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memorandum

date July 7, 2025

to Gabriela Silva, City of Culver City

from Mike Harden, ESA
Alan Sako, ESA

subject Peer Review of the Response to Appeal of Planning Commission's Adoption of Resolution No. 2024-P007 Costco Gasoline – On-Site Relocation (P2021-0135-CUP/M) 13431 and 13463 Washington Boulevard, Culver City, California 90292. Costco Loc. No. 479 / Our Job No. 10857

The City of Culver City (City) approved a Conditional Use Permit Modification (P2021-0135-CUP/M) and a California Environmental Quality Act (CEQA) Class 32 Categorical Exemption (CE) for the relocation and expansion of Costco's Gas Station Relocation Project (the Project). The City received an appeal from Angel Law who serves as legal counsel for Sol y Luna Montessori School (Sol y Luna). On August 8, 2024, Angel Law wrote to appeal the City Planning Commission's adoption of Resolution No. 2024-P007, which approved a CUP/M and CE for the Project. On September 26, 2024, Barghausen Consulting Engineers, Inc. provided "point-by-point responses" to the Appellant's Appeal letter dated August 8, 2024. The Barghausen letter includes an attachment titled, Technical Memorandum RE: Response to Appeal of Planning Commission's Adoption of Resolution No. 2024-P007, prepared by Kittelson & Associates, dated September 16, 2024, which addresses the Appellant's traffic related comments. Also, the Barghausen letter included another attachment titled, Response To Appeal of Planning Commission's Adoption of Resolution No. 2024-P007, prepared by Ramboll, dated September 18, 2004, which addresses the Appellant's air quality and health risk concerns. As discussed and concluded in the Barghausen letter, none of the Appeal issues have merit or are supported by credible evidence of a potential significant impact; therefore, Barghausen concludes that the Planning Commission did not make an error in approving the Project, and the Appeal should be denied.

ESA has been requested by the City to peer review the Appellant's Appeal letter (and its 3 attachments) and the Barghausen response letter (with its attachments), in consideration of the Project's Air Quality/Health Risk Technical Report, prepared by Ramboll in May 2024 and the Project's Transportation Study prepared by Kittelson and Associates, dated May 29, 2024, to determine whether the Appellant's letter provides credible evidence of a potential significant impact that would invalidate the City's approval of the CE or CUP. Below is a summary of the Project, followed by ESA's peer review findings of the above referenced documents. ESA's peer review of comments pertaining to CEQA adequacy was conducted by senior environmental planners and senior air quality specialists, while comments related to traffic/transportation concerns were in part addressed with support from Gibson Transportation Consulting, Inc, a subconsultant to ESA. Gibson's Memorandum titled, RE: Review of Transportation Study for the Culver City Costco Fuel Station On-Site Relocation, Culver City, California, dated April 30, 2025, is included as an attachment to this Peer Review Memo.

Project Description

The Project proposes the relocation and expansion of an existing Costco Gasoline fuel station located within the Culver City Costco Warehouse shopping area, located at 13463 Washington Boulevard in Culver City, California. The property is currently developed with a Costco warehouse and a sixteen (16) vehicle fueling position Costco Gasoline fuel station located on the southeast corner of the property. In addition, there are several pad developments on the property including a fast-food restaurant and other retail uses. The project includes a new, approximately 13,000-square-foot fuel canopy, the installation of 15 new multi-product dispensers (MPDs), three (3) 40,000-gallon underground gasoline storage tanks (USTs), one (1) 1,500-gallon fuel additive UST, a new controller enclosure, a vapor processing unit, and associated site improvements, such as parking and landscaping. In addition, temporary noise barriers will be provided along the project's western property line, northern property line, and the existing fueling facility's eastern property line; the power construction equipment will contain noise shielding and muffling devices, consistent with manufacturers' standards; and a portion of the project construction activities will not occur concurrently with the City's Washington Boulevard Stormwater and Urban Runoff Project, as further described in the Noise Study, prepared by Acoustical Engineering Services, Inc., dated May 2024.

The existing fueling facility will be razed and removed from the site and the existing currently unoccupied commercial buildings will be demolished. The existing underground storage tanks and piping will be decommissioned and removed by state certified contractors. Following demolition, the existing fueling facility site will be improved with additional parking for the Costco Warehouse. The intent of the relocation is to install a new state of the art facility to provide a more efficient fuel purchasing experience for Costco members.

As discussed above, the on-site relocation will move the gas station to the southwest corner of the site to provide better on-site circulation and fuel station queue management. The relocation will also expand the fuel station to thirty (30) vehicle fueling positions to better serve peak period demand and reduce peak period queuing, wait times, and idling. The new location is currently occupied by retail buildings with an area of 6,890 square feet, and a Starbucks Coffee with an area of 1,590 square feet. These buildings will be demolished and therefore existing permitted trips associated with those land uses will be eliminated.¹ The on-site relocation and expansion is intended to improve site circulation and service provided to Costco members.

The proposed fuel station will retain the same operating hours as the existing station, operating approximately from 5:30 AM to 9:30 PM Monday through Friday, from 6:00 AM. to 8:00 PM on Saturdays, and from 6:00 AM to 7:30 PM on Sundays.

Appellant Comments and Responses

Below are summaries of the comments/issues raised in the Appellant letter dated August 8, 2024 and its attachments. Below each comment are responses to the Appellant's comments provided by Barghausen in their September 26, 2024 letter, by Ramboll in their September 18, 2024 letter, and/or by Kittelson in their Memo dated September 16, 2024. Then, ESA's peer review findings of the comments and responses are presented following each of the Barghausen, Ramboll and/or Kittelson responses.

¹ Under applicable case law (*North County Advocates v. City of Carlsbad* (2015) 241 Cal. App. 4th 94), these uses are considered to be part of the CEQA baseline even though the buildings are currently unoccupied. Therefore, this analysis includes a trip credit for the removal of these uses from the Project site. Moreover, as the buildings were occupied when the historic traffic counts at area roadways were taken, not taking such a credit would overstate post-Project traffic conditions

Angel Law Appellant Letter dated August 8, 2024 (referred to below as Angel)

- 1A. Air Quality. The Appeal claims that the Air Quality analysis and health risk assessment (HRA) for the Project did not assess potential impacts on sensitive receptors in the area, including the Sol y Luna preschool, Morning Glory preschool, and Venice High School.

Barghausen Response. The Appeal incorrectly claims that the Air Quality analysis and HRA for the Project did not assess potential impacts on sensitive receptors in the area, including the Sol y Luna preschool, Morning Glory preschool, and Venice High School. As set forth in the expert response memo from Ramboll US Consulting, Inc. dated September 2024 (Ramboll Memo), consistent with guidance from South Coast Air Quality Management District (SCAQMD) the Air Quality analysis identified sensitive receptors within one quarter mile of the Project Site. The Sol y Luna preschool (which is operated out of a single-family home without required zoning approvals), Morning Glory preschool, and Venice High School were more conservatively assessed as residential or worker receptors. The analysis shows that impacts would be less than significant even under the more conservative assumptions. Appellant provided no credible evidence of a significant impact.

Ramboll Response: The Air Quality analysis includes all of the necessary information to represent the potential air quality impacts consistent with what is required to support the Class 32 Categorical Exemption and also would meet the standards of an air quality analysis completed for an environmental impact report (EIR). Consistent with the SCAQMD CEQA Handbook, the Air Quality analysis assessed potential impacts on all sensitive receptors within a quarter mile radius of the project boundary based on a search of comprehensive databases, including the California Department of Education's California School Directory, California Community Care Licensing Division, California Office of Statewide Health Planning and Development's Automated Licensing Information and Report Tracking System, and Davis Demographics' School Site Locator. The distance of the search is based on the SCAQMD CEQA Handbook. The Sol y Luna home school was not identified as it is not permitted by the City of Los Angeles² and is therefore not listed in these databases. However, as can be seen in Figure 3 of the Air Quality analysis, there is a receptor located on the location of the Sol y Luna home school. Thus, the Air Quality analysis has assessed the health risk at this location and accounted for it in the reporting of the potential air quality impacts using the more conservative assumption that it is a residential receptor (which assumes an exposure period of 30 years, well beyond what an attending student may be present for). The analysis shows that impacts would be less than significant even under this more conservative assumption.

Venice High School was not identified on Figure 3 as it is outside the quarter mile search radius specified in the SCAQMD CEQA Handbook. Nonetheless, the Health Risk Assessment conservatively included receptors at this school location as worker receptor (which assumes an exposure period of 25 years, well beyond what an attending student may be present for). The analysis shows the impacts would be less than significant even under this more conservative assumption. The attached updated Figure 3 (see Ramboll Memo) shows the Sol y Luna home school and Venice High School as sensitive receptors. The updated figure also clearly identified other sensitive receptors.

² This school is run out of a single-family home on a site zoned R1V2, which does not permit private preschools without a conditional use permit (CUP). According to the City of Los Angeles online zoning data base (see <https://zimas.lacity.org/>), no CUP has been issued to permit the school to operate legally.

SCAQMD's methodology assesses air quality impacts under the localized significance thresholds (LSTs) at the closest sensitive receptor, as concentrations of localized pollutant emissions decrease with distance from the source.³ As set forth in Table 7-1 (of the Project's Air Quality/Health Risk Technical Report), the Air Quality analyzed assessed potential LST impacts based on the distance to the nearest sensitive receptor, 34 meters. As LST impacts would be less than significant at this receptor, they would also be less than significant at receptors located farther from the project site, including the Sol y Luna home school and Venice High School.

The SCAQMD's regional criteria air pollutant (CAP) methodology is based on whether a project exceeds regional emissions thresholds.⁴ Therefore, the identification of sensitive receptors is not required or relevant to the CAP analysis. Therefore, the comment does not provide evidence of a significant impact on sensitive receptors.

ESA Response. The response generally addresses the concerns raised in the comment regarding the consideration of all sensitive receptors in the air quality and health risk analyses, including the Sol y Luna home school and Venice High School. With respect to the health risk assessment, the response clarifies that while the Sol y Luna home school was not specifically analyzed as a school receptor, it was evaluated as a residential receptor. This approach assumes a more conservative exposure duration of 30 years, which significantly exceeds the typical duration of a student's attendance at a school facility. Similarly, the Venice High School location was analyzed as a worker receptor, which assumes a conservative exposure duration of 25 years—also longer than the expected exposure period for students at a high school facility. Therefore, both locations were assessed using more conservative assumptions than would apply if they were treated strictly as student receptors.

Regarding the localized air quality analysis, the response explains that it was conducted using the SCAQMD Localized Significance Threshold (LST) methodology, with impacts analyzed based on a distance of 34 meters (approximately 112 feet) to the nearest sensitive receptor. The results of this analysis indicated impacts would be less than significant. As further explained in the response, since concentrations of localized air pollutant emissions decrease with distance from the source, the impacts at the Sol y Luna home school and Venice High School—both located farther than the nearest sensitive receptor—would be lower than those presented in the Air Quality/Health Risk Technical Report and also less than significant.

- 1B. Air Quality. The Appeal claims that the new Costco gas station along with its accompanying toxic emissions (from gasoline and idling cars), which would sit a mere 213 feet from Sol y Luna and 186 feet from Morning Glory Preschool, would result in detrimental human health risks, especially the health of children.

Ramboll Response. Although the California Air Resources Board (CARB) provides recommended siting distances, that is only a recommendation. Gas stations can be sited closer to sensitive uses when it is demonstrated that there will be less than significant impacts. Here, Ramboll prepared an Air Quality emissions impact assessment as well as a Health Risk Assessment, both of which demonstrated that there

³ SCAQMD. 2008. Final Localized Significance Threshold Methodology. July. Available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodologydocument.pdf?sfvrsn=2>. Accessed: September 2024.

⁴ SCAQMD Air Quality Significance Thresholds. Available at <https://www.aqmd.gov/docs/defaultsource/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25>. Accessed: September 2024.

would be less than significant impacts on all sensitive receptors, including those within 300 feet of the relocated fuel facility. As such, there is no detrimental risk to human health with siting the relocated fuel facility close to sensitive receptors.

ESA Response. The responses adequately addresses the concerns raised in the comment regarding the Project's proximity to sensitive receptors relative to the siting distances recommended by CARB. The response does so by referencing Ramboll's Air Quality/Health Risk Technical Report and the associated analyses, which demonstrate that, although the Project is located closer to sensitive receptors than CARB's recommended siting distance, the resulting air quality and health risk impact assessment determined the impact to be less than significant. Therefore, the Project is not expected to pose any detrimental health risks to human health.

2. CEQA. The Project does not fit into a Class 32 Exemption since it could result in a significant effect related traffic, noise, air quality, or water quality.

Barghausen Response. Appellant claims there is a "common sense conclusion" that the Project "will at least have a significant effect on air quality." Yet, Appellant provides no credible evidence of such an impact. Appellant's "common sense" is actually speculation, which is not substantial evidence under CEQA. (Pub. Resources Code § 21080(e)(2); Guidelines § 15384(a).) In contrast, the Class 32 Categorical Exemption justification and supporting expert technical studies provide substantial evidence that the Project meets all the exemption criteria.

ESA Response. Based on the responses herein and the supporting technical studies that were prepared in support of the CE, ESA finds there is no substantial evidence that the Project would have a significant environmental impact that would not disallow the Class 32 CE that was prepared for the Project.

3. Traffic. Appellant maintains that the traffic analysis improperly took trip credits for the retail uses on the Site that will be removed as part of the Project.

Barghausen Response. Appellant maintains that the traffic analysis improperly took trip credits for the retail uses on the Site that will be removed as part of the Project. As set forth in the expert response memo from Kittelson & Associates, Inc. dated September 2024 (Kittelson Memo), the Project Transportation Study was initiated in 2020 and a scoping agreement to establish the methodologies and assumptions was completed in May of 2021. Due to the stay-at-home order related to COVID-19, the City directed that the Project transportation analysis use historic traffic counts from prior to 2020 adjusted upward using a general growth rate to establish existing traffic conditions. The counts used for the traffic analysis were collected prior to the closures of the businesses in the retail buildings. Thus, it is reasonable and correct to account for a credit for the traffic from those uses.

Regarding North County Advocates v. City of Carlsbad, Appellant acknowledges that the City has discretion in determining the CEQA baseline and simply argues that the City should have exercised its discretion differently; yet, use of existing conditions (which included at the time the retail uses) is the appropriate CEQA baseline. (Guidelines, § 15125, subd. (a).) Appellant offers no evidence of unanalyzed significant impacts due to the City's use of an existing conditions baseline. North County Advocates is valid legal authority for the City's use of an existing conditions baseline that included the retail uses being

replaced by the Project. In any event, as stated in the Kittelson Memo, the Project's CEQA impacts (i.e., vehicle miles traveled), would be less than significant even without the trip credit.

Kittelson Response. Appellant claims that it was not appropriate to take a trip credit for the retail uses that the relocated/expanded fuel facility will replace, in part because those uses have been vacant since 2023. As explained below, it was entirely appropriate to take a trip reduction credit.

The Transportation Study was initiated in 2020 and a scoping agreement to establish the methodologies and assumptions was completed in May of 2021 (see Memorandum of Understanding for Transportation Study, attached to Transportation Study). Due to the stay-at-home order related to COVID-19, realistic traffic counts could not be obtained at the time. With City of Culver City direction and as done by the entirety of the transportation profession during that period of time, the transportation analysis prepared for this project used historic traffic counts from prior to 2020 with a general growth rate applied to them to establish existing traffic conditions. The counts used for the transportation analysis were collected prior to the closures of the business in the retail buildings. As such the data and analysis from the transportation study all reflect conditions when the retail stores were in operation. Thus, is it reasonable and correct to account for a credit for the traffic from those uses as part of the evaluation. In fact, not taking the credit would result in an overstatement of traffic conditions with the project.

Furthermore, as the retail buildings are an entitled use and have historically been used for retail stores, they can be re-occupied by a similar retail use without any discretionary approvals. Therefore, it is appropriate to take a trip credit for the building's demolition as they are part of the existing baseline as provided for in *North County Advocates v. City of Carlsbad* (2015) 241 Cal.App.4th 94.

The Appellant claims the Transportation Study shows that there will be increased trips based on expanded fuel facilities at other Costco locations and that it is not credible that the same won't occur here. Table 12 of the Transportation Study provides the Comparative Trip Generation Summary. When one compares the trips generated from the existing fuel facility to those projected for the expanded facility, there is an increase in trips in the Weekday PM Peak Hour, Saturday PM Peak Hour and Weekday Daily Trips. This is consistent with the data collected at other Costco expanded fuel facilities.⁵ However, here, the relocation is replacing retail uses, and as set forth above, it is appropriate to reduce the expanded fuel facilities trip generation accordingly. Thus, the net trip generation is actually less than the existing fuel facility plus the to be replaced retail buildings.

In summary, the findings and conclusions of the Transportation Study are correct in applying a trip credit for the existing retail buildings that will be removed with project implementation.

Appellant's consultant (who is not a traffic expert) asserts that taking the trip credit disqualifies the project from using a Class 32 categorical exemption, implying (but providing no supporting evidence) that the project's traffic impacts would be significant without the credit. This is incorrect. Consistent with state law, the City assessed the project's traffic impacts based on vehicle miles travelled (VMT). As set forth in our traffic analysis, which was reviewed and approved by the City, VMT impacts would be less than significant

⁵ The data regarding other expanded fuel station locations only addressed increased trips when compared to the existing fuel facility. It did not include any adjustments to trips from removal/replacement of uses etc.

as the project would result in a net trip reduction with the trip credit. However, VMT impacts would be less significant even without the credit.

The City's Traffic Impact Analysis (TIA) Guidelines include the screening criteria for local serving retail in page 8 of their guidelines: "A development project that meets any of the below VMT screening thresholds would be cleared from having to conduct VMT impact analysis to comply with CEQA, as a less than significant impact would be presumed.

5. Local serving retail projects having less than 50,000 square feet in size at a single store"

As the project is local serving and less than 50,000 square feet in size, its VMT impacts are presumed to be less than significant under this criterion as well. Therefore, the claims of appellant's consultant are without merit.

ESA Response. ESA retained Gibson Transportation Consulting, Inc, to conduct a peer review of the Transportation Study. As discussed in Gibson's Memo dated April 20, 2025, Gibson concluded that the Transportation Study's use of empirical trip generation rates that are higher than industry-standard rates provides for an accurate evaluation of the Project's impacts on the local roadway network. Thus, Gibson concludes that the Transportation Study is consistent with industry standards, including some conservative assumptions and data. Gibson concurs with the conclusions of the Transportation Study.

4. Membership and Visits. Appellant contends that an expanded fuel facility will increase Costco membership.

Barghausen Response. Appellant confuses Costco membership with patrons to the fuel facility in arguing that an expanded fuel facility will increase Costco membership. A Costco fuel facility is only open to Costco members, not the general public. Costco data shows that when a Costco fuel facility is expanded, there is an increase in patronage of the fuel facility from the existing membership. However, overall Costco membership does not increase – i.e., the expanded fuel facility does not result in new Costco members. And here, while it is expected that there will be more trips to the expanded fuel facility than the existing facility, those trips are offset with the trips from the removed retail facilities, as demonstrated above and in the traffic analysis.

Appellant speculates that annual gasoline throughput will increase with the Project because Costco previously applied for a new permit to operate from the SCAQMD to increase throughput to 2,220,000 gallons per month or 26.64 million gallon per year (mgy). In order for SCQAMD to approve the new Permit to Operate (which it did), Costco had to demonstrate with air quality technical studies that emissions from the increased throughput operations would be less than significant under SCAQMD's significance thresholds. Since obtaining the SCAQMD permit to increase throughput in 2019, Costco has not reached its monthly cap. Costco does not anticipate reaching the cap with the expanded fuel facility, nor does Costco intend to seek a throughput increase beyond the currently permitted 26.64 mgy. Such an increase would require a more intensive SCAQMD permitting process that would require, among other things, a new air quality study and HRA that show impacts from the increased throughput would be less than significant.

Ramboll Response. The commenter speculates that gas sales will increase under the project and appears to imply that the Air Quality analysis is inaccurate. This is incorrect. The Air Quality analysis and the health

risk assessment were based on the maximum throughput of 26.64 million gallons per year permitted under the SCAQMD-issued Permit to Operate. Therefore, even if gas sales increase beyond current levels following project development but are within the maximum approved throughput, such an increase has been assessed in the Air Quality analysis, and the conclusion that impacts would be less than significant would remain unchanged.

ESA Response. The response adequately addresses the concern raised in the comment regarding the potential for increased gasoline sales under the Project by clarifying that both the air quality analysis and the health risk assessment were based on a maximum throughput of 26.64 mg, as permitted under the SCAQMD-issued Permit to Operate. Accordingly, even if gasoline sales were to increase as a result of the Project, they are expected to remain within the maximum throughput assumed in the analyses. As such, the impacts evaluated in Ramboll's Air Quality/Health Risk Technical Report represent the Project's maximum potential air quality and health risk impacts, which were determined to be less than significant.

5. HRA. Appellant claims that seven volatile organic compounds (VOCs) present in vehicle exhaust and fueling operations vapor loss were not analyzed as part of the HRA.

Barghausen Response. Appellant claims that seven volatile organic compounds (VOCs) present in vehicle exhaust and fueling operations vapor loss were not analyzed as part of the HRA. As set forth in the Ramboll Memo, the HRA addressed all VOCs that have meaningful toxicity/risk values. The seven VOCs Appellant claims were not included in the HRA analysis have no reported or very low toxicity/risk value, so they have a minimum risk. Appellant provides no credible evidence that had those seven VOCs been analyzed, a significant impact would have been shown. In fact, as set forth in the Ramboll Memo, including these seven VOCs in the HRA would not materially change the health risks to sensitive receptors, and impacts would remain less than significant.

Ramboll Response. The Air Quality analysis relies upon more current data for the identification of toxic air contaminants (TACs) than that suggested by the comment, and the Air Quality analysis has substantiated the basis for the TACs included in the analysis. The comment inappropriately uses outdated sources of information that are not credible. The Health Risk Assessment that was included in the Air Quality analyses meets the standards for an analysis that would be included in an EIR; the comment's purported analysis does not as it is merely negative comments, not an actual air quality or health risk analysis.

The comment has not properly cited the source of the data provided in the comment, and without the proper citation, the data are not credible. The weight fractions shown in the table provided in the comment cannot be found in the link provided by the commenter (Footnote #4 from Attachment 3: <https://ww2.arb.ca.gov/speciation-profiles-used-carb-modeling>). Through a search, it appears that the comment has referenced data from the 2012 Bay Area Air Quality Management District (BAAQMD)'s Recommended Methods for Screening and Modeling Local risks and Hazards, Table 14 – Toxic Speciation of Total Organic Gases (TOG) due to Tailpipe Emissions,⁶ which has since been updated in 2022 and no

⁶ Bay Area Air Quality Management District, 2012, Recommended Methods for Screening and Modeling Local Risks and Hazards. Available at: <https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/risk-modelingapproach-may-2012.pdf>. Accessed: September 2024.

longer includes Table 14.⁷ This is also guidance from a different air district than the governing body in this jurisdiction (i.e., the SCAQMD) and would therefore be inapplicable even if it was not outdated.

In contrast, the Ramboll Air Quality analysis uses the most current mass fractions from CARB's speciation profiles, which is consistent with SCAQMD's guidance on identifying TACs. The TACs selected from the CARB speciation profiles are based on 2023 Mobile Source Air Toxics (MSAT). MSAT identified compounds with "significant contributions from mobile sources that are among the national and regional scale cancer risk drivers or contributors and non-cancer hazard contributors from the 2011 National Air Toxics Assessment (NATA)".⁸ As such, the Air Quality analysis uses the best available data and is representative of health impacts from the project's exhaust emissions.

While the Air Quality analysis is accurate and consistent with CEQA requirements, we performed further analysis to demonstrate that incorporating the comment's outdated and inappropriate data would not make any material difference to the impact conclusions. In addition to the species identified in the comment, the following chemicals were included in this evaluation: methyl tert-butyl ether, 1,3,5-trimethylbenzene, 1,2,4-trimethylbenzene, and 1,2,3-trimethylbenzene. See below for the full TAC speciation. Table 1 and Table 2 summarize the TACs from CARB speciation profile OG 2303 & 2304 included in the evaluation. (See Table 1-2 on pages 9-11 of the Ramboll Memo dated September 18, 2024).

The results from the health risk analysis with these additional compounds show that the change in health risks is less than 0.007%. This is because these compounds have low toxicity factors, thus including them resulted in a near identical risk as demonstrated in the prior analysis. As the results of the Health Risk Assessment would remain unchanged even if it was modified as set forth in the comment, the comment does not provide credible evidence of a significant project impact.

ESA Response. The response generally addresses the concerns raised in the comment regarding the inclusion of all relevant VOC TAC emissions in the health risk analysis. While the comment did not specifically list or provide a speciation profile of VOC TAC pollutants that were missing from Vapor Loss From Fueling Operations, the response explains that the VOC TACs considered in the analysis were identified in accordance with SCAQMD guidance, which relies on CARB speciation profiles based on the 2023 Mobile Source Air Toxics (MSAT) data. Additionally, the response notes that Ramboll conducted a revised health risk assessment to include the additional VOC TAC pollutants mentioned in the comment—specifically, hexane, methanol, methyl ethyl ketone, naphthalene, propylene, styrene, toluene, and xylene—as well as other compounds such as methyl tert-butyl ether, 1,3,5-trimethylbenzene, 1,2,4-trimethylbenzene, and 1,2,3-trimethylbenzene. The results of the updated analysis demonstrated that including these additional VOC TACs led to a change in health risk of less than 0.007%. Therefore, the overall health risk impacts remain less than significant.

⁷ Bay Area Air Quality Management District, 2022, Air Quality Guidelines Appendix E: Recommended Methods for Screening and Modeling Local Risks and Hazards. Available at: https://www.baaqmd.gov/~media/files/planningand-research/ceqa/ceqa-guidelines-2022/appendix-e-recommended-methods-for-screening-and-modeling-localrisks-and-hazards_final-pdf.pdf?rev=b8917a27345a4a629fc18fc8650951e4&sc_lang=en. Accessed: September 2024.

⁸ U.S Department of Transportation, 2023, Updated Interim Guidance on Mobile Source Air Toxic Analysis in NEPA Documents. Available at: https://www.fhwa.dot.gov/environment/air_quality/air_toxics/policy_and_guidance/msat/fhwa_nepa_msat_memo_random_2023.pdf. Accessed: September 2024

6. Unusual Circumstances. Appellant contends that the unusual circumstances exception to the Class 32 Exemption applies here because it is unusual for a fuel facility to be located near preschools and that there is “at least a reasonable probability of the Project’s significant effect on this preschool population.”

Barghausen Response. Appellant claims that the unusual circumstances exception to the Class 32 exemption applies here because it is unusual for a fuel facility to be located near preschools and that there is “at least a reasonable probability of the Project’s significant effect on this preschool population.” Yet, Appellant ignores the fact that the fuel facility currently exists at the Project Site near the two preschools of concern. Thus, it cannot be unusual to have a fuel facility near a preschool when that is existing conditions. Moreover, in an urbanized area as the one surrounding the Project Site, gas stations are common rather than unusual. Indeed, a preschool is just another type of sensitive receptor, like a residence, and fuel facilities are commonly located near residences throughout the area, as is the situation here as the City stated in its findings. Specifically, there are several existing gas stations in the vicinity of the Project Site that are near sensitive receptors, including, but not limited to, 811 Washington (130 feet from Young Minds Learning Academy preschool), 300 Lincoln (110 feet from residential), 2400 Lincoln Boulevard. (115 feet from residential), 4300 Lincoln Boulevard (200 feet from residential), and 4680 Lincoln Boulevard. (245 feet from residential). As set forth in the Ramboll Memo, residential uses have greater exposure to TACs from gas stations than preschools and therefore, increased health risks. Moreover, as demonstrated above, and in the technical reports attached to the Class 32 Justification, the Project’s air quality, noise, and traffic impacts would be less than significant. Appellant has submitted no credible evidence of a potential significant impact.

ESA Response. Based on the responses herein and the supporting technical studies that were prepared in support of the CE, ESA finds there is no substantial evidence that the Project would have unusual circumstances that would disallow the Class 32 CE that was prepared for the Project.

7. Planning Commission Findings. The Appellant claims the Planning Commission findings in approving the CUP/CE were not supported by substantial evidence in the record.

Barghausen Response. As demonstrated above, none of Appellant’s claims have merit or are supported by credible evidence. As such, Appellant’s claim that the Planning Commission’s findings are not supported due to flaws in the record evidence are without merit.

ESA Response. Based on the responses herein and the supporting technical studies that were prepared in support of the CE, ESA finds there is no substantial evidence that the Project would have a significant environmental impact that would not disallow the Class 32 CE nor Planning Commission findings that were prepared for the Project.

8. Document Availability. The Appellant contends that not all of the supporting documentation was in the record, thus, the Planning Commission findings were not supported by substantial evidence in the record.

Barghausen Response. As noted on the Hearing Notice, all application documents are available in the City’s Project application file, and the public only needs to make a request to the City to review such documents. The documents posted for the hearing are merely a subset of the application file. The Planning Commission also had full access to the application file, including the Class 32 Justification document and all of the attachments. Planning Staff determined that for posting purposes, only certain attachments needed to be directly provided given that all are available in the application file. In any event, Appellant clearly had access to the pertinent documents given the detailed comments in the Appeal letter; therefore, there has

been no prejudice.

ESA Response. ESA concurs that all application documents are available in the City’s Project application file, and the public only needs to make a request to the City to review such documents. No such requested were made and denied by the City. The Planning Commission also had access to all such files in the application file prior to their findings.

Attachment 3 to Angel letter – Clark and Associates Environmental Consulting Ind, dated August 7, 2024 (referred to below as Clark).

1. Air Quality and HRA. The Air Quality/Health Risk Analysis used in the CE fails to identify all relevant sensitive receptors near the project site. See pages 3-5 of the Ramboll Memo dated September 18, 2024 for full comment.

Barghausen Response. See Response to Comment Angel-1A, above.

Ramboll Response: See Response to Comment Angel-1A, above.

ESA Response. See Response to Comment Angel-1A, above.

2. Air Quality and HRA. The Air Quality/Health Risk Analysis calculates exposures to only a fraction of the VOCs present in exhaust from vehicles and vapor loss from fueling operations. See pages 6-7 of the Ramboll Memo dated September 18, 2024 for full comment.

Barghausen Response. See Response to Comment Angel-5, above.

Ramboll Response. See Response to Comment Angel-5, above.

ESA Response. See Response to Comment Angel-5, above.

3. Air Quality and HRA. The Air Quality/Health Risk Analysis conclusion that risks from the combined construction and operational emissions are below the SCAQMD's risk significance threshold is not supported by the underlying data from the analysis. See pages 10-11 of the Ramboll Memo dated September 18, 2024 for full comment.

Ramboll Response. The comment misrepresents the California Office of Environmental Health Hazard Assessment (OEHHA) guidance on spatial averaging. The Air Quality analysis of the potential health risk at the maximally exposed individual resident (MEIR) follows OEHHA Toxics Hot Spots Program Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments (OEHHA Guidance Manual), as noted on page 26 of the Air Quality analysis. Page 4-23 of the OEHHA Guidance Manual describes the methodology for spatial averaging, stating that: “Averaging results over a small domain will give a more representative picture of individual exposure and risk than an estimate based on one single location within their property.”⁹ The approach used in the Air Quality analysis follows the OEHHA Guidance Manual to represent the potential health risk at the MEIR. A similar approach at each location would be more accurate. However, as the potential health risks at all other receptors were below SCAQMD

⁹ California Environmental Protection Agency (Cal/EPA), Office of Environmental Health Hazard Assessment (OEHHA). 2015. Air Toxics Hot Spots Program Risk Assessment Guidelines. February. Available at: <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>. Accessed: September 2024.

thresholds (i.e., less than significant) using a more conservative approach, no further analysis is necessary. The Health Risk Analysis, including the spatial averaging approach, is the same type of health risk assessment that would be prepared if an EIR was prepared. The comment provides no credible evidence of a significant project impact.

ESA Response. The response adequately addresses the concerns raised in the comment regarding the spatial averaging methodology used for MEIR by referencing the OEHHA Toxics Hot Spots Program Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments. The response clarifies that the OEHHA manual states that averaging results over a small spatial domain provides a more representative estimate of individual exposure and risk than relying on a single point within a property. As such, the response appropriately justifies the spatial averaging approach used in the health risk analysis, as it aligns with OEHHA guidance and more accurately reflects potential health risks at the MEIR. The comment further suggests that spatial averaging should have been applied to all other receptors; however, the response explains that the health risks at all other receptors were already below SCAQMD thresholds, even under the more conservative approach of analyzing a single receptor location. Therefore, applying spatial averaging to those receptors was not necessary.

4. Traffic. The Traffic Analysis incorrectly states that the Project would remove/replace four existing retail/commercial sites. See page 12 of the Ramboll Memo dated September 18, 2024 for full comment.

Ramboll Response. The health risk assessment is focused on the health risk impact from project construction and operation. The assessment does not consider existing conditions.

While the criteria air pollutant (CAP) emissions inventory did account for the existing baseline mobile emissions as is the accepted approach to properly account for baseline conditions, the CAP emissions would still be less than significant even if the existing baseline mobile emissions were assumed to be zero. This is supported by Table 3 (see Table 3 on page 12 of the Ramboll Memo dated September 18, 2024), which illustrates what happens if the existing mobile emissions excluded (assumed as zero, highlighted yellow in the table). As shown in this table, the emissions are still below the SCAQMD mass daily significance thresholds.

Therefore, the air quality impact findings would not change if the existing baseline mobile emissions were excluded.

ESA Response. The response adequately addresses the concerns raised in the comment regarding the application of existing trip credit in the air quality analysis by demonstrating, through Table 3 of Ramboll's Response to Appeal document, that the Project's net operational emissions would remain below SCAQMD regional thresholds even without accounting for existing mobile source emission credits. Therefore, the significance of the Project's operational air quality impacts would not change, as the emissions would still be less than significant even if existing mobile emissions were excluded from the analysis.

Neighbors Comments

Comments raised by letters from neighbors were identified in Ramboll's Memo to Barghausen Consulting Engineers, Inc., dated September 18, 2024 (referred to be as Neighbors). The comments included the following.

1. “Negative impact to neighborhood, including increased traffic, noise, toxic fumes, car accident risk and light pollution not adequately considered by consultants....”

“As neighbors, we are concerned about toxic fumes, noise from cars waiting in lines (even if their wait times are shorter, there are now twice as many cars), increased traffic cutting through Walnut, more congestion at the intersection with In n Out and risk for traffic accidents, opening hours for the gas station are very long, and light pollution from the gas station lights being on all night.”

Ramboll Response. The Air Quality analysis includes a health risk evaluation that includes emissions associated with construction and operation of the project. This includes the project sources mentioned by the comment, notably off-road diesel construction equipment, hauling trucks, vendor trucks, and backup generator operation during construction of the project; Costco members’ passenger cars; fuel delivery trucks; gasoline transfer and dispensing; and backup generator operation. The results are presented in Table 5-3 through Table 5-5 and show that the potential health risk impacts are all less than the SCAQMD CEQA significance thresholds.

ESA Response. The response adequately addresses the concerns raised in the comment regarding toxic fumes by explaining that a comprehensive health risk evaluation was conducted, which assessed TAC emissions from the sources identified in the comment, as well as additional sources. These sources included off-road diesel construction equipment, hauling trucks, vendor trucks, and backup generator operation during both construction and operation of the Project; as well as Costco members’ passenger vehicles, fuel delivery trucks, and gasoline transfer and dispensing activities. The response further notes that the results of the health risk analysis, as presented in Tables 5-3 through 5-5 of the Costco Culver City Project Air Quality/Health Risk Technical Report, demonstrate that the associated health risk impacts would be less than significant.

In addition, the CE document adequately addressed noise, traffic and water quality impacts per applicable CEQA requirements, all of which were found to result in less than significant impacts.

2. “There are two pre-schools within 500 feet of the proposed site.”

Ramboll Response. See responses to the Sol y Luna comment letter, above.

ESA Response. The response adequately addresses the concerns raised in the comment by directing the commenter to Response to Angel Comment #1A and 1B, which specifically address the air quality and health risk impacts associated with the Project. The responses demonstrate that the impacts are less than significant for the two preschools located within 500 feet of the proposed site.

3. “The EIR for this site was done prior to it being built, making it at least 26 years old. As you know, neighborhoods and thresholds change. We don’t think it is right to relocate and expand a gas station closer to residences without, at least, doing a new EIR (Environmental Impact Report).”

Ramboll Response. The Air Quality analysis prepared for the Categorical 32 exemption assesses all of the issues as would be assessed in an air quality analysis for an EIR.

ESA Response. The response adequately addresses the concerns raised in the comment by explaining that the information presented in the Costco Culver City Project Air Quality/Health Risk Technical Report, which supports the Class 32 Categorical Exemption, along with the associated air quality analyses and health risk assessment, comprehensively identifies and evaluates all potential air quality and health risk impacts associated with the Project. Furthermore, the analysis is consistent with the standards and methodologies required for an air quality analysis prepared in support of an EIR.

Conclusion

As demonstrated above, none of the Appeal issues have merit or are supported by credible evidence of a potential significant impact; therefore, the Planning Commission did not make an error in approving the Project or its CEQA documentation, and we recommend denial of the Appeal. Should you have any questions please contact Mike Harden at (949) 870-1510 or at mharden@esassoc.com.



DRAFT

MEMORANDUM

TO: Mike Harden, ESA

FROM: Richard Gibson and Rebecca Avanesian

DATE: July 3, 2025

RE: Review of Transportation Study for the
Culver City Costco Fuel Station On-Site Relocation
Culver City, California

Ref: J2175

Gibson Transportation Consulting, Inc. (GTC) reviewed *Culver City Costco Fuel Station On-Site Relocation Transportation Study* (Kittelson & Associates, Inc., May 2024) (Transportation Study).

In general, GTC finds the Transportation Study to be consistent with industry standards and conservative in nature. GTC concurs with the conclusions of the Transportation Study that the fuel station relocation project (Project) as proposed will not create a significant transportation impact.

TRANSPORTATION STUDY COMMENTS

GTC reviewed the Transportation Study assumptions for Project trip generation, distribution, future traffic forecasting, vehicle miles traveled, parking, construction traffic, and existing volume data, as applicable. Each of the assumptions was deemed consistent with industry standards. Additional detail related to general comments, trip generation, and traffic counts data is provided below.

Project Trip Generation

In the Transportation Study, Project trip generation for the retail and coffee shop uses was projected using *Trip Generation Manual, 10th Edition* (Institute of Transportation Engineers, September 2017) (Trip Gen Manual), an industry-standard publication from which a majority of trip generation rates for transportation studies are found. For the gas station uses, empirical trip generation rates derived from existing Costco gas stations were utilized to predict Project traffic volumes. The resulting rates are higher than those found in the Trip Gen Manual, providing for a conservative analysis.

For example, the daily trip rate calculated at existing Costco gas stations is approximately 350 trips per day per fueling position. The Trip Gen Manual shows a daily rate of 172.01 daily trips per fueling position, more than half the rate of Costco's fueling positions.

As such, GTC concluded that the Transportation Study's use of empirical trip generation rates that are higher than industry-standard rates provides for an accurate evaluation of the Project's impacts on the local roadway network.

Traffic Count Data

The Transportation Study used historical count data from years 2009-2019 scaled up by 1% per year of growth to estimate typical weekday afternoon and Saturday midday 2020 counts. The methodology of creating this scaled data is consistent with industry standards.

In order to verify that the existing, scaled, baseline count data utilized in the Transportation Study is consistent with empirical count data, GTC conducted weekday afternoon and Saturday midday traffic counts at each of the study intersections in March and April 2025 (Empirical Counts) and compared those results to the 2020 Existing Conditions traffic volumes in the Transportation Study (Study Volumes) to determine if they are comparable. The results of the Empirical Counts are provided in the Attachment.

Table 1 provides a summary of the comparison between the Study Volumes and the Empirical Volumes. As shown in the table, the Study Volumes were higher than the Empirical Counts by between 119 and 982 total vehicles per hour. The baseline Study Volumes used in the Transportation Study were higher than 2025 counts and, therefore, provided a conservative analysis of existing conditions.

| TABLE 1 | | | | | | |
|---------------------------------|--------------|-------------|-------------------------|--------------------|-------------|-------------------------|
| TRAFFIC COUNT VOLUME COMPARISON | | | | | | |
| Intersection | PM Peak Hour | | | Saturday Peak Hour | | |
| | Study Counts | 2025 Counts | Net Increase/(Decrease) | Study Counts | 2025 Counts | Net Increase/(Decrease) |
| Washington & Lincoln | 5,952 | 4,970 | (982) | 6,200 | 5,444 | (756) |
| Washington & Costco Driveway | 2,656 | 2,258 | (398) | 2,715 | 2,596 | (119) |
| Washington & Glencoe | 3,911 | 3,282 | (629) | 3,799 | 3,541 | (258) |

CONCLUSION

The Transportation Study is consistent with industry standards, including some conservative assumptions and data. GTC concurs with the conclusions of the Transportation Study.

Attachment
2025 Traffic Counts

Turning Movement Count Report PM

Location ID: 1
 North/South: Lincoln Blvd
 East/West: Washington Blvd

Date: 03/25/25
 City: Culver City, CA

| | Southbound | | | Westbound | | | Northbound | | | Eastbound | | | Totals: |
|------------|------------|-----|----|-----------|-----|----|------------|-----|-----|-----------|-----|----|---------|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | |
| Movements: | R | T | L | R | T | L | R | T | L | R | T | L | |
| 15:00 | 17 | 238 | 53 | 63 | 91 | 63 | 49 | 216 | 63 | 107 | 146 | 18 | 1124 |
| 15:15 | 19 | 256 | 43 | 45 | 147 | 56 | 45 | 227 | 97 | 98 | 154 | 20 | 1207 |
| 15:30 | 25 | 272 | 54 | 49 | 132 | 39 | 39 | 244 | 103 | 118 | 132 | 44 | 1251 |
| 15:45 | 29 | 238 | 61 | 48 | 120 | 42 | 51 | 224 | 97 | 103 | 162 | 30 | 1205 |
| 16:00 | 23 | 261 | 49 | 53 | 124 | 40 | 53 | 193 | 96 | 104 | 143 | 25 | 1164 |
| 16:15 | 42 | 267 | 55 | 58 | 148 | 43 | 49 | 177 | 94 | 104 | 169 | 24 | 1230 |
| 16:30 | 30 | 237 | 51 | 43 | 146 | 55 | 35 | 223 | 89 | 112 | 154 | 19 | 1194 |
| 16:45 | 42 | 240 | 52 | 60 | 150 | 33 | 28 | 232 | 94 | 98 | 148 | 22 | 1199 |
| 17:00 | 37 | 248 | 46 | 50 | 141 | 50 | 28 | 226 | 95 | 109 | 177 | 32 | 1239 |
| 17:15 | 45 | 268 | 58 | 56 | 144 | 44 | 42 | 220 | 97 | 93 | 149 | 14 | 1230 |
| 17:30 | 47 | 250 | 47 | 62 | 151 | 48 | 43 | 232 | 99 | 94 | 150 | 23 | 1246 |
| 17:45 | 44 | 271 | 55 | 45 | 148 | 34 | 27 | 250 | 74 | 98 | 177 | 32 | 1255 |

| | | | | | | | | | | | | | |
|---------------|-----|------|-----|-----|------|-----|-----|------|------|------|------|-----|-------|
| Total Volume: | 400 | 3046 | 624 | 632 | 1642 | 547 | 489 | 2664 | 1098 | 1238 | 1861 | 303 | 14544 |
| Approach % | 10% | 75% | 15% | 22% | 58% | 19% | 12% | 63% | 26% | 36% | 55% | 9% | |

| | | | | | | | | | | | | | |
|----------------|-------|------|-----|-------|-----|-----|-------|-----|-----|-------|-----|-----|------|
| Peak Hr Begin: | 17:00 | | | | | | | | | | | | |
| PHV | 173 | 1037 | 206 | 213 | 584 | 176 | 140 | 928 | 365 | 394 | 653 | 101 | 4970 |
| PHF | 0.954 | | | 0.932 | | | 0.958 | | | 0.903 | | | |

Turning Movement Count Report SAT

Location ID: 1
 North/South: Lincoln Blvd
 East/West: Washington Blvd

Date: 04/05/25
 City: Culver City, CA

| | Southbound | | | Westbound | | | Northbound | | | Eastbound | | | |
|------------|------------|-----|-----|-----------|-----|----|------------|-----|-----|-----------|-----|----|---------|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | |
| Movements: | R | T | L | R | T | L | R | T | L | R | T | L | Totals: |
| 12:00 | 36 | 224 | 105 | 74 | 158 | 45 | 53 | 204 | 168 | 128 | 165 | 28 | 1388 |
| 12:15 | 34 | 242 | 64 | 51 | 159 | 43 | 57 | 236 | 158 | 121 | 172 | 28 | 1365 |
| 12:30 | 19 | 237 | 61 | 51 | 156 | 41 | 66 | 234 | 175 | 131 | 168 | 22 | 1361 |
| 12:45 | 28 | 259 | 53 | 52 | 165 | 39 | 56 | 238 | 130 | 127 | 158 | 25 | 1330 |
| 13:00 | 31 | 220 | 67 | 57 | 174 | 50 | 42 | 225 | 141 | 140 | 160 | 33 | 1340 |
| 13:15 | 36 | 264 | 65 | 65 | 145 | 46 | 48 | 238 | 131 | 133 | 140 | 47 | 1358 |
| 13:30 | 17 | 234 | 51 | 59 | 161 | 56 | 50 | 263 | 143 | 153 | 177 | 22 | 1386 |
| 13:45 | 34 | 229 | 55 | 45 | 184 | 51 | 50 | 228 | 151 | 148 | 163 | 22 | 1360 |

| | | | | | | | | | | | | | |
|---------------|-----|------|-----|-----|------|-----|-----|------|------|------|------|-----|-------|
| Total Volume: | 235 | 1909 | 521 | 454 | 1302 | 371 | 422 | 1866 | 1197 | 1081 | 1303 | 227 | 10888 |
| Approach % | 9% | 72% | 20% | 21% | 61% | 17% | 12% | 54% | 34% | 41% | 50% | 9% | |

| | | | | | | | | | | | | | |
|----------------|-------|-----|-----|-------|-----|-----|-------|-----|-----|-------|-----|-----|------|
| Peak Hr Begin: | 12:00 | | | | | | | | | | | | |
| PHV | 117 | 962 | 283 | 228 | 638 | 168 | 232 | 912 | 631 | 507 | 663 | 103 | 5444 |
| PHF | 0.933 | | | 0.933 | | | 0.934 | | | 0.991 | | | |

Turning Movement Count Report PM

Location ID: 2
 North/South: Project Driveway
 East/West: Washington Blvd

Date: 03/25/25
 City: Culver City, CA

| | Southbound | | | Westbound | | | Northbound | | | Eastbound | | | Totals: |
|------------|------------|---|----|-----------|-----|---|------------|---|---|-----------|-----|----|---------|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | |
| Movements: | R | T | L | R | T | L | R | T | L | R | T | L | |
| 15:00 | 60 | 0 | 38 | 27 | 166 | 1 | 2 | 0 | 0 | 0 | 171 | 71 | 536 |
| 15:15 | 47 | 0 | 30 | 19 | 214 | 1 | 1 | 0 | 0 | 0 | 202 | 64 | 578 |
| 15:30 | 43 | 0 | 37 | 27 | 176 | 2 | 1 | 0 | 0 | 0 | 180 | 53 | 519 |
| 15:45 | 59 | 0 | 33 | 23 | 176 | 1 | 0 | 0 | 0 | 0 | 212 | 64 | 568 |
| 16:00 | 49 | 0 | 32 | 20 | 176 | 2 | 1 | 0 | 0 | 0 | 194 | 64 | 538 |
| 16:15 | 46 | 0 | 25 | 22 | 211 | 2 | 1 | 0 | 0 | 1 | 213 | 61 | 582 |
| 16:30 | 53 | 1 | 31 | 17 | 193 | 1 | 1 | 0 | 0 | 2 | 200 | 54 | 553 |
| 16:45 | 51 | 0 | 23 | 25 | 226 | 0 | 1 | 0 | 0 | 0 | 176 | 49 | 551 |
| 17:00 | 45 | 0 | 36 | 20 | 205 | 1 | 0 | 0 | 0 | 0 | 205 | 53 | 565 |
| 17:15 | 48 | 0 | 26 | 17 | 215 | 1 | 1 | 0 | 0 | 0 | 210 | 38 | 556 |
| 17:30 | 54 | 0 | 25 | 27 | 200 | 2 | 1 | 0 | 0 | 0 | 194 | 54 | 557 |
| 17:45 | 45 | 1 | 33 | 20 | 208 | 0 | 1 | 0 | 0 | 1 | 201 | 70 | 580 |

| | | | | | | | | | | | | | |
|---------------|-----|----|-----|-----|------|----|------|----|----|----|------|-----|------|
| Total Volume: | 600 | 2 | 369 | 264 | 2366 | 14 | 11 | 0 | 0 | 4 | 2358 | 695 | 6683 |
| Approach % | 62% | 0% | 38% | 10% | 89% | 1% | 100% | 0% | 0% | 0% | 77% | 23% | |

| | | | | | | | | | | | | | |
|----------------|-------|---|-----|-------|-----|---|-------|---|---|-------|-----|-----|------|
| Peak Hr Begin: | 17:00 | | | | | | | | | | | | |
| PHV | 192 | 1 | 120 | 84 | 828 | 4 | 3 | 0 | 0 | 1 | 810 | 215 | 2258 |
| PHF | 0.966 | | | 0.983 | | | 0.750 | | | 0.943 | | | |

Turning Movement Count Report SAT

Location ID: 2
 North/South: Project Driveway
 East/West: Washington Blvd

Date: 04/05/25
 City: Culver City, CA

| | Southbound | | | Westbound | | | Northbound | | | Eastbound | | | |
|------------|------------|---|----|-----------|-----|---|------------|---|---|-----------|-----|----|---------|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | |
| Movements: | R | T | L | R | T | L | R | T | L | R | T | L | Totals: |
| 12:00 | 48 | 0 | 31 | 38 | 223 | 1 | 2 | 0 | 1 | 0 | 252 | 88 | 684 |
| 12:15 | 48 | 0 | 37 | 34 | 215 | 1 | 0 | 0 | 0 | 0 | 235 | 84 | 654 |
| 12:30 | 44 | 0 | 56 | 30 | 202 | 1 | 0 | 0 | 0 | 1 | 212 | 80 | 626 |
| 12:45 | 50 | 0 | 41 | 24 | 219 | 0 | 1 | 0 | 0 | 0 | 204 | 65 | 604 |
| 13:00 | 48 | 0 | 38 | 39 | 245 | 0 | 1 | 0 | 0 | 1 | 228 | 69 | 669 |
| 13:15 | 48 | 0 | 49 | 28 | 229 | 2 | 1 | 0 | 0 | 0 | 190 | 68 | 615 |
| 13:30 | 45 | 0 | 42 | 29 | 235 | 0 | 0 | 0 | 0 | 2 | 223 | 61 | 637 |
| 13:45 | 45 | 0 | 47 | 25 | 245 | 1 | 1 | 0 | 0 | 1 | 225 | 58 | 648 |

| | | | | | | | | | | | | | |
|---------------|-----|----|-----|-----|------|----|-----|----|-----|----|------|-----|------|
| Total Volume: | 376 | 0 | 341 | 247 | 1813 | 6 | 6 | 0 | 1 | 5 | 1769 | 573 | 5137 |
| Approach % | 52% | 0% | 48% | 12% | 88% | 0% | 86% | 0% | 14% | 0% | 75% | 24% | |

| | | | | | | | | | | | | | |
|----------------|-------|---|-----|-------|-----|---|-------|---|---|-------|-----|-----|------|
| Peak Hr Begin: | 13:00 | | | | | | | | | | | | |
| PHV | 186 | 0 | 176 | 121 | 954 | 3 | 3 | 0 | 0 | 4 | 866 | 256 | 2569 |
| PHF | 0.933 | | | 0.949 | | | 0.750 | | | 0.945 | | | |

Turning Movement Count Report PM

Location ID: 3
 North/South: Glencoe Ave
 East/West: Washington Blvd

Date: 03/25/25
 City: Culver City, CA

| | Southbound | | | Westbound | | | Northbound | | | Eastbound | | | Totals: |
|------------|------------|----|----|-----------|-----|----|------------|----|----|-----------|-----|----|---------|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | |
| Movements: | R | T | L | R | T | L | R | T | L | R | T | L | |
| 15:00 | 16 | 45 | 96 | 90 | 153 | 63 | 39 | 29 | 32 | 31 | 146 | 3 | 743 |
| 15:15 | 19 | 41 | 77 | 99 | 167 | 76 | 50 | 31 | 41 | 49 | 177 | 10 | 837 |
| 15:30 | 15 | 37 | 90 | 92 | 160 | 84 | 61 | 43 | 29 | 54 | 129 | 7 | 801 |
| 15:45 | 18 | 39 | 80 | 93 | 133 | 73 | 52 | 31 | 31 | 82 | 162 | 6 | 800 |
| 16:00 | 14 | 51 | 72 | 95 | 155 | 75 | 42 | 26 | 25 | 67 | 146 | 4 | 772 |
| 16:15 | 25 | 30 | 77 | 93 | 163 | 80 | 47 | 34 | 46 | 54 | 186 | 11 | 846 |
| 16:30 | 14 | 39 | 61 | 92 | 154 | 85 | 43 | 30 | 36 | 62 | 149 | 10 | 775 |
| 16:45 | 13 | 40 | 83 | 92 | 186 | 86 | 48 | 31 | 42 | 52 | 135 | 3 | 811 |
| 17:00 | 19 | 33 | 77 | 105 | 147 | 81 | 52 | 33 | 45 | 67 | 179 | 6 | 844 |
| 17:15 | 18 | 40 | 67 | 73 | 176 | 94 | 40 | 26 | 46 | 61 | 161 | 4 | 806 |
| 17:30 | 9 | 35 | 76 | 81 | 176 | 76 | 52 | 40 | 36 | 50 | 173 | 4 | 808 |
| 17:45 | 17 | 38 | 65 | 101 | 169 | 72 | 68 | 27 | 46 | 55 | 157 | 9 | 824 |

| | | | | | | | | | | | | | |
|---------------|-----|-----|-----|------|------|-----|-----|-----|-----|-----|------|----|------|
| Total Volume: | 197 | 468 | 921 | 1106 | 1939 | 945 | 594 | 381 | 455 | 684 | 1900 | 77 | 9667 |
| Approach % | 12% | 30% | 58% | 28% | 49% | 24% | 42% | 27% | 32% | 26% | 71% | 3% | |

| | | | | | | | | | | | | | |
|----------------|-------|-----|-----|-------|-----|-----|-------|-----|-----|-------|-----|----|------|
| Peak Hr Begin: | 17:00 | | | | | | | | | | | | |
| PHV | 63 | 146 | 285 | 360 | 668 | 323 | 212 | 126 | 173 | 233 | 670 | 23 | 3282 |
| PHF | 0.957 | | | 0.985 | | | 0.906 | | | 0.919 | | | |

Turning Movement Count Report SAT

Location ID: 3
 North/South: Glencoe Ave
 East/West: Washington Blvd

Date: 04/05/25
 City: Culver City, CA

| | Southbound | | | Westbound | | | Northbound | | | Eastbound | | | |
|------------|------------|----|-----|-----------|-----|----|------------|----|----|-----------|-----|----|---------|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | |
| Movements: | R | T | L | R | T | L | R | T | L | R | T | L | Totals: |
| 12:00 | 19 | 33 | 97 | 128 | 189 | 53 | 47 | 35 | 35 | 54 | 217 | 15 | 922 |
| 12:15 | 21 | 32 | 77 | 127 | 177 | 55 | 44 | 42 | 39 | 63 | 203 | 8 | 888 |
| 12:30 | 18 | 23 | 79 | 97 | 170 | 53 | 61 | 38 | 42 | 49 | 209 | 12 | 851 |
| 12:45 | 17 | 30 | 105 | 108 | 182 | 50 | 62 | 30 | 45 | 50 | 190 | 11 | 880 |
| 13:00 | 20 | 35 | 93 | 129 | 184 | 50 | 45 | 30 | 44 | 56 | 184 | 17 | 887 |
| 13:15 | 24 | 32 | 92 | 121 | 185 | 41 | 45 | 31 | 38 | 53 | 166 | 11 | 839 |
| 13:30 | 24 | 29 | 73 | 92 | 175 | 35 | 57 | 36 | 41 | 50 | 201 | 12 | 825 |
| 13:45 | 20 | 30 | 80 | 131 | 192 | 51 | 57 | 36 | 33 | 59 | 198 | 8 | 895 |

| | | | | | | | | | | | | | |
|---------------|-----|-----|-----|-----|------|-----|-----|-----|-----|-----|------|----|------|
| Total Volume: | 163 | 244 | 696 | 933 | 1454 | 388 | 418 | 278 | 317 | 434 | 1568 | 94 | 6987 |
| Approach % | 15% | 22% | 63% | 34% | 52% | 14% | 41% | 27% | 31% | 21% | 75% | 4% | |

| | | | | | | | | | | | | | |
|----------------|-------|-----|-----|-------|-----|-----|-------|-----|-----|-------|-----|----|------|
| Peak Hr Begin: | 12:00 | | | | | | | | | | | | |
| PHV | 75 | 118 | 358 | 460 | 718 | 211 | 214 | 145 | 161 | 216 | 819 | 46 | 3541 |
| PHF | 0.906 | | | 0.939 | | | 0.922 | | | 0.945 | | | |