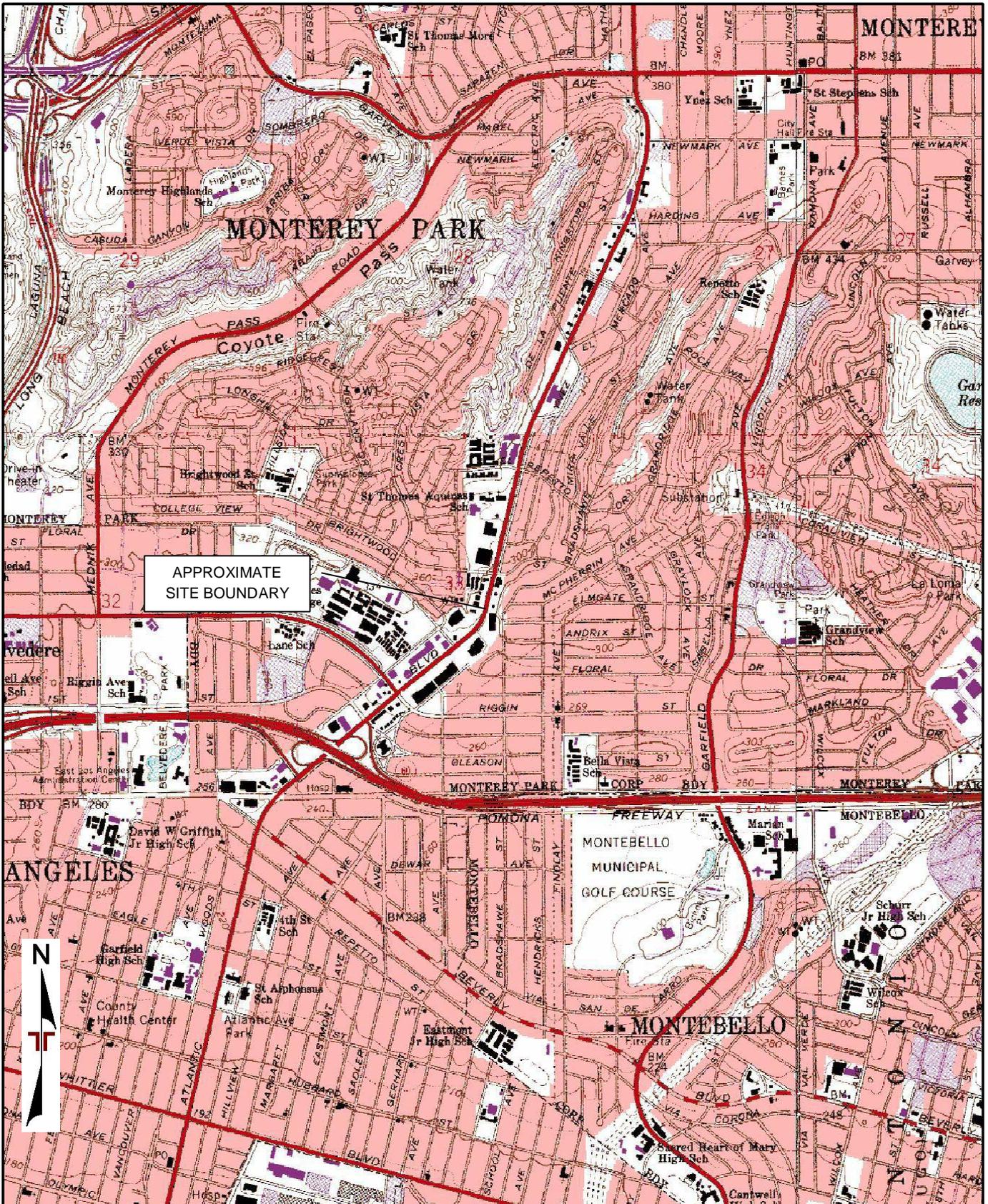
July 24, 2018 ■ Terracon Project No. 60187256



- n Analytical results for the soil gas samples collected from the site exhibited VOCs concentrations above their respective RLs; however, below the applicable screening levels for residential and commercial land use.
- n Based on the soil and soil gas sample laboratory analytical results, additional soil or soil gas investigation at the site does not appear warranted at this time.
- n Although Terracon did not identify soil impacts above applicable regulatory screening levels at the areas explored, there is the potential that other areas of the site may have impacts, as a result of the historical activities conducted at the site. In addition, historical automotive service/gasoline station activities often utilize underground structures and components which may go unnoticed until discovered during future earth work activities. Thereforeif soils located on the site are to be disturbed during future excavations or construction activities, proper procedures should be followed with respect to worker health and safety, and any affected soil encountered should be properly characterized, treated, and/or disposed in accordance with applicable local, state or federal regulations.

## **APPENDIX A**

### **Exhibits**



APPROXIMATE  
SITE BOUNDARY

TOPOGRAPHIC MAP IMAGE COURTESY OF THE U.S. GEOLOGICAL SURVEY  
 QUADRANGLES INCLUDE: LOS ANGELES, CA (1/1/1994) and EL MONTE, CA (1/1/1994).

Project Manager:	FM
Drawn by:	MKM
Checked by:	FM
Approved by:	FM

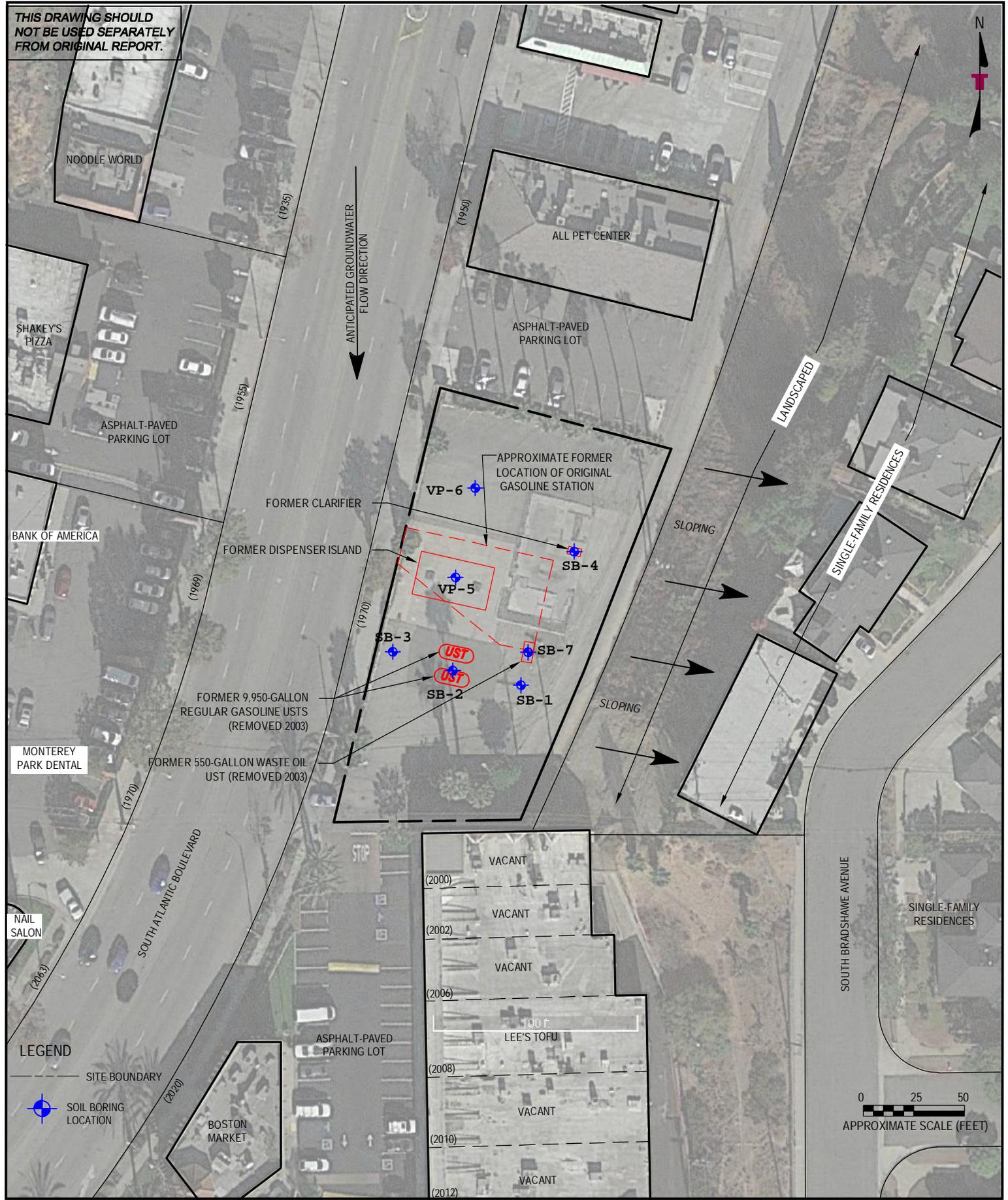
Project No.	60187256
Scale:	1"=2,000'
File Name:	Drawings.jpg
Date:	7/9/2018

**Terracon**  
 1421 Edinger Avenue, Suite C  
 Tustin, California 92780

**TOPOGRAPHIC MAP**  
 Raising Cane's Restaurant (RC 387) – Monterey Park  
 1970 South Atlantic Boulevard  
 Monterey Park, California

Exhibit	1
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THIS DRAWING SHOULD NOT BE USED SEPARATELY FROM ORIGINAL REPORT.



Project Mngr:	LSG
Drawn By:	JRR
Checked By:	IRN
Approved By:	IRN

Project No.	60187218
Scale:	AS SHOWN
File No.	60187218.dwg
Date:	06-2018

**Terracon**  
 Consulting Engineers and Scientists  
 1421 EDINGER AVENUE, SUITE C TUSTIN, CALIFORNIA 92780  
 PH. (949) 261-0051 FAX. (949) 261-6110

**SITE DIAGRAM**

**RAISING CANE'S RESTAURANT (RC 387) - MONTEREY PARK**  
 1970 SOUTH ATLANTIC BOULEVARD  
 MONTEREY PARK, LOS ANGELES COUNTY, CALIFORNIA

Page 56 of 122

EXHIBIT	2
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**APPENDIX B**

**Boring Logs**

# BORING LOG NO. SB-1

**PROJECT:** Raising Cane's Restaurant (RC 387)

**CLIENT:** Raising Cane's Restaurants, LLC  
Plano, TX

**SITE:** 1970 South Atlantic Boulevard  
Monterey Park, California

GRAPHIC LOG	LOCATION See Exhibit A-2	DEPTH (ft)	WATER LEVEL OBSERVATIONS	SAMPLE TYPE	RECOVERY (%)	OVA/PIID (ppm)
	DEPTH MATERIAL DESCRIPTION					
GRAPHIC LOG DEPTH MATERIAL DESCRIPTION	<b>WELL GRADED SAND (SW)</b> , trace gravel and clay, brown, dry, loose, no odor, no staining					<1.0
						<1.0
						<1.0
						<1.0
						<1.0
	decrease clay	5				<1.0
						<1.0
						<1.0
						<1.0
						<1.0
	<b>LEAN CLAY WITH SILT (CL)</b> , brown, moist, soft, no odor, no staining	9.0				<1.0
	4-inch well graded sand lens, with gravel, brown	12.0				<1.0
	<b>POORLY GRADED SAND (SP)</b> , trace gravel and clay, brown, dry, medium dense, no odor, no staining	13.0				<1.0
	<b>at 13 Feet</b>					<1.0

The stratification lines represent the approximate transition between differing soil types and/or rock types; in-situ these transitions may be gradual or may occur at different depths than shown.

Hammer Type: Automatic

Advancement Method: Direct-Push	See Appendices for description of field procedures.  See Appendices for description of laboratory procedures and additional data (if any).  See Appendices for explanation of symbols and abbreviations.	Notes:
Abandonment Method: Boring backfilled with grout and capped with asphalt.		
<b>WATER LEVEL OBSERVATIONS</b>  No free water observed		Boring Started: 07-03-2018 Drill Rig: Geoprobe Project No.: 60187256
		Boring Completed: 07-03-2018 Driller: ABC Liovin Drilling Exhibit: B-1

THIS BORING LOG IS NOT VALID IF SEPARATED FROM ORIGINAL REPORT. ENVIRONMENTAL SMART LOG 60187256.GPJ TERRACON\_DATATEMPLATE.GDT 7/12/18

# BORING LOG NO. SB-2

**PROJECT:** Raising Cane's Restaurant (RC 387)

**CLIENT:** Raising Cane's Restaurants, LLC  
Plano, TX

**SITE:** 1970 South Atlantic Boulevard  
Monterey Park, California

THIS BORING LOG IS NOT VALID IF SEPARATED FROM ORIGINAL REPORT. ENVIRONMENTAL SMART LOG 60187256.GPJ TERRACON\_DATATEMPLATE.GDT 7/12/18

GRAPHIC LOG	LOCATION See Exhibit A-2	DEPTH (ft)	WATER LEVEL OBSERVATIONS	SAMPLE TYPE	RECOVERY (%)	OVA/PID (ppm)
	DEPTH MATERIAL DESCRIPTION					
0	<b>POORLY GRADED SAND (SP)</b> , trace gravel and clay, brown, dry, loose, no odor, no staining					<1.0
3.0	<b>POORLY GRADED SAND WITH CLAY (SP-SC)</b> , trace gravel, brown, dry, loose, no odor, no staining  grayish-brown  dampness observed 7 to 9 feet	5		X		<1.0
9.0	<b>WELL GRADED SAND WITH CLAY AND GRAVEL (SW-SC)</b> , grayish-brown to brown, dry, medium dense, no odor, no staining	10		X		<1.0
15.0	<b>Boring Terminated at 15 Feet</b>	15		X		<1.0

The stratification lines represent the approximate transition between differing soil types and/or rock types; in-situ these transitions may be gradual or may occur at different depths than shown.

Hammer Type: Automatic

Advancement Method: Direct-Push	See Appendices for description of field procedures.  See Appendices for description of laboratory procedures and additional data (if any).  See Appendices for explanation of symbols and abbreviations.	Notes:
Abandonment Method: Boring backfilled with grout and capped with asphalt.		
<b>WATER LEVEL OBSERVATIONS</b>  <i>No free water observed</i>		Boring Started: 07-03-2018 Drill Rig: Geoprobe Project No.: 60187256
		Boring Completed: 07-03-2018 Driller: ABC Liovin Drilling Exhibit: B-2



# BORING LOG NO. SB-4

**PROJECT:** Raising Cane's Restaurant (RC 387)

**CLIENT:** Raising Cane's Restaurants, LLC  
Plano, TX

**SITE:** 1970 South Atlantic Boulevard  
Monterey Park, California

THIS BORING LOG IS NOT VALID IF SEPARATED FROM ORIGINAL REPORT. ENVIRONMENTAL SMART LOG 60187256.GPJ TERRACON.DATATEMPLATE.GDT 7/12/18

GRAPHIC LOG	LOCATION See Exhibit A-2	DEPTH (ft)	WATER LEVEL OBSERVATIONS	SAMPLE TYPE	RECOVERY (%)	OVA/PID (ppm)
	DEPTH MATERIAL DESCRIPTION					
	<p><b>SANDY LEAN CLAY (CL)</b>, trace gravel, brown, dry, very soft, no odor, no staining</p> <p>with silt</p> <p>decreased sand to 8 feet</p>	5		X		<1.0
	<p><b>WELL GRADED SAND WITH GRAVEL (SW)</b>, brown, dry, very dense, no odor, no staining</p>	10		X		<1.0
	<p><b>at 13 Feet</b></p>					<1.0

The stratification lines represent the approximate transition between differing soil types and/or rock types; in-situ these transitions may be gradual or may occur at different depths than shown.

Hammer Type: Automatic

<p>Advancement Method: Direct-Push</p>	<p>See Appendices for description of field procedures.</p> <p>See Appendices for description of laboratory procedures and additional data (if any).</p> <p>See Appendices for explanation of symbols and abbreviations.</p>	<p>Notes:</p>						
<p>Abandonment Method: Boring backfilled with grout and capped with concrete.</p>								
<p><b>WATER LEVEL OBSERVATIONS</b></p> <p><i>No free water observed</i></p>		<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Boring Started: 07-03-2018</td> <td style="width: 50%;">Boring Completed: 07-03-2018</td> </tr> <tr> <td>Drill Rig: Geoprobe</td> <td>Driller: ABC Liovin Drilling</td> </tr> <tr> <td>Project No.: 60187256</td> <td>Exhibit: B-4</td> </tr> </table>	Boring Started: 07-03-2018	Boring Completed: 07-03-2018	Drill Rig: Geoprobe	Driller: ABC Liovin Drilling	Project No.: 60187256	Exhibit: B-4
Boring Started: 07-03-2018	Boring Completed: 07-03-2018							
Drill Rig: Geoprobe	Driller: ABC Liovin Drilling							
Project No.: 60187256	Exhibit: B-4							

# PROBE LOG NO. VP-5

**PROJECT:** Raising Cane's Restaurant (RC 387)

**CLIENT:** Raising Cane's Restaurants, LLC  
Plano, TX

**SITE:** 1970 South Atlantic Boulevard  
Monterey Park, California

GRAPHIC LOG	LOCATION See Exhibit A-2	DEPTH (ft)	WATER LEVEL OBSERVATIONS	SAMPLE TYPE	RECOVERY (%)	OVA/PID (ppm)
	DEPTH MATERIAL DESCRIPTION					
5.0	<b>SANDY LEAN CLAY (CL)</b> , trace gravel, brown, dry, medium stiff, no odor, no staining	5		X		<1.0
	<b>Probe Terminated at 5 Feet</b>					<1.0

The stratification lines represent the approximate transition between differing soil types and/or rock types; in-situ these transitions may be gradual or may occur at different depths than shown.

Hammer Type: Automatic

Advancement Method: Direct-Push	See Appendices for description of field procedures.  See Appendices for description of laboratory procedures and additional data (if any).	Notes:	
Abandonment Method: Boring converted into vapor probe.	See Appendices for explanation of symbols and abbreviations.		
<b>WATER LEVEL OBSERVATIONS</b>  <i>No free water observed</i>		Probe Started: 07-03-2018 Drill Rig: Geoprobe Project No.: 60187256	Probe Completed: 07-03-2018 Driller: ABC Liovin Drilling Exhibit: B-6

THIS BORING LOG IS NOT VALID IF SEPARATED FROM ORIGINAL REPORT. ENVIRONMENTAL SMART LOG 60187256.GPJ TERRACON\_DATATEMPLATE.GDT 7/12/18

# PROBE LOG NO. VP-6

**PROJECT:** Raising Cane's Restaurant (RC 387)

**CLIENT:** Raising Cane's Restaurants, LLC  
Plano, TX

**SITE:** 1970 South Atlantic Boulevard  
Monterey Park, California

GRAPHIC LOG	LOCATION See Exhibit A-2	DEPTH (ft)	WATER LEVEL OBSERVATIONS	SAMPLE TYPE	RECOVERY (%)	OVA/PID (ppm)
	DEPTH MATERIAL DESCRIPTION					
2.0	<b>LEAN CLAY WITH SAND (CL)</b> , trace gravel, brown, dry, soft, no odor, no staining					<1.0
5.0	<b>CLAYEY SAND (SC)</b> , trace silt, brown, dry, loose, no odor, no staining			X		<1.0
<b>Probe Terminated at 5 Feet</b>		5		X		<1.0

The stratification lines represent the approximate transition between differing soil types and/or rock types; in-situ these transitions may be gradual or may occur at different depths than shown.

Hammer Type: Automatic

Advancement Method: Direct-Push	See Appendices for description of field procedures.  See Appendices for description of laboratory procedures and additional data (if any).	Notes:
Abandonment Method: Boring converted into vapor probe.	See Appendices for explanation of symbols and abbreviations.	
<b>WATER LEVEL OBSERVATIONS</b>  <i>No free water observed</i>		Probe Started: 07-03-2018 Drill Rig: Geoprobe Project No.: 60187256
		Probe Completed: 07-03-2018 Driller: ABC Liovin Drilling Exhibit: B-7

THIS BORING LOG IS NOT VALID IF SEPARATED FROM ORIGINAL REPORT. ENVIRONMENTAL SMART LOG 60187256.GPJ TERRACON\_DATATEMPLATE.GDT 7/12/18



## **APPENDIX C**

### **Tables**

<b>TABLE 1</b> <b>SOIL SAMPLE ANALYTICAL RESULTS - VOCs and TPH</b> Raising Cane's Restaurant (RC 387) - Monterey Park 1970 South Atlantic Boulevard Monterey Park, Los Angeles County, California Terracon Project No. 60187256						
Sample I.D.	Sample Date	Sample Depth (feet bgs)	VOC's	Total Petroleum Hydrocarbons		
			EPA Method 8260B	TPH GRO	TPH DRO	TPH ORO
			mg/kg			
SB-1-12'	7/3/18	11.5 to 12	ND	<10	<10	<10
SB-2-13'		12.5 to 13	ND	<10	<10	<10
SB-3-2.5'		2 to 2.5	ND	<10	<10	180
SB-4-12.5'		12 to 12.5	ND	<10	<10	<10
VP-5-2.5'		2 to 2.5	ND	<10	<10	<10
VP-6-5'		4.5 to 5	ND	<10	<10	87
SB-7-10'		9.5 to 10	ND	<10	<10	78
<b>RSLs</b>			<b>NA</b>	<b>NE</b>	<b>NE</b>	<b>NE</b>
<b>MSLs</b>			<b>NA</b>	<b>500</b>	<b>1,000</b>	<b>10,000</b>

Notes:

All units are in milligrams per kilograms (mg/kg)

bgs= below ground surface

EPA = United States Environmental Protection Agency

TPH DRO = total petroleum hydrocarbons in diesel carbon range (C13-C22)

TPH ORO = total petroleum hydrocarbons in waste oil carbon range (C23-C32)

< = not detected above laboratory reporting limit specified

ND = not detected above laboratory reporting limits

NA = not applicable

NE = not established

(1) Regional Screening Levels (RSLs) for EPA Region 9, Industrial Soil, November, 2015

(2) MSLs = Maximum Screening Levels (MSLs) for soils 20-150 feet for distance above groundwater, Sand, Region 4, Regional Water Quality Control Board-Los Angeles Region, Interim Site Assessment & Cleanup Guidebook, January 2005

**TABLE 2**  
**SOIL SAMPLE ANALYTICAL RESULTS - METALS**  
 Raising Cane's Restaurant (RC 387) - Monterey Park  
 1970 South Atlantic Boulevard  
 Monterey Park, Los Angeles County, California  
 Terracon Project No. 60187256

Sample I.D.	Sample Date	Sample Depth (feet bgs)	Antimony	*Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Lead	Molybdenum	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc
			EPA Method 6010B															
			(mg/kg)															
SB-4-12.5'	07/03/18	12 to 12.5	<3.0	<5.0	43	<1.0	<2.0	6.4	5.4	7.8	<3.0	<5.0	5.4	<5.0	<2.0	<2.0	20	20
SB-7-10'	07/03/18	9.5 to 10	<3.0	<5.0	50	<1.0	<2.0	6.1	5.7	8.4	<3.0	<5.0	5.1	<5.0	<2.0	<2.0	25	28
<b>CHHSLs (Residential)</b>			30	0.07	5,200	150	1.7	100,000	660	3,000	80 (OEHHA)	380	1,600	380	380	5.0	530	23,000
<b>CHHSLs (Commercial)</b>			380	0.24	63,000	1,700	7.5	100,000	3,200	38,000	320 (OEHHA)	4,800	16,000	4,800	4,800	63	6,700	100,000

Notes:  
 All units are in milligrams per kilograms (mg/kg)  
 bgs= below ground surface  
 EPA = United States Environmental Protection Agency  
 < = not detected above laboratory reporting limit specified

CHHSLs = California Human Health Screening Levels (CHHSLs) for Soil and Comparison to Other Potential Environmental Concerns for Residential and Commercial land use  
 OEHHA = Office of Environmental Health Hazard Assessment for Residential and Commercial land use.

\* Background Metals = The Department of Toxic Substances Control (DTSC) established a regional background arsenic concentration in soil that can be used as a screening tool for sites throughout southern California. The term "background" collectively refers to both naturally occurring and anthropogenic concentrations in shallow soil. Statistical analysis of a large data set from school sites in Los Angeles County gave an upper-bound background arsenic concentration of 12 mg/kg. The analysis for 5 counties in southern California also gave an upper-bound background arsenic concentration of 12 mg/kg.

<b>TABLE 3</b> <b>SOIL GAS ANALYTICAL RESULTS - VOCs</b> Raising Cane's Restaurant (RC 387) - Monterey Park 1970 South Atlantic Boulevard Monterey Park, Los Angeles County, California Terracon Project No. 60187256				
Sample I.D.	Sample Date	Sample Depth (feet bgs)	VOCs	1,1-Difluoroethane (Leak Check Compound)
			EPA Method TO-15 (µg/m <sup>3</sup> )	
VP-5-SG	7/3/2018	5	Acetone - 210 2-Butanone (MEK) - 130 Heptane - 11 Styrene - 37 Tetrahydrofuran - 13 Tetrachloroethene (PCE) - 56 Trichloroethene (TCE) - 16 Benzene - 25 Ethylbenzene - 51 Toluene - 490 m,p-Xylene - 130 o-Xylene - 55 1,2,4-Trimethylbenzene - 45	<27
VP-6-SG	7/3/2018	5	Acetone - 170 2-Butanone (MEK) - 94 Carbon Disulfide - 120 Chloroform - 6.6 Cyclohexane - 110 Styrene - 11 Tetrachloroethene (PCE) - 60 Benzene - 7.4 Ethylbenzene - 24 Toluene - 1,000 m,p-Xylene - 58 o-Xylene - 20	<27
<b>Existing Structure Soil Gas Screening Levels</b>	<b>Residential<sup>(1)</sup> / Commercial<sup>(2)</sup></b>		<b>Acetone - 16,000,000 / 140,000,000</b> <b>2-Butanone (MEK) - 2,600,000 / 22,000,000</b> <b>Carbon Dissulfide - 365,000 / 3,100,000</b> <b>Chloroform - 60 / 530</b> <b>Cyclohexane - 3,300,000 / 26,000,000</b> <b>Heptane - NE</b> <b>Styrene - 500,000 / 4,400,000</b> <b>Tetrahydrofuran - 1,100,000 / 8,800,000</b> <b>Tetrachloroethene (PCE) - 230 / 2,000</b> <b>Trichloroethene (TCE) - 240 / 3,000</b> <b>Benzene - 48.5 / 420</b> <b>Ethylbenzene - 550 / 4,900</b> <b>Toluene - 2,600,000 / 22,000,000</b> <b>m,p-Xylene - 100,000 / 880,000</b> <b>o-Xylene - 50,000 / 440,000</b> <b>1,2,4-Trimethylbenzene - 3,700 / 31,000</b>	<b>21,000,000 / 180,000,000</b>
<b>Future Structure Soil Gas Screening Levels</b>	<b>Residential<sup>(3)</sup> / Commercial<sup>(4)</sup></b>		<b>Acetone - 32,000,000 / 280,000,000</b> <b>2-Butanone (MEK) - 5,200,000 / 44,000,000</b> <b>Carbon Dissulfide - 530,000 / 6,200,000</b> <b>Chloroform - 120 / 1,060</b> <b>Cyclohexane - 6,400,000 / 52,000,000</b> <b>Heptane - NE</b> <b>Styrene - 1,000,000 / 8,800,000</b> <b>Tetrahydrofuran - 2,100,000 / 18,000,000</b> <b>Tetrachloroethene (PCE) - 460 / 4,000</b> <b>Trichloroethene (TCE) - 480 / 6,000</b> <b>Benzene - 97 / 840</b> <b>Ethylbenzene - 1,100 / 9,800</b> <b>Toluene - 5,200,000 / 44,000,000</b> <b>m,p-Xylene - 200,000 / 1,760,000</b> <b>o-Xylene - 100,000 / 880,000</b> <b>1,2,4-Trimethylbenzene - 7,300 / 62,000</b>	<b>42,000,000 / 360,000,000</b>

**Notes:**

All units are in micrograms per cubic meter (µg/m<sup>3</sup>)

bgs= below ground surface

EPA = United States Environmental Protection Agency

VOCs = volatile organic compound

NE= not established

< = not detected above laboratory reporting limit specified

(1) Screening Levels for Soil Gas (Existing Structure) - Residential Property (Calculated using RSL Indoor Air Screening Levels, HQ-1.0 with HERO HHRA Table 2 and 3, January 2018; Attenuation Factor of 0.002

(2) Screening Levels for Soil Gas (Existing Structure) - Commercial Property (Calculated using RSL Indoor Air Screening Levels, HQ-1.0 with HERO HHRA Table 2 and 3, January 2018; Attenuation Factor of 0.001

(3) Screening Levels for Soil Gas (Future Structure) - Residential Property (Calculated using RSL Indoor Air Screening Levels, HQ-1.0 with HERO HHRA Table 2 and 3, January 2018; Attenuation Factor of 0.001

(4) Screening Levels for Soil Gas (Future Structure) - Commercial Property (Calculated using RSL Indoor Air Screening Levels, HQ-1.0 with HERO HHRA Table 2 and 3, January 2018; Attenuation Factor of 0.0005

HERO=Human and Ecological Risk

HHRA=Human Health Risk Assessment

HQ=Hazard Quotient

## **APPENDIX D**

### **Laboratory Data Sheets and Chain-of-Custody Forms**



25712 Commercentre Drive  
Lake Forest, California 92630  
949.297.5020 Phone  
949.297.5027 Fax

12 July 2018

Fabio Minervini  
Terracon - Tustin  
1421 Edinger Avenue, Suite C  
Tustin, CA 92780  
RE: Raising Cane's RC-387

Enclosed are the results of analyses for samples received by the laboratory on 07/03/18 14:30. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Alexandra Huerta  
Project Manager Assistant



25712 Commercentre Drive  
 Lake Forest, California 92630  
 949.297.5020 Phone  
 949.297.5027 Fax

Terracon - Tustin 1421 Edinger Avenue, Suite C Tustin CA, 92780	Project: Raising Cane's RC-387 Project Number: 60187218A Project Manager: Fabio Minervini	Reported: 07/12/18 14:00
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**ANALYTICAL REPORT FOR SAMPLES**

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
VP-5-2.5	T182159-01	Soil	07/03/18 07:35	07/03/18 14:30
VP-6-5'	T182159-04	Soil	07/03/18 08:05	07/03/18 14:30
SB-4-12.5'	T182159-07	Soil	07/03/18 08:45	07/03/18 14:30
SB-3-2.5'	T182159-08	Soil	07/03/18 09:00	07/03/18 14:30
SB-2-13'	T182159-14	Soil	07/03/18 09:35	07/03/18 14:30
SB-1-12'	T182159-17	Soil	07/03/18 10:10	07/03/18 14:30
SB-7-10'	T182159-20	Soil	07/03/18 10:20	07/03/18 14:30
VP-6 (SG)	T182159-22	Air	07/03/18 10:50	07/03/18 14:30
VP-5 (SG)	T182159-23	Air	07/03/18 10:45	07/03/18 14:30

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Alexandra Huerta, Project Manager Assistant



Terracon - Tustin  
1421 Edinger Avenue, Suite C  
Tustin CA, 92780

Project: Raising Cane's RC-387  
Project Number: 60187218A  
Project Manager: Fabio Minervini

Reported:  
07/12/18 14:00

Sample ID: SB-1-12'

Laboratory ID: T182159-17

No Results Detected

Sample ID: SB-7-10'

Laboratory ID: T182159-20

Analyte	Result	Reporting		Units	Method	Notes
		Limit				
C23-C32 (MORO)	78	10		mg/kg	EPA 8015B	
Barium	50	1.0		mg/kg	EPA 6010b	
Chromium	6.1	2.0		mg/kg	EPA 6010b	
Cobalt	5.7	2.0		mg/kg	EPA 6010b	
Copper	8.4	1.0		mg/kg	EPA 6010b	
Nickel	5.1	2.0		mg/kg	EPA 6010b	
Vanadium	25	5.0		mg/kg	EPA 6010b	
Zinc	28	1.0		mg/kg	EPA 6010b	

Sample ID: VP-6 (SG)

Laboratory ID: T182159-22

Analyte	Result	Reporting		Units	Method	Notes
		Limit				
Acetone	170	12		ug/m <sup>3</sup> Air	TO-15	
Carbon Disulfide	120	3.2		ug/m <sup>3</sup> Air	TO-15	
Chloroform	6.6	5.0		ug/m <sup>3</sup> Air	TO-15	
Cyclohexane	110	3.5		ug/m <sup>3</sup> Air	TO-15	
Styrene	11	4.3		ug/m <sup>3</sup> Air	TO-15	
Tetrachloroethene	60	6.9		ug/m <sup>3</sup> Air	TO-15	
2-Butanone (MEK)	94	15		ug/m <sup>3</sup> Air	TO-15	
Benzene	7.4	3.3		ug/m <sup>3</sup> Air	TO-15	
Toluene	1000	3.8		ug/m <sup>3</sup> Air	TO-15	
Ethylbenzene	24	4.4		ug/m <sup>3</sup> Air	TO-15	
m,p-Xylene	58	8.8		ug/m <sup>3</sup> Air	TO-15	
o-Xylene	20	4.4		ug/m <sup>3</sup> Air	TO-15	

Sample ID: VP-5 (SG)

Laboratory ID: T182159-23

Analyte	Result	Reporting		Units	Method	Notes
		Limit				
Acetone	210	12		ug/m <sup>3</sup> Air	TO-15	

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Terracon - Tustin  
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Tustin CA, 92780

Project: Raising Cane's RC-387  
Project Number: 60187218A  
Project Manager: Fabio Minervini

Reported:  
07/12/18 14:00

Sample ID: VP-5 (SG)

Laboratory ID: T182159-23

Analyte	Result	Reporting		Units	Method	Notes
		Limit				
Heptane	11	4.2		ug/m <sup>3</sup> Air	TO-15	
Styrene	37	4.3		ug/m <sup>3</sup> Air	TO-15	
Tetrahydrofuran	13	3.0		ug/m <sup>3</sup> Air	TO-15	
Tetrachloroethene	56	6.9		ug/m <sup>3</sup> Air	TO-15	
Trichloroethene	16	5.5		ug/m <sup>3</sup> Air	TO-15	
1,2,4-Trimethylbenzene	45	5.0		ug/m <sup>3</sup> Air	TO-15	
2-Butanone (MEK)	130	15		ug/m <sup>3</sup> Air	TO-15	
Benzene	25	3.3		ug/m <sup>3</sup> Air	TO-15	
Toluene	490	3.8		ug/m <sup>3</sup> Air	TO-15	
Ethylbenzene	51	4.4		ug/m <sup>3</sup> Air	TO-15	
m,p-Xylene	130	8.8		ug/m <sup>3</sup> Air	TO-15	
o-Xylene	55	4.4		ug/m <sup>3</sup> Air	TO-15	

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Alexandra Huerta, Project Manager Assistant



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Terracon - Tustin 1421 Edinger Avenue, Suite C Tustin CA, 92780	Project: Raising Cane's RC-387 Project Number: 60187218A Project Manager: Fabio Minervini	Reported: 07/12/18 14:00
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**VP-5-2.5**  
**T182159-01 (Soil)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**Extractable Petroleum Hydrocarbons by 8015B**

C6-C12 (GRO)	ND	10	mg/kg	1	8070528	07/05/18	07/06/18	EPA 8015B	
C13-C22 (DRO)	ND	10	"	"	"	"	"	"	
C23-C32 (MORO)	ND	10	"	"	"	"	"	"	
Surrogate: <i>p</i> -Terphenyl		91.7 %	65-135		"	"	"	"	

**Volatile Organic Compounds by EPA Method 8260B**

Bromobenzene	ND	0.0050	mg/kg	1	8070501	07/05/18	07/05/18	EPA 8260B	
Bromochloromethane	ND	0.0050	"	"	"	"	"	"	
Bromodichloromethane	ND	0.0050	"	"	"	"	"	"	
Bromoform	ND	0.0050	"	"	"	"	"	"	
Bromomethane	ND	0.0050	"	"	"	"	"	"	
n-Butylbenzene	ND	0.0050	"	"	"	"	"	"	
sec-Butylbenzene	ND	0.0050	"	"	"	"	"	"	
tert-Butylbenzene	ND	0.0050	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.0050	"	"	"	"	"	"	
Chlorobenzene	ND	0.0050	"	"	"	"	"	"	
Chloroethane	ND	0.0050	"	"	"	"	"	"	
Chloroform	ND	0.0050	"	"	"	"	"	"	
Chloromethane	ND	0.0050	"	"	"	"	"	"	
2-Chlorotoluene	ND	0.0050	"	"	"	"	"	"	
4-Chlorotoluene	ND	0.0050	"	"	"	"	"	"	
Dibromochloromethane	ND	0.0050	"	"	"	"	"	"	
1,2-Dibromo-3-chloropropane	ND	0.010	"	"	"	"	"	"	
1,2-Dibromoethane (EDB)	ND	0.0050	"	"	"	"	"	"	
Dibromomethane	ND	0.0050	"	"	"	"	"	"	
1,2-Dichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,3-Dichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,4-Dichlorobenzene	ND	0.0050	"	"	"	"	"	"	
Dichlorodifluoromethane	ND	0.0050	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.0050	"	"	"	"	"	"	
1,2-Dichloroethane	ND	0.0050	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.0050	"	"	"	"	"	"	

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Alexandra Huerta, Project Manager Assistant

Terracon - Tustin  
1421 Edinger Avenue, Suite C  
Tustin CA, 92780

Project: Raising Cane's RC-387  
Project Number: 60187218A  
Project Manager: Fabio Minervini

Reported:  
07/12/18 14:00

**VP-5-2.5**  
**T182159-01 (Soil)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**Volatile Organic Compounds by EPA Method 8260B**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
cis-1,2-Dichloroethene	ND	0.0050	mg/kg	1	8070501	07/05/18	07/05/18	EPA 8260B	
trans-1,2-Dichloroethene	ND	0.0050	"	"	"	"	"	"	
1,2-Dichloropropane	ND	0.0050	"	"	"	"	"	"	
1,3-Dichloropropane	ND	0.0050	"	"	"	"	"	"	
2,2-Dichloropropane	ND	0.0050	"	"	"	"	"	"	
1,1-Dichloropropene	ND	0.0050	"	"	"	"	"	"	
cis-1,3-Dichloropropene	ND	0.0050	"	"	"	"	"	"	
trans-1,3-Dichloropropene	ND	0.0050	"	"	"	"	"	"	
Hexachlorobutadiene	ND	0.0050	"	"	"	"	"	"	
Isopropylbenzene	ND	0.0050	"	"	"	"	"	"	
p-Isopropyltoluene	ND	0.0050	"	"	"	"	"	"	
Methylene chloride	ND	0.0050	"	"	"	"	"	"	
Naphthalene	ND	0.0050	"	"	"	"	"	"	
n-Propylbenzene	ND	0.0050	"	"	"	"	"	"	
Styrene	ND	0.0050	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.0050	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.0050	"	"	"	"	"	"	
Tetrachloroethene	ND	0.0050	"	"	"	"	"	"	
1,2,3-Trichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,2,4-Trichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.0050	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.0050	"	"	"	"	"	"	
Trichloroethene	ND	0.0050	"	"	"	"	"	"	
Trichlorofluoromethane	ND	0.0050	"	"	"	"	"	"	
1,2,3-Trichloropropane	ND	0.0050	"	"	"	"	"	"	
1,3,5-Trimethylbenzene	ND	0.0050	"	"	"	"	"	"	
1,2,4-Trimethylbenzene	ND	0.0050	"	"	"	"	"	"	
Vinyl chloride	ND	0.0050	"	"	"	"	"	"	
Benzene	ND	0.0050	"	"	"	"	"	"	
Toluene	ND	0.0050	"	"	"	"	"	"	
Ethylbenzene	ND	0.0050	"	"	"	"	"	"	
m,p-Xylene	ND	0.010	"	"	"	"	"	"	

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**VP-5-2.5**  
**T182159-01 (Soil)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**Volatile Organic Compounds by EPA Method 8260B**

o-Xylene	ND	0.0050	mg/kg	1	8070501	07/05/18	07/05/18	EPA 8260B	
Surrogate: 4-Bromofluorobenzene		114 %	81.2-123		"	"	"	"	
Surrogate: Dibromofluoromethane		110 %	95.7-135		"	"	"	"	
Surrogate: Toluene-d8		105 %	85.5-116		"	"	"	"	

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**VP-6-5'**  
**T182159-04 (Soil)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**Extractable Petroleum Hydrocarbons by 8015B**

C6-C12 (GRO)	ND	10	mg/kg	1	8070528	07/05/18	07/06/18	EPA 8015B	
C13-C22 (DRO)	ND	10	"	"	"	"	"	"	
<b>C23-C32 (MORO)</b>	<b>87</b>	<b>10</b>	<b>"</b>	<b>"</b>	<b>"</b>	<b>"</b>	<b>"</b>	<b>"</b>	
Surrogate: <i>p</i> -Terphenyl		89.6 %	65-135		"	"	"	"	

**Volatile Organic Compounds by EPA Method 8260B**

Bromobenzene	ND	0.0050	mg/kg	1	8070501	07/05/18	07/05/18	EPA 8260B	
Bromochloromethane	ND	0.0050	"	"	"	"	"	"	
Bromodichloromethane	ND	0.0050	"	"	"	"	"	"	
Bromoform	ND	0.0050	"	"	"	"	"	"	
Bromomethane	ND	0.0050	"	"	"	"	"	"	
n-Butylbenzene	ND	0.0050	"	"	"	"	"	"	
sec-Butylbenzene	ND	0.0050	"	"	"	"	"	"	
tert-Butylbenzene	ND	0.0050	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.0050	"	"	"	"	"	"	
Chlorobenzene	ND	0.0050	"	"	"	"	"	"	
Chloroethane	ND	0.0050	"	"	"	"	"	"	
Chloroform	ND	0.0050	"	"	"	"	"	"	
Chloromethane	ND	0.0050	"	"	"	"	"	"	
2-Chlorotoluene	ND	0.0050	"	"	"	"	"	"	
4-Chlorotoluene	ND	0.0050	"	"	"	"	"	"	
Dibromochloromethane	ND	0.0050	"	"	"	"	"	"	
1,2-Dibromo-3-chloropropane	ND	0.010	"	"	"	"	"	"	
1,2-Dibromoethane (EDB)	ND	0.0050	"	"	"	"	"	"	
Dibromomethane	ND	0.0050	"	"	"	"	"	"	
1,2-Dichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,3-Dichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,4-Dichlorobenzene	ND	0.0050	"	"	"	"	"	"	
Dichlorodifluoromethane	ND	0.0050	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.0050	"	"	"	"	"	"	
1,2-Dichloroethane	ND	0.0050	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.0050	"	"	"	"	"	"	

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**VP-6-5'**  
**T182159-04 (Soil)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**Volatile Organic Compounds by EPA Method 8260B**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
cis-1,2-Dichloroethene	ND	0.0050	mg/kg	1	8070501	07/05/18	07/05/18	EPA 8260B	
trans-1,2-Dichloroethene	ND	0.0050	"	"	"	"	"	"	
1,2-Dichloropropane	ND	0.0050	"	"	"	"	"	"	
1,3-Dichloropropane	ND	0.0050	"	"	"	"	"	"	
2,2-Dichloropropane	ND	0.0050	"	"	"	"	"	"	
1,1-Dichloropropene	ND	0.0050	"	"	"	"	"	"	
cis-1,3-Dichloropropene	ND	0.0050	"	"	"	"	"	"	
trans-1,3-Dichloropropene	ND	0.0050	"	"	"	"	"	"	
Hexachlorobutadiene	ND	0.0050	"	"	"	"	"	"	
Isopropylbenzene	ND	0.0050	"	"	"	"	"	"	
p-Isopropyltoluene	ND	0.0050	"	"	"	"	"	"	
Methylene chloride	ND	0.0050	"	"	"	"	"	"	
Naphthalene	ND	0.0050	"	"	"	"	"	"	
n-Propylbenzene	ND	0.0050	"	"	"	"	"	"	
Styrene	ND	0.0050	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.0050	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.0050	"	"	"	"	"	"	
Tetrachloroethene	ND	0.0050	"	"	"	"	"	"	
1,2,3-Trichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,2,4-Trichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.0050	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.0050	"	"	"	"	"	"	
Trichloroethene	ND	0.0050	"	"	"	"	"	"	
Trichlorofluoromethane	ND	0.0050	"	"	"	"	"	"	
1,2,3-Trichloropropane	ND	0.0050	"	"	"	"	"	"	
1,3,5-Trimethylbenzene	ND	0.0050	"	"	"	"	"	"	
1,2,4-Trimethylbenzene	ND	0.0050	"	"	"	"	"	"	
Vinyl chloride	ND	0.0050	"	"	"	"	"	"	
Benzene	ND	0.0050	"	"	"	"	"	"	
Toluene	ND	0.0050	"	"	"	"	"	"	
Ethylbenzene	ND	0.0050	"	"	"	"	"	"	
m,p-Xylene	ND	0.010	"	"	"	"	"	"	

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**VP-6-5'**  
**T182159-04 (Soil)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**Volatile Organic Compounds by EPA Method 8260B**

o-Xylene	ND	0.0050	mg/kg	1	8070501	07/05/18	07/05/18	EPA 8260B	
Surrogate: 4-Bromofluorobenzene		114 %	81.2-123		"	"	"	"	
Surrogate: Dibromofluoromethane		113 %	95.7-135		"	"	"	"	
Surrogate: Toluene-d8		100 %	85.5-116		"	"	"	"	

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Terracon - Tustin 1421 Edinger Avenue, Suite C Tustin CA, 92780	Project: Raising Cane's RC-387 Project Number: 60187218A Project Manager: Fabio Minervini	Reported: 07/12/18 14:00
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**SB-4-12.5'**  
**T182159-07 (Soil)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**Extractable Petroleum Hydrocarbons by 8015B**

C6-C12 (GRO)	ND	10	mg/kg	1	8070528	07/05/18	07/06/18	EPA 8015B	
C13-C22 (DRO)	ND	10	"	"	"	"	"	"	
C23-C32 (MORO)	ND	10	"	"	"	"	"	"	
Surrogate: <i>p</i> -Terphenyl		94.4 %	65-135		"	"	"	"	

**Metals by EPA 6010B**

Antimony	ND	3.0	mg/kg	1	8070524	07/05/18	07/05/18	EPA 6010b	
Arsenic	ND	5.0	"	"	"	"	"	"	
<b>Barium</b>	<b>43</b>	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	07/05/18	"	
Cadmium	ND	2.0	"	"	"	"	07/05/18	"	
<b>Chromium</b>	<b>6.4</b>	2.0	"	"	"	"	"	"	
<b>Cobalt</b>	<b>5.4</b>	2.0	"	"	"	"	"	"	
<b>Copper</b>	<b>7.8</b>	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	5.0	"	"	"	"	"	"	
<b>Nickel</b>	<b>5.4</b>	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Silver	ND	2.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
<b>Vanadium</b>	<b>20</b>	5.0	"	"	"	"	"	"	
<b>Zinc</b>	<b>20</b>	1.0	"	"	"	"	"	"	

**Volatile Organic Compounds by EPA Method 8260B**

Bromobenzene	ND	0.0050	mg/kg	1	8070501	07/05/18	07/05/18	EPA 8260B	
Bromochloromethane	ND	0.0050	"	"	"	"	"	"	
Bromodichloromethane	ND	0.0050	"	"	"	"	"	"	
Bromoform	ND	0.0050	"	"	"	"	"	"	
Bromomethane	ND	0.0050	"	"	"	"	"	"	
n-Butylbenzene	ND	0.0050	"	"	"	"	"	"	
sec-Butylbenzene	ND	0.0050	"	"	"	"	"	"	
tert-Butylbenzene	ND	0.0050	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.0050	"	"	"	"	"	"	

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Terracon - Tustin 1421 Edinger Avenue, Suite C Tustin CA, 92780	Project: Raising Cane's RC-387 Project Number: 60187218A Project Manager: Fabio Minervini	Reported: 07/12/18 14:00
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**SB-4-12.5'**  
**T182159-07 (Soil)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**Volatile Organic Compounds by EPA Method 8260B**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Chlorobenzene	ND	0.0050	mg/kg	1	8070501	07/05/18	07/05/18	EPA 8260B	
Chloroethane	ND	0.0050	"	"	"	"	"	"	
Chloroform	ND	0.0050	"	"	"	"	"	"	
Chloromethane	ND	0.0050	"	"	"	"	"	"	
2-Chlorotoluene	ND	0.0050	"	"	"	"	"	"	
4-Chlorotoluene	ND	0.0050	"	"	"	"	"	"	
Dibromochloromethane	ND	0.0050	"	"	"	"	"	"	
1,2-Dibromo-3-chloropropane	ND	0.010	"	"	"	"	"	"	
1,2-Dibromoethane (EDB)	ND	0.0050	"	"	"	"	"	"	
Dibromomethane	ND	0.0050	"	"	"	"	"	"	
1,2-Dichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,3-Dichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,4-Dichlorobenzene	ND	0.0050	"	"	"	"	"	"	
Dichlorodifluoromethane	ND	0.0050	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.0050	"	"	"	"	"	"	
1,2-Dichloroethane	ND	0.0050	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.0050	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.0050	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.0050	"	"	"	"	"	"	
1,2-Dichloropropane	ND	0.0050	"	"	"	"	"	"	
1,3-Dichloropropane	ND	0.0050	"	"	"	"	"	"	
2,2-Dichloropropane	ND	0.0050	"	"	"	"	"	"	
1,1-Dichloropropene	ND	0.0050	"	"	"	"	"	"	
cis-1,3-Dichloropropene	ND	0.0050	"	"	"	"	"	"	
trans-1,3-Dichloropropene	ND	0.0050	"	"	"	"	"	"	
Hexachlorobutadiene	ND	0.0050	"	"	"	"	"	"	
Isopropylbenzene	ND	0.0050	"	"	"	"	"	"	
p-Isopropyltoluene	ND	0.0050	"	"	"	"	"	"	
Methylene chloride	ND	0.0050	"	"	"	"	"	"	
Naphthalene	ND	0.0050	"	"	"	"	"	"	
n-Propylbenzene	ND	0.0050	"	"	"	"	"	"	
Styrene	ND	0.0050	"	"	"	"	"	"	

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**SB-4-12.5'**  
**T182159-07 (Soil)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**Volatile Organic Compounds by EPA Method 8260B**

1,1,2,2-Tetrachloroethane	ND	0.0050	mg/kg	1	8070501	07/05/18	07/05/18	EPA 8260B	
1,1,1,2-Tetrachloroethane	ND	0.0050	"	"	"	"	"	"	
Tetrachloroethene	ND	0.0050	"	"	"	"	"	"	
1,2,3-Trichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,2,4-Trichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.0050	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.0050	"	"	"	"	"	"	
Trichloroethene	ND	0.0050	"	"	"	"	"	"	
Trichlorofluoromethane	ND	0.0050	"	"	"	"	"	"	
1,2,3-Trichloropropane	ND	0.0050	"	"	"	"	"	"	
1,3,5-Trimethylbenzene	ND	0.0050	"	"	"	"	"	"	
1,2,4-Trimethylbenzene	ND	0.0050	"	"	"	"	"	"	
Vinyl chloride	ND	0.0050	"	"	"	"	"	"	
Benzene	ND	0.0050	"	"	"	"	"	"	
Toluene	ND	0.0050	"	"	"	"	"	"	
Ethylbenzene	ND	0.0050	"	"	"	"	"	"	
m,p-Xylene	ND	0.010	"	"	"	"	"	"	
o-Xylene	ND	0.0050	"	"	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		111 %		81.2-123	"	"	"	"	
Surrogate: Dibromofluoromethane		106 %		95.7-135	"	"	"	"	
Surrogate: Toluene-d8		102 %		85.5-116	"	"	"	"	

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**SB-3-2.5'**  
**T182159-08 (Soil)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**Extractable Petroleum Hydrocarbons by 8015B**

C6-C12 (GRO)	ND	10	mg/kg	1	8070528	07/05/18	07/06/18	EPA 8015B	
C13-C22 (DRO)	ND	10	"	"	"	"	"	"	
<b>C23-C32 (MORO)</b>	<b>180</b>	10	"	"	"	"	"	"	
Surrogate: <i>p</i> -Terphenyl		92.6 %	65-135		"	"	"	"	

**Volatile Organic Compounds by EPA Method 8260B**

Bromobenzene	ND	0.0050	mg/kg	1	8070501	07/05/18	07/05/18	EPA 8260B	
Bromochloromethane	ND	0.0050	"	"	"	"	"	"	
Bromodichloromethane	ND	0.0050	"	"	"	"	"	"	
Bromoform	ND	0.0050	"	"	"	"	"	"	
Bromomethane	ND	0.0050	"	"	"	"	"	"	
n-Butylbenzene	ND	0.0050	"	"	"	"	"	"	
sec-Butylbenzene	ND	0.0050	"	"	"	"	"	"	
tert-Butylbenzene	ND	0.0050	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.0050	"	"	"	"	"	"	
Chlorobenzene	ND	0.0050	"	"	"	"	"	"	
Chloroethane	ND	0.0050	"	"	"	"	"	"	
Chloroform	ND	0.0050	"	"	"	"	"	"	
Chloromethane	ND	0.0050	"	"	"	"	"	"	
2-Chlorotoluene	ND	0.0050	"	"	"	"	"	"	
4-Chlorotoluene	ND	0.0050	"	"	"	"	"	"	
Dibromochloromethane	ND	0.0050	"	"	"	"	"	"	
1,2-Dibromo-3-chloropropane	ND	0.010	"	"	"	"	"	"	
1,2-Dibromoethane (EDB)	ND	0.0050	"	"	"	"	"	"	
Dibromomethane	ND	0.0050	"	"	"	"	"	"	
1,2-Dichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,3-Dichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,4-Dichlorobenzene	ND	0.0050	"	"	"	"	"	"	
Dichlorodifluoromethane	ND	0.0050	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.0050	"	"	"	"	"	"	
1,2-Dichloroethane	ND	0.0050	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.0050	"	"	"	"	"	"	

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Terracon - Tustin  
1421 Edinger Avenue, Suite C  
Tustin CA, 92780

Project: Raising Cane's RC-387  
Project Number: 60187218A  
Project Manager: Fabio Minervini

**Reported:**  
07/12/18 14:00

**SB-3-2.5'**  
**T182159-08 (Soil)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**Volatile Organic Compounds by EPA Method 8260B**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
cis-1,2-Dichloroethene	ND	0.0050	mg/kg	1	8070501	07/05/18	07/05/18	EPA 8260B	
trans-1,2-Dichloroethene	ND	0.0050	"	"	"	"	"	"	
1,2-Dichloropropane	ND	0.0050	"	"	"	"	"	"	
1,3-Dichloropropane	ND	0.0050	"	"	"	"	"	"	
2,2-Dichloropropane	ND	0.0050	"	"	"	"	"	"	
1,1-Dichloropropene	ND	0.0050	"	"	"	"	"	"	
cis-1,3-Dichloropropene	ND	0.0050	"	"	"	"	"	"	
trans-1,3-Dichloropropene	ND	0.0050	"	"	"	"	"	"	
Hexachlorobutadiene	ND	0.0050	"	"	"	"	"	"	
Isopropylbenzene	ND	0.0050	"	"	"	"	"	"	
p-Isopropyltoluene	ND	0.0050	"	"	"	"	"	"	
Methylene chloride	ND	0.0050	"	"	"	"	"	"	
Naphthalene	ND	0.0050	"	"	"	"	"	"	
n-Propylbenzene	ND	0.0050	"	"	"	"	"	"	
Styrene	ND	0.0050	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.0050	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.0050	"	"	"	"	"	"	
Tetrachloroethene	ND	0.0050	"	"	"	"	"	"	
1,2,3-Trichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,2,4-Trichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.0050	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.0050	"	"	"	"	"	"	
Trichloroethene	ND	0.0050	"	"	"	"	"	"	
Trichlorofluoromethane	ND	0.0050	"	"	"	"	"	"	
1,2,3-Trichloropropane	ND	0.0050	"	"	"	"	"	"	
1,3,5-Trimethylbenzene	ND	0.0050	"	"	"	"	"	"	
1,2,4-Trimethylbenzene	ND	0.0050	"	"	"	"	"	"	
Vinyl chloride	ND	0.0050	"	"	"	"	"	"	
Benzene	ND	0.0050	"	"	"	"	"	"	
Toluene	ND	0.0050	"	"	"	"	"	"	
Ethylbenzene	ND	0.0050	"	"	"	"	"	"	
m,p-Xylene	ND	0.010	"	"	"	"	"	"	

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**SB-3-2.5'**  
**T182159-08 (Soil)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**Volatile Organic Compounds by EPA Method 8260B**

o-Xylene	ND	0.0050	mg/kg	1	8070501	07/05/18	07/05/18	EPA 8260B	
Surrogate: 4-Bromofluorobenzene		110 %	81.2-123		"	"	"	"	
Surrogate: Dibromofluoromethane		108 %	95.7-135		"	"	"	"	
Surrogate: Toluene-d8		102 %	85.5-116		"	"	"	"	

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**SB-2-13'**  
**T182159-14 (Soil)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**Extractable Petroleum Hydrocarbons by 8015B**

C6-C12 (GRO)	ND	10	mg/kg	1	8070528	07/05/18	07/06/18	EPA 8015B	
C13-C22 (DRO)	ND	10	"	"	"	"	"	"	
C23-C32 (MORO)	ND	10	"	"	"	"	"	"	
Surrogate: <i>p</i> -Terphenyl		93.4 %	65-135		"	"	"	"	

**Volatile Organic Compounds by EPA Method 8260B**

Bromobenzene	ND	0.0050	mg/kg	1	8070501	07/05/18	07/05/18	EPA 8260B	
Bromochloromethane	ND	0.0050	"	"	"	"	"	"	
Bromodichloromethane	ND	0.0050	"	"	"	"	"	"	
Bromoform	ND	0.0050	"	"	"	"	"	"	
Bromomethane	ND	0.0050	"	"	"	"	"	"	
n-Butylbenzene	ND	0.0050	"	"	"	"	"	"	
sec-Butylbenzene	ND	0.0050	"	"	"	"	"	"	
tert-Butylbenzene	ND	0.0050	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.0050	"	"	"	"	"	"	
Chlorobenzene	ND	0.0050	"	"	"	"	"	"	
Chloroethane	ND	0.0050	"	"	"	"	"	"	
Chloroform	ND	0.0050	"	"	"	"	"	"	
Chloromethane	ND	0.0050	"	"	"	"	"	"	
2-Chlorotoluene	ND	0.0050	"	"	"	"	"	"	
4-Chlorotoluene	ND	0.0050	"	"	"	"	"	"	
Dibromochloromethane	ND	0.0050	"	"	"	"	"	"	
1,2-Dibromo-3-chloropropane	ND	0.010	"	"	"	"	"	"	
1,2-Dibromoethane (EDB)	ND	0.0050	"	"	"	"	"	"	
Dibromomethane	ND	0.0050	"	"	"	"	"	"	
1,2-Dichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,3-Dichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,4-Dichlorobenzene	ND	0.0050	"	"	"	"	"	"	
Dichlorodifluoromethane	ND	0.0050	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.0050	"	"	"	"	"	"	
1,2-Dichloroethane	ND	0.0050	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.0050	"	"	"	"	"	"	

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**SB-2-13'**  
**T182159-14 (Soil)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**Volatile Organic Compounds by EPA Method 8260B**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
cis-1,2-Dichloroethene	ND	0.0050	mg/kg	1	8070501	07/05/18	07/05/18	EPA 8260B	
trans-1,2-Dichloroethene	ND	0.0050	"	"	"	"	"	"	
1,2-Dichloropropane	ND	0.0050	"	"	"	"	"	"	
1,3-Dichloropropane	ND	0.0050	"	"	"	"	"	"	
2,2-Dichloropropane	ND	0.0050	"	"	"	"	"	"	
1,1-Dichloropropene	ND	0.0050	"	"	"	"	"	"	
cis-1,3-Dichloropropene	ND	0.0050	"	"	"	"	"	"	
trans-1,3-Dichloropropene	ND	0.0050	"	"	"	"	"	"	
Hexachlorobutadiene	ND	0.0050	"	"	"	"	"	"	
Isopropylbenzene	ND	0.0050	"	"	"	"	"	"	
p-Isopropyltoluene	ND	0.0050	"	"	"	"	"	"	
Methylene chloride	ND	0.0050	"	"	"	"	"	"	
Naphthalene	ND	0.0050	"	"	"	"	"	"	
n-Propylbenzene	ND	0.0050	"	"	"	"	"	"	
Styrene	ND	0.0050	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.0050	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.0050	"	"	"	"	"	"	
Tetrachloroethene	ND	0.0050	"	"	"	"	"	"	
1,2,3-Trichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,2,4-Trichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.0050	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.0050	"	"	"	"	"	"	
Trichloroethene	ND	0.0050	"	"	"	"	"	"	
Trichlorofluoromethane	ND	0.0050	"	"	"	"	"	"	
1,2,3-Trichloropropane	ND	0.0050	"	"	"	"	"	"	
1,3,5-Trimethylbenzene	ND	0.0050	"	"	"	"	"	"	
1,2,4-Trimethylbenzene	ND	0.0050	"	"	"	"	"	"	
Vinyl chloride	ND	0.0050	"	"	"	"	"	"	
Benzene	ND	0.0050	"	"	"	"	"	"	
Toluene	ND	0.0050	"	"	"	"	"	"	
Ethylbenzene	ND	0.0050	"	"	"	"	"	"	
m,p-Xylene	ND	0.010	"	"	"	"	"	"	

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**SB-2-13'**  
**T182159-14 (Soil)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**Volatile Organic Compounds by EPA Method 8260B**

o-Xylene	ND	0.0050	mg/kg	1	8070501	07/05/18	07/05/18	EPA 8260B	
Surrogate: 4-Bromofluorobenzene		110 %	81.2-123		"	"	"	"	
Surrogate: Dibromofluoromethane		107 %	95.7-135		"	"	"	"	
Surrogate: Toluene-d8		103 %	85.5-116		"	"	"	"	

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Terracon - Tustin 1421 Edinger Avenue, Suite C Tustin CA, 92780	Project: Raising Cane's RC-387 Project Number: 60187218A Project Manager: Fabio Minervini	Reported: 07/12/18 14:00
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**SB-1-12'**  
**T182159-17 (Soil)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**Extractable Petroleum Hydrocarbons by 8015B**

C6-C12 (GRO)	ND	10	mg/kg	1	8070528	07/05/18	07/06/18	EPA 8015B	
C13-C22 (DRO)	ND	10	"	"	"	"	"	"	
C23-C32 (MORO)	ND	10	"	"	"	"	"	"	
Surrogate: <i>p</i> -Terphenyl		85.6 %	65-135		"	"	"	"	

**Volatile Organic Compounds by EPA Method 8260B**

Bromobenzene	ND	0.0050	mg/kg	1	8070501	07/05/18	07/05/18	EPA 8260B	
Bromochloromethane	ND	0.0050	"	"	"	"	"	"	
Bromodichloromethane	ND	0.0050	"	"	"	"	"	"	
Bromoform	ND	0.0050	"	"	"	"	"	"	
Bromomethane	ND	0.0050	"	"	"	"	"	"	
n-Butylbenzene	ND	0.0050	"	"	"	"	"	"	
sec-Butylbenzene	ND	0.0050	"	"	"	"	"	"	
tert-Butylbenzene	ND	0.0050	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.0050	"	"	"	"	"	"	
Chlorobenzene	ND	0.0050	"	"	"	"	"	"	
Chloroethane	ND	0.0050	"	"	"	"	"	"	
Chloroform	ND	0.0050	"	"	"	"	"	"	
Chloromethane	ND	0.0050	"	"	"	"	"	"	
2-Chlorotoluene	ND	0.0050	"	"	"	"	"	"	
4-Chlorotoluene	ND	0.0050	"	"	"	"	"	"	
Dibromochloromethane	ND	0.0050	"	"	"	"	"	"	
1,2-Dibromo-3-chloropropane	ND	0.010	"	"	"	"	"	"	
1,2-Dibromoethane (EDB)	ND	0.0050	"	"	"	"	"	"	
Dibromomethane	ND	0.0050	"	"	"	"	"	"	
1,2-Dichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,3-Dichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,4-Dichlorobenzene	ND	0.0050	"	"	"	"	"	"	
Dichlorodifluoromethane	ND	0.0050	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.0050	"	"	"	"	"	"	
1,2-Dichloroethane	ND	0.0050	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.0050	"	"	"	"	"	"	

SunStar Laboratories, Inc.

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Alexandra Huerta, Project Manager Assistant

Terracon - Tustin  
1421 Edinger Avenue, Suite C  
Tustin CA, 92780

Project: Raising Cane's RC-387  
Project Number: 60187218A  
Project Manager: Fabio Minervini

Reported:  
07/12/18 14:00

**SB-1-12'**  
**T182159-17 (Soil)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**Volatile Organic Compounds by EPA Method 8260B**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
cis-1,2-Dichloroethene	ND	0.0050	mg/kg	1	8070501	07/05/18	07/05/18	EPA 8260B	
trans-1,2-Dichloroethene	ND	0.0050	"	"	"	"	"	"	
1,2-Dichloropropane	ND	0.0050	"	"	"	"	"	"	
1,3-Dichloropropane	ND	0.0050	"	"	"	"	"	"	
2,2-Dichloropropane	ND	0.0050	"	"	"	"	"	"	
1,1-Dichloropropene	ND	0.0050	"	"	"	"	"	"	
cis-1,3-Dichloropropene	ND	0.0050	"	"	"	"	"	"	
trans-1,3-Dichloropropene	ND	0.0050	"	"	"	"	"	"	
Hexachlorobutadiene	ND	0.0050	"	"	"	"	"	"	
Isopropylbenzene	ND	0.0050	"	"	"	"	"	"	
p-Isopropyltoluene	ND	0.0050	"	"	"	"	"	"	
Methylene chloride	ND	0.0050	"	"	"	"	"	"	
Naphthalene	ND	0.0050	"	"	"	"	"	"	
n-Propylbenzene	ND	0.0050	"	"	"	"	"	"	
Styrene	ND	0.0050	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	0.0050	"	"	"	"	"	"	
1,1,1,2-Tetrachloroethane	ND	0.0050	"	"	"	"	"	"	
Tetrachloroethene	ND	0.0050	"	"	"	"	"	"	
1,2,3-Trichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,2,4-Trichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.0050	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.0050	"	"	"	"	"	"	
Trichloroethene	ND	0.0050	"	"	"	"	"	"	
Trichlorofluoromethane	ND	0.0050	"	"	"	"	"	"	
1,2,3-Trichloropropane	ND	0.0050	"	"	"	"	"	"	
1,3,5-Trimethylbenzene	ND	0.0050	"	"	"	"	"	"	
1,2,4-Trimethylbenzene	ND	0.0050	"	"	"	"	"	"	
Vinyl chloride	ND	0.0050	"	"	"	"	"	"	
Benzene	ND	0.0050	"	"	"	"	"	"	
Toluene	ND	0.0050	"	"	"	"	"	"	
Ethylbenzene	ND	0.0050	"	"	"	"	"	"	
m,p-Xylene	ND	0.010	"	"	"	"	"	"	

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Alexandra Huerta, Project Manager Assistant



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Terracon - Tustin 1421 Edinger Avenue, Suite C Tustin CA, 92780	Project: Raising Cane's RC-387 Project Number: 60187218A Project Manager: Fabio Minervini	Reported: 07/12/18 14:00
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**SB-1-12'**  
**T182159-17 (Soil)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**Volatile Organic Compounds by EPA Method 8260B**

o-Xylene	ND	0.0050	mg/kg	1	8070501	07/05/18	07/05/18	EPA 8260B	
Surrogate: 4-Bromofluorobenzene		108 %	81.2-123		"	"	"	"	
Surrogate: Dibromofluoromethane		106 %	95.7-135		"	"	"	"	
Surrogate: Toluene-d8		103 %	85.5-116		"	"	"	"	

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Alexandra Huerta, Project Manager Assistant

Terracon - Tustin 1421 Edinger Avenue, Suite C Tustin CA, 92780	Project: Raising Cane's RC-387 Project Number: 60187218A Project Manager: Fabio Minervini	Reported: 07/12/18 14:00
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**SB-7-10'**  
**T182159-20 (Soil)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**Extractable Petroleum Hydrocarbons by 8015B**

C6-C12 (GRO)	ND	10	mg/kg	1	8070528	07/05/18	07/06/18	EPA 8015B	
C13-C22 (DRO)	ND	10	"	"	"	"	"	"	
<b>C23-C32 (MORO)</b>	<b>78</b>	10	"	"	"	"	"	"	
<i>Surrogate: p-Terphenyl</i>		87.5 %	65-135	"	"	"	"	"	

**Metals by EPA 6010B**

Antimony	ND	3.0	mg/kg	1	8070524	07/05/18	07/05/18	EPA 6010b	
Arsenic	ND	5.0	"	"	"	"	"	"	
<b>Barium</b>	<b>50</b>	1.0	"	"	"	"	"	"	
Beryllium	ND	1.0	"	"	"	"	"	"	
Cadmium	ND	2.0	"	"	"	"	"	"	
<b>Chromium</b>	<b>6.1</b>	2.0	"	"	"	"	"	"	
<b>Cobalt</b>	<b>5.7</b>	2.0	"	"	"	"	"	"	
<b>Copper</b>	<b>8.4</b>	1.0	"	"	"	"	"	"	
Lead	ND	3.0	"	"	"	"	"	"	
Molybdenum	ND	5.0	"	"	"	"	"	"	
<b>Nickel</b>	<b>5.1</b>	2.0	"	"	"	"	"	"	
Selenium	ND	5.0	"	"	"	"	"	"	
Silver	ND	2.0	"	"	"	"	"	"	
Thallium	ND	2.0	"	"	"	"	"	"	
<b>Vanadium</b>	<b>25</b>	5.0	"	"	"	"	"	"	
<b>Zinc</b>	<b>28</b>	1.0	"	"	"	"	"	"	

**Volatile Organic Compounds by EPA Method 8260B**

Bromobenzene	ND	0.0050	mg/kg	1	8070501	07/05/18	07/05/18	EPA 8260B	
Bromochloromethane	ND	0.0050	"	"	"	"	"	"	
Bromodichloromethane	ND	0.0050	"	"	"	"	"	"	
Bromoform	ND	0.0050	"	"	"	"	"	"	
Bromomethane	ND	0.0050	"	"	"	"	"	"	
n-Butylbenzene	ND	0.0050	"	"	"	"	"	"	
sec-Butylbenzene	ND	0.0050	"	"	"	"	"	"	
tert-Butylbenzene	ND	0.0050	"	"	"	"	"	"	
Carbon tetrachloride	ND	0.0050	"	"	"	"	"	"	

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Alexandra Huerta, Project Manager Assistant



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Terracon - Tustin 1421 Edinger Avenue, Suite C Tustin CA, 92780	Project: Raising Cane's RC-387 Project Number: 60187218A Project Manager: Fabio Minervini	Reported: 07/12/18 14:00
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**SB-7-10'**  
**T182159-20 (Soil)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**Volatile Organic Compounds by EPA Method 8260B**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Chlorobenzene	ND	0.0050	mg/kg	1	8070501	07/05/18	07/05/18	EPA 8260B	
Chloroethane	ND	0.0050	"	"	"	"	"	"	
Chloroform	ND	0.0050	"	"	"	"	"	"	
Chloromethane	ND	0.0050	"	"	"	"	"	"	
2-Chlorotoluene	ND	0.0050	"	"	"	"	"	"	
4-Chlorotoluene	ND	0.0050	"	"	"	"	"	"	
Dibromochloromethane	ND	0.0050	"	"	"	"	"	"	
1,2-Dibromo-3-chloropropane	ND	0.010	"	"	"	"	"	"	
1,2-Dibromoethane (EDB)	ND	0.0050	"	"	"	"	"	"	
Dibromomethane	ND	0.0050	"	"	"	"	"	"	
1,2-Dichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,3-Dichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,4-Dichlorobenzene	ND	0.0050	"	"	"	"	"	"	
Dichlorodifluoromethane	ND	0.0050	"	"	"	"	"	"	
1,1-Dichloroethane	ND	0.0050	"	"	"	"	"	"	
1,2-Dichloroethane	ND	0.0050	"	"	"	"	"	"	
1,1-Dichloroethene	ND	0.0050	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	0.0050	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	0.0050	"	"	"	"	"	"	
1,2-Dichloropropane	ND	0.0050	"	"	"	"	"	"	
1,3-Dichloropropane	ND	0.0050	"	"	"	"	"	"	
2,2-Dichloropropane	ND	0.0050	"	"	"	"	"	"	
1,1-Dichloropropene	ND	0.0050	"	"	"	"	"	"	
cis-1,3-Dichloropropene	ND	0.0050	"	"	"	"	"	"	
trans-1,3-Dichloropropene	ND	0.0050	"	"	"	"	"	"	
Hexachlorobutadiene	ND	0.0050	"	"	"	"	"	"	
Isopropylbenzene	ND	0.0050	"	"	"	"	"	"	
p-Isopropyltoluene	ND	0.0050	"	"	"	"	"	"	
Methylene chloride	ND	0.0050	"	"	"	"	"	"	
Naphthalene	ND	0.0050	"	"	"	"	"	"	
n-Propylbenzene	ND	0.0050	"	"	"	"	"	"	
Styrene	ND	0.0050	"	"	"	"	"	"	

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Alexandra Huerta, Project Manager Assistant

Terracon - Tustin  
1421 Edinger Avenue, Suite C  
Tustin CA, 92780

Project: Raising Cane's RC-387  
Project Number: 60187218A  
Project Manager: Fabio Minervini

**Reported:**  
07/12/18 14:00

**SB-7-10'**  
**T182159-20 (Soil)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**Volatile Organic Compounds by EPA Method 8260B**

1,1,2,2-Tetrachloroethane	ND	0.0050	mg/kg	1	8070501	07/05/18	07/05/18	EPA 8260B	
1,1,1,2-Tetrachloroethane	ND	0.0050	"	"	"	"	"	"	
Tetrachloroethene	ND	0.0050	"	"	"	"	"	"	
1,2,3-Trichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,2,4-Trichlorobenzene	ND	0.0050	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	0.0050	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	0.0050	"	"	"	"	"	"	
Trichloroethene	ND	0.0050	"	"	"	"	"	"	
Trichlorofluoromethane	ND	0.0050	"	"	"	"	"	"	
1,2,3-Trichloropropane	ND	0.0050	"	"	"	"	"	"	
1,3,5-Trimethylbenzene	ND	0.0050	"	"	"	"	"	"	
1,2,4-Trimethylbenzene	ND	0.0050	"	"	"	"	"	"	
Vinyl chloride	ND	0.0050	"	"	"	"	"	"	
Benzene	ND	0.0050	"	"	"	"	"	"	
Toluene	ND	0.0050	"	"	"	"	"	"	
Ethylbenzene	ND	0.0050	"	"	"	"	"	"	
m,p-Xylene	ND	0.010	"	"	"	"	"	"	
o-Xylene	ND	0.0050	"	"	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		112 %		81.2-123	"	"	"	"	
Surrogate: Dibromofluoromethane		109 %		95.7-135	"	"	"	"	
Surrogate: Toluene-d8		101 %		85.5-116	"	"	"	"	

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Alexandra Huerta, Project Manager Assistant

Terracon - Tustin  
1421 Edinger Avenue, Suite C  
Tustin CA, 92780

Project: Raising Cane's RC-387  
Project Number: 60187218A  
Project Manager: Fabio Minervini

**Reported:**  
07/12/18 14:00

**VP-6 (SG)  
T182159-22 (Air)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**TO-15**

1,1-Difluoroethane (Freon 152)	ND	27	ug/m <sup>3</sup> Air	1.69	8070916	07/09/18	07/10/18	TO-15	
<b>Acetone</b>	<b>170</b>	12	"	"	"	"	"	"	
1,3-Butadiene	ND	4.5	"	"	"	"	"	"	
<b>Carbon Disulfide</b>	<b>120</b>	3.2	"	"	"	"	"	"	
1,1,2-trichloro-1,2,2-trifluoroethane (CFC 113)	ND	7.7	"	"	"	"	"	"	
Isopropyl alcohol	ND	13	"	"	"	"	"	"	
Bromodichloromethane	ND	6.8	"	"	"	"	"	"	
Bromoform	ND	11	"	"	"	"	"	"	
Bromomethane	ND	4.0	"	"	"	"	"	"	
Carbon tetrachloride	ND	6.4	"	"	"	"	"	"	
Chlorobenzene	ND	4.7	"	"	"	"	"	"	
Chloroethane	ND	2.7	"	"	"	"	"	"	
<b>Chloroform</b>	<b>6.6</b>	5.0	"	"	"	"	"	"	
Chloromethane	ND	11	"	"	"	"	"	"	
<b>Cyclohexane</b>	<b>110</b>	3.5	"	"	"	"	"	"	
Heptane	ND	4.2	"	"	"	"	"	"	
Hexane	ND	3.6	"	"	"	"	"	"	
Dibromochloromethane	ND	8.7	"	"	"	"	"	"	
1,2-Dibromoethane (EDB)	ND	7.8	"	"	"	"	"	"	
1,2-Dichlorobenzene	ND	6.1	"	"	"	"	"	"	
1,3-Dichlorobenzene	ND	6.1	"	"	"	"	"	"	
1,4-Dichlorobenzene	ND	6.1	"	"	"	"	"	"	
Dichlorodifluoromethane	ND	5.0	"	"	"	"	"	"	
1,1-Dichloroethane	ND	4.1	"	"	"	"	"	"	
1,2-Dichloroethane	ND	4.1	"	"	"	"	"	"	
1,1-Dichloroethene	ND	4.0	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	4.0	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	4.0	"	"	"	"	"	"	
1,2-Dichloropropane	ND	4.7	"	"	"	"	"	"	
cis-1,3-Dichloropropene	ND	4.6	"	"	"	"	"	"	
trans-1,3-Dichloropropene	ND	4.6	"	"	"	"	"	"	

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Alexandra Huerta, Project Manager Assistant



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Terracon - Tustin 1421 Edinger Avenue, Suite C Tustin CA, 92780	Project: Raising Cane's RC-387 Project Number: 60187218A Project Manager: Fabio Minervini	Reported: 07/12/18 14:00
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**VP-6 (SG)**  
**T182159-22 (Air)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**TO-15**

4-Ethyltoluene	ND	5.0	ug/m <sup>3</sup> Air	1.69	8070916	07/09/18	07/10/18	TO-15	
Methylene chloride	ND	3.5	"	"	"	"	"	"	
<b>Styrene</b>	<b>11</b>	4.3	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	7.0	"	"	"	"	"	"	
Tetrahydrofuran	ND	3.0	"	"	"	"	"	"	
<b>Tetrachloroethene</b>	<b>60</b>	6.9	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	5.6	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	5.6	"	"	"	"	"	"	
Trichloroethene	ND	5.5	"	"	"	"	"	"	
Trichlorofluoromethane	ND	5.7	"	"	"	"	"	"	
1,3,5-Trimethylbenzene	ND	5.0	"	"	"	"	"	"	
1,2,4-Trimethylbenzene	ND	5.0	"	"	"	"	"	"	
Vinyl acetate	ND	3.6	"	"	"	"	"	"	
Vinyl chloride	ND	2.6	"	"	"	"	"	"	
1,4-Dioxane	ND	18	"	"	"	"	"	"	
<b>2-Butanone (MEK)</b>	<b>94</b>	15	"	"	"	"	"	"	
Methyl isobutyl ketone	ND	42	"	"	"	"	"	"	
<b>Benzene</b>	<b>7.4</b>	3.3	"	"	"	"	"	"	
<b>Toluene</b>	<b>1000</b>	3.8	"	"	"	"	"	"	
<b>Ethylbenzene</b>	<b>24</b>	4.4	"	"	"	"	"	"	
<b>m,p-Xylene</b>	<b>58</b>	8.8	"	"	"	"	"	"	
<b>o-Xylene</b>	<b>20</b>	4.4	"	"	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		89.3 %		40-160	"	"	"	"	

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Alexandra Huerta, Project Manager Assistant



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Terracon - Tustin 1421 Edinger Avenue, Suite C Tustin CA, 92780	Project: Raising Cane's RC-387 Project Number: 60187218A Project Manager: Fabio Minervini	Reported: 07/12/18 14:00
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**VP-5 (SG)**  
**T182159-23 (Air)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**TO-15**

1,1-Difluoroethane (Freon 152)	ND	27	ug/m <sup>3</sup> Air	1.8	8070916	07/09/18	07/10/18	TO-15	
<b>Acetone</b>	<b>210</b>	12	"	"	"	"	"	"	
1,3-Butadiene	ND	4.5	"	"	"	"	"	"	
Carbon Disulfide	ND	3.2	"	"	"	"	"	"	
1,1,2-trichloro-1,2,2-trifluoroethane (CFC 113)	ND	7.7	"	"	"	"	"	"	
Isopropyl alcohol	ND	13	"	"	"	"	"	"	
Bromodichloromethane	ND	6.8	"	"	"	"	"	"	
Bromoform	ND	11	"	"	"	"	"	"	
Bromomethane	ND	4.0	"	"	"	"	"	"	
Carbon tetrachloride	ND	6.4	"	"	"	"	"	"	
Chlorobenzene	ND	4.7	"	"	"	"	"	"	
Chloroethane	ND	2.7	"	"	"	"	"	"	
Chloroform	ND	5.0	"	"	"	"	"	"	
Chloromethane	ND	11	"	"	"	"	"	"	
Cyclohexane	ND	3.5	"	"	"	"	"	"	
<b>Heptane</b>	<b>11</b>	4.2	"	"	"	"	"	"	
Hexane	ND	3.6	"	"	"	"	"	"	
Dibromochloromethane	ND	8.7	"	"	"	"	"	"	
1,2-Dibromoethane (EDB)	ND	7.8	"	"	"	"	"	"	
1,2-Dichlorobenzene	ND	6.1	"	"	"	"	"	"	
1,3-Dichlorobenzene	ND	6.1	"	"	"	"	"	"	
1,4-Dichlorobenzene	ND	6.1	"	"	"	"	"	"	
Dichlorodifluoromethane	ND	5.0	"	"	"	"	"	"	
1,1-Dichloroethane	ND	4.1	"	"	"	"	"	"	
1,2-Dichloroethane	ND	4.1	"	"	"	"	"	"	
1,1-Dichloroethene	ND	4.0	"	"	"	"	"	"	
cis-1,2-Dichloroethene	ND	4.0	"	"	"	"	"	"	
trans-1,2-Dichloroethene	ND	4.0	"	"	"	"	"	"	
1,2-Dichloropropane	ND	4.7	"	"	"	"	"	"	
cis-1,3-Dichloropropene	ND	4.6	"	"	"	"	"	"	
trans-1,3-Dichloropropene	ND	4.6	"	"	"	"	"	"	

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Alexandra Huerta, Project Manager Assistant



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Terracon - Tustin 1421 Edinger Avenue, Suite C Tustin CA, 92780	Project: Raising Cane's RC-387 Project Number: 60187218A Project Manager: Fabio Minervini	Reported: 07/12/18 14:00
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**VP-5 (SG)**  
**T182159-23 (Air)**

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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**SunStar Laboratories, Inc.**

**TO-15**

4-Ethyltoluene	ND	5.0	ug/m <sup>3</sup> Air	1.8	8070916	07/09/18	07/10/18	TO-15	
Methylene chloride	ND	3.5	"	"	"	"	"	"	
<b>Styrene</b>	<b>37</b>	4.3	"	"	"	"	"	"	
1,1,2,2-Tetrachloroethane	ND	7.0	"	"	"	"	"	"	
<b>Tetrahydrofuran</b>	<b>13</b>	3.0	"	"	"	"	"	"	
<b>Tetrachloroethene</b>	<b>56</b>	6.9	"	"	"	"	"	"	
1,1,2-Trichloroethane	ND	5.6	"	"	"	"	"	"	
1,1,1-Trichloroethane	ND	5.6	"	"	"	"	"	"	
<b>Trichloroethene</b>	<b>16</b>	5.5	"	"	"	"	"	"	
Trichlorofluoromethane	ND	5.7	"	"	"	"	"	"	
1,3,5-Trimethylbenzene	ND	5.0	"	"	"	"	"	"	
<b>1,2,4-Trimethylbenzene</b>	<b>45</b>	5.0	"	"	"	"	"	"	
Vinyl acetate	ND	3.6	"	"	"	"	"	"	
Vinyl chloride	ND	2.6	"	"	"	"	"	"	
1,4-Dioxane	ND	18	"	"	"	"	"	"	
<b>2-Butanone (MEK)</b>	<b>130</b>	15	"	"	"	"	"	"	
Methyl isobutyl ketone	ND	42	"	"	"	"	"	"	
<b>Benzene</b>	<b>25</b>	3.3	"	"	"	"	"	"	
<b>Toluene</b>	<b>490</b>	3.8	"	"	"	"	"	"	
<b>Ethylbenzene</b>	<b>51</b>	4.4	"	"	"	"	"	"	
<b>m,p-Xylene</b>	<b>130</b>	8.8	"	"	"	"	"	"	
<b>o-Xylene</b>	<b>55</b>	4.4	"	"	"	"	"	"	
Surrogate: 4-Bromofluorobenzene		97.8 %		40-160	"	"	"	"	

SunStar Laboratories, Inc.

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Terracon - Tustin 1421 Edinger Avenue, Suite C Tustin CA, 92780	Project: Raising Cane's RC-387 Project Number: 60187218A Project Manager: Fabio Minervini	Reported: 07/12/18 14:00
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**TO-15 - Quality Control**  
**SunStar Laboratories, Inc.**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 8070916 - Canister Analysis**

**Blank (8070916-BLK1)**

Prepared: 07/09/18 Analyzed: 07/10/18

1,1-Difluoroethane (Freon 152)	ND	27	ug/m <sup>3</sup> Air							
Acetone	ND	12	"							
1,3-Butadiene	ND	4.5	"							
Carbon Disulfide	ND	3.2	"							
1,1,2-trichloro-1,2,2-trifluoroethane (CFC 113)	ND	7.7	"							
Isopropyl alcohol	ND	13	"							
Bromodichloromethane	ND	6.8	"							
Bromoform	ND	11	"							
Bromomethane	ND	4.0	"							
Carbon tetrachloride	ND	6.4	"							
Chlorobenzene	ND	4.7	"							
Chloroethane	ND	2.7	"							
Chloroform	ND	5.0	"							
Chloromethane	ND	11	"							
Cyclohexane	ND	3.5	"							
Heptane	ND	4.2	"							
Hexane	ND	3.6	"							
Dibromochloromethane	ND	8.7	"							
1,2-Dibromoethane (EDB)	ND	7.8	"							
1,2-Dichlorobenzene	ND	6.1	"							
1,3-Dichlorobenzene	ND	6.1	"							
1,4-Dichlorobenzene	ND	6.1	"							
Dichlorodifluoromethane	ND	5.0	"							
1,1-Dichloroethane	ND	4.1	"							
1,2-Dichloroethane	ND	4.1	"							
1,1-Dichloroethene	ND	4.0	"							
cis-1,2-Dichloroethene	ND	4.0	"							
trans-1,2-Dichloroethene	ND	4.0	"							
1,2-Dichloropropane	ND	4.7	"							
cis-1,3-Dichloropropene	ND	4.6	"							
trans-1,3-Dichloropropene	ND	4.6	"							
4-Ethyltoluene	ND	5.0	"							
Methylene chloride	ND	3.5	"							
Styrene	ND	4.3	"							
1,1,2,2-Tetrachloroethane	ND	7.0	"							

SunStar Laboratories, Inc.

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Alexandra Huerta, Project Manager Assistant



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**TO-15 - Quality Control**  
**SunStar Laboratories, Inc.**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 8070916 - Canister Analysis**

**Blank (8070916-BLK1)**

Prepared: 07/09/18 Analyzed: 07/10/18

Tetrahydrofuran	ND	3.0	ug/m <sup>3</sup> Air							
Tetrachloroethene	ND	6.9	"							
1,1,2-Trichloroethane	ND	5.6	"							
1,1,1-Trichloroethane	ND	5.6	"							
Trichloroethene	ND	5.5	"							
Trichlorofluoromethane	ND	5.7	"							
1,3,5-Trimethylbenzene	ND	5.0	"							
1,2,4-Trimethylbenzene	ND	5.0	"							
Vinyl acetate	ND	3.6	"							
Vinyl chloride	ND	2.6	"							
1,4-Dioxane	ND	18	"							
2-Butanone (MEK)	ND	15	"							
Methyl isobutyl ketone	ND	42	"							
Benzene	ND	3.3	"							
Toluene	ND	3.8	"							
Ethylbenzene	ND	4.4	"							
m,p-Xylene	ND	8.8	"							
o-Xylene	ND	4.4	"							
Surrogate: 4-Bromofluorobenzene	36.5		"	45.3		80.6	40-160			

**Duplicate (8070916-DUP1)**

Source: T182117-01

Prepared: 07/09/18 Analyzed: 07/10/18

1,1-Difluoroethane (Freon 152)	ND	27	ug/m <sup>3</sup> Air		ND					
Acetone	ND	12	"		ND				30	
1,3-Butadiene	ND	4.5	"		ND				30	
Carbon Disulfide	ND	3.2	"		ND				30	
1,1,2-trichloro-1,2,2-trifluoroethane (CFC 113)	ND	7.7	"		ND				30	
Isopropyl alcohol	ND	13	"		ND				30	
Bromodichloromethane	ND	6.8	"		ND				30	
Bromoform	ND	11	"		ND				30	
Bromomethane	ND	4.0	"		ND				30	
Carbon tetrachloride	ND	6.4	"		ND				30	
Chlorobenzene	ND	4.7	"		ND				30	
Chloroethane	ND	2.7	"		ND				30	
Chloroform	ND	5.0	"		ND				30	
Chloromethane	ND	11	"		ND				30	

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Alexandra Huerta, Project Manager Assistant

Terracon - Tustin  
1421 Edinger Avenue, Suite C  
Tustin CA, 92780

Project: Raising Cane's RC-387  
Project Number: 60187218A  
Project Manager: Fabio Minervini

Reported:  
07/12/18 14:00

**TO-15 - Quality Control**  
**SunStar Laboratories, Inc.**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 8070916 - Canister Analysis**

**Duplicate (8070916-DUP1)**

**Source: T182117-01**

Prepared: 07/09/18 Analyzed: 07/10/18

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Cyclohexane	ND	3.5	ug/m <sup>3</sup> Air		ND				30	
Heptane	ND	4.2	"		ND				30	
Hexane	ND	3.6	"		ND				30	
Dibromochloromethane	ND	8.7	"		ND				30	
1,2-Dibromoethane (EDB)	ND	7.8	"		ND				30	
1,2-Dichlorobenzene	ND	6.1	"		ND				30	
1,3-Dichlorobenzene	ND	6.1	"		ND				30	
1,4-Dichlorobenzene	ND	6.1	"		ND				30	
Dichlorodifluoromethane	ND	5.0	"		ND				30	
1,1-Dichloroethane	ND	4.1	"		ND				30	
1,2-Dichloroethane	ND	4.1	"		ND				30	
1,1-Dichloroethene	ND	4.0	"		ND				30	
cis-1,2-Dichloroethene	ND	4.0	"		ND				30	
trans-1,2-Dichloroethene	ND	4.0	"		ND				30	
1,2-Dichloropropane	ND	4.7	"		ND				30	
cis-1,3-Dichloropropene	ND	4.6	"		ND				30	
trans-1,3-Dichloropropene	ND	4.6	"		ND				30	
4-Ethyltoluene	ND	5.0	"		ND				30	
Methylene chloride	ND	3.5	"		ND				30	
Styrene	ND	4.3	"		ND				30	
1,1,2,2-Tetrachloroethane	ND	7.0	"		ND				30	
Tetrahydrofuran	ND	3.0	"		ND				30	
Tetrachloroethene	31.1	6.9	"		31.1			0.00	30	
1,1,2-Trichloroethane	ND	5.6	"		ND				30	
1,1,1-Trichloroethane	ND	5.6	"		ND				30	
Trichloroethene	277	5.5	"		278			0.345	30	
Trichlorofluoromethane	ND	5.7	"		ND				30	
1,3,5-Trimethylbenzene	ND	5.0	"		ND				30	
1,2,4-Trimethylbenzene	ND	5.0	"		ND				30	
Vinyl acetate	ND	3.6	"		ND				30	
Vinyl chloride	ND	2.6	"		ND				30	
1,4-Dioxane	ND	18	"		ND				30	
2-Butanone (MEK)	ND	15	"		ND				30	
Methyl isobutyl ketone	ND	42	"		ND				30	
Benzene	ND	3.3	"		ND				30	
Toluene	ND	3.8	"		ND				30	

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**TO-15 - Quality Control**  
**SunStar Laboratories, Inc.**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 8070916 - Canister Analysis**

Duplicate (8070916-DUP1)	Source: T182117-01			Prepared: 07/09/18 Analyzed: 07/10/18						
Ethylbenzene	ND	4.4	ug/m <sup>3</sup> Air		ND				30	
m,p-Xylene	ND	8.8	"		ND				30	
o-Xylene	ND	4.4	"		ND				30	
Surrogate: 4-Bromofluorobenzene	35.8		"	45.3		79.0	40-160			

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Alexandra Huerta, Project Manager Assistant

Terracon - Tustin  
1421 Edinger Avenue, Suite C  
Tustin CA, 92780

Project: Raising Cane's RC-387  
Project Number: 60187218A  
Project Manager: Fabio Minervini

**Reported:**  
07/12/18 14:00

**Extractable Petroleum Hydrocarbons by 8015B - Quality Control**

**SunStar Laboratories, Inc.**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 8070528 - EPA 3550B GC**

**Blank (8070528-BLK1)**

Prepared & Analyzed: 07/05/18

C6-C12 (GRO)	ND	10	mg/kg							
C13-C22 (DRO)	ND	10	"							
C23-C32 (MORO)	ND	10	"							
Surrogate: <i>p</i> -Terphenyl	91.5		"	99.0		92.4	65-135			

**LCS (8070528-BS1)**

Prepared & Analyzed: 07/05/18

C13-C22 (DRO)	400	10	mg/kg	495		81.3	75-125			
Surrogate: <i>p</i> -Terphenyl	88.1		"	99.0		89.0	65-135			

**LCS Dup (8070528-BSD1)**

Prepared & Analyzed: 07/05/18

C13-C22 (DRO)	400	10	mg/kg	495		80.9	75-125	0.488	20	
Surrogate: <i>p</i> -Terphenyl	90.2		"	99.0		91.1	65-135			

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**Metals by EPA 6010B - Quality Control**

**SunStar Laboratories, Inc.**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 8070524 - EPA 3050B**

**Blank (8070524-BLK1)**

Prepared & Analyzed: 07/05/18

Antimony	ND	3.0	mg/kg							
Arsenic	ND	5.0	"							
Barium	ND	1.0	"							
Beryllium	ND	1.0	"							
Cadmium	ND	2.0	"							
Chromium	ND	2.0	"							
Cobalt	ND	2.0	"							
Copper	ND	1.0	"							
Lead	ND	3.0	"							
Molybdenum	ND	5.0	"							
Nickel	ND	2.0	"							
Selenium	ND	5.0	"							
Silver	ND	2.0	"							
Thallium	ND	2.0	"							
Vanadium	ND	5.0	"							
Zinc	ND	1.0	"							

**LCS (8070524-BS1)**

Prepared & Analyzed: 07/05/18

Arsenic	114	5.0	mg/kg	100		114	75-125			
Barium	114	1.0	"	100		114	75-125			
Cadmium	112	2.0	"	100		112	75-125			
Chromium	109	2.0	"	100		109	75-125			
Lead	113	3.0	"	100		113	75-125			

**Matrix Spike (8070524-MS1)**

Source: T182127-41

Prepared & Analyzed: 07/05/18

Arsenic	107	5.0	mg/kg	95.2	3.14	109	75-125			
Barium	174	1.0	"	95.2	54.4	126	75-125			QM-05
Cadmium	106	2.0	"	95.2	2.35	109	75-125			
Chromium	124	2.0	"	95.2	16.4	113	75-125			
Lead	102	3.0	"	95.2	1.14	106	75-125			

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**Metals by EPA 6010B - Quality Control**

**SunStar Laboratories, Inc.**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 8070524 - EPA 3050B**

Matrix Spike Dup (8070524-MSD1)	Source: T182127-41			Prepared & Analyzed: 07/05/18						
Arsenic	112	5.0	mg/kg	98.0	3.14	111	75-125	4.16	20	
Barium	191	1.0	"	98.0	54.4	139	75-125	8.92	20	QM-05
Cadmium	107	2.0	"	98.0	2.35	107	75-125	0.974	20	
Chromium	123	2.0	"	98.0	16.4	108	75-125	0.719	20	
Lead	105	3.0	"	98.0	1.14	106	75-125	2.99	20	

SunStar Laboratories, Inc.

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Alexandra Huerta, Project Manager Assistant



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Terracon - Tustin  
 1421 Edinger Avenue, Suite C  
 Tustin CA, 92780

Project: Raising Cane's RC-387  
 Project Number: 60187218A  
 Project Manager: Fabio Minervini

Reported:  
 07/12/18 14:00

**Volatile Organic Compounds by EPA Method 8260B - Quality Control**

**SunStar Laboratories, Inc.**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 8070501 - EPA 5030 GCMS**

**Blank (8070501-BLK1)**

Prepared & Analyzed: 07/05/18

Bromobenzene	ND	0.0050	mg/kg							
Bromochloromethane	ND	0.0050	"							
Bromodichloromethane	ND	0.0050	"							
Bromoform	ND	0.0050	"							
Bromomethane	ND	0.0050	"							
n-Butylbenzene	ND	0.0050	"							
sec-Butylbenzene	ND	0.0050	"							
tert-Butylbenzene	ND	0.0050	"							
Carbon tetrachloride	ND	0.0050	"							
Chlorobenzene	ND	0.0050	"							
Chloroethane	ND	0.0050	"							
Chloroform	ND	0.0050	"							
Chloromethane	ND	0.0050	"							
2-Chlorotoluene	ND	0.0050	"							
4-Chlorotoluene	ND	0.0050	"							
Dibromochloromethane	ND	0.0050	"							
1,2-Dibromo-3-chloropropane	ND	0.010	"							
1,2-Dibromoethane (EDB)	ND	0.0050	"							
Dibromomethane	ND	0.0050	"							
1,2-Dichlorobenzene	ND	0.0050	"							
1,3-Dichlorobenzene	ND	0.0050	"							
1,4-Dichlorobenzene	ND	0.0050	"							
Dichlorodifluoromethane	ND	0.0050	"							
1,1-Dichloroethane	ND	0.0050	"							
1,2-Dichloroethane	ND	0.0050	"							
1,1-Dichloroethene	ND	0.0050	"							
cis-1,2-Dichloroethene	ND	0.0050	"							
trans-1,2-Dichloroethene	ND	0.0050	"							
1,2-Dichloropropane	ND	0.0050	"							
1,3-Dichloropropane	ND	0.0050	"							
2,2-Dichloropropane	ND	0.0050	"							
1,1-Dichloropropene	ND	0.0050	"							
cis-1,3-Dichloropropene	ND	0.0050	"							
trans-1,3-Dichloropropene	ND	0.0050	"							
Hexachlorobutadiene	ND	0.0050	"							
Isopropylbenzene	ND	0.0050	"							

SunStar Laboratories, Inc.

*The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.*

Alexandra Huerta, Project Manager Assistant



25712 Commercentre Drive  
 Lake Forest, California 92630  
 949.297.5020 Phone  
 949.297.5027 Fax

Terracon - Tustin  
 1421 Edinger Avenue, Suite C  
 Tustin CA, 92780

Project: Raising Cane's RC-387  
 Project Number: 60187218A  
 Project Manager: Fabio Minervini

Reported:  
 07/12/18 14:00

**Volatile Organic Compounds by EPA Method 8260B - Quality Control**

**SunStar Laboratories, Inc.**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 8070501 - EPA 5030 GCMS**

**Blank (8070501-BLK1)**

Prepared & Analyzed: 07/05/18

p-Isopropyltoluene	ND	0.0050	mg/kg							
Methylene chloride	ND	0.0050	"							
Naphthalene	ND	0.0050	"							
n-Propylbenzene	ND	0.0050	"							
Styrene	ND	0.0050	"							
1,1,2,2-Tetrachloroethane	ND	0.0050	"							
1,1,1,2-Tetrachloroethane	ND	0.0050	"							
Tetrachloroethene	ND	0.0050	"							
1,2,3-Trichlorobenzene	ND	0.0050	"							
1,2,4-Trichlorobenzene	ND	0.0050	"							
1,1,2-Trichloroethane	ND	0.0050	"							
1,1,1-Trichloroethane	ND	0.0050	"							
Trichloroethene	ND	0.0050	"							
Trichlorofluoromethane	ND	0.0050	"							
1,2,3-Trichloropropane	ND	0.0050	"							
1,3,5-Trimethylbenzene	ND	0.0050	"							
1,2,4-Trimethylbenzene	ND	0.0050	"							
Vinyl chloride	ND	0.0050	"							
Benzene	ND	0.0050	"							
Toluene	ND	0.0050	"							
Ethylbenzene	ND	0.0050	"							
m,p-Xylene	ND	0.010	"							
o-Xylene	ND	0.0050	"							
Surrogate: 4-Bromofluorobenzene	0.0443		"	0.0396		112	81.2-123			
Surrogate: Dibromofluoromethane	0.0411		"	0.0396		104	95.7-135			
Surrogate: Toluene-d8	0.0417		"	0.0396		105	85.5-116			

**LCS (8070501-BS1)**

Prepared & Analyzed: 07/05/18

Chlorobenzene	0.0497	0.0050	mg/kg	0.0400		124	75-125			
1,1-Dichloroethene	0.0441	0.0050	"	0.0400		110	75-125			
Trichloroethene	0.0458	0.0050	"	0.0400		115	75-125			
Benzene	0.0491	0.0050	"	0.0400		123	75-125			
Toluene	0.0483	0.0050	"	0.0400		121	75-125			
Surrogate: 4-Bromofluorobenzene	0.0432		"	0.0400		108	81.2-123			
Surrogate: Dibromofluoromethane	0.0413		"	0.0400		103	95.7-135			
Surrogate: Toluene-d8	0.0419		"	0.0400		105	85.5-116			

SunStar Laboratories, Inc.

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Alexandra Huerta, Project Manager Assistant

Terracon - Tustin  
1421 Edinger Avenue, Suite C  
Tustin CA, 92780

Project: Raising Cane's RC-387  
Project Number: 60187218A  
Project Manager: Fabio Minervini

Reported:  
07/12/18 14:00

**Volatile Organic Compounds by EPA Method 8260B - Quality Control**

**SunStar Laboratories, Inc.**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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**Batch 8070501 - EPA 5030 GCMS**

**Matrix Spike (8070501-MS1)**

Source: T182159-01

Prepared & Analyzed: 07/05/18

Chlorobenzene	0.0401	0.0050	mg/kg	0.0398	ND	101	75-125			
1,1-Dichloroethene	0.0382	0.0050	"	0.0398	ND	95.9	75-125			
Trichloroethene	0.0383	0.0050	"	0.0398	ND	96.3	75-125			
Benzene	0.0398	0.0050	"	0.0398	ND	99.9	75-125			
Toluene	0.0394	0.0050	"	0.0398	ND	99.0	75-125			
Surrogate: 4-Bromofluorobenzene	0.0434		"	0.0398		109	81.2-123			
Surrogate: Dibromofluoromethane	0.0425		"	0.0398		107	95.7-135			
Surrogate: Toluene-d8	0.0417		"	0.0398		105	85.5-116			

**Matrix Spike Dup (8070501-MSD1)**

Source: T182159-01

Prepared & Analyzed: 07/05/18

Chlorobenzene	0.0414	0.0050	mg/kg	0.0396	ND	104	75-125	3.06	20	
1,1-Dichloroethene	0.0384	0.0050	"	0.0396	ND	97.0	75-125	0.545	20	
Trichloroethene	0.0385	0.0050	"	0.0396	ND	97.2	75-125	0.386	20	
Benzene	0.0416	0.0050	"	0.0396	ND	105	75-125	4.33	20	
Toluene	0.0402	0.0050	"	0.0396	ND	102	75-125	1.95	20	
Surrogate: 4-Bromofluorobenzene	0.0420		"	0.0396		106	81.2-123			
Surrogate: Dibromofluoromethane	0.0430		"	0.0396		108	95.7-135			
Surrogate: Toluene-d8	0.0407		"	0.0396		103	85.5-116			

SunStar Laboratories, Inc.

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Alexandra Huerta, Project Manager Assistant



25712 Commercentre Drive  
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949.297.5020 Phone  
949.297.5027 Fax

Terracon - Tustin  
1421 Edinger Avenue, Suite C  
Tustin CA, 92780

Project: Raising Cane's RC-387  
Project Number: 60187218A  
Project Manager: Fabio Minervini

**Reported:**  
07/12/18 14:00

### Notes and Definitions

- QM-05 The spike recovery was outside acceptance limits for the MS and/or MSD due to possible matrix interference. The LCS was within acceptance criteria. The data is acceptable as no negative impact on data is expected.
- DET Analyte DETECTED
- ND Analyte NOT DETECTED at or above the reporting limit
- NR Not Reported
- dry Sample results reported on a dry weight basis
- RPD Relative Percent Difference

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SunStar Laboratories, Inc.

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Alexandra Huerta, Project Manager Assistant

# Terracon

Consulting Engineers & Scientists

Office Location 421 Edinger Ave.  
Irvine, CA  
 Project Manager Fabio Marinelli

Laboratory: Son Star Lab.  
 Address: Lake Forest, CA  
 Contact: Alexandra Huerta  
 Phone: 949-297-5020  
 PO/SO #:

Sampler's Name Mary Medjenouch Sampler's Signature Mary Medjenouch

Proj. No. 60187218A Project Name Raisins Care's - RC-387 No/Type of Containers 21/8oz. 21/Minerals

Matrix	Date	Time	Compend	Identifying Marks of Sample(s)	Start Depth	End Depth	VOA	AG 1L	250 ml	P/O	ANALYSIS REQUESTED	Lab Sample ID (Lab Use Only)
S	7/3/18	7:35	X	VP-5-2.5'	2'	2.5'					VOC's-EPA 8260B TPH- 8015M Metals- 6010B Hold- VOCs - TO-15	01
		7:40		VP-5-5'	4.5'	5'						02
		8:00		VP-6-2.5'	2'	2.5'						03
		8:05		VP-6-5'	4.5'	5'						04
		8:30		SB-4- <del>2.5</del> 5.5'	5'	5.5'						05
		8:35		SB-4-10'	9.5'	10'						06
		8:45		SB-4-12.5'	12'	12.5'						07
		9:00		SB-3-2.5'	2'	2.5'						08
		9:05		SB-3-5.5'	5'	5.5'						09
		9:10		SB-3-10'	9.5'	10'						10

Turn around time  Normal  25% Rush  50% Rush  100% Rush

Relinquished by (Signature) Mary Medjenouch Date: 7/3/18 Time: 14:20 Received by (Signature) \_\_\_\_\_ Date: 7-3-18 Time: 1430

Relinquished by (Signature) \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_ Received by (Signature) \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

Relinquished by (Signature) \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_ Received by (Signature) \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

Relinquished by (Signature) \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_ Received by (Signature) \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

NOTES: \_\_\_\_\_

Lab use only  
 Due Date: \_\_\_\_\_  
 Temp. of coolers when received (C°): 4.5  
 Page 1 of 3

Matrix Container WW - Wastewater VOA - 40 ml vial W - Water AG - Amber / Or Glass 1 Liter S - Soil SD - Solid L - Liquid A - Air Bag C - Charcoal tube P/O - Plastic or other SL - sludge O - Oil

# Terracon

Consulting Engineers & Scientists

Office Location: 1421 Edinger Ave. Irvine, CA

Project Manager: Fabio Meridini

Laboratory: Sun Star Lab.  
Address: Lake Forest, CA

Contact: \_\_\_\_\_  
Phone: \_\_\_\_\_  
PO/SO #: \_\_\_\_\_

Sampler's Name: Mary Mendenich

Sampler's Signature: Mary Mendenich

Proj. No. 60187A Project Name Raising Cane's - RC-387 No/Type of Containers 21/8 OZ. PETE BOTTLES

Matrix	Date	Time	Compliance	Identifying Marks of Sample(s)	Start Depth	End Depth	VOA	AG 1L	250 ml	PIO	ANALYSIS REQUESTED
S	7/31/18	9:15	X	SB-3-15'	14.5'	15.1'					VOC's - 8260B TPH - 8015M Metals - 6010B Hold VOC - TD-15
		9:25		SB-2-3'	2.5'	3'					X
		9:30		SB-2-8'	7.5'	8'					X
		9:35		SB-2-13'	12.5'	13'					X
		9:45		SB-1-3'	2.5'	3'					X
		9:50		SB-1-7.5'	7'	7.5'					X
		9:55		SB-1-12'	11.5'	12'					X
		D:10		SB-7-3'	2.5'	3'					X
		10:15		SB-7-5.5'	5'	5.5'					X
		10:20		SB-7-10'	9.5'	10'					X
Turn around time			<input checked="" type="checkbox"/> Normal				<input type="checkbox"/> 25% Rush	<input type="checkbox"/> 50% Rush	<input type="checkbox"/> 100% Rush		
Relinquished by (Signature)	<u>Mary Mendenich</u>	Date: <u>7/31/18</u>	Time: <u>11:20</u>	Received by (Signature)		Date: <u>7-3-18</u>	Time: <u>14:30</u>	NOTES:			
Relinquished by (Signature)		Date:	Time:	Received by (Signature)		Date:	Time:				
Relinquished by (Signature)		Date:	Time:	Received by (Signature)		Date:	Time:				

Lab use only	Due Date:	Temp. of coolers when received (C°):
		<u>4.5</u>
1	2	3
4	5	

Page 2 of 3

Lab Sample ID (Lab Use Only)

Matrix: WW - Wastewater VOA - 40 ml Vial  
Container: W - Water A/G - Amber / Or Glass 1 Liter  
S - Soil SD - Solid L - Liquid A - Air Bag  
C - Charcoal tube P/O - Plastic or other  
SL - sludge O - Oil

Orange County Office  
2817 McGaw Avenue  
Irvine, California 92614  
Office (949) 864-2064  
Fax (949) 261-6110

# Terracon

Consulting Engineers & Scientists

Office Location 421 Edinger Ave.  
Tustin, CA  
 Project Manager Fabrizio Marinoni

Laboratory: Sun Star Lab  
 Address: Lake Forest, CA

Contact: \_\_\_\_\_  
 Phone: \_\_\_\_\_  
 PO/SO #: \_\_\_\_\_

Project No. 60187218A Project Name Hazing Cans - RC-381  
 Sampler's Name Mary M. Jendrich Sampler's Signature Mary M. Jendrich

No/Type of Containers  
21/862/19  
2/1/2/wh/cans

Matrix	Date	Time	C o n t a i n e r	G r a b	Identifying Marks of Sample(s)	Start Depth	End Depth	VOA	AG 1L	250 ml	P/O	ANALYSIS REQUESTED	Lab Sample ID (Lab Use Only)
S	7/3/18	10:25	X		SB-7-15 -	4.5'	15'					VOC's - 8260B TPH - 8015M Metals - 6010B Hold VOCs - 10-15	21
P/O		10:50	X		VP-6 (SG)	5'							22 397
P/O		10:45	X		VP-5 (SG)	5'							23 299
NFS													

Turn around time  Normal  25% Rush  50% Rush  100% Rush

Relinquished by (Signature) Mary M. Jendrich Date: 7/3/18 Time: 14:20 Received by (Signature) \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_  
 Relinquished by (Signature) \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_ Received by (Signature) \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_  
 Relinquished by (Signature) \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_ Received by (Signature) \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

NOTES:

Lab use only  
 Due Date: \_\_\_\_\_  
 Temp. of coolers when received (C°): 4.5°  
 Page 3 of 3

Matrix: WW - Wastewater W - Water S - Soil SD - Solid L - Liquid A - Air Bag  
 Container: VOA - 40 ml Vial AG - Amber / Or Glass 1 Liter AG - Amber / Or Glass 1 Liter 250 ml - Glass wide mouth P/O - Charcoal tube SL - sludge O - Oil

Orange County Office

2817 McGaw Avenue  
 Irvine, California 92614

Office (949) 864-2064  
 Fax (949) 261-6110

## SAMPLE RECEIVING REVIEW SHEET

Batch/Work Order #: T182159

Client Name: TEO. BACON Project: RAISING CANES - RC 387

Delivered by:  Client  SunStar Courier  GSO  FedEx  Other

If Courier, Received by: \_\_\_\_\_ Date/Time Courier Received: \_\_\_\_\_

Lab Received by: DAN Date/Time Lab Received: 7/3/18 1930

Total number of coolers received: 1

Temperature: Cooler #1	<u>3.3</u> <u>3.0</u> <u>RC</u>	°C +/- the CF ( 1.2°C) = <u>4.5</u>	°C corrected temperature
Temperature: Cooler #2		°C +/- the CF ( 1.2°C) =	°C corrected temperature
Temperature: Cooler #3		°C +/- the CF ( 1.2°C) =	°C corrected temperature
<b>Temperature criteria = ≤ 6°C (no frozen containers)</b>		Within criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>If NO:</b>			
Samples received on ice?	<input type="checkbox"/> Yes	<input type="checkbox"/> No →	<b>Complete Non-Conformance Sheet</b>
If on ice, samples received same day collected?	<input type="checkbox"/> Yes → Acceptable	<input type="checkbox"/> No →	<b>Complete Non-Conformance Sheet</b>

Custody seals intact on cooler/sample  Yes  No\*  N/A

Sample containers intact  Yes  No\*

Sample labels match Chain of Custody IDs  Yes  No\*

Total number of containers received match COC  Yes  No\*

Proper containers received for analyses requested on COC  Yes  No\*

Proper preservative indicated on COC/containers for analyses requested  Yes  No\*  N/A

Complete shipment received in good condition with correct temperatures, containers, labels, volumes preservatives and within method specified holding times  Yes  No\*

\* Complete Non-Conformance Receiving Sheet if checked  Cooler/Sample Review - Initials and date: BC 7/3/18

**Comments:** \_\_\_\_\_

# Asset Check-In Receipt

SunStar Laboratories Inc.

Check-In Date: 7/3/2018

User Name: Marteski, Dan

Asset Tag	Asset Type	Serial No	Location	Customer No.	Customer Name
0252 - unused	1000cc: 1000cc Summa	0252	Sunstar Labs, Lake Forest Air Lab	Terracon-Joe	Joe Yang
0299	1000cc: 1000cc Summa	0299	Sunstar Labs, Lake Forest Air Lab	Terracon-Joe	Joe Yang
0397	1000cc: 1000cc Summa	0397	Sunstar Labs, Lake Forest Air Lab	Terracon-Joe	Joe Yang
2037	Vapor Manifold: Vapor Manifold	2037	Sunstar Labs, Lake Forest Air Lab	Terracon-Joe	Joe Yang
2078	Vapor Manifold: Vapor Manifold	2078	Sunstar Labs, SunStar Labs - South	Terracon-Joe	Joe Yang
3038	Vapor Manifold: Vapor Manifold	3038	Sunstar Labs, SunStar Labs - South	Terracon-Joe	Joe Yang

+ 3 Nuts / Ferrules

Project Name: MONTERY PARK LSI			KATHERINE	
Company: TERRACON				
Name: JOE YANG				
Item	Quantity	Unit		
2 oz Jars 24/CS				
4 oz Jars 24/CS				
8 oz Jars 12/CS	24	EA		
40 ml unpreserved VOAs 100/box				
40 ml HCL-preserved VOAs 72/box				
250 ml Poly 24/CS				
1 Liter Poly 12/CS				
500 ml Poly 16/CS				
500 ml Amber Bottle Wide 12/CS				
1 Liter Amber Bottle 12/CS				
1 Gallon Poly 4/box				
5035 kits:(2)Sodium Bisulfate VOAs 72/box				
(1) Methanol VOA 72/box				
(1)Syringe 50/pack				
Lock-N-Load Handle 1/pack				
Tedlar Bags 10/pack				
Sub Slab Insert w/ washer & N/F				
Soil Gas SS 16" Drop Tubes				
Gas Extraction Fittings				
Soil Gas Filters				
	# Sent	Used	Unused	Unreturned
Batch Certified Summa Canisters	400cc			
	1L	3	2	1
	3L			0
	6L			
Individually Certified Summa Canisters	400cc			
	1L			
	3L			
	6L			
150/63 Manifolds, Var. Sampler, etc. Calibrated Correctly - Gauge Reads at 0				
Manifolds: Inst. Sampler, Variable Sampler	3-MANIFOLDS (150) CHARGE 2			
Swagelok Fittings: Nuts/Ferrules, Ts	3 - NUTS/FERRULES 3- RETURNED			
Cooler (Sm, Med, Lrg) Number & Quantity	1-LRG 1 RETURNED			
Other: Poly Tube, Valves, Silicon Tape, etc.				
Prepared By: DF	Date: 6/29/18			
Reviewed By:	Date:			



**WORK ORDER**

**T182159**

<b>Client:</b> Terracon - Tustin	<b>Project Manager:</b> Alexandra Huerta
<b>Project:</b> Raising Cane's RC-387	<b>Project Number:</b> 60187218A

**Report To:**

Terracon - Tustin  
 Fabio Minervini  
 1421 Edinger Avenue, Suite C  
 Tustin, CA 92780

<b>Date Due:</b> 07/11/18 17:00 (5 day TAT)	<b>Date Received:</b> 07/03/18 14:30
<b>Received By:</b> Dan Marteski	<b>Date Logged In:</b> 07/03/18 15:19
<b>Logged In By:</b> Brian Charon	

<b>Samples Received at:</b> 4.5°C
<b>Custody Seals:</b> No <b>Received On Ice:</b> Yes
<b>Containers Intact:</b> Yes
<b>COC/Labels Agree:</b> Yes
<b>Preservation Confirmed:</b> No

Analysis	Due	TAT	Expires	Comments
<b>T182159-01 VP-5-2.5 [Soil] Sampled 07/03/18 07:35 (GMT-08:00) Pacific Time (US &amp;</b>				
8015 CC (6-12)(13-22)(23-32)	07/11/18 15:00	5	07/17/18 07:35	
8260	07/11/18 15:00	5	07/17/18 07:35	
<b>T182159-02 VP-5-5' [Soil] Sampled 07/03/18 07:40 (GMT-08:00) Pacific Time (US &amp;</b>				
[NO ANALYSES]				
<b>T182159-03 VP-6-2.5' [Soil] Sampled 07/03/18 08:00 (GMT-08:00) Pacific Time (US &amp;</b>				
[NO ANALYSES]				
<b>T182159-04 VP-6-5' [Soil] Sampled 07/03/18 08:05 (GMT-08:00) Pacific Time (US &amp;</b>				
8015 CC (6-12)(13-22)(23-32)	07/11/18 15:00	5	07/17/18 08:05	
8260	07/11/18 15:00	5	07/17/18 08:05	
<b>T182159-05 SB-4-5.5' [Soil] Sampled 07/03/18 08:30 (GMT-08:00) Pacific Time (US &amp;</b>				
[NO ANALYSES]				
<b>T182159-06 SB-4-10' [Soil] Sampled 07/03/18 08:35 (GMT-08:00) Pacific Time (US &amp;</b>				
[NO ANALYSES]				



**WORK ORDER**

**T182159**

<b>Client:</b> Terracon - Tustin	<b>Project Manager:</b> Alexandra Huerta
<b>Project:</b> Raising Cane's RC-387	<b>Project Number:</b> 60187218A

Analysis	Due	TAT	Expires	Comments
<b>T182159-07 SB-4-12.5' [Soil] Sampled 07/03/18 08:45 (GMT-08:00) Pacific Time (US &amp;</b>				
6010 Individual Metals	07/11/18 15:00	5	12/30/18 08:45	
8015 CC (6-12)(13-22)(23-32)	07/11/18 15:00	5	07/17/18 08:45	
8260	07/11/18 15:00	5	07/17/18 08:45	
<b>T182159-08 SB-3-2.5' [Soil] Sampled 07/03/18 09:00 (GMT-08:00) Pacific Time (US &amp;</b>				
8015 CC (6-12)(13-22)(23-32)	07/11/18 15:00	5	07/17/18 09:00	
8260	07/11/18 15:00	5	07/17/18 09:00	
<b>T182159-09 SB-3-5.5' [Soil] Sampled 07/03/18 09:05 (GMT-08:00) Pacific Time (US &amp;</b>				
[NO ANALYSES]				
<b>T182159-10 SB-3-10' [Soil] Sampled 07/03/18 09:10 (GMT-08:00) Pacific Time (US &amp;</b>				
[NO ANALYSES]				
<b>T182159-11 SB-3-15' [Soil] Sampled 07/03/18 09:15 (GMT-08:00) Pacific Time (US &amp;</b>				
[NO ANALYSES]				
<b>T182159-12 SB-2-3' [Soil] Sampled 07/03/18 09:25 (GMT-08:00) Pacific Time (US &amp;</b>				
[NO ANALYSES]				
<b>T182159-13 SB-2-8' [Soil] Sampled 07/03/18 09:30 (GMT-08:00) Pacific Time (US &amp;</b>				
[NO ANALYSES]				
<b>T182159-14 SB-2-13' [Soil] Sampled 07/03/18 09:35 (GMT-08:00) Pacific Time (US &amp;</b>				
8015 CC (6-12)(13-22)(23-32)	07/11/18 15:00	5	07/17/18 09:35	
8260	07/11/18 15:00	5	07/17/18 09:35	
<b>T182159-15 SB-1-3' [Soil] Sampled 07/03/18 09:45 (GMT-08:00) Pacific Time (US &amp;</b>				
[NO ANALYSES]				



**WORK ORDER**

**T182159**

<b>Client:</b> Terracon - Tustin	<b>Project Manager:</b> Alexandra Huerta
<b>Project:</b> Raising Cane's RC-387	<b>Project Number:</b> 60187218A

Analysis	Due	TAT	Expires	Comments
<b>T182159-16 SB-1-7.5' [Soil] Sampled 07/03/18 09:50 (GMT-08:00) Pacific Time</b>				
(US & [NO ANALYSES])				
<b>T182159-17 SB-1-12' [Soil] Sampled 07/03/18 10:10 (GMT-08:00) Pacific Time</b>				
(US &				
8015 CC (6-12)(13-22)(23-32)	07/11/18 15:00	5	07/17/18 10:10	
8260	07/11/18 15:00	5	07/17/18 10:10	
<b>T182159-18 SB-7-3' [Soil] Sampled 07/03/18 10:15 (GMT-08:00) Pacific Time</b>				
(US & [NO ANALYSES])				
<b>T182159-19 SB-7-5.5' [Soil] Sampled 07/03/18 10:15 (GMT-08:00) Pacific Time</b>				
(US & [NO ANALYSES])				
<b>T182159-20 SB-7-10' [Soil] Sampled 07/03/18 10:20 (GMT-08:00) Pacific Time</b>				
(US &				
6010 Individual Metals	07/11/18 15:00	5	12/30/18 10:20	
8015 CC (6-12)(13-22)(23-32)	07/11/18 15:00	5	07/17/18 10:20	
8260	07/11/18 15:00	5	07/17/18 10:20	
<b>T182159-21 SB-7-15' [Soil] Sampled 07/03/18 10:25 (GMT-08:00) Pacific Time</b>				
(US & [NO ANALYSES])				
<b>T182159-22 VP-6 (SG) [Air] Sampled 07/03/18 10:50 (GMT-08:00) Pacific Time</b>				
(US &				
TO-15	07/11/18 15:00	5	08/02/18 10:50	
<b>T182159-23 VP-5 (SG) [Air] Sampled 07/03/18 10:45 (GMT-08:00) Pacific Time</b>				
(US &				
TO-15	07/11/18 15:00	5	08/02/18 10:45	

June 24, 2020



Raising Cane's Restaurants, LLC  
6800 Bishop Rd Ste 210  
Plano, TX 75024-4275

Attn: Ms. Kristen Roberts  
P: (972) 769-3348  
E: [KRoberts@raisingcanes.com](mailto:KRoberts@raisingcanes.com)

Re: Summary of Environmental Conditions  
Proposed Raising Cane's Restaurant (RC 387) - Monterey Park  
1970 South Atlantic Boulevard  
Monterey Park, Los Angeles County, California  
Terracon Project No. 60187218A

Dear Ms. Roberts:

Per your request, Terracon Consultants, Inc. (Terracon) is pleased to submit this Summary of Environmental Conditions letter to assist with your responses to Conditional Use Permit (CUP) appeal for the referenced project.

Terracon completed a Phase I Environmental Site Assessment (ESA) on July 2, 2018 (Terracon Project No. 60187218) and Limited Site Investigation (LSI) report on July 24, 2018. Summary of findings of the Phase I ESA and the LSI are provided in the following paragraphs:

- The site is located at 1970 South Atlantic Boulevard in Monterey Park, Los Angeles County, California, and consists of three contiguous parcels (Designated as County of Los Angeles Assessor Parcel Numbers (APNs): 5266-002-032, -033 and -034) totaling approximately 0.41-acre. The site consists of a vacant asphalt/concrete paved lot.
- Historically, the site was occupied by Ott Frank E Jr. Union Service DLR, a service station, from at least 1957 through 1969. This service station was demolished and replaced by another service station that continued to operate on the site until 2003. Subsequent to the demolition of the former service station (1957-1969), two sets of Underground Storage Tanks (USTs) were installed at the site in 1969 and in 1990. These USTs were removed under regulatory oversight by the Los Angeles Department of Public Works, Environmental Program Division (LACDPW), due to discovery of petroleum hydrocarbon releases from the USTs, in 1990 and in 2003, respectively.
- Several subsurface assessments were performed by others to evaluate the release(s) from the former UST systems and associated automotive repairing underground features (i.e. clarifier and three in-ground hydraulic lifts) were conducted in 1990, 1997, 2003, 2005, and 2006, resulting in regulatory closure with no further action requirements in 1992 and in 2007.

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Proposed Raising Cane's Restaurant (RC 387) - Monterey Park ■ Monterey Park, California

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- Terracon's Phase I ESA report identified significant data gaps in connection with former on-site service station facilities that occupied the site from 1957 through 1969, with no documentation of USTs. In addition, a significant data gap was identified in connection with inadequate soil assessment of a former waste oil UST at the site.
- Subsequent to the Phase I ESA and to evaluate the identified significant data gaps, Terracon completed an LSI, which included soil and soil gas sampling and analysis at the site.
- The LSI scope of work consisted of advancement of five soil borings (SB-1, SB-2, SB-3, SB-4, SB-7) to a maximum depth of 15 feet below grade surface (bgs). In addition, two borings (VP-5 and VP-6) were advanced to depths of approximately 5.0 feet bgs and converted into a vapor probe set at a depth of approximately 4.5 feet bgs. The soil samples were analyzed for TPH as gasoline range organics (GRO), diesel range organics (DRO), and Oil Range Organics (ORO) by United States Environmental Protection Agency (USEPA) Method 8015M and VOCs by USEPA Method 8260B. The soil gas samples were analyzed for VOCs by USEPA Method TO-15. The following summarizes findings of the LSI:
  - Analytical results for the soil samples collected from the site did not exhibit VOCs, TPH-GRO, and TPH-DRO at concentrations above their respective laboratory reporting limits. Concentrations of TPH-ORO were detected in soil borings SB-3, VP-6, and SB-7; however, the detected concentrations were well below the applicable screening levels.
  - The detected metals concentrations in soil samples were reported at concentrations below the applicable screening levels and/or background concentrations.
  - Analytical results for the soil gas samples exhibited VOC concentrations above their respective reporting limits (RL); however, below the applicable screening levels for residential and commercial land use at that time.
- Based on the findings of the LSI, additional investigation did not appear warranted. However, based on the historical site use, and typical redevelopment practices of the client, during site excavation activities (if needed) proper procedures will be followed with respect to worker health and safety, and potentially affected soils encountered will be properly characterized, treated, and/or disposed in accordance with applicable local, state or federal regulations.

It should be noted that regulatory screening levels are routinely evaluated and updated. Terracon compared the soil gas analytical results from the prior LSI (July 2018) to the current Environmental Screening Levels established by the San Francisco Bay Area, Regional Water Quality Control Board, also adopted by most regulatory agencies in California. The reported benzene concentration in one of the soil gas samples slightly exceeds the current ESLs for commercial

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land use; however, the remaining soil gas analytical results reported concentrations below the ESLs for commercial land use.

Based on the previous documented UST removal activities, regulatory closure, and the findings from Terracon's prior subsurface investigations, significant environmental conditions that warrant a response action were not identified. It should be noted that based on the findings of the Phase I ESA, the anticipated depth to groundwater in the site vicinity is greater than 150 feet below grade surface; and based on subsurface conditions is not considered threatened.

As a precautionary measure, and per typical redevelopment practices of the client for sites that have had a history of environmental impact, the on-site soils will be managed under a Soil Management Plan (SMP) to provide guidance during planned future earthwork activities in the unlikely event that petroleum hydrocarbon impacted soils are encountered.

Additionally, the client will install a voluntary Vapor Barrier below the proposed structure to provide additional assurances regarding residual vapors that may remain at the site. Based on the environmental review of the site conditions, the proposed SMP and Vapor Barrier are believed to be sufficient to mitigate potential soil and or vapor concerns.

If there are any questions regarding this letter or if we may be of further assistance, please do not hesitate to contact us.

Sincerely,

**Terracon Consultants, Inc.**

Islam (Sami) R. Noaman, E.I.T.  
Environmental Department Manager II

Carl A. Parten  
Senior Principal