September 14, 2023

City of Culver City
Planning and Development Department
9770 Culver Boulevard,
Culver City, CA 90232

Re: Rationale Supporting a Class 32 Categorical Exemption for the Minerva School Project, located at 5840 Uplander Way.

The following information is being submitted in support of the determination that the proposed Minerva School Project, located at 5840 Uplander Way, Culver City, CA 90230, qualifies for a Categorical Exemption as a Class 32 Infill Development Project under the California Environmental Quality Act (CEQA) (P.R.C. 21000-21189.2), and the State CEQA Guidelines (C.C.R. Title 14, Division 6, Chapter 3, 15000-15387).

As presented in the enclosed materials, the Proposed Project meets all of the criteria necessary to qualify for a CEQA Exemption as a Class 32 (Infill Development Project) pursuant to CEQA Guideline Section 15332 and no significant environmental impacts would result from any unusual circumstances. Therefore, no further environmental analysis is warranted.

Sincerely,

PARKER ENVIRONMENTAL CONSULTANTS

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Valencia, CA 91355
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MINERVA SCHOOL PROJECT

Project Address: 5840 Uplander Way, Culver City, CA 90230

Project Description: The Project Site occupies 35,134 square feet of total lot area (0.81 acres) and is currently developed with a two-story 16,080 square-foot commercial building. Development of the Proposed Project includes interior renovations of an existing vacant commercial building for the use and maintenance of a private school serving a total of 144 students, including 108 preschool students and 36 kindergarten students, known as the Minerva School (Proposed Project). Exterior improvements on the Project Site would include poured in place rubber surfacing on the existing surface parking lot for the outdoor play yard. No new development resulting in added floor area is proposed. The Proposed Project has a total floor area of 16,080 square feet, resulting in a floor area ratio of 0.46:1, which is consistent with existing conditions. The preschool would be located on the ground floor and the kindergarten and offices would be located on the second floor. The Proposed Project would provide 37 vehicle parking spaces and eight (8) bicycle parking spaces, including two (2) long-term spaces and six (6) short-term spaces.

PREPARED FOR:
The City of Culver City
Department of City Planning

PREPARED BY:
Parker Environmental Consultants, LLC

APPLICANT:
Uplander Campus, LLC

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1.0 Project Description

A. Project Summary

The Project Site occupies 35,134 square feet of total lot area (0.81 acres) and is currently developed with a two-story 16,080 square-foot commercial building. Development of the Proposed Project includes interior renovations of an existing vacant commercial building for the use and maintenance of a private school serving a total of 144 students, including 108 preschool students and 36 kindergarten students, known as the Minerva School (Proposed Project). Exterior improvements on the Project Site would include poured in place rubber surfacing on the existing surface parking lot for the outdoor play yard. No new development resulting in added floor area is proposed. The Proposed Project has a total floor area of 16,080 square feet, resulting in a floor area ratio of 0.46:1, which is consistent with existing conditions. The preschool would be located on the ground floor and the kindergarten and offices would be located on the second floor. The Proposed Project would provide 37 vehicle parking spaces and eight (8) bicycle parking spaces, including two (2) long-term spaces and six (6) short-term spaces.

The Applicant requests the following discretionary approvals to implement the Proposed Project:

1) Pursuant to Culver City Municipal Code (CCMC) Section 17.220.015, Plan Approval to the Conditional Use Permit (CUP).

B. Environmental Setting

1. Project Location

The Project Site is located in the Fox Hills neighborhood within the City of Culver City. The Project Site's location within the City of Culver City and the greater Los Angeles region is depicted in Figure 1, Project Location Map. The Project Site encompasses one parcel and includes approximately 35,134 square feet of total lot area. The Project Site's property address, Assessor's Identification Number (AIN), land use, and lot area are summarized in Table 1.1, Summary of Project Site, below.

The Project Site is generally bound by Uplander Way to the north; commercial buildings to the west; the Fox Hills park to the south; and commercial buildings to the east.

Table 1.1
Summary of Project Site

Address	AIN	Existing Land Use	Lot Area (square feet)
5840 Uplander Way	4134-005-009	Commercial building and surface parking lot	35,134 sf
		Total Lot Area	**35,134 sf**

Note: sf = square feet
Sources: City of Culver City Department of City Planning, Property Information Search, accessed July 2023.

Regional access to the Project Site is provided by the San Diego Freeway (I-405). The San Diego Freeway generally runs in a north-south direction approximately 0.6 miles to the west of the Project Site.

Local street access is provided by the grid roadway system surrounding the Project Site. Uplander Way, which borders the Project Site to the north, is a two-way street providing one travel lane in each direction. Metered street parking is provided along Uplander Way adjacent to the Project Site.

The Los Angeles Metropolitan Transportation Authority (Metro) and the Culver City Bus operate multiple bus lines with multiple bus stops within walking distance (approximately one-half mile) from the Project Site. In the vicinity of the Project Site, bus stops are primarily located along Bristol Parkway, Hannum Avenue, Buckingham Parkway. Bus lines that operate in the Project Site area include, but are not limited to, Culver City Bus Line 3, Culver City Bus Line 5C2, Metro 108 and Metro 110. The Project Site is easily accessible and connected with the City of Culver City and the greater Los Angeles area. The Project Site is also situated within walking distance to commercial properties located along Uplander Way and Bristol Parkway and residential properties located along Buckingham Parkway.

Source: ArcGIS, 2023.

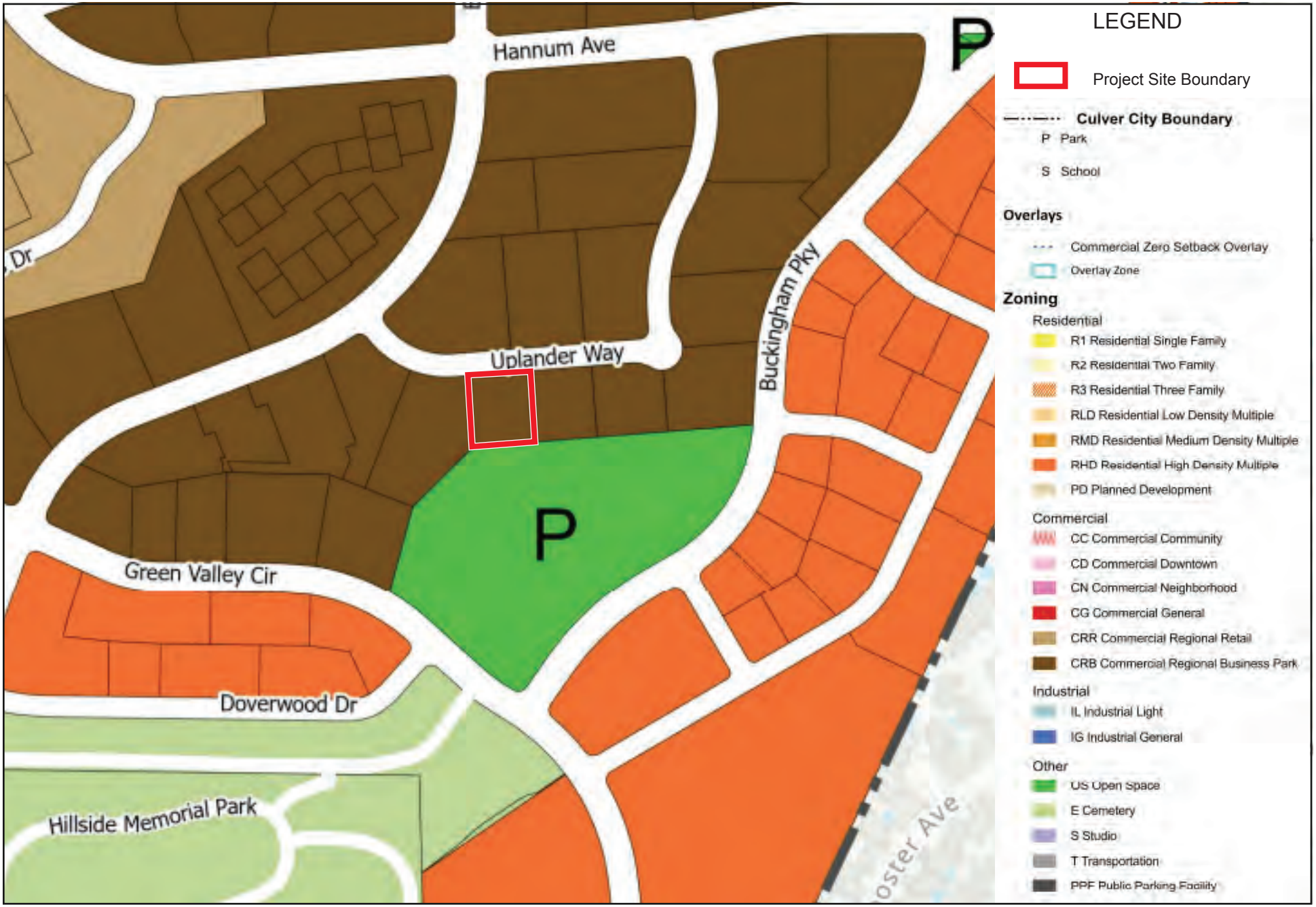
Figure 1
Project Location Map

2. Existing Conditions

2.1 Zoning and Land Use Designations

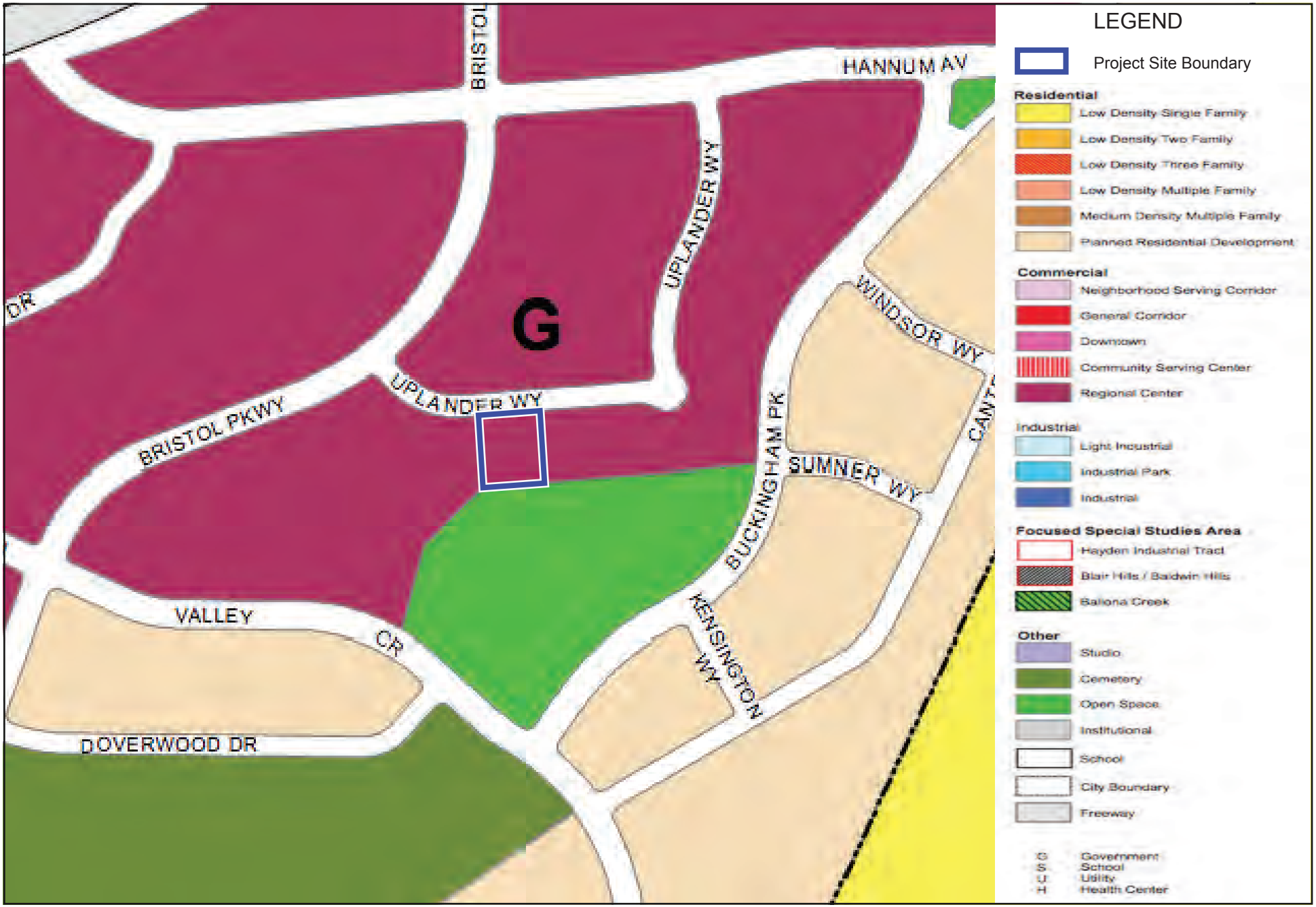
The Project Site is zoned Commercial Regional Business Park (CRB) and the Culver City General Plan designates the Project Site for Regional Center land uses. The CRB Zoning District identifies areas appropriate for large-scale office and business park developments with shared parking, including specific light industrial uses. The CRB Zoning District is consistent with the Regional Center and Industrial Park land use designations of the General Plan. Thus, the zoning of the Project Site is consistent with the existing land use designation. In accordance with Section 17.220.015 of the CCMC, the Applicant is requesting a Conditional Use Permit to allow for Institutional uses (private school) on the Project Site.

Figure 2, Zoning Map, shows the existing zoning on the Project Site and in the surrounding area. Figure 3, General Plan Land Use Element Map, shows the land use designation on the Project Site and in the surrounding area.



Source: City of Culver City, Zoning Map, May 2023.

Figure 2
Zoning Map



Source: City of Culver City, General Plan Land Use Element Map, August 28, 2007.

Figure 3
General Plan Land Use Element Map

2.2 Existing Site Conditions

Figure 4, Aerial Photograph of the Project Site and Surrounding Land Uses, shows an aerial view of the Project Site and identifies the photograph locations shown in Figure 5 and Figure 6.

The Project Site is currently developed with a commercial totaling 16,080 square feet and associated surface parking lot. There is one vehicle driveway located along Uplander Way that provides access to the Project Site. Landscaping is limited to ornamental shrubs and trees planted adjacent to the existing building and parking lot area.

2.3 Surrounding Land Uses

As shown in Figure 4, the Project Site is in a commercially zoned area, and properties surrounding the Project Site are zoned CRB (Commercial Regional Business Park) with a General Plan land use designation of Regional Center. The Project Site is also adjacent to the Fox Hills Park, which has an Open Space zoning and General Plan land use designation. The properties surrounding the Project Site include one- to two-story commercial buildings fronting Uplander Way and the Fox Hills Park. Photographs of the land uses immediately surrounding the Project Site are provided in Figure 6. Below is a description of the existing conditions in the surrounding area.

North: Abutting the Project Site to the north is Uplander Way. Further north, past Uplander Way, are one- to two-story commercial buildings. These properties are zoned CRB (Commercial Regional Business Park) with a General Plan land use designation of Regional Center. Refer to Figure 6, Views 7 and 8.

West: Abutting the Project Site to the west are one-story commercial buildings. These commercial properties are zoned CRB (Commercial Regional Business Park) with a General Plan land use designation of Regional Center. Refer to Figure 6, View 9. Further west, past Bristol Parkway, are two-story commercial buildings. These commercial properties are zoned CRB (Commercial Regional Business Park) with a General Plan land use designation of Regional Center. Refer to Figure 6, View 10.

East: Abutting the Project Site to the east are two-story commercial properties. These properties are zoned CRB (Commercial Regional Business Park) with a General Plan land use designation of Regional Center. Refer to Figure 6, View 11.

South: Abutting the Project Site to the south is the Fox Hills Park, which fronts Green Valley Circle and Buckingham Parkway. This property has an Open Space zoning and General Plan land use designation. Refer to Figure 6, View 12.

Source: Google Earth, Aerial View, 2020.

Figure 4
Aerial Photograph of the Project Site and Surrounding Land Uses

View 1: From the north side of Uplander Way, looking south at the Project Site.

View 2: From the north side of Uplander Way, looking south-east at the Project Site.

View 3: From the north side of Uplander Way, looking south-west at the Project Site.

View 4: From the south side of Uplander Way, looking south at the Project Site.

View 5: From the west corner of the Project Site, looking east at the Project Site.

View 6: From the south side of the Project Site, looking northeast at the Project Site.

Source: Parker Environmental Consultants, July 13, 2023.

Figure 5
Photographs of the Project Site

View 7: From the south side of Uplander Way, looking north-east at the commercial properties north of the Project Site.

View 8: From the south side of Uplander Way, looking north-west at the commercial properties north of the Project Site

View 9: From the north side of Uplander Way, looking south-west at the commercial buildings west of the Project Site

View 10: From the south side of Uplander Way, looking northwest at the commercial buildings west of the Project Site, across Bristol Parkway.

View 11: From the north side of Uplander Way, looking southeast at the commercial buildings east of the Project Site.

View 12: From the east side of Buckingham Parkway, looking northwest at the Fox Hills Parl south of the Project Site.

Source: Parker Environmental Consultants, July 13, 2023.

Figure 6
Photographs of the Surrounding Land Uses

C. Description of Project

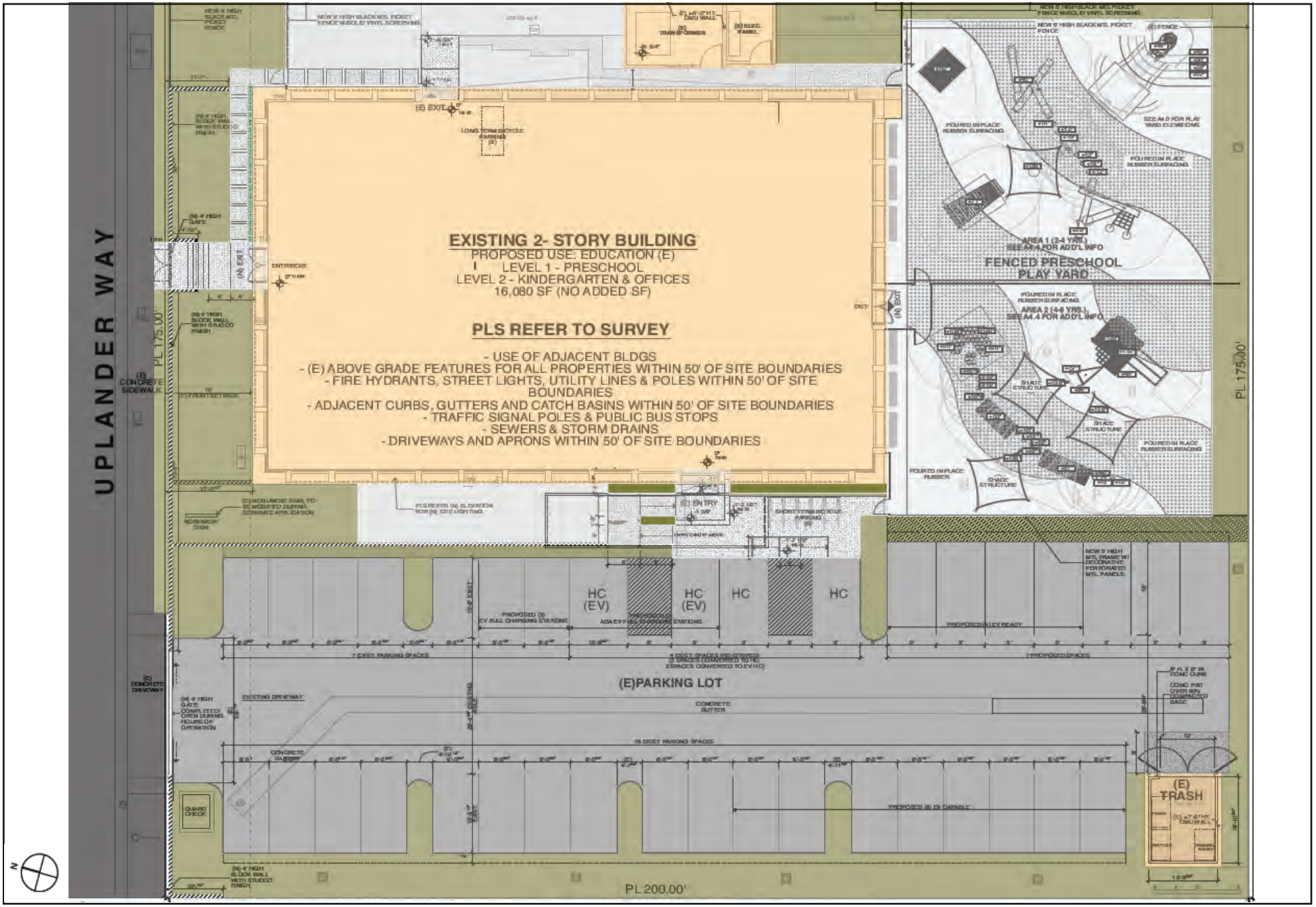
1. Project Overview

The Project Site occupies 35,134 square feet of total lot area (0.81 acres) and is currently developed with a two-story 16,080 square-foot commercial building. Development of the Proposed Project includes interior renovations of an existing vacant commercial building for the use and maintenance of a private school serving a total of 144 students, including 108 preschool students and 36 kindergarten students, known as the Minerva School (Proposed Project). Exterior improvements on the Project Site would include poured in place rubber surfacing on the existing surface parking lot for the outdoor play yard. No new development resulting in added floor area is proposed. The Proposed Project has a total floor area of 16,080 square feet, resulting in a floor area ratio of 0.46:1, which is consistent with existing conditions. The preschool would be located on the ground floor and the kindergarten and offices would be located on the second floor. The Proposed Project would provide 37 vehicle parking spaces and eight (8) bicycle parking spaces, including two (2) long-term spaces and six (6) short-term spaces.

A summary of the Proposed Project is provided in Table 1.2, Proposed Development Program, below. The plan layout of the Proposed Project is depicted in Figure 7.

Table 1.2
Proposed Development Program

Land Use	Students	Proposed Floor Area (square feet)
Private School		
Day Care Center	108	16,080 sf
Private School (K-8)	36	
Faculty/Staff	20	
TOTAL:		**16,080 sf (0.46:1 FAR)**
Source: SweisKloss Design + Construct, April 21, 2023.		



Source: SweisKloss Design + Construct, September 14, 2023.

Figure 7
Site Plan

Institutional Uses

As shown in Table 1.2, above, the Proposed Project would include 16,080 square feet of educational uses. The proposed private school building would include a Preschool located on the ground floor and Kindergarten and offices located on the second floor.

2. Floor Area

The Project Site includes a total lot area of 35,134 square feet. The Project Site contains an existing 16,080 square-foot commercial building with a 0.46:1 FAR. Development of the Proposed Project is limited to includes interior renovations of the existing vacant commercial building. No new development resulting in added floor area is proposed. As such, the Proposed Project would have a total floor area of 16,080 square feet, resulting in a floor area ratio of 0.46:1, which is consistent with existing conditions.

3. Setbacks

Pursuant to CCMC Section 17.22.020, the commercial development on a CRB zone does not require side or rear yard setbacks. The Project Site is located on a street facing parcel with a lot area greater than 20,000 square feet, and as such, is required to provide a 15-foot front yard setback. As such, the Proposed Project would provide a 15-foot front yard setback and no side or rear yard setbacks.

4. Design and Architecture

As mentioned above, development of the Proposed Project is limited to includes interior renovations of the existing vacant commercial building. The Proposed Project would also require poured in place rubber surfacing for the outdoor play yard. The Project Site would be fenced with a combination of a 4-foot high black metal picket fence and 4-foot high block wall with stucco finish in the front yard and a 6-foot high black metal picket fence with solid vinyl screening along the entire eastern property line. The west end of the playground would be fenced with a new 5-foot high metal frame fence with decorated perforated panels.

5. Open Space and Landscaping

The Proposed Project would include an outdoor fenced Preschool play yard with shade structures and poured in place rubber surfacing. The Proposed Project is required to landscape 15% of the total lot area. As such, the Proposed Project is required to provide 5,270 square feet of landscaped area. The Proposed Project would provide 6,201 square feet of landscaped area.

6. Access, Circulation, and Parking

Vehicle Parking

Parking for the Proposed Project would be provided in a surface parking lot. Vehicular access to the surface parking lot would continue to be provided via one full-access driveway along Uplander Way. The Proposed Project would provide 37 parking spaces, including two (2) Americans with Disabilities Act (ADA)-compliant spaces, eight (8) electric vehicle (EV)-capable spaces, four (4) EV-installed spaces, and four (4) EV-ready spaces.

Bicycle Parking

The Proposed Project would provide indoor long-term bicycle spaces located in the proposed school building and outdoor short-term bicycle spaces located adjacent to the school building entrance. As required by Section 17.320.045 of the CCMC, one long-term space is required for each 10 classrooms. The short-term parking rate requires two parking spaces per classroom. As show in Table 1.3, below, the Proposed Project is required to supply two (2) long-term bicycle parking spaces and four (4) short-term bicycle parking spaces, for a total of six (6) bicycle parking spaces. The Proposed Project would provide eight (8) bicycle spaces including 2 long-term spaces and 6 short-term spaces. Thus, the Proposed Project would be consistent with the CCMC requirements for bicycle parking.

Table 1.3
Summary of Required and Proposed Bicycle Parking Spaces

Description	Rate	Total Spaces Required
Long-Term		
2 classrooms	1 stall per 10 classrooms	2 [a]
Short-Term		
2 classrooms	2 stalls per classroom	4
	Total Required Bicycle Parking Spaces:	**6**
	Total Proposed Bicycle Parking Spaces:	**8**

[a] A minimum of 2 short-term and 2-long term spaces shall be provided in all cases.
Source: SweisKloss Design + Construct, April 21, 2023.

7. Lighting and Signage

Exterior lighting features within the Proposed Project would consist of low-level illuminated pedestrian walkways and lighting within common areas and parking areas. On site signage would include a monument sign and wayfinding signs in accordance with the CCMC.

8. Site Security

Security for the Proposed Project would be provided via site planning and secured access points of entry. The Project Site would include a guard gated driveway entry, block walls, metal picket fencing, and safety screens.

9. Sustainability Features

The Proposed Project would include numerous conservation measures to and sustainable design elements. The Proposed Project would be designed and constructed to meet CALGreen Code and City's Green Building Program by including several measures designed to reduce energy consumption, including, but not limited to, installing efficient lighting fixtures, low-flow plumbing fixtures, water-efficient lighting, and ENERGY STAR-rated appliances. These measures would further promote a reduction in GHG emissions, which would be consistent with the goals of 2022 Scoping Plan. The Proposed Project would include 10 percent of the required parking spaces as EV charging stations, 10 percent are EV-ready parking stalls, and 10 percent are EV-capable.

10. Anticipated Construction Schedule

For purposes of analyzing impacts associated with air quality, this analysis assumes a Project construction schedule of approximately 6 months, with final buildout occurring in 2025. Construction activities would include three main steps: (1) interior remodeling/renovations, (2) architectural coatings/finishings, and (3) landscaping/paving.

All construction activities would be performed in accordance with all applicable state and federal laws and City codes and policies with respect to building construction and activities. As provided in CCMC Chapter 9.07 (Noise Regulations) and Section 9.07.035 (Construction), the permissible hours of construction within the City are 8:00 A.M. to 8:00 P.M. Monday through Friday, between 9:00 A.M. and 7:00 P.M. on Saturday, and between 10:00 A.M. and 7:00 P.M. on Sunday. The Proposed Project would comply with these restrictions.

Interior Renovations Phase

This phase would include the alteration of approximately 16,080 square feet of floor area and existing walls to reconfigure the proposed school uses. The interior renovations phase would be completed in approximately six (6) months.

Architectural Coatings/ Finishings Phase

The architectural coatings/ finishings phase would involve installation of any additional windows, doors, cabinetry, appliances, and would involve the application of interior and exterior paint and coating materials. This phase is expected to occur during the last two (2) months of construction concurrent with interior renovations.

Paving and Landscaping Phase

The paving phase would involve recoating the surface parking lot, walkways, sidewalks, and pouring rubber asphalt on the proposed playground. It is anticipated that landscaping features would be completed in this phase; however, no existing trees are proposed for removal. This phase is expected to occur during the last month of construction concurrent with interior renovations and architectural coatings.

D. Requested Permits and Approvals

The list below includes the anticipated requests for approval of the Proposed Project. The discretionary entitlements, reviews, permits and approvals required to implement the Proposed Project include, but are not necessarily limited to, the following:

1) Pursuant to Culver City Municipal Code (CCMC) Section 17.220.15, Plan Approval to the Conditional Use Permit (CUP).

2.0 Evaluation of Class 32 Criteria

Every discretionary action requires environmental review pursuant to CEQA. However, the CEQA Guidelines (Sections 15300 to 15332) include a list of classes of projects, which have been determined to not have a significant effect on the environment, known as Categorical Exemptions. If a project falls within one of these classes, it is exempt from the provisions of CEQA, and no further environmental review is required. The Class 32 "Infill" Categorical Exemption (CEQA Guideline Section 15332), hereafter referred to as the Class 32 Exemption, exempts infill development within urbanized areas if it meets certain criteria. The class consists of infill projects that are consistent with the local General Plan and Zoning requirements. This class is not intended for projects that would result in any significant traffic, noise, air quality, or water quality impacts. It may apply to residential, commercial, industrial, and/or mixed-use projects. As supported by the information presented herein, the Proposed Project falls under the Class 32 Exemption.

A Class 32 Exemption applies to a project characterized as in-fill development meeting the conditions described below:

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.

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

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

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

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

As presented herein, the Proposed Project qualifies for a Class 32 Infill Development Project under the CEQA (P.R.C. 21000-21189.2), and the State CEQA Guidelines (C.C.R. Title 14, Division 6, Chapter 3, 15000-15387). The Proposed Project meets all of the criteria necessary to qualify for a CEQA Exemption as a Class 32 (Infill Development Project) pursuant to CEQA Guideline Section 15332, respectively, and none of the exceptions section set forth in CEQA Guidelines Section 15300.2 apply. Therefore, no further environmental analysis is warranted.

A. Supporting Analysis for a Class 32 Categorical Exemption

Consistent with the State CEQA Guidelines and the Department of City Planning's policies for implementing CEQA, the following assessment provides substantial evidence to support the determination that the Proposed Project meets the above criteria, pursuant to the Class 32 (Infill Development) requirements as set forth in Section 15332 of the State CEQA Guidelines.

a) The Proposed Project is consistent with the applicable General Plan designation and all applicable General Plan policies as well as with applicable zoning designation and regulations.

A significant impact may occur if a project is inconsistent with applicable land use plans or zoning designations adopted for the purpose of avoiding mitigating an environmental effect. Plan inconsistencies in and of themselves are not a significant impact on the environment under CEQA. CEQA recognizes only direct physical changes or reasonably foreseeable indirect physical changes in the environment.[1] As such, the analysis below only addresses those policies that have the potential to result in physical impacts to the environment.

The Project Site is subject to the zoning codes and design regulations of the Culver City Municipal Code (CCMC). The following information addresses the Proposed Project's consistency with the CCMC.

CCMC: Zoning Designations and Regulations

Land Use

The Project Site is zoned Commercial Regional Business Park (CRB) and the Culver City General Plan designates the Project Site for Regional Center land uses. The CRB Zoning District is consistent with the Regional Center and Industrial Park land use designations of the General Plan. Thus, the zoning of the Project Site is consistent with the existing land use designation. The Applicant is requesting a Conditional Use Permit per CCMC 17.220.015 to allow for educational uses (private school) on the Project Site.

Floor Area Ratio

The Project Site includes a total lot area of 35,134 square feet. The Project Site contains an existing 16,080 square-foot commercial building with a 0.46:1 FAR. Development of the Proposed Project is limited to includes interior renovations of the existing vacant commercial building. No new development resulting in added floor area is proposed. As such, the Proposed Project would have a total floor area of 16,080 square feet, resulting in a floor area ratio of 0.46:1, which is consistent with existing conditions.

Setbacks

Pursuant to CCMC Section 17.22.020, the commercial development on a CRB zone does not require side or rear yard setbacks. The Project Site is located on a street facing parcel with a lot area greater than 20,000 square feet, and as such, is required to provide a 15-foot front yard setback. As such, the Proposed Project would provide a 15-foot front yard setback and no side or rear yard setbacks.

[1] *See Guidelines Section 15064(d)-(e).*

Vehicle Parking

The Proposed Project would provide 37 parking spaces, including two (2) Americans with Disabilities Act (ADA)-compliant spaces, eight (8) electric vehicle (EV)-capable spaces, four (4) EV-installed spaces, and four (4) EV-ready spaces. Vehicular access to the surface parking lot would continue to be provided via one full-access driveway along Uplander Way.

On October 24, 2022, the City Council voted to abolish minimum parking requirements for new developments within Culver City. As such, the Proposed Project is not required to comply with minimum parking rates for schools and daycare facilities. However, a Proposed Mobility Plan Technical memorandum has been prepared by KOA on January 23, 2022 (see Attachment 1 of this Categorical Exemption). This Technical Memorandum includes a Parking Demand Analysis to determine whether the proposed 37-space parking lot can accommodate the Proposed Project's peak faculty/staff parking demands and student drop-off/pick-up operations without producing off-site adverse effects.

The Parking Demand Analysis concluded that the faculty/staff and student drop-off/pick-up parking demands are expected to be accommodated comfortably within the Proposed Project's surface parking lot. The parking demands of the Proposed Project are not expected to spill over onto the surrounding roadway system and adjacent properties.

Bicycle Parking

The Proposed Project would provide indoor long-term bicycle spaces located in the proposed school building and outdoor short-term bicycle spaces located adjacent to the school building entrance. As required by Section 17.320.045 of the CCMC, one long-term space is required for each 10 classrooms. The short-term parking rate requires two parking spaces per classroom. The Proposed Project is required to supply two (2) long-term bicycle parking spaces and four (4) short-term bicycle parking spaces, for a total of six (6) bicycle parking spaces. The Proposed Project would provide eight (8) bicycle spaces, including 2 long-term bicycle parking spaces and 6 short-term bicycle parking spaces. Thus, the Proposed Project would be consistent with the CCMC requirements for bicycle parking.

Open Space and Landscaping

The Proposed Project would include an outdoor fenced Preschool play yard with shade structures and poured in place rubber surfacing. The Proposed Project is required to landscape 15% of the total lot area. As such, the Proposed Project is required to provide 5,270 square feet of landscaped area. The Proposed Project would provide 6,201 square feet of landscaped area.

City of Culver City General Plan Land Use Element – Regional Center

The City's General Plan Land Use Element designated the Project Site for Regional Center land uses and CRB (Commercial Regional Business Park) zoning. The CRB Zoning District is consistent with the Regional Center and Industrial Park land use designations of the General Plan. Thus, the zoning of the Project Site is consistent with the existing land use designation. The Applicant is requesting a Conditional Use Permit per CCMC 17.220.015 to allow for educational uses (private school) on the Project Site.

According to the General Plan Land Use Element, the Regional Center designation allows large-scale commercial uses that may share parking. It is intended to support existing and anticipated commercial developments that serve a regional market area and would serve both the residential and business communities. The designation is characterized by varying height limits from two stories to 56 feet, expansive landscaped setbacks, and a minimum parcel size. This designation is applied to existing retail, office, and business park uses such as Fox Hills Mall, Studio Village Shopping Center, Corporate Pointe, and Fox Hills Business Park, and could be applied to entertainment, hotel, retail and office uses of similar scale.

The General Plan Land Use Element has identified eight (8) Sub-Areas and eight (8) Neighborhoods in the City of Culver City. Each Sub-Area of Culver City has its own sense of character and its own special needs. Sub-Area issues are addressed by objectives and policies specific to the area. The Project Site is located within the Fox Hills Sub-Area and Fox Hills Neighborhood. The Fox Hills Sub-Area includes those portions of the City south of Jefferson Boulevard and Playa Street. Fox Hills's identity derives from its regional-serving retail and commercial office centers, specifically the Fox Hills Mall, Fox Hills Business Park, Buckingham Business Park and Corporate Pointe developments. These large-scale commercial uses are attractively landscaped and blend well with large multiple family residential uses. With the exception of the Culver City Terrace Mobile Home Park, Fox Hills's residential communities are planned developments of multiple family building complexes. Table 2.1 illustrates the Proposed Project's consistency with the Objectives and Policies of the Culver City General Plan Land Use Element.

Table 2.1
Project Consistency Analysis with Applicable Objectives and Policies of the Culver City General Plan Land Use Element

Objective / Policy	Project Consistency Analysis
Citywide Land Use Policies	
Objective 5. Economic Diversity: Encourage new business opportunities that expand Culver City's economic base and serve the needs of the City's residential and business community.	**Consistent.** The Proposed Project would serve the City's residential and business community by providing new educational uses and employment opportunities. The Proposed Project would serve approximately 108 preschool students, 26 kindergarten students, and 20 employees. Therefore, the Proposed Project is consistent with this objective.
Policy 5.C: Encourage development of cultural, educational, and entertainment uses that will provide leisure activities for Culver City's residents and enhance the image of the City.	**Consistent.** The Proposed Project would provide an educational land use on an existing lot currently occupied by a vacant commercial building. This would enhance the image of the City and would provide additional educational uses for the residents of the City. Therefore, the Proposed Project is consistent with this policy.
Fox Hills Sub-Area	
Objective 25: Protect and enhance residential and business uses within the Fox Hills Sub-Area.	**Consistent.** The Proposed Project includes interior renovations of an existing commercial building for proposed educational uses. The Proposed Project would maintain the design character of the area and protect the visual quality of the Project Site as the Proposed Project is limited to interior renovations. The Proposed Project includes development of a Preschool play area located in the rear of the Project Site. Additionally, the proposed educational use will serve as a convenient school option for the children of the nearby residences and children of the employees of local

	businesses. Therefore, the Proposed Project is consistent with this objective.
Policy 25.A: Support the continued use of Culver City Terrace Mobile Home Park property for affordable housing.	**Not Applicable.** The Project Site is not located within the Culver City Terrace Mobile Home Park and the Proposed Project does not include housing. Therefore, this policy is not applicable to the Proposed Project.
Policy 25.B: Improve the Fox Hills Sub-Area's identity as part of Culver City by assigning high priority to signage and gateway improvements for this Sub-Area.	**Not Applicable.** The Proposed Project is an institutional land use project with a proposed private day care center and elementary school. The Proposed Project would include a monument sign on the Project Site facing Uplander Way. The Proposed Project does not include Fox Hills signage or gateway improvements. As such, this policy is not applicable to the Proposed Project.
Policy 25.C: Increase the feeling of safety in the area of Fox Hills Mall.	**Consistent.** The Project Site is located approximately 0.3 miles east of the Fox Hills Mall in a Commercial Regional Business Park area. As mentioned, security for the Proposed Project would be provided via site planning and secured access points of entry. The Project Site would include a guard gated driveway entry, block walls, metal picket fencing, and safety screens. Therefore, this policy is consistent with the Proposed Project.
Policy 25.D: Encourage continued use of the Kite site (Sepulveda Boulevard and Slauson Avenue) to complement rather than compete with Fox Hills Mall, and to function as a portal that helps to unify Fox Hills with the rest of Culver City.	**Not Applicable.** The Project Site is located approximately 0.6 miles southeast of the Kite site. Additionally, the Proposed Project includes interior renovations of an existing commercial building for proposed educational uses. As such, the Proposed Project's educational uses would not compete with the Fox Hills Mall. Therefore, this policy is not applicable to the Proposed Project.
Policy 25.E: Encourage development of the Triangle site (Sepulveda Boulevard, Slauson Avenue, Jefferson Boulevard) as office, retail, service commercial and restaurant uses, consistent with the Redevelopment Agency's Design for Development.	**Not Applicable.** The Project Site is located approximately 0.6 miles southeast of the Triangle site. Therefore, this policy is not applicable to the Proposed Project.
Policy 25.F: Reinforce the physical and visual connection the Fox Hills mall and nearby hotels.	**Not Applicable.** The Proposed Project development is limited to interior renovations of an existing commercial building for proposed educational uses. Therefore, this policy is not applicable to the Proposed Project.
Policy 25.G: Evaluate the feasibility of annexing the two properties within the Los Angeles County Sphere of Influence Area on Green Valley Circle, as a means of controlling the development character of this gateway into Culver City.	**Not Applicable.** The Proposed Project development is limited to interior renovations of an existing commercial building for proposed educational uses. The Project Site is not one of the two properties within the Los Angeles County Sphere of Influence Area on Green Valley Circle. Therefore, this policy is not applicable to the Proposed Project
Source: City of Culver City, General Plan Land Use Element, February 28, 2000; and Parker Environmental Consultants, 2023.	

As detailed in Table 2.1, above, the Proposed Project would be consistent with the applicable objectives and policies of the Fox Hills Sub-Area. As such, impacts related to the consistency with the applicable land use and planning policies would be less than significant.

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

As shown in Figure 4, Aerial Photograph of the Project Site and Surrounding Land Uses, the Project Site is located in the Fox Hills Sub-Area within the City of Culver City and is entirely surrounded by urban land uses. The Project Site encompasses one parcel, and is identified by the following County of Los Angeles AIN: 4134-005-009. The Project Site encompasses approximately 35,134 square feet of lot area (0.81 acres). The Project Site is surrounded by a mix of commercial buildings. Therefore, the Project Site is less than five acres and surrounded by urban uses.

c) The Project Site has no value as habitat for endangered, rare or threatened species.

The Project Site is located in a highly urbanized area within the City of Culver City. As shown in Figure 4, Aerial Photograph of the Project Site and Surrounding Land Uses, the Project Site and the surrounding area are fully developed with urban infrastructure. The Fox Hills Park is located south of the Project Site, which contains a significant area of natural open space and an area of potential biological resource value. The Project Site is fully developed with established commercial uses and a surface parking lot. Vegetation on the Project Site is limited to ornamental shrubs and mature trees adjacent to the existing building and parking lot. There are no public street trees located along the public right-of-way fronting Uplander Way.

According to the U.S. Fish and Wildlife Service (USFWS) Threatened & Endangered Species Active Critical Habitat Report, no candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or the USFWS have been recorded or exist on the Project Site. Additionally, the USFWS's IPaC database identified two endangered bird species (California Least Tern and Least Bell's Vireo) that occur within the broader project locale. However, the Project Site does not overlap the critical habitat for Least Bell's Vireo and no critical habitat has been designated for the California Least Tern. Two threatened bird species (Coastal California Gnatcatcher and Western Snowy Plover) also occur within the broader project locale, but the Project Site does not overlap with the critical habitat for either species. There is one identified insect species (Monarch Butterfly) within the broader project locale, but no critical habitat has been designated for this species (see Attachment 2 to this Categorical Exemption). Therefore, the Project Site has no value as habitat for endangered, rare, or threatened species, and the Proposed Project would have no impact on any sensitive species or habitat.

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

Traffic/Transportation

The following information summarizes the findings and conclusions of the Memorandum of Understanding for Transportation Study (MOU) for the Minerva School Project dated November 28, 2022 (see Attachment 3 to this Categorical Exemption).

Transportation Assessment Screening Criteria

In July 2020 the City of Culver City Public Works Department Mobility & Traffic Engineering Division, Community Development Department Advance and Current Planning Divisions, and Transportation Department updated the City's Transportation Study Criteria and Guidelines, which shifted the performance metric for evaluating transportation impacts under CEQA from level of service (LOS) to vehicle miles traveled (VMT) for studies completed within the City. Per the City's Transportation Study Criteria and Guidelines, a Transportation Assessment is required when a project is likely to add 250 or more net daily trips to the local street system, the development project would conflict with the City's plans, programs, ordinances, or policies, or would substantially increase hazards due to a geometric design feature or incompatible use(s). A VMT Screening Assessment has been conducted to determine if the Proposed Project would generate 250 or more net daily trips and would thereby require the preparation of a Transportation Assessment.

The City has updated the Transportation Study Criteria and Guidelines to ensure compliance with Section 15064.3, subdivision (b)(1) of the CEQA Guidelines, which asks if a development project would result in a substantial increase in VMT. The Transportation Study Criteria and Guidelines sets the following criterion for determining significant transportation impacts based on VMT:

> *For a land use project, would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?*

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.

1. Small projects that result in less than 250 daily or 25 peak hour trips

2. Projects within a ½ mile from these key TPAs: Metro E (Expo) Line Culver City Station, Metro E (Expo) Line La Cienega Station, Westfield-Culver City Transit Center, or Sepulveda/Venice Boulevard intersection may be screened (Attachment C). Threshold may be updated in response to changes in TPAs without required Planning Commission or City Council approval when mutually agreed upon by the Directors in the Transportation, Public Works, and Community Development Departments.

3. Projects located within any TPA where at least 15% of the on-site residential units are affordable

4. Affordable housing projects where 100% of the dwelling units are affordable

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

Thresholds 4 and 5 apply to specific land uses-meaning these land uses can also be screened from a mixed use project, and other uses in the same project not otherwise screened would have to analyze VMT impacts.

Project Trip Generation Assessment

Along with the updated Transportation Study Criteria and Guidelines, the City developed the VMT Calculator Version 1.00 (the VMT Calculator). The VMT Calculator estimates the daily vehicle trips, daily VMT, daily household VMT per capita, and daily work VMT per employee for land use projects.

As shown in the MOU (Attachment 3 to this Categorical Exemption), the Elementary School land use rate was applied to the Proposed Project. As shown, based on the Culver City VMT Tool, the Proposed Project would generate approximately 40 daily trips. As the Proposed Project would generate fewer than 250 net daily trips, the Proposed Project would not require the preparation of a Transportation Assessment or further VMT analysis, per the screening thresholds in the Transportation Study Criteria and Guidelines.

Per the Transportation Study Criteria and Guidelines, a Transportation Assessment is required when a project is likely to add 250 or more net daily trips to the local street system. Given that the Proposed Project is estimated to result in an increase of 40 daily trips to the local street system on a typical weekday, the Proposed Project would not be expected to result in significant impacts to the surrounding transportation system. Therefore, neither a Transportation Assessment nor other further analysis of transportation impacts is required for the Proposed Project. As such, operational transportation impacts would be less than significant with respect to VMT.

Geometric Design Feature or Incompatible Use Hazards

The Proposed Project would continue to provide one vehicle driveway along the western property line from Uplander Way and would not introduce new driveways along the Uplander Way street frontage. The Proposed Project would maintain the internal drive aisle. Thus, the Proposed Project is considered not to have a significant impact, as it would not lead to a substantial increase in hazards due to a geometric design feature or incompatible use.

Emergency Access

Construction Impacts

Development on the Project Site is not anticipated to require temporary and/or partial street closures due to construction activities. The Proposed Project would not cause permanent alterations to vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way. Further, the Proposed Project would be developed in a manner that satisfies the emergency response requirements of the Culver City Fire Department (CCFD). There are no hazardous design features included in the access design or site plan for the Proposed Project that could impede emergency access. Accordingly, any temporary construction traffic impacts would be less than significant.

Operational Impacts

The operation of the Proposed Project would satisfy the emergency response requirements of the CCFD. There are no hazardous design features included in the proposed vehicular design or site plan for the Proposed Project that could impede emergency access. The Proposed Project does not propose the permanent closure of any local public streets, and primary access to the Project Site would continue to be provided from Uplander Way. As such, the Proposed Project would not adversely affect emergency access to or around the Project Site, and impacts would be less than significant.

Noise

According to the City of Culver City General Plan Noise Element, the City of Culver City Noise Standards are developed from those of several Federal and State agencies including the FHWA, the USEPA, the Department of Housing and Urban Development, the American National Standards Institute, and the State of California Department of Health Services. These standards set limits on the noise exposure level for various land uses.

Construction Noise Impacts

For purposes of determining the Proposed Project's construction noise impacts, a significant impact would occur if the Proposed Project is not in compliance with CCMC Chapter 9.07. CCMC Section 9.07.035 states that construction activity shall be prohibited, except between the hours of: 8:00 A.M. and 8:00 P.M. Mondays through Fridays; 9:00 A.M. and 7:00 P.M. Saturdays; and 10:00 A.M. and 7:00 P.M. Sundays. It is prohibited for any person to operate a device, which amplifies music or sound, at a construction site in a manner that results in noise levels that are audible beyond the construction site property line. This analysis addresses whether construction activities would exceed existing ambient exterior noise levels by 5 dBA (hourly L_{eq}) or more in residential areas. If necessary, features to reduce noise to below a 5-dBA ambient noise increase can be incorporated into the project design to ensure regulatory compliance.

For purposes of evaluating the Proposed Project's construction and operational noise impacts, the following regulatory compliance measures and construction project design features would be incorporated into the Proposed Project's construction activities. These features and control measures are consistent with the noise management procedures and regulations of the LAMC and Noise Element of the General Plan.

Culver City Municipal Code

The CCMC contains a number of regulations that would apply to the Proposed Project's temporary construction activities and long-term operations.

SEC.9.07.35 Construction

Construction activity shall be prohibited, except between the hours of: 8:00 A.M. and 8:00 P.M. Mondays through Fridays; 9:00 A.M. and 7:00 P.M. Saturdays; and 10:00 A.M. and

7:00 P.M. Sundays. It is prohibited for any person to operate a device, which amplifies music or sound, at a construction site in a manner that results in noise levels that are audible beyond the construction site property line.

SEC.9.07.35 Domestic Power Tools

A. It is prohibited for any person to operate or permit the operation of any power saw, sander, drill, grinder, lawn or garden tool, or similar tool, or pneumatic or other air-powered tool except between 7:30 A.M. and 10:00 P.M. so as to be audible at or beyond the property line where the tool is located.

B. It is prohibited for any person to operate, or permit the operation of any gasoline-powered lawn mower, leaf blowers, or similar equipment within the City except between the hours of 8:00 A.M. and 6:00 P.M. Mondays through Fridays, and between the hours of 10:00 A.M. and 5:00 P.M. on Saturdays and Sundays. Additional restrictions apply to the operation of leaf blowers, as set forth in Section 9.04.015I. of this Code.

SEC.9.07.55 Amplified Sounds

A. Electronic devices. It is prohibited for any person to permit the transmission of, or cause to be transmitted, any amplified sound on any public street, sidewalk, alley, right-of-way, park, or any other public place or property which sound is audible at fifty (50) feet. This Section shall not apply to any noncommercial public speaking, public assembly, or other activity for which a permit has been issued.

B. On private property. It shall be prohibited for any persons to operate a loud speaker or sound amplifying equipment for the purposes of transmitting messages, giving instructions or providing entertainment which is audible at a distance of fifty (50) feet or beyond the subject's property line without first filing an application and obtaining a permit as set forth in this Chapter.

C. Permits. Every user of sound amplifying equipment on public or private property, except block parties which have obtained a permit from the Chief of Police or activities in public parks which have obtained a permit for use of amplifying equipment from the Parks, Recreation and Community Services Department shall file an application with the Committee on Permits and Licenses at least ten (10) days prior to the day on which the sound amplifying equipment is to be used.

1. Restrictions. The commercial and noncommercial use of sound amplifying equipment shall be subject to the following restrictions:

    a. The only sounds permitted shall be either music or human speech, or both.

    b. The operation of sound amplifying equipment shall occur only between the hours of:

    8:00 a.m. through 8:00 p.m. Monday through Thursday

8:00 a.m. through 10:00 p.m. Friday,

10:00 a.m. through 10:00 p.m. Saturday,

10:00 a.m. through 8:00 p.m. Sunday and City specified holidays

SEC.17.220.040 Commercial Regional Business Park (CRB) District Requirements

B. Vicinity Impacts. The building, machinery and equipment shall be so constructed, installed and maintained, and the activity conducted therein shall be such that all noises, vibration, dust, odor and other objectionable factors shall be reduced to the extent that no annoyance or injury will result to any persons residing in the vicinity of such CRB premises.

City of Culver City General Plan Noise Element

Objective 2. Stationary Noise Sources. Protect those areas that are or may be subject to unacceptable noise from stationary noise sources.

Policy 2.A. Create a comprehensive ordinance establishing noise regulation criteria, and standards for noise sources and receptors to include but not be limited to the following:

- Noise reduction features during site planning to mitigate anticipated noise impacts on affected noise sensitive land uses, such as schools, hospitals, convalescent homes, and libraries.
- Standards for mechanical equipment such as fans, air conditioners, compressors, and exhaust vents.
- Temporary sound barrier installation at construction site if construction noise is impacting nearby noise sensitive land uses.
- Noise abatement and acoustical design criteria for construction and operation of any new development.

Project Design Features

In addition to the above regulatory requirements and in furtherance of complying with the provisions set forth in LAMC Section 9.07.35, above, the Applicant will incorporate the following voluntary features into the construction work plans:

- Exterior construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The project contractor shall use power construction equipment with noise shielding and muffling devices.
- The project contractor will erect a temporary noise-attenuating sound barrier along the perimeter of the Project Site. The sound barrier will be a minimum of 8 feet in height to block the line-of-sight of construction equipment and off-site receptors at the ground level. Localized and portable sound enclosures, such as Echo Barrier Outdoor noise barrier/absorbers, would also be used and doubled layered to significantly reduce

noise from construction equipment. The sound barrier shall include sound absorbing material capable of achieving a minimum of 15-dBA reduction in sound level.

- The Project Site Plan includes a new 6-foot high metal picket fence with a solid vinyl screening along the entire eastern perimeter.

A summary of the construction and operational noise impacts is discussed below. Calculation worksheets are provided in Attachment 4 of this Categorical Exemption. With respect to demonstrating compliance with the State CEQA Guidelines Appendix G, Table 2.3, below, provides the estimated construction noise levels at the nearby sensitive receptors based on distance attenuation and sound attenuation resulting from the use of noise shielding devices and the installation of a temporary sound barrier along the perimeter of the Project Site.

Construction Noise

Construction of the Proposed Project would require the use of heavy equipment for interior renovations, architectural coatings, and paving. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity. Table 2.2 identifies the representative noise levels for the two loudest types of construction equipment anticipated to be used for the Proposed Project,[2] including estimated usage factors found in the U.S. Department of Transportation, Federal Highway Administration, Roadway Construction Noise Model. The noise levels listed in Table 2.2, below, represent the A-weighted maximum sound level (L_{max}), measured at a distance of 50 feet from the construction equipment.

It should be noted that not all construction noise equipment would be utilized concurrently during each phase and the location and spacing of heavy construction equipment and machinery would vary over the course of construction. Mobile equipment moves around the construction site with power applied in cyclic fashion (bulldozers, loaders), or to and from the site (trucks). Because the precise numbers and locations of equipment operating at the same time are not known, this analysis follows the recommended procedures contained in the Federal Transit Administrations Transit Noise and Vibration Impact Assessment Manual for a quantitative construction noise assessment. Pursuant to these procedures, the noise levels for the two loudest pieces of construction equipment were calculated from the center of the Project Site and the respective distance to each sensitive receptor.

[2] *Based on the construction equipment identified in the CalEEMod worksheets for the air quality model presented in Attachment 4 of this Categorical Exemption.*

Table 2.2
Noise Data for Selected Construction Equipment

Construction Phases	Two Loudest Construction Equipment per Phase	Estimated Usage Factor %	Actual Measures Noise Level at 50 Feet (dBA L_{max})
Interior Renovations	Tractor/Loader/Backhoe	40	84
Architectural Coating	Air Compressors	40	78
Paving/Landscaping	Roller	20	80
Paving/Landscaping	Tractor/Loader/Backhoe	40	84

Note:
Pursuant to the procedures from the Federal Transit Administration's Transit Noise and Vibration Impact Assessment Manual for a quantitative construction noise assessment, the noise levels for the two loudest pieces of construction equipment were calculated from the center of the Project Site and the respective distance to each sensitive receptor.
Source: FHWA, Roadway Construction Noise Model, Construction Noise Prediction, (at Table 1 CA/T Equipment noise emissions and acoustical usage factors database, January 2006.

The Culver City General Plan Noise Element defines sensitive land uses as single-family and multi-family homes; hotels and motels; long-term medical or mental care facilities; schools; libraries; business and professional office buildings; places of worship; concert halls; and restaurants Sensitive receptors identified within 500 feet of the Project Site include:

1) Adjacent commercial building located east of the Project Site;
2) Adjacent commercial building located west of the Project Site;
3) Commercial buildings located north, northeast, west, southwest, and northwest of the Project Site.

These sensitive receptors are depicted below in Figure 8, Noise Monitoring and Sensitive Receptor Location Map.

Source: Google Earth, Aerial View, 2020.

Figure 8
Noise Monitoring and Sensitive Receptor Location Map

Pursuant to CCMC Section 9.07.035 construction activity shall be prohibited, except between the hours of: 8:00 A.M. and 8:00 P.M. Mondays through Fridays; 9:00 A.M. and 7:00 P.M. Saturdays; and 10:00 A.M. and 7:00 P.M. Sundays. The construction activities associated with the Proposed Project would comply with these CCMC requirements.

As shown in Table 2.3, Estimated Exterior Construction Noise at Nearest Sensitive Receptors, the ambient exterior noise level in the Project Vicinity is 61.1 dBA. The maximum anticipated construction noise level at the three sensitive receptors would range from 50.8 dBA to 56.1 dBA L_{eq}. The three sensitive receptors identified within a 500 foot radius are all commercial businesses and professional office land uses. As these land uses operate primarily indoors, a 20 dBA reduction was applied in calculating the interior-exterior noise levels. As the anticipated construction noise levels would not exceed ambient noise levels by more than 5-dBA at any of the sensitive receptors, temporary construction-related noise impacts would be considered less than significant in accordance with City requirements and standards.

Table 2.3
Estimated Exterior Construction Noise Levels at Nearest Sensitive Receptors

ID	Ambient Noise (dBA L_{eq})	Noise Level Impact (dBA L_{eq}) by Phase			Maximum Construction Noise Level	Construction Noise Threshold (dBA L_{eq})	Significant Noise Impact? (Yes/No)
		Interior Renovations	Architectural Coatings	Paving			
1	60.1	50.0	56.1	54.5	56.1	65.1	No
2	60.1	50.0	52.3	45.4	52.3	65.1	No
3	60.1	50.0	50.8	47.9	50.8	65.1	No

Notes:
[1] ID refers to the sensitive receptor locations identified in Figure 8, Noise Monitoring and Sensitive Receptor Location Map.
[2] Daytime noise levels are based on the actual noise measurement taken at the Project Site vicinity. Ambient noise levels measured represent noise for similar and nearby land use types.
[3] Calculations based on the loudest two pieces of heavy construction equipment specific to each phase.
Source: Parker Environmental Consultants, 2023 (see Attachment 4, Noise Calculations Worksheets).

Operation

Roadway Noise

With respect to traffic noise impacts, in order for a new noise source to be audible, there would need to be a 3 dBA or greater CNEL noise increase. The traffic volume on any given roadway would need to double in order for a 3-dBA increase in ambient noise to occur. Based on the VMT Screening Assessment completed for the Proposed Project, the Proposed Project would result in an approximate increase of 40 daily vehicle trips. Therefore, implementation of the Proposed Project is not anticipated to double the amount of peak hour traffic volumes along any of the nearby roadway segments or intersections. As such, mobile source noise from the Proposed Project would be less than 3 dBA, and operational noise impacts due to roadway noise would be less than significant.

Outdoor Playground Noise

Sources of operational noise from the school would include the use of outdoor play areas during breaks between classes and during pick up and departure periods. The Project includes an approximate 6,201 square foot playground positioned to the rear of the existing structure that will be improved with shade structures and a poured in place rubber surface. As shown on the proposed site plan, a 6-foot high metal picket fence with vinyl screening is proposed along the eastern perimeter of the site and adjacent to the playground. The western side of the playground will be fenced with a 5-foot high metal fence with decorated perforated panels. Use of the outdoor playground would be intermittent throughout the day during scheduled play periods. Based on a schedule of daily activities provided by the Applicant, the outdoor playground would be utilized from approximately 8:30 a.m. to 9:15 a.m., 9:45 a.m. to 11:30 a.m.; 12:15 a.m. to 1:15 a.m., and from 2:00 p.m. to 2:30 p.m.

With the increase of students and faculty on the Project Site, noise associated with outdoor activities would be generated by voices of students and adult supervisors. Based on representative noise levels at private elementary school campuses throughout the Los Angeles area, outdoor noise levels on school playgrounds can range from 61-69 dBA L_{eq} at the source.[3] It should be noted, however, that these representative noise levels are considered to be conservative as they were recorded at larger schools with higher attendance levels than the Proposed Project and during organized athletic events with spectators, which would not occur on-site.

As noted above, the Project proposes a solid 6-foot high metal fence with vinyl screening around the eastern perimeter of the campus and play areas that would be bordered by a planter with on-site landscaping. With this design feature, outdoor noise levels for sensitive receptors to the east of the Project Site would be expected to be attenuated by approximately 8 dBA[4], resulting in a sound level of up to 53 - 61 dBA L_{eq} at sensitive receptor No. 1. The resulting noise level at sensitive receptor No. 1 would be 0.9 dBA_{eq} above the ambient noise level. For sensitive receptors No. 2 and 3, which are located approximately 150 feet and 225 feet from the playground area, respectively, the calculated noise levels would range from 37.48 to 49 dBA L_{eq}, which is well below the ambient noise level. For sensitive receptor No. 3 (e.g., the office buildings on the north side of Uplander Way), the resulting noise level would be further attenuated by the school building, which blocks the line-of-sight between the playground and the office buildings north of the Project Site. Therefore, noise from outdoor school activities would be less than significant.

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[3] *Representative noise levels were based on recorded noise levels as reported in Environmental Impact Reports for other school projects within the City of Los Angeles. For example, noise levels on the outdoor play area at the Brentwood School Campus in West Los Angeles were recorded between 58.1 – 63.2 dBA Leq (Brentwood School Education Master Plan EIR (ENV-2014-572-EIR) December 2015). Additionally, outdoor noise levels during separately recorded softball games with spectators at the Archer Campus ranged from 63-69 dBA Leq (Archer Forward: Campus Preservation and Improvement Plan EIR, (ENV-2011-2689-EIR) February 2014).*

[4] *Based on the FHWA Roadway Construction Noise Model User's Guide, Appendix A: Best Practices for Calculating Estimated Shielding for Use in the RCNM (at page A-1), February 2006, the If a noise source is shielded with a solid barrier located close to the source, an 8 dBA noise level reduction can be assumed.*

Additionally, it should be noted that the Project Site is adjacent to the Fox Hills Park, which provides sports courts and outdoor open space play areas. Accordingly, noise from children recreating on the playground would be consistent with children and adults recreating at the public park and would likely be indistinguishable from noise generated at the public park. Thus, the proposed outdoor play area is a consistent land use and would not generate significant noise impacts due to unusual circumstances.

Air Quality

Construction Emissions

With respect to air quality during the construction phases, the Proposed Project would be required to comply with all applicable City, regional, state, and federal regulatory compliance measures from agencies including, but not limited to, the City of Culver City, the Southern California Air Quality Management District (SCAQMD), and the California Code of Regulations. As required by CEQA, the Proposed Project's construction emissions were quantified utilizing the California Emissions Estimator Model (CalEEMod *Version 2022.1.1.14*), as recommended by the SCAQMD. Table 2.4, below, identifies daily emissions that are estimated to occur on peak daily construction emissions during the Proposed Project's construction.

This analysis assumes a Project construction schedule of approximately 6 months, with final buildout occurring in 2025. Construction activities associated with the Proposed Project would be undertaken in three main steps: (1) interior remodeling, (2) architectural coatings/finishings, and (3) paving.

As shown in Table 2.4, below, construction-related daily emissions associated with the Proposed Project would not exceed any regional SCAQMD significance thresholds for criteria pollutants during the construction phases. Construction-related emissions associated with the Proposed Project are not expected to exceed significance thresholds for criteria pollutants and hazardous substances. Further, all grading and earthwork activities would be conducted in accordance with applicable City, regional, state, and federal regulatory compliance measures. As such, construction of the Proposed Project would not result in the accidental release of hazardous pollutants. Therefore, temporary constructed-related air quality impacts related to criteria pollutants and hazardous substances would be considered less than significant.

Table 2.4
Estimated Peak Daily Construction Emissions

Emission Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
2023	0.54	4.28	5.51	0.01	0.30	0.20
2024	11.20	8.34	10.80	0.02	0.56	0.36
SCAQMD Daily Significance Thresholds:	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Note: Calculations assume compliance with SCAQMD Rule 1113 – Architectural Coatings. The interface on CalEEMod (Version 2022.1.1.14) lists this under the "Mitigation" tab, when they are actually required rules by the SCAQMD. The term "Mitigation" in CalEEMod is defined differently than "Mitigation Measures" in this Categorical Exemption. The model does not allow for these regulatory measures to be implemented in the "unmitigated project" impact scenario. As such, the values that appear under the "Mitigated" results columns are reflective of the Proposed Project impacts that are compliant with required regulations.
Source: CalEEMod 2022.1.1.14, Calculation sheets are provided in Attachment 5 to this Categorical Exemption.

Localized Construction Emissions

The SCAQMD has developed localized significance thresholds (LSTs) that are based on the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO_x, CO, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each source receptor areas (SRA). For PM_{10}, the LSTs were derived based on requirements in SCAQMD Rule 403 — Fugitive Dust. For $PM_{2.5}$, the LSTs were derived based on a general ratio of $PM_{2.5}$ to PM_{10} for both fugitive dust and combustion emissions.

LSTs are provided for each of SCAQMD's 38 source receptor areas (SRA) at various distances from the source of emissions. The Project Site is located within SRA 2, which includes the "Northwest Los Angeles County Coastal" area. The nearest sensitive receptor that could potentially be subject to localized air quality impacts associated with construction of the Proposed Project includes the Fox Hills Park located south of the Project Site. Given the proximity of this sensitive receptor to the Project Site, and pursuant to SCAQMD guidance, the LSTs with receptors located within 25 meters (82.02 feet) are used to address the potential localized air quality impacts associated with the construction-related NO_X, CO, PM_{10}, and $PM_{2.5}$ emissions for each construction phase.

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. However, as shown in Table 2.5, Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within the

Table 2.5
Localized On-Site Peak Daily Construction Emissions

Construction Phase [a]	Total On-site Emissions (Pounds per Day)			
	NO_x [b]	CO	PM_{10}	$PM_{2.5}$
Interior Remodeling	4.14	4.91	0.19	0.17
Architectural Coatings	1.63	1.93	0.04	0.03
Paving	2.54	2.92	0.13	0.12
SCAQMD Localized Thresholds [c]	**103**	**562**	**4**	**3**
Potentially Significant Impact?	***No***	***No***	***No***	***No***

Notes:
[a] *The localized thresholds for all phases are based on a receptor distance of 25 meters in SCAQMD's SRA 2 for a Project Site of one acre.*
[b] *The localized thresholds listed for NO_x in this table takes into consideration the gradual conversion of NO_x to NO_2, and are provided in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD. As discussed previously, the analysis of localized air quality impacts associated with NO_x emissions is focused on NO_2 levels as they are associated with adverse health effects.*
[c] *SCAQMD, Final LST Methodology Document, Appendix C – Mass Rate LST Look-Up Tables, October 21, 2009, and Sample Construction Scenarios for Projects Less than Five Acres in Size, Appendix K.*
Source: CalEEMod 2022.1.1.14, Calculation sheets are provided in Attachment 5 to this Categorical Exemption.

Project Site during construction activities would not exceed the applicable construction LSTs for a Project Site of one acre in SRA 2. Therefore, localized air quality impacts from construction activities on the off-site sensitive receptors would be less than significant.

Operational Emissions

The Project Site is currently developed with a vacant commercial building. Therefore, this analysis assumes there are no existing emissions at the Project Site. The Proposed Project would include interior renovations of the existing vacant commercial building for the use and maintenance of a preschool and kindergarten school. The Proposed Project would generate both stationary and mobile emissions, including the consumption of electricity and natural gas, landscape maintenance, and vehicles traveling to and from the Project Site. The analysis of daily operational emissions associated with the Proposed Project has been prepared utilizing CalEEMod. The results of these calculations are presented in Table 2.6, Proposed Project Estimated Daily Regional Operational Emissions, below. As shown in Table 2.6, the operational emissions generated by the Proposed Project would not exceed the regional thresholds of significance set by the SCAQMD. Therefore, impacts associated with regional operational emissions from the Proposed Project would be less than significant.

Table 2.6
Proposed Project Estimated Daily Regional Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Summertime (Smog Season) Emissions						
Mobile Sources	0.97	0.59	6.28	0.01	1.09	0.28
Area Sources	0.50	0.01	0.70	<0.005	<0.005	<0.005
Energy Sources	<0.005	0.09	0.07	<0.005	0.01	0.01
Total Project Emissions:	**1.47**	**0.69**	**7.05**	**0.01**	**1.10**	**0.29**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**
Wintertime (Non-Smog Season) Emissions						
Mobile Sources	0.95	0.64	5.98	0.01	1.09	0.28
Area Sources	0.39	--	--	--	--	--
Energy Sources	<0.005	0.09	0.07	<0.005	0.01	0.01
Total Project Emissions:	**1.34**	**0.73**	**6.05**	**0.01**	**1.10**	**0.29**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Potentially Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod 2022.1.1.14, Calculation worksheets are provided in Attachment 5.

Greenhouse Gas Emissions

Article 19 of the State's CEQA Guidelines states that eligible projects that qualify for categorical exemptions are deemed to not have a significant effect on the environment. Under Section 15332, the Class 32 exemption that governs in-fill development projects identifies the conditions under which a project can qualify, noting that "[a]pproval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality…" There are no requirements to making findings about a project's effects on GHG emissions. As such, the following analysis of GHG emissions is provided for informational purposes only.

Neither the City of Culver City, SCAQMD, nor the State CEQA Guidelines Amendments provide any adopted thresholds of significance for addressing an institutional project's GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines Amendments serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City of Los Angeles does not have an adopted quantitative threshold of significance for a mixed-use project's generation of greenhouse gas emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines.

Consistent with Section 15064.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) the extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting; (2) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. The Guidelines do not mandate the use of absolute numerical

thresholds to measure the significance of greenhouse gas emissions. As such, this analysis relies on the extent to which the Proposed Project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

Construction

Greenhouse gas (GHG) emissions were calculated using CalEEMod (*Version 2022.1.1.14*). Construction of the Proposed Project would emit GHG emissions through the combustion of fossil fuels by construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. Emissions of GHGs were calculated for each year of construction of the Proposed Project and the results of this analysis are presented in Table 2.7, Proposed Project Construction-Related Greenhouse Gas Emissions. As shown in Table 2.7, the total GHG emissions from construction activities related to the Proposed Project would be approximately 170 metric tons occurring in 2024. Total Construction Greenhouse Gas Emissions are amortized over the 30-year life of the Project and added to the total operational impacts.

Table 2.7
Proposed Project Construction-Related Greenhouse Gas Emissions

Year	CO_2e Emissions (Metric Tons per Year) [a]
2023	35.7
2024	24.4
Total Construction GHG Emissions:	**60.1**

[a] *Construction CO_2 values were derived using CalEEMod Version 2022.1.1.14. Calculation data and results are provided in Attachment 5.*
Source: Parker Environmental Consultants, 2023.

Operation

The Project Site is currently developed with a vacant commercial building. Therefore, this analysis assumes there are no existing GHG emissions occurring at the Project Site. The GHG emissions resulting from operation of the Proposed Project, which involves the usage of on-road mobile vehicles, electricity, natural gas, water, landscape equipment and generation of solid waste and wastewater, were calculated using CalEEMod. As shown in Table 2.8, below, the net increase in GHG emissions generated by the Proposed Project would result in a net increase of approximately 200.81 CO_2e MTY, which is well below the 3,000 $MTCO_2e$ per year threshold of significance considered by the SCAQMD.

Table 2.8
Proposed Project Operational Greenhouse Gas Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)
Mobile	149
Area	0.33
Energy	44.90
Water	1.32
Waste	3.25
Refrigerants	0.01
Construction Emissions [a]	2.00
Proposed Project Total:	**200.81**

Notes:
[a] *The total construction GHG emissions were amortized over 30 years and added to the operation of the Proposed Project.*
Calculation data and results provided in Attachment 5 to this Categorical Exemption.
Source: Parker Environmental Consultants, 2023.

The Proposed Project's structural and operational features such as installing low-flow plumbing fixtures in restrooms and implementing an operational recycling program during the life of the Proposed Project would reduce the Proposed Project's GHG emissions. The Proposed Project would comply with the various regulations, plans, and policies that have been adopted with the intent of reducing GHG emissions in furtherance of the State's GHG reduction targets under SB 32.

Plan Consistency

Through required implementation of the Green Building Code (CALGreen Code) and the Project Site's location on an infill site, the Proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including SB 32, SB 375, SCAG's RTP/SCS, CARB's Scoping Plan, and Culver City's Green Building Program.

Consistency with SB 375

California SB 375 requires integration of planning processes for transportation, land-use and housing. Under the bill, each Metropolitan Planning Organization would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet the target provided in the Scoping Plan, created by CARB, for reducing GHG emissions. SB 375 requires SCAG to direct the development of the SCS for the region. A discussion of the Proposed Project's consistency with the SCS is provided further below.

Consistency with the 2022 Scoping Plan

Jurisdictions that want to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP should also look to the three priority areas (transportation electrification, VMT

reduction, and building decarbonization). To assist local jurisdictions, the 2022 Scoping Plan Update presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas (Priority GHG Reduction Strategies for Local Government Climate Action Priority Areas). A detailed assessment of goals, plans, policies implemented by the City which would support the GHG reduction strategies in the three priority areas is provided below. In addition, further details are provided regarding the correlation between these reduction strategies and applicable actions included in Table 2-1 (page 72) of the Scoping Plan (Actions for the Scoping Plan Scenario).

Transportation Electrification. Pursuant to the CALGreen Code, a minimum of 10 percent of the total code required parking is required to install EV charging stations. The Proposed Project would include 10 percent of the vehicle spaces with EV charging stations, and 10 percent of the spaces would be capable of supporting future EV stations. The provision of EV infrastructure would further serve to promote the utilization of alternative fueled vehicles thus, reducing the combustion of fossil fuels. Therefore, the Proposed Project would not conflict with these goals by installing EV chargers in at least 10 percent of total proposed parking spaces.

VMT Reduction. The Proposed Project represents an infill development within an existing urbanized area that would concentrate new development consistent with the overall growth pattern encouraged in the RTP/SCS. Thus, these Proposed Project characteristics would result in a reduction in VMT, which would overall reduce GHG emissions.

Building Decarbonization. The City has updated its CCMC with requirements for all new buildings, which will reduce GHG emissions related to natural gas combustion. The City has adopted a photovoltaic requirement which requires 1 kilowatt (kW) of photovoltaic power installed per 10,000 square feet of new development. The Proposed Project would include the renovation of an existing building. Therefore, the City's photovoltaic requirements are not applicable to the Project.

The Proposed Project would be designed and constructed to meet CALGreen Code and City's Green Building Program by including several measures designed to reduce energy consumption, including, but not limited to, installing efficient lighting fixtures and low-flow plumbing fixtures. These measures would further promote a reduction in GHG emissions, which would be consistent with the goals of 2022 Scoping Plan.

Consistency with Connect SoCal (2020 RTP/SCS)

The Proposed Project is consistent with the following key GHG reduction strategies in SCAG's Connect SoCal (2020 RTP/SCS), which are based on changing the region's land use and travel patterns; focusing growth near destinations and mobility options; leveraging technology innovations; supporting implementation of sustainability policies; and promoting a green region.

The Proposed Project represents an infill development within an existing urbanized area that would provide new institutional uses. The Proposed Project would provide employees, patrons, and visitors with convenient access to public transit and opportunities for walking and biking which

would facilitate a reduction in vehicle miles traveled and related vehicular GHG emissions. These and other measures would further promote a reduction in vehicle miles traveled and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's Connect SoCal Plan.

Consistency with Culver City Green Building Program

As demonstrated above, the Proposed Project's characteristics and design features, coupled with compliance with mandatory regulatory measures would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including SB 32, SB 375, SCAG's RTP/SCS, CARB's 2022 Scoping Plan, and the City's Green Building Program. Therefore, the Proposed Project's generation of GHG emissions would not conflict with any applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases.

Water Quality

Groundwater

Based on the Department of Toxic Substances Control EnviroStor Database, the Project Site is not listed for cleanup, permitting, or investigation of any hazardous waste contamination. Therefore, the Proposed Project would not exacerbate any hazardous conditions on the Project Site during construction that could affect groundwater conditions. Moreover, any hazardous materials utilized during construction would be used, stored, and disposed of in accordance with all applicable regulatory requirements, and would therefore not pose any potential impacts to groundwater or surface water quality. The Proposed Project, once operational, would not use hazardous materials other than modest amounts of typical cleaning supplies and solvents used for janitorial purposes that are typically associated with the operation of the Proposed Project and the use of these substances would comply with State Health Codes and Regulations. As such, the Proposed Project does not include potential sources of contaminants that could potentially degrade water quality during operation. As such, the Proposed Project would not exacerbate any hazardous conditions on the Project Site that could affect groundwater conditions.

Stormwater

The Project Site is currently developed with a commercial building and associated surface parking lot. Approximately 100 percent of the Project Site is covered with impervious surfaces, thus, approximately 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. With respect to water quality from stormwater, surface runoff leaving the Project Site is directed towards Uplander Way, which contains two catch basins and two laterals. Storm drains are located along Bristol Parkway. As shown below in Figure 9, LADWP Storm Drain System Map, the Proposed Project would continue to generate surface water runoff similar to existing conditions, and stormwater would be directed towards existing stormwater infrastructure that currently serve the Project Site.

The City of Culver City Public Works Department requires project to submit a Storm Water Pollution Prevention Plan (SWPPP) and Wet Weather Erosion Control Plan for construction activities consistent with the NPDES General Construction Permit. The Proposed Project would not include any ground disturbances, as development of the Proposed Project is limited to interior renovations and poured in place rubber surfacing. However, the Proposed Project would comply with all Best Management Practices (BMPs) for erosion control and other measures to meet the NPDES requirements for stormwater quality. Implementation of the BMPs identified in the SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality during construction.

Additionally, the Proposed Project would be required to demonstrate compliance with Low Impact Development (LID) Ordinance standards and retain and treat the first ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. Compliance with the LID Ordinance would ensure that the Proposed Project would not adversely affect water quality or significantly contribute to site runoff during the operation of the Proposed Project. Therefore, the Proposed Project would result in less than significant impacts to the existing stormwater infrastructure serving the Project Site.

Figure 9
LADWP Storm Drain System Map

e) The Project Site can be adequately served by all required utilities and public services.

Water

The Project Site is located within the service area of the Golden State Water Company (GSWC) for potable water service. GSWC Culver City serves imported water from the Colorado River Aqueduct and the State Water Project (imported and distributed by Metropolitan Water District of Southern California). The GSWC's 2020 Urban Water Management Plan (UWMP) projects the City of Culver City will have a water demand of 5,002 acre-feet in 2025 and reliable water supply of approximately 5,002 acre-feet in 2025. The UWMP projects the City of Culver City will have a water demand of 5,370 acre-feet in 2045 and reliable water supply of approximately 5,370 acre-feet in 2045. Based on the Culver City UWMP, GSWC Culver City has reliable supplies to meet its retail customer demands in normal, single dry years, and five consecutive dry year conditions through 2045. Because GSWC Culver City purchases water only as much water as is necessary to meet customer demands, it is anticipated that supplies and demands are congruent across all scenarios. Based on the sewer generation factors provided by the Los Angeles County Sanitation District and assuming all water usage converts to wastewater, it is estimated that the Proposed Project's water demand would be approximately 3,216 gallons per day, or approximately 3.6 AFY, as shown in Table 2.9, below. Compliance with CCMC Chapter 5.03: Water Conservation and Water Supply Shortage Program and Culver City's green building requirements would reduce the total water demand for the Proposed Project. The Proposed Project water demand is less than one percent of the GSWC's estimated water demand for 2025, therefore, impacts upon water demand would be less than significant.

Table 2.9
Proposed Project Estimated Water Demand

Type of Use	Size	Water Demand Rate (gpd/unit) [a]	Total Water Demand (gpd)
Proposed Project			
Institutional			
Private School	16,080 sf	0.2 gpd/sf	3,216
	Total Proposed Project Water Demand:		**3,216**

Notes: sf= square feet; gpd= gallons per day
[a] *Consumption Rates based on Los Angeles County Sanitation Districts, Table 1, Loadings for Each Class of Land Use, dated August 2018. It is assumed that all water usage would convert to wastewater.*
Source: Parker Environmental Consultants, 2023.

Sewer

Wastewater from the Proposed Project would be treated by the Hyperion Water Reclamation Plant (HWRP), which treats an average daily flow of 275 million gallons per day (mgd) on an average dry weather day and with a maximum daily flow of 450 mgd. This equals a remaining

capacity of 175 mgd of wastewater able to be treated at the HWRP. Based on standard sewer flow rates published by the Los Angeles County Sanitation Districts, the Proposed Project's sewer generation is expected to be 3,216 gallons per day. The Proposed Project's wastewater generation is less than one percent of the capacity available at the HWRP. Pursuant to City policy, the Culver City Public Works Department will check the gauging of the sewer lines and make the appropriate decisions on how best to connect to the local sewer lines at the time of construction. As discussed previously, the Proposed Project does not include new development that would result in new floor area, as the Proposed Project is limited to interior renovations of an existing commercial building and poured in place rubber for the development of an outdoor play area. The existing below grade infrastructure will remain in place. If the public sewer has insufficient capacity to accommodate the Proposed Project's wastewater flows, the Applicant would be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connect permit would be made at the time. Ultimately, the sewage flow would be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the Proposed Project. As the Proposed Project would make all necessary improvements and would have a negligible impact on the existing sewer capacity, the Proposed Project's impacts upon the City's sewer system would be less than significant.

Solid Waste

The Project Site is served by Culver City's Public Works Environmental Programs and Operations Division, which collects municipal solid waste which includes trash, recycling, organics, and construction and demolition debris from commercial and residential sectors. Solid waste generated within the City of Culver City is disposed of at privately owned landfill facilities throughout Los Angeles County. Private haulers provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill.

Solid waste management in the state is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal.

In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects.

Furthermore, Assembly Bill 341 (AB 341), which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California.

Based on the 2020 Los Angeles County Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the countywide cumulative need for Class III landfill disposal capacity of approximately 154.3 million tons in the year 2032 will not exceed the 2019 remaining permitted Class III landfill capacity of 148.4 million tons.[5] However, solutions to resolve the regional solid waste disposal needs beyond 2030 are continuously being investigated at the state, regional, and local levels. The regional scenario analyses presented in the CoIWMP demonstrate that the County could meet its disposal capacity needs by promoting extended producer responsibility, continuing to enhance diversion programs and increasing the Countywide diversion rate, and developing conversion and other alternative technologies. Additionally, by successfully permitting and developing all proposed in-County landfill expansions, utilizing available or planned out-of-County disposal facilities, and developing infrastructure to facilitate exportation of waste to out-of-County landfills, the County may further ensure adequate disposal capacity is available throughout the planning period. Thus, cumulative impacts with respect to regional solid waste impacts would be less than significant.

The Proposed Project would comply with CCMC Section 5.01: Solid Waste Management, which requires that the Applicant submits a construction and demolition recycling and waste assessment plan as well as monthly report submittal during construction. Summary reports with documentation would be submitted prior to final inspection.

Construction of the Proposed Project is limited to interior renovations of the existing commercial building. No demolition is proposed. However, the Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. Under the requirements of the hauler's AB 939 Compliance Permit from the Bureau of Sanitation, all construction and demolition debris would be delivered to a Certified Construction and Demolition Waste Processing Facility.

Operation of the Proposed Project is expected to result in a solid waste generation at the Project Site of approximately 315 tons per year. The Proposed Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. The amount of solid waste generated by the Proposed Project is estimated to be well within the available capacities of area landfills.

Fire Services

The Culver City Fire Department provides fire protection and emergency services to the entire city, including the Project Site. The Culver City Fire Department is tied into a mutual response program with the abutting jurisdictions of Los Angeles City and Los Angeles County which allows handling of most emergencies. Additionally, other jurisdictions that are included for mutual aid assistance are Beverly Hills, Santa Monica, and West Hollywood. The Project Site is located within CCFD Fire District 3. The Culver City Fire Department Station No. 3, located at 6030 Bristol Parkway, currently serves the Project Site. This fire station is located approximately 0.2 mile

[5] *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan, 2019 Annual Report, September 2020, at page 39, https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF, accessed August 2023.*

(driving distance) north of the Project Site. Fire Station No. 3 currently has an engine company, paramedic resources, and truck company.

Local access to the Project Site is provided via Uplander Way. Vehicle access to the Project Site would continue to be provided via one full-access driveway along the east side of Uplander Way. The proposed driveway would remain and continue to be provide adequate access, including emergency access, to the Project Site. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Proposed Project. The Proposed Project would not involve activities during its operational phase that could impede public access or travel upon public right-of-way or would interfere with an adopted emergency response or evacuation plan. Therefore, development of the Proposed Project is not expected to significantly impact fire protection services in the Project area.

Police Services

The Culver City Police Department (CCPD) provides police protection services for the City and for the Project Site. The CCPD consists of a total of 161 full time employees. This includes 109 sworn officers and 52 professional staff all dedicated to providing the highest level of police service to the residents, businesses, and visitors of Culver City. In addition, the Department has 12 reserve police officers and 19 volunteers in patrol, who dedicate their personal time to contribute to the success of the police department. Additionally, the CCPD collaborates with regional partners and the Los Angeles County Sheriff's Department (LASD), when needed, for large scale police-related emergencies, and along with several other local cities, contracts with the South Bay Regional Public Communications Authority for dispatch services.

The Culver City Police Department is located at 4040 Duquesne Avenue, approximately 3.3 miles (driving distance) north of the Project Site. The Proposed Project would be subject to Site Plan Review and would be reviewed by the CCPD for compliance with the recommended site design guidelines to improve public safety. Thus, implementation of the Proposed Project would not significantly impact police protection services in the Project area.

Culver City Unified School District

The Project Site is located within the service area of the Culver City Unified School District (CCUSD). The Proposed Project includes interior renovations of an existing commercial building for a private preschool and kindergarten. As such, the Proposed Project would not be generating a demand for school facilities that would exceed the enrollment or capacity of the CCUSD. As such, the Proposed Project's impacts would be less than significant.

Parks

A significant impact generally occurs if a project includes substantial population growth through residential development that could generate an increased demand in recreational and park facilities. The Proposed Project includes the development of a private school. The Proposed Project would not result in direct population growth since the Proposed Project does not include residential uses. Therefore, the Proposed Project would not cause an increase on local parks and

recreational facilities by new residents. The Proposed Project includes open space that would be landscaped and includes an outdoor play area. Any incremental need for open space as a result of the Proposed Project would be expected to be met by the Proposed Project's proposed landscaping and open space areas. As such, the Proposed Project would not be expected to increase demand on the surrounding area and surrounding recreation and park facilities. Therefore, the increased use in recreation and park facilities would be minimal, and a less than significant impact would occur.

3.0 Exceptions to the Categorical Exemptions

In addition to the above qualifying criteria, there are exceptions to the exemptions depending on the nature or location of a project, or unusual circumstances that create the reasonable possibility of significant effects. As provided in CEQA Section 15300.2, for a proposed project to qualify for an exemption to CEQA, the project must be able to demonstrate that it does not fall under the following exceptions:

a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located - a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

a) Location

The Proposed Project does not qualify for a Class 3, 4, 5, 6, or 11 Categorical Exemption. As discussed herein, the Proposed Project qualifies under the Class 32 Categorical Exemption – "In-fill Development Projects." Therefore, this exception does not apply to the Proposed Project.

b) Cumulative Impacts

Provided below are individual analyses of the cumulative impacts from traffic, noise, air quality, water quality, public services, and public utilities. In accordance with CEQA Guidelines Section 15300.2, this Categorical Exemption includes an evaluation of the Proposed Project's cumulative

impacts to rule out the exception of cumulative impacts under Section 15300.2(b). Section 15300.2(b), Cumulative Impact, states that: "All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant."

In determining the cumulative impacts, the guidance provided under CEQA Guidelines Section 15064(h) is as follows:

> *"(1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.*
>
> *(2) A lead agency may determine in an initial study that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.*
>
> *(3) A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.*
>
> *(4) The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable."*

In light of the guidance summarized above, an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B)). The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence.

Based on a review of active related projects in the City of Culver City, at the time of this analysis there are 15 active development projects identified in the City (See Attachment 6). None of the active development projects involve day care or elementary school land uses. Thus, there are no successive projects of the same type in the same place as the Proposed Project. The nearest identified active project in the City is a new hotel development located at 11469 Jefferson Blvd (The Jeff Hotel). As this project is located over one-half mile away from the Project Site, and the remaining 14 active projects are all well over 1 mile from the Project Site there would be no potential for localized cumulative impacts to occur with respect to construction activities.

Cumulative Traffic Impacts

Development of the Proposed Project in conjunction with the related projects would result in an increase in average daily vehicle trips and peak hour vehicle trips in the City of Culver City. As noted above, the Proposed Project's increase in VMT would be less than the threshold for a significant impact to occur, and the Proposed Project's contribution to cumulative impacts is less than significant and would not be cumulative considerable. Therefore, as the Proposed Project's VMT impacts are less than significant on a project level, and the Proposed Project would not exceed growth projections of the RTP/SCS, the Proposed Project's cumulative traffic impacts would be less than significant.

Cumulative Noise Impacts

Development of the Proposed Project in conjunction with related projects increase construction-related noise as well as on-site stationary noise sources in the Culver City planning area. As discussed above, none of the related project are located within one-half mile of the Proposed Project. Thus, the Project would not have the potential to result in cumulative noise impacts when considered in conjunction with the geographic distribution of the related projects identified in Attachment 6. Furthermore, similar to the Proposed Project, all related projects would be required to comply with the City's noise ordinance, as well as implement mitigation measures or project design features that may be prescribed pursuant to CEQA provisions that require potentially significant impacts to be reduced to the maximum extent feasible. Compliance with the CCMC would ensure that construction noise levels of these related projects do not increase ambient noise levels by more than 5 dBA. Construction noise from the related projects would be localized and would not have the potential to create a cumulative noise impact with the Proposed Project. The siting and development of related projects would be subject to further CEQA review and evaluated on a case-by-case basis, and cumulative operational noise would be less than significant.

Cumulative Air Quality Impacts

Development of the Proposed Project in conjunction with the related projects in the Project Site vicinity would increase construction and operational emissions in the City of Culver City. For purposes of evaluating cumulative air quality impacts, the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project-specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the project-specific significance thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.[6] Thus, because the construction-related and operational daily emissions associated with Proposed Project would not exceed the SCAQMD's recommended thresholds, these emissions associated with the Proposed Project would not be cumulatively considerable. Further, each related project would quantify and address air quality emissions and mitigate impacts, if necessary, to ensure no cumulative impacts would occur. Therefore, cumulative air quality impacts would be less than significant.

Cumulative Greenhouse Gas Emissions Impacts

As discussed above, there are no requirements to analyze or make findings about a project's effects on GHG emissions. As such, the following cumulative analysis is provided for informational purposes only.

A cumulatively considerable impact impact would occur where the impact of the Proposed Project in addition to the related projects would be significant. However, in the case of global climate change, the proximity of the Proposed Project to other GHG emission generating activities is not directly relevant to the determination of a cumulative impact because climate change is a global condition. Based on guidance the California Air Pollution Officers Association, the analysis of a project's GHG emissions is inherently a cumulative analysis because climate change is a global issue and the emissions from individual projects are negligible in a global context.[7] Accordingly, the analysis above takes into account the potential for the Proposed Project to contribute to a cumulative impact of global climate change. According to CAPCOA, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective."[8]

The GHG emissions from a preschool and kindergarten grade private school are relatively small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have

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6 *SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution. Appendix D, August 2003 (at page D-3).*

7 *California Air Pollution Control Officers Association, CEQA & Climate change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, 2008.*

8 *California Air Pollution Control Officers Association, CEQA & Climate change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, 2008.*

no significant direct impact on climate change. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change, which can cause the adverse environmental effects previously discussed. Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.

SCAG's 2020-2045 RTP/SCS, adopted in September 2020, is the regional plan that demonstrates compliance with air quality conformity requirements and GHG reduction targets. As such, projects and land use plans that are consistent with this plan in terms of development location, density, and intensity, are part of the regional solution for meeting air pollution and GHG reduction goals. Planning for more housing and jobs near transit was a strategy incorporated in SCAG's first RTP/SCS in 2012 and carried forward in the 2020 RTP/SCS with a focus on areas that are well served by transit. The Proposed Project is an infill development and would be designed with sustainability features that are aimed at reducing overall GHG emissions. As such, the Project would not conflict with the regional growth projections of the 2020-2045 RTP/SCS.

The Proposed Project would not conflict with any applicable local ordinances, regulations, or policies that have been adopted in furtherance of the State and City's goals of reducing GHG emissions. The Proposed Project would comply with the building efficiency standards of the California's Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations. Increased energy efficiency and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standards. Additionally, the Proposed Project would comply with the CALGreen Code. As such, any subsequent cumulative projects of a similar scale or nature would also be required to comply with applicable Title 24 Building Efficiency Standards and incorporate GHG reducing measures as required. Thus, the Proposed Project would not make a cumulatively considerable contribution to GHG emissions and impacts would be less than significant.

Cumulative Water Quality Impacts

Development of the Proposed Project in combination with the related projects would result in the further infilling of uses in a highly developed area within the City of Culver City. As discussed above, the Project Site and the surrounding areas are served by the existing City or County storm drain system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest stormwater drainage inlet. It is likely that most, if not all, of the related projects would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Proposed Project and the related project sites, since the surrounding area is highly developed with impervious surfaces. The surrounding area has long been developed and is heavily urbanized and improved with various commercial and residential buildings; thus, subsequent projects are not likely to result in a significant change from existing conditions with regards to runoff quantity. Nonetheless, each related project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event

producing ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. Mandatory structural BMPs in accordance with the NPDES water quality program would result in a cumulative reduction of surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, cumulative water quality impacts would be less than significant.

Cumulative Water Demand Impacts

Development of the Proposed Project and related projects and the cumulative growth throughout the City of Culver City would further increase the demand for potable water within the City. Through the 2020 GSWC UWMP, the GSWC has demonstrated that it can provide adequate water supplies for the City through the year 2045, with implementation of conservation strategies and proper supply management. This estimate is based in part on demographic projections obtained for the GSWC service area from the Metropolitan Water District (MWD). The MWD utilizes a land-use based planning tool that allocates projected demographic data from the Southern California Association of Governments (SCAG) into water service areas for each of MWD's member agencies. As such, the additional water demands generated by the Proposed Project are accounted for in the 2020 UWMP. With approval of the requested discretionary actions, the Proposed Project is consistent with the underlying allowable uses per the CCMC and would not exceed the available capacity in the local aqueduct. As such, the additional water demands generated by the Proposed Project are accounted for in the 2020 UWMP, and cumulative impacts associated with increased water demand would be less than significant.

Cumulative Sewer Impacts

Development of the Proposed Project in conjunction with the related projects would further increase regional demands on the HWRP's capacity. Similar to the Proposed Project, each related project would be required to obtain approval by the Department of Public Works to ensure adequate sewer capacity for each related project. Since the Proposed Project would require approval from the Culver City Public Works Department, signifying that the sewer lines serving the Project Site have adequate capacity, the Proposed Project would not be expected to contribute to a local cumulative impact. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the HWRP's service to the City of Culver City and surrounding area. However, it is anticipated that the 175 mgd of available capacity in the HWRP would not be significantly reduced with the cumulative wastewater generation from the related projects and Proposed Project. As such, cumulative impacts with respect to wastewater generation would be less than significant.

Cumulative Solid Waste Impacts

Development of the Proposed Project in conjunction with the related projects would further increase regional demands on landfill capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the existing landfills serving the County of Los Angeles. The Proposed Project's contribution to cumulative impacts would continue to decrease as it increases waste diversion rates in accordance with City goals. Moreover, as with the Proposed Project, the related projects would participate in regional source

reduction and recycling programs, significantly reducing the amount of solid waste deposited in area landfills. Therefore, the cumulative impacts with respect to solid waste would be less than significant.

Cumulative Impacts to Fire Services

The Proposed Project, in combination with the related projects, could increase the demand for fire protection services in the Project area. Specifically, there could be increased demands for additional CCFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Proposed Project and related projects would contribute. Similar to the Proposed Project, each of the related projects would be individually subject to CCFD review and would be required to comply with all applicable fire safety requirements of the CCFD in order to adequately mitigate fire protection impacts. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the CCFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Proposed Project would not make a cumulatively considerable impact to fire protection services, and, as such cumulative impacts on fire protection would be less than significant.

Cumulative Impacts to Police Services

The Proposed Project, in combination with the related projects, could increase the demand for police protection services in the Project area. Specifically, there could be an increased demand for additional CCPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Proposed Project and related projects would contribute. In addition, each of the related projects would be individually subject to CCPD review and would be required to comply with all applicable safety requirements of the CCPD and the City of Culver City in order to adequately address police protection service demands. Furthermore, each of the related projects would likely install and/or incorporate adequate crime prevention design features in consultation with the CCPD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the CCPD does not currently have any plans for new police stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Proposed Project would not make a cumulatively considerable impact to police protection services, and cumulative impacts on police protection would be less than significant.

Cumulative Impacts to Schools

The Proposed Project is a private day care and elementary school project that would have the effect of reducing demands for public educational land uses in the surrounding community. In combination with the related projects, which would have the potential to increase demands upon public school land uses, the potential for cumulative impacts upon school facilities would be reduced and thus less than cumulatively considerable. Further, development of the related projects would be subject to applicable school fees to mitigate the increased demand for school services. Pursuant to Government Code Section 65995, payment of development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation." With the payment of School Development Fee, any future school infrastructure would be developed as needed, and thus the cumulative impacts on schools from the related projects would be less than significant.

Cumulative Impacts to Parks

The Proposed Project is a private day care and elementary school project that would have the effect of reducing demands for public park facilities in the surrounding community as the Proposed Project would provide on-site recreational uses for students. The Proposed Project is required to provide 5,270 square feet of landscaped area and would provide 6,201 square feet of landscaped area inclusive of recreational play areas for students. As such the project would not increase demands for public recreational facilities in the area. While development of the related projects would likely result in an increase in permanent residents residing in the greater Project area, each residential related project would also be required to comply with the on-site open space requirements of the CCMC. Therefore, with payment of the applicable recreation fees on a project-by-project basis, any future park infrastructure would be developed as needed; therefore, the Proposed Project would not make a cumulatively considerable impact to parks and recreational facilities, and cumulative impacts would be less than significant.

Cumulative Impacts Summary

As presented in the analysis above, the Proposed Project would not result in any significant cumulative impacts from traffic, noise, air quality, water quality impacts, or utilities and public services. With approval of the Conditional Use Permit, the Proposed Project would be consistent with the use type and density of projects that are permitted by right and otherwise anticipated by the zoning code and General Plan, and when viewed in conjunction with other proposed, approved, or reasonably anticipated projects, would not generate impacts that are cumulatively considerable. Thus, the potential for the Proposed Project to result in cumulative impacts is less than significant.

c) Significant Effect / Unusual Circumstances

As noted in the supporting analyses above, there are no unusual circumstances that exist in connection with the Proposed Project or surrounding environmental conditions. The Proposed Project would not result in any significant impacts from noise, traffic, air quality, water quality impacts, or utilities and public services. The Project Site is located in an urbanized area of the City of Culver City and is consistent with the existing physical arrangement of the properties within

the vicinity of the Project Site. The zoning designation for the Project Site is CRB with a General Plan land use designation of Regional Center. The Proposed Project would be consistent with the designated zoning and would adhere to all requirements of the CCMC, with approval of the discretionary requests. There are no features of the Proposed Project, such as its size or location, that distinguish it from others in the exempt class. As such, there are no unique or unusual circumstances that exist in connection with the Proposed Project or surrounding environmental conditions that have the potential to result in a significant environmental impact upon the environment.

d) Scenic Resources

The Project Site is bordered by Uplander Way to the north, which is not a designated State scenic highway, and there are no State designated near the Project Site. As such, the Proposed Project would not damage any scenic resources within an officially designated State Scenic Highway. The Topanga Canyon State Scenic Highway is the closest officially designated State scenic highway, located approximately 15.1 miles northwest of the Project Site. [9] There are no protected trees or unique geologic features on-site or in the public right-of-way.

e) Hazardous Materials

Pursuant to Government Code Section 65962.5, the Department of Toxic Substances Control (DTSC) shall compile and update as appropriate, at least annually, a list of all hazardous waste facilities subject to corrective action (pursuant to Section 25187.5 of the Health and Safety Code), all land designated as hazardous waste property or border zone property (pursuant to Section 25220 of the Health and Safety Code), all information received by the DTSC on hazardous waste disposals on public land (pursuant to Section 25242 of the Health and Safety Code), and all site listed pursuant to Section 25356 of the Health and Safety Code. Based on the DTSC EnviroStor Database, the Project Site is not listed for cleanup, permitting, or investigation of any hazardous waste contamination (see Figure 10, DTSC EnviroStor Map, below). Therefore, the Project Site is not located on a site that the DTSC and the Secretary of the EPA have identified, pursuant to Government code section 65962.5, as being affected by hazardous wastes. Therefore, the Project Site is not located on a site that the DTSC and the Secretary of the Environmental Protection have identified as being affected by hazardous wastes or clean-up problems. As such, the Proposed Project would not exacerbate any hazardous conditions on the Project Site that could affect groundwater conditions.

f) Historic Resources

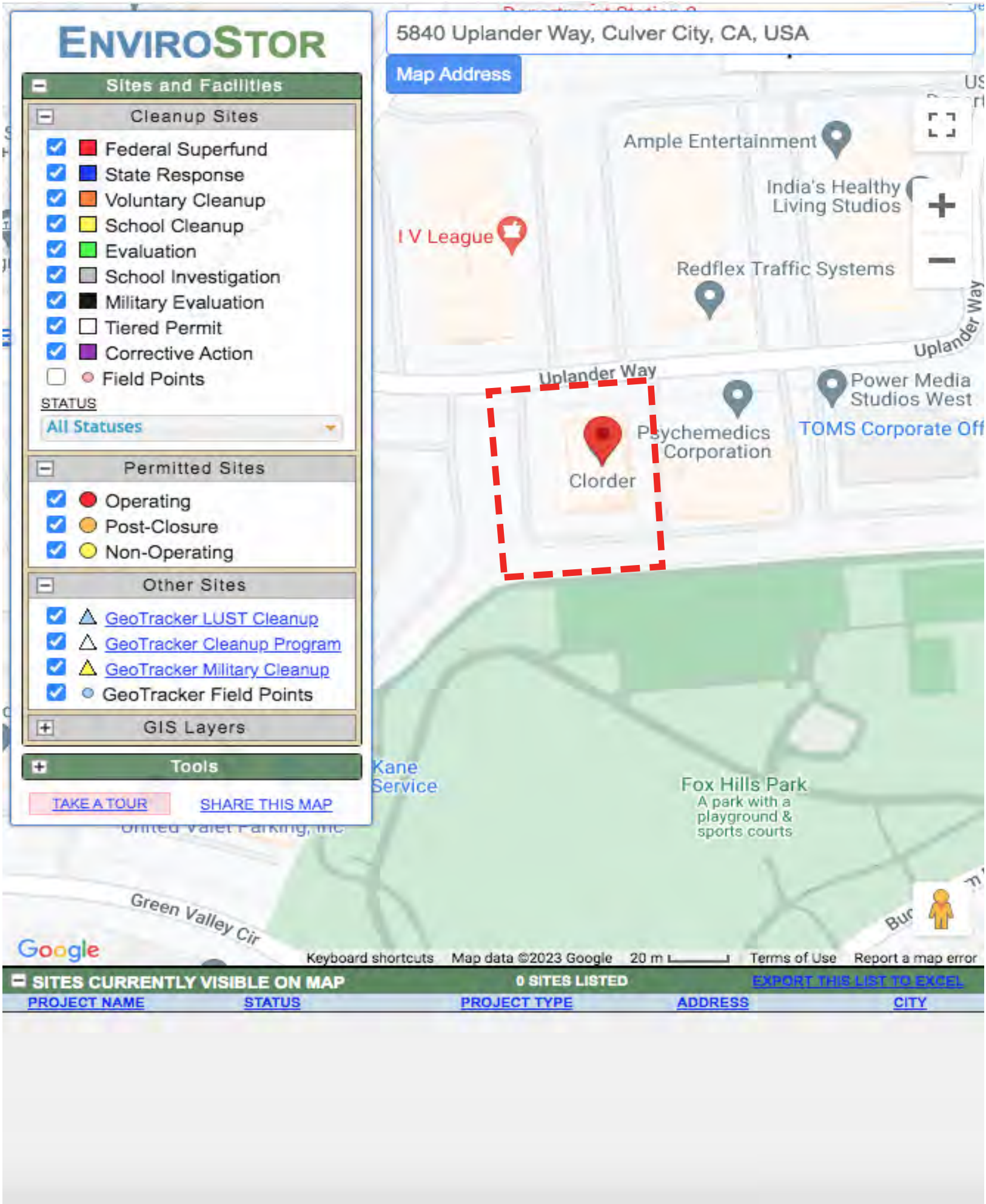
A substantial adverse change in the significance of a historic resource means the demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. The existing commercial building on the Project Site is not designated in the National Register of Historic Places or the

[9] *California Department of Transportation, California State Scenic Highway System Map, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed July 2023.*

California Register of Historical Resources. Additionally, no properties in the Project Site vicinity are designated in the National Register of Historic Places or the California Register of Historical Resources. The Project Site is located in a CRB (Commercial Regional Business Park) zone and is not located near historic resources.

In November 1987, Thirtieth Street Architects, Inc. completed a field survey of significant structures in Culver City that became the basis for the August 29, 1990 Culver City Historic Preservation Advisory Committee Report (HPAC Report). The 1990 HPAC Report ranked over 100 structures (including film studio, commercial and residential properties) for designation as Cultural Resources at either "Landmark," "Significant" or "Recognized" levels. The Project Site is also not listed in the 1990 Culver City HPAC Report. Since the Project Site does not directly abut any historic resources, the Proposed Project would not directly demolish, relocate, or significantly modify these properties, or their surroundings, such that their significance would be materially impaired. Therefore, the Proposed Project would not cause a substantial adverse change in the significance of a historical resource and would have a less than significant impact to historic resources.

Figure 10: DTSC EnviroStor Map



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ATTACHMENT 1

Technical Memorandum
Proposed Mobility Plan

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MONTEREY PARK ORANGE ONTARIO SAN DIEGO LA QUINTA CULVER CITY

TECHNICAL MEMORANDUM

Date: January 23, 2022

To: William Kavadas, Planning Division – City of Culver City

From: Ryan Kelly, Senior Engineer – KOA Corporation

Subject: Minerva School Conditional Use Permit Application – Proposed Mobility Plan

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This Mobility Plan has been prepared by KOA Corporation (KOA) to ensure that the proposed Minerva School (the "School") will provide on-site automobile parking sufficient to accommodate the demands of faculty/staff and student drop-off/pick-up activities, and to manage the parking and vehicle trip demands of the School. This Mobility Plan consists of the following three components:

- Parking Demand Analysis
- Parking Demand Management (PDM) Plan
- Transportation Demand Management (TDM) Plan

These components have been included as part of the Mobility Plan per the City's comments on the School's Conditional Use Permit (CUP) Application. As part of the CUP Application, the School has requested approval of the establishment of a preschool and kindergarten facility serving a full- and part-time student enrollment of up to 144 students, with up to 20 full- and part-time employees (the "Project"). Through Mobility Plan implementation, the School is anticipated to generate automobile parking demands lower than the School's proposed automobile parking supply and would, therefore, not create off-site parking impacts. In addition, the strategies proposed for implementation as part of the PDM and TDM Plans will further reduce the vehicle trips and on-site parking generated by the Project.

EXISTING SCHOOL DESCRIPTION AND OPERATION

The existing school (Culver City Montessori Preschool) is located at 11269 Washington Boulevard in the western portion of the City of Culver City (the "City"). The existing school will be relocated and re-established as the Minerva School at 5840 Uplander Way in the southeastern portion of the City. The existing school site is located on the block bounded by Washington Boulevard to the south, Sawtelle Boulevard to the west, an alley to the north, and Globe Avenue to the east. The existing School site is situated immediately west of the Interstate 405 freeway. The existing School currently serves a total of 58 preschool students, split between 6 classes, with 12 faculty/staff members. The preschool operates between 8:00 AM and 4:30 PM with the vast majority of student drop-offs and pick-ups occurring from 8:00 AM to 8:30 AM and from 4:30 PM to 5:00 PM, respectively. Drop-off and pick-up activities occur at two locations adjacent to the school site: (1) along the curb adjacent to the existing school on the north side of Washington Boulevard, and (2) within the existing school's parking lot across the alley north of the site. Approximately 7 on-street parking spaces along Washington Boulevard and 15 spaces within the existing school parking lot are provided for

student drop-off/pick-up activities[1]. Upon parking their vehicles in either of the two existing school parking areas, parents walk students to the school gate at the front or rear of the building for drop-off, and then return to their vehicle. For pick-ups, parents follow a similar routine, except they retrieve students from the school gate at the front or rear of the building before returning to their vehicle. Two faculty/staff members are posted at each school gate to ensure safe and efficient processing of students to and from the school.

PROPOSED SCHOOL DESCRIPTION AND OPERATION

As part of Project development, the existing school uses will be relocated and expanded to operate from the Uplander Campus located at 5840 Uplander Way. The Project site will include an approximately 16,080 square-foot building and 5,600 square-foot play yard for the proposed preschool and kindergarten uses. Within the school building, six classrooms and ancillary lobby, lounge, restroom, and storage space will be provided on the ground floor for the preschool use. The second floor will provide two classrooms (as well as three specialty activity rooms for art, music, etc.), ancillary storage, and restroom space for the kindergarten uses, as well as faculty office, conference, and teacher's lounge space to be shared between the preschool and kindergarten uses. The proposed Project site plan is provided in Attachment 1. The preschool program will include 108 students (84 full-time and 24 part-time students) across six classes and the kindergarten program will include 36 students in two classes. Two teachers will be provided for every preschool class (12 total) and one teacher will be provided for each kindergarten class (2 total). The teachers employed at the existing School site are expected to be retained. In addition to the 14 teachers, the School faculty/staff will include a Head of School, Mandarin Director, Spanish Director, two kitchen staff members, and a guard. Thus, the School will have a total of 20 employees.

The proposed School will operate between 7:00 AM and 6:00 PM, with the full-time preschool program running between 8:00 AM and 4:00 PM and the kindergarten program running between 8:30 AM and 3:00 PM. The proposed School will also provide a part-time preschool program between 9:00 AM and 12:00 PM, as well as an aftercare program until 6:00 PM. A staggered drop-off and pick-up schedule will be employed for both the preschool and kindergarten students. The full-time students for each preschool class will be assigned a 15-minute drop-off window between 7:30 AM and 9:00 AM and a 15-minute pick-up window between 4:00 PM and 5:30 PM. Part-time preschool students will be dropped off between 9:00 AM and 9:20 AM and picked up between 12:00 PM and 12:20 PM. Each of the two kindergarten classes will be assigned a 15-minute drop-off window between 8:00 AM and 8:30 AM and a 15-minute pick-up window between 3:00 PM and 3:30 PM. Sporadic pick-ups will occur between 5:30 PM and 6:00 PM and 3:30 PM and 6:00 PM for the preschool aftercare and kindergarten aftercare programs, respectively.

Drop-off and pick-up activities will occur within the proposed Project parking lot. The proposed School parking lot will include 37 automobile parking spaces, including 2 Americans with Disabilities Act (ADA) reserved spaces. For the drop-off operations, a parent will park their vehicle in the parking lot, help to unload the student(s), and walk the student(s) to the School entrance where School staff will check the student(s) in. Pick-up operations will occur in a similar manner, with a parent parking their vehicle in the School parking lot, retrieving the student(s) from the School entrance, then returning to their vehicle and exiting the site. Two-to-three School faculty/staff members will be stationed at each School entrance (along Uplander Way and adjacent to the School parking lot) in order to provide convenient and fast processing of students into and out of the School. The School guard, stationed at the guard shack by the driveway entrance during class time, will monitor student drop-offs and pick-ups within the parking lot at the start and end of the school day to ensure that operations run smoothly.

[1] The existing school site shares a 16-space parking lot with the Culver City Presbyterian Church, which operates from the same address. Of the spaces in the shared parking lot, approximately one space is utilized on weekdays for church-related activities, leaving 15 spaces available for preschool use.

PARKING DEMAND ANALYSIS

On October 24, 2022, the City Council voted to abolish minimum parking requirements for new developments within the City. As such, the School is no longer required to comply with minimum parking rates for schools and daycare facilities. However, the City's Planning Division was interested in knowing that the student drop-off/pick-up operations would not result in spillover onto adjacent roadways. Therefore, a parking demand analysis has been prepared for the School to determine whether the proposed 37-space parking lot can accommodate the School's peak faculty/staff parking demands and student drop-off/pick-up operations without producing off-site adverse effects.

For the proposed School, the parking demand will be comprised of two primary components: the faculty/staff parking demand and the parking demand associated with student drop-off/pick-up activities. The methodology, assumptions, and results of the analysis to determine the parking demands associated with these two components are detailed in the following sections.

EMPLOYEE PARKING DEMAND

EXISTING SCHOOL FACULTY/STAFF COMMUTE TRAVEL STATISTICS

In order to determine the anticipated parking demand associated with the proposed School site, the School and KOA surveyed current faculty/staff at the existing school to gauge their typical commute behavior. The survey results indicated that existing faculty/staff maintain the following general travel mode splits:

- Drive Alone – 10 of 12 (83.3 percent)
- Public Transportation – 1 of 12 (8.3 percent)
- Drop-off/Pick-up – 1 of 12 (8.3 percent)

Based on the results of the survey, the existing faculty/staff anticipate that they will utilize the same travel mode to access the proposed School site following relocation. Thus, these mode split percentages were applied to the proposed School faculty/staff members to determine the anticipated employee parking demand.

PROPOSED SCHOOL FACULTY/STAFF PARKING DEMAND

As discussed, the proposed School is expected to employ a total of 20 faculty/staff members, including 14 teachers, 2 foreign language directors, 2 kitchen staff members, 1 guard, and 1 Head of School. In order to determine the faculty/staff parking demand of the proposed School, the travel mode split percentages determined from the survey of existing School faculty/staff were applied to the anticipated staff population for the proposed School.

Based on the collected survey data, approximately 83.3 percent of faculty/staff currently drive alone and will be expected to drive alone to the proposed Uplander Campus. Thus, of the 20 proposed employees, approximately 17 will drive and park within the proposed School parking lot. Of the remaining staff members, one or two are expected to take transit to and from the site and one or two will be picked up and dropped off.

Based on information provided by the Project team, the following staff schedules are anticipated for the proposed School:

- Morning Shift: 7:30 AM to 4:30 PM
- Afternoon Shift: 9:00 AM to 6:00 PM
- Kitchen Staff: 7:00 AM to 1:00 PM

However, the division of staff between the morning and afternoon shifts will be dependent on the number of students enrolled in the aftercare program. As these numbers cannot be determined until after Project approval and enrollment of students, all teachers and non-kitchen faculty/staff were conservatively assumed to arrive prior to the morning student drop-off period and leave after the afternoon student pick-up period. The two kitchen staff members were assumed to arrive prior to morning drop-off activities and leave prior to the beginning of the afternoon pick-up window.

Based on the expected mode split factors and proposed School staffing schedule, 17 of the 37 on-site parking spaces will be required to meet the faculty/staff parking demand during the morning drop-off period. In the afternoon pick-up period, 16 parking spaces will be occupied by employee vehicles on the site (conservatively assuming one of the kitchen staff members takes transit to and from the site). With these faculty/staff parking demands on the site, 18 spaces and 19 spaces will be available to accommodate student drop-offs and pick-ups during the morning and afternoon periods, respectively. This analysis conservatively assumes no use of the ADA parking spaces for employees or student drop-offs/pick-ups.

STUDENT DROP-OFF/PICK-UP PARKING DEMAND

As discussed previously, when students are dropped-off and picked-up at the proposed School site, parents will drive into the Project parking lot and park in a parking space before unloading or loading a student from or into their vehicle. Thus, the drop-off and pick-up activities for the School site will have an associated parking demand which must be accommodated by the School's parking facilities.

STUDENT DROP-OFF/PICK-UP PARKING SUPPLY

In order to estimate the anticipated parking supply available for drop-off and pick-up activities at the proposed School, empirical drop-off/pick-up parking data were collected at the existing school site. Parking duration data for student drop-offs and pick-ups were collected for a typical school day on Thursday, September 15, 2022. Parking data were collected for the period starting 15 minutes before and ending 15 minutes after the existing school drop-off and pick-up periods (i.e., 7:45 AM to 8:45 AM and 4:15 PM to 5:15 PM). During these periods, the time was recorded starting when a vehicle parked to drop-off/pick-up a student and ending when the vehicle departed the existing school parking area. These data were evaluated to determine the average parking dwell time for vehicles at the existing school. The parking duration data collected for the existing School site are provided in Attachment 2.

As shown in Attachment 2, during the morning student drop-off period, dwell times in the existing School parking facilities ranged from less than 2 minutes to approximately 13 minutes. The average dwell time for vehicles during the student drop-off period was calculated to be approximately 4 minutes, 47 seconds. During the afternoon student pick-up period, vehicular dwell times in the parking facilities ranged from under 2 minutes to approximately 27 minutes, with an average dwell time of 5 minutes, 52 seconds.

Based on these average dwell times, it was assumed that vehicular parking spaces would turnover approximately every five minutes during the morning student drop-off period and every 6 minutes during the afternoon student pick-up period. Assuming these turnover rates, each non-employee parking space in the proposed School parking lot would be available to turnover 3 times during the peak 15-minute student drop-off period and 2.5 times during the peak 15-minute student pick-up period. By applying these turnover rates to the number of available non-ADA parking spaces within the proposed School parking lot after accounting for the anticipated faculty/staff parking demand, a total of 54 effective drop-off spaces and 47 effective pick-up spaces would be available for student vehicles during the morning and afternoon peak 15-minute periods, respectively. These calculations are detailed below in Table 1.

Table 1: Available Automobile Parking Supply Calculations for Peak 15-Minute Periods of Student Drop-Offs and Pick-Ups

Drop-off/Pick-Up Period	Total Spaces in Parking Lot[1]	Employee Parking Demand	Spaces Available for Student Drop-Offs/Pick-ups	Average Vehicular Dwell Time	15-Minute Turnover Factor[2]	Effective 15-Minute Drop-off/Pick-Up Parking Supply
Morning Drop-Off Period (7:30 AM to 9:00 AM)	35	17	18	0:04:47	3.0	54
Afternoon Pick-Up Period (3:00 PM to 5:30 PM)	35	16	19	0:05:52	2.5	47

Notes:
[1] The total conservatively does not include the two ADA parking spaces.
[2] Based on parking space turnover rates of 5 minutes and 6 minutes for the morning pick-up and afternoon drop-off periods, respectively.

STUDENT DROP-OFF/PICK-UP PARKING DEMAND

In order to evaluate whether the student drop-off/pick-up parking supply is sufficient to meet the needs of the proposed School, the peak drop-off/pick-up demands were estimated for the site. The peak 15-minute periods for drop-off and pick-up activities were determined based on the previously described operational schedule. Due to the lack of information regarding the number of students that will be enrolled in the aftercare program (and thus the anticipated pick-up demand during the aftercare period), only the standard drop-off/pick-up windows were evaluated. It is assumed that, through the provision of the additional aftercare pick-up windows, student pick-ups will be spread across a longer timeframe and the peak pick-up demands analyzed herein present a conservative condition.

In addition to the student drop-off/pick-up parking duration data collected at the existing school site, the number of students within each vehicle was also recorded to inform the anticipated parking demand of the proposed School. During the morning drop-off period, 6 of the 39 observed vehicles dropped off 2 students during the morning period, while the remaining 33 vehicles contained a single student. The afternoon pick-up period exhibited a similar rate of students per vehicle, with 5 of the 34 vehicles picking up two students. The students per vehicle data are presented in Attachment 2.

Based on these data, reductions to the required drop-off/pick-up parking demand are appropriate to account for students who will arrive to and depart from the School in the same vehicle. While adjustments could have been implemented based on the observed data, it was conservatively assumed that all students at the proposed School would arrive to and depart from the site in separate vehicles. Although it is expected that some students will carpool to/from the School site (especially given the tuition incentives proposed to be implemented by the School as part of the TDM Plan), estimating the number of future carpooling students is difficult due to changes in enrollment that may occur as a result of the School relocation. Thus, it was conservatively assumed that all students would arrive to and depart from the site via separate vehicles.

As discussed previously, the student drop-offs and pick-ups at the proposed School site would be divided into separate windows for each class. Based on the student drop-off/pick-up schedule, the peak 15-minute periods for student drop-offs would occur from 8:00 AM to 8:15 AM and from 8:15 AM to 8:30 AM, when drop-offs would include a preschool class and a kindergarten class. During each of these periods a total of 32 students (14 preschool, 18 kindergarten) would be dropped off. Assuming each of these students would arrive to the site in a separate vehicle, the peak 15-minute student drop-off parking demand is 32 vehicles.

During the afternoon pick-up period, the designated preschool and kindergarten pick-up periods do not overlap. Therefore, the peak periods for student pick-ups would occur from 3:00 PM to 3:15 PM and from 3:15 PM to 3:30 PM, during kindergarten class pick-ups. Assuming the 18 kindergarten students per period will each be picked up by a separate vehicle, the peak 15-minute student pick-up parking demand is 18 vehicles.

STUDENT DROP-OFF/PICK-UP PARKING EVALUATION

Based on the peak parking supply and demand calculations detailed above, an evaluation of whether the proposed School parking facility can accommodate the anticipated parking demands was conducted and the results are presented below in Table 2. As shown, during the morning peak 15-minute drop-off periods from 8:00 AM to 8:15 AM and from 8:15 AM to 8:30 AM, the effective parking supply of 54 vehicle spaces can accommodate the 32-vehicle peak parking demand. Similarly, during the afternoon peak 15-minute pick-up periods from 3:00 PM to 3:15 PM and from 3:15 PM to 3:30 PM, the effective parking supply of 47 vehicle spaces can accommodate the 18-vehicle peak parking demand.

Table 2: Student Drop-Off/Pick-Up Parking Supply vs. Demand

Drop-Off Period	Preschool Students	Kindergarten Students	Total Students	Total Parking Demand	Effective Available Spaces[1]	Exceeds Supply?
7:30-7:45 AM	14	0	14	14	54	No
7:45-8:00 AM	14	0	14	14	54	No
8:00-8:15 AM	14	18	32	32	54	No
8:15-8:30 AM	14	18	32	32	54	No
8:30-8:45 AM	14	0	14	14	54	No
8:45-9:00 AM	14	0	14	14	54	No
9:00-9:20 AM	24	0	24	24	54	No
Pick-Up Period	**Preschool Students**	**Kindergarten Students**	**Total Students**	**Total Parking Demand**	**Effective Available Spaces[2]**	**Exceeds Supply?**
3:00-3:15 PM	0	18	18	18	47	No
3:15-3:30 PM	0	18	18	18	47	No
4:00-4:15 PM	14	0	14	14	47	No
4:15-4:30 PM	14	0	14	14	47	No
4:30-4:45 PM	14	0	14	14	47	No
4:45-5:00 PM	14	0	14	14	47	No
5:00-5:15 PM	14	0	14	14	47	No
5:15-5:30 PM	14	0	14	14	47	No

Notes:

[1] Available parking spaces determined by multiplying the 18 non-ADA parking spaces unoccupied by faculty/staff by the number of parking space turnovers per period (based on a 5-minute parking duration).

[2] Available parking spaces determined by multiplying the 19 non-ADA parking spaces unoccupied by faculty/staff by the number of parking space turnovers per period (based on a 6-minute parking duration).

Thus, based on this analysis, the proposed School site provides sufficient parking in order to accommodate the parking demands of both faculty/staff and student drop-offs/pick-ups without spilling over to the on-street parking along Uplander Way or adjacent properties. During the morning drop-off period, the proposed School parking facility can accommodate 22 or more additional drop-off vehicles during each peak 15-minute drop-off period. Further, during the afternoon pick-up period, 29 or more additional pick-up vehicles can be accommodated in the parking lot during each peak 15-minute pick-up window. While student drop-off and pick-up activities at the proposed School site are expected to be very similar to the existing school site, the additional drop-off/pick-up capacities provide ample buffer should some drop-offs or pick-ups take longer than the average observed times.

PARKING DEMAND MANAGEMENT PLAN

As evidenced by the parking demand analysis presented above, the proposed on-site parking supply will meet the anticipated faculty/staff and student drop-off/pick-up parking demands for the relocated and

expanded School facility. As such, it is not anticipated that Project will result in off-site parking impacts to neighboring facilities. However, the Project proposes to implement various measures in order to reduce the number of visitors and employees parked on the site at any single time to reduce further the risk of parking impacts to neighboring businesses. The potential measures proposed for implementation as part of this PDM Plan are discussed below.

EMPLOYEE CARPOOL PROGRAM

As discussed previously, based on the survey of existing faculty/staff, approximately 17 percent of existing faculty/staff commute to and from the campus via non-single-occupancy passenger vehicle. The School presently employs few TDM measures aimed at encouraging alternative mode use for the employees and reducing the number of vehicles parked on site. This provides room for the implementation of measures that will expand carpooling and alternative mode travel, and thus reduce the number of automobiles used by employees to travel to and from the site.

In addition, as part of the survey of existing faculty/staff, the School provided home zip code data to determine where employees live in relation to the campus. The faculty/staff home zip code data indicated that several employees who drive alone to/from work reside either in the same zip code or near each other:

- 2 employees in the north Inglewood community zip code 90302, who both presently drive alone
- 2 employees in South Bay community zip codes, who both presently drive alone
- 5 employees in Westside community zip codes, who all presently drive alone

Based on this information, there is opportunity for the employees of the proposed School to carpool to the Uplander Campus. The School operators will encourage and facilitate planning between faculty and staff members to coordinate carpooling opportunities. By reducing the number of faculty/staff-related vehicles on the site throughout the school day, more parking spaces will remain available for student drop-off/pick-up use.

DISCOUNTED TRANSIT PASSES

To incentive employees to use transit to arrive to and depart from the site, the School will offer subsidized transit passes (e.g., through a Transit Access Pass [TAP] program). School faculty/staff will be presented with a minimum 50 percent off on transit passes. These incentives will be provided in lieu of a dedicated parking space and will be provided to discourage the use of private vehicle travel.

PARKING CASH OUT

Any full-time employee working at the School may be offered the option to be paid an annual $400 parking subsidy, to be used at the employee's discretion for any expenses associated with commuting to and from work or any other expenses, in exchange for relinquishing a parking space within the School parking lot. Any employee taking advantage of the parking cash out must qualify through the use of a non-single-occupancy passenger vehicle travel mode alternative, such as carpooling, public transit, bicycling, or walking.

GUARANTEED RIDE HOME PROGRAM

This program offers registered alternative commute participants a free ride home (e.g., via a taxi voucher arrangement or a transportation network company [TNC] like Uber or Lyft) in the event of an emergency or unexpected late work at the School. The number of emergency rides is typically limited to 6 per year to prevent overuse of the program. Such a program is often a valuable selling point to employees who want to engage in carpooling or an alternative mode arrangement but are concerned about being stranded should an emergency or the unexpected arise.

LONG-TERM BICYCLE PARKING

In compliance with the City's Municipal Code § 17.320.045 A.2, the proposed School will provide 4 short-term bicycle parking spaces (based on two kindergarten classrooms) and 2 long-term bicycle parking spaces. The short-term bicycle racks will be provided near the School entrance adjacent to the automobile parking area. Secure, long-term bicycle parking may consist of a fully enclosed space or a locker accessible only to the owner/operator of the bicycle that better protects the bicycle from inclement weather and potential theft. The School has identified an enclosed near the east stairwell on the ground floor that can accommodate the long-term bicycle parking spaces. The provision of short- and long-term bicycle parking will provide employees with end-of-trip bicycle facilities and will encourage the use of alternative travel modes instead of private vehicles (reducing the number of vehicles parked at the site).

SCHOOL VISITOR RESTRICTIONS

In order to limit parking spillover from the parking lot, guest visits to the proposed School will be limited to off-peak periods when the parking lot exhibits sufficient additional capacity. These periods will be limited to the times outside of the student drop-off and pick-up windows. Thus, all guest visits to the School will occur between 9:30 AM and 3:00 PM. By scheduling visits during these periods, the Project will ensure that the visitor parking demand does not occupy spaces that are needed for employees and student drop-off/pick-up activities.

TRANSPORTATION DEMAND MANAGEMENT PLAN

While the measures of the above PDM plan seek to ensure that appropriate measures are in place to avoid potential parking spillover into adjacent properties, the TDM Plan seeks to reduce the overall number of vehicle trips to and from the site. These measures are intended to encourage School faculty/staff and parents to consider the use of alternative travel modes, including those that support the reduction of greenhouse gas emissions. Many of the PDM measures listed above, in addition to reducing the parking demands on the Project site, would also reduce the number of vehicle trips to and from the proposed School. Despite their travel reduction benefits, they are listed only in the PDM Plan section to avoid redundancy.

CENTRALIZED TRANSPORTATION INFORMATION DISPLAY

A bulletin board, display case, or kiosk displaying transportation information shall be installed in the faculty/staff lounge, where it will be accessible to all employees. All required information shall be stocked/updated on a regular basis. Such information will include, at a minimum, the following:

- Current maps, routes, and schedules for public transit routes serving the site, including nearby bus service provided by Culver CityBus and Metro
- Telephone numbers/websites for referrals on regional ridesharing agencies, transportation management associations, and local transit operators
- Ridesharing material supplied by commuter-oriented organizations
- Bicycle route and facility information, including regional/local bicycle maps and safety information
- A listing of any promotional materials for other facilities and resources that may be available for carpoolers, transit riders, bicyclists, and pedestrians at the site

OTHER MARKETING

Annual state- and regional-level events, such as those related to Rideshare Week and Bike-to-Work Day, will be advertised and potentially used as the setting for a site-specific marketing event and/or transportation fair.

NEW EMPLOYEE ORIENTATION

Every new employee will be required to participate in an orientation. This orientation will be offered during the hiring process and will be conducted by the School administrators. This orientation will include:

- An introduction to the concept and goals of TDM, both in general and how it relates specifically to the School
- The physical and programmatic resources and incentives available to all faculty/staff
- The distribution of transportation demand welcome packages, with Metro pass promotional plans; detailed written information about the parking demand strategies, resources, and incentives; and phone numbers and website links for further information

ANNUAL CONTINUING EMPLOYEE ORIENTATION

This continued orientation will be offered on an annual basis to all School faculty/staff. This training will be in addition to the orientation offered to new employees, as described above. This orientation will be conducted by the School administrators and will serve to:

- Review all of the resources and services of the PDM/TDM Plans
- Address current strengths and shortcomings of the PDM/TDM Plans
- Solicit comments, complaints, and/or recommendations from faculty/staff
- Discuss potential future changes and updates to the PDM/TDM Plans

PRIORITY PARKING FOR EMPLOYEE CARPOOLS

The School will establish priority parking for employee carpools, as needed, based on faculty/staff demand. At a minimum, it is recommended that one automobile parking space in a desirable location will be reserved for future carpool use. The desirable locations include the standard parking spaces closest to the School building entrances. The extra width and length of the standard parking spaces will allow carpool drivers and passengers to arrive at and depart from the School more easily than using compact spaces. The number of employee carpool parking spaces will increase as employees form more carpools.

STUDENT CARPOOL PROGRAM

In addition to encouraging employees to carpool, the proposed School will also promote carpooling for families dropping off and picking up students. As part of the information collected for the existing school site, student zip code data was gathered from school administration to determine the areas to and from which students are drawn. A review of the student home zip code data indicated that several students reside in the same zip codes:

- 12 students in the north Culver City community zip code 90232
- 11 students in the south Culver City community zip code 90230
- 6 students in the Mar Vista/West Los Angeles/Culver City community zip code 90066
- 6 students in the Palms/Beverlywood community zip code 90034

Based on this information, there are opportunities for the parents of students to arrange carpools for student drop-offs and pick-ups at the proposed Uplander Campus. School administrators will assist parents with identifying and coordinating carpool opportunities for student drop-offs and pick-ups. To incentivize parents to arrange carpooling with other families, the proposed School will offer a monthly tuition credit for those families that choose to use carpooling or alternative modes of travel.

ELECTRIC VEHICLE PARKING

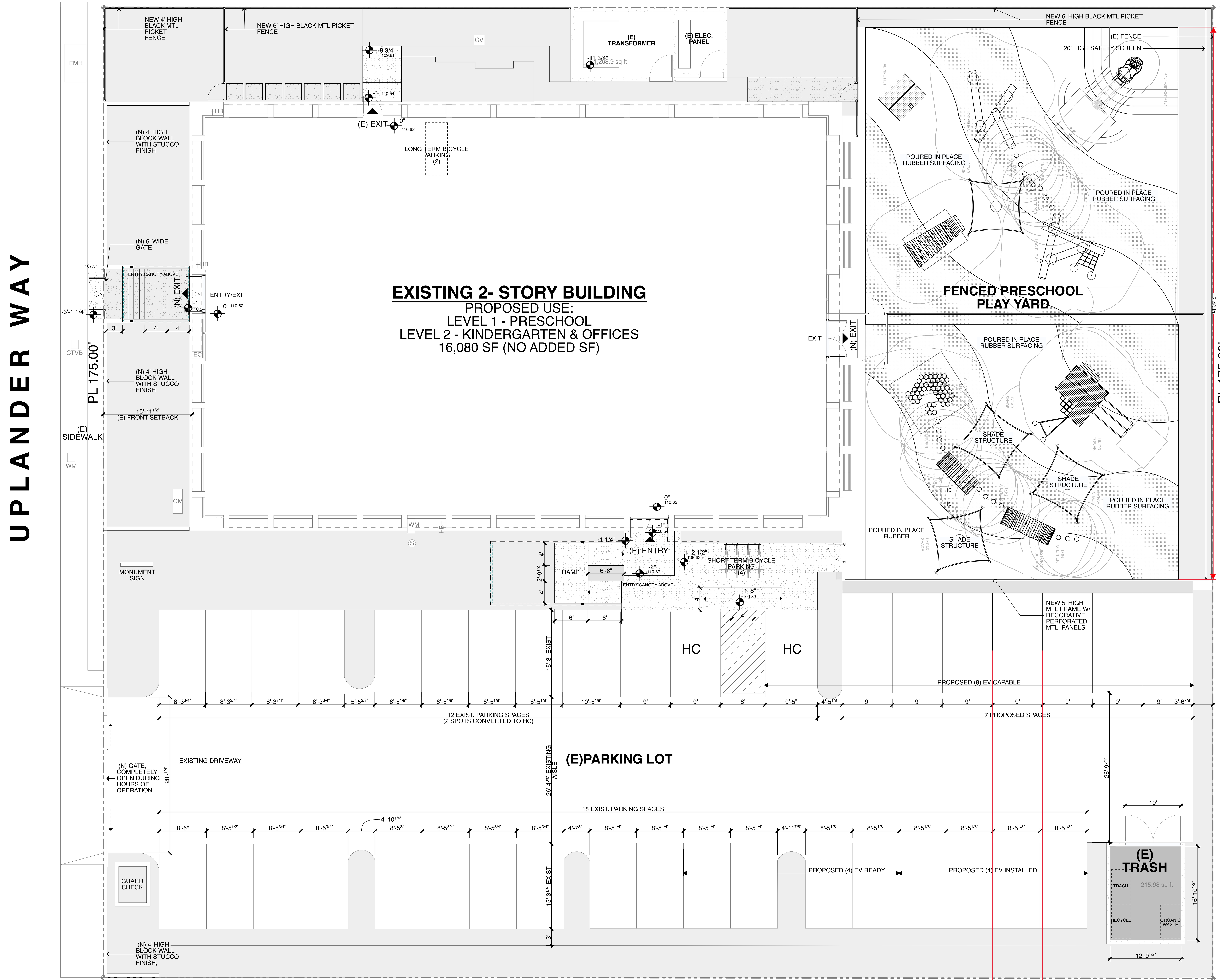
The Project will comply with the City's Electric Vehicle (EV) parking requirements. Per the City's Municipal Code § 17.320.035 O.3, of the parking provided for a non-residential land use, 20 percent is required to be EV Capable, 10 percent is required to be EV Ready, and 10 percent is required to be Full EV Chargers/Charging Stations. Based on the School's proposed 37-space automobile parking supply, the Project will provide 8 EV Capable parking spaces, 4 EV Ready parking spaces, and 4 EV Charging Station spaces. The EV spaces will be located along the southern portion of the School parking lot, as shown in Attachment 1. The EV Capable and EV Ready spaces will not be reserved for exclusive use by EVs, in order to provide sufficient parking capacity for faculty/staff and student drop-off/pick-up parking demands. The EV Charging Station spaces will be restricted to exclusive EV use only as demand warrants. The provision of these spaces will encourage the use of clean energy vehicles when visiting the site.

CONCLUSIONS

As evidenced by the Parking Demand Analysis presented above, the faculty/staff and student drop-off/pick-up parking demands are expected to be accommodated comfortably within the School's proposed parking facilities. While the parking demands of the School are not expected to spill over onto the surrounding roadway system and adjacent properties, the School has proposed potential measures to reduce the number of trips and parked vehicles associated with the site as part of the PDM and TDM Plans. As part of these Plans, the School will encourage the establishment of a carpool program for both faculty/staff and students, which will reduce the number of parked vehicles on site and the number of the trips traveling to and from the School. School administration will promote participation within these programs by providing tuition credits to student families and cash out payments to employees who participate in these programs. Through these measures and the additional strategies discussed herein, it is anticipated that the School parking demands will be lower than those analyzed in this analysis. For these reasons, it is expected that the Project will be able to accommodate all associated parking demands within the facilities provided on site.

ATTACHMENT 1

CONCEPTUAL PROJECT SITE PLAN


UPLANDER WAY
EXISTING 2- STORY BUILDING
PROPOSED USE:
LEVEL 1 - PRESCHOOL
LEVEL 2 - KINDERGARTEN & OFFICES
16,080 SF (NO ADDED SF)
FENCED PRESCHOOL PLAY YARD
(E)PARKING LOT
NEW 4' HIGH BLACK MTL PICKET FENCE
NEW 6' HIGH BLACK MTL PICKET FENCE
(E) TRANSFORMER
(E) ELEC. PANEL
(E) EXIT
LONG TERM BICYCLE PARKING (2)
(N) 4' HIGH BLOCK WALL WITH STUCCO FINISH
(N) 6' WIDE GATE
ENTRY CANOPY ABOVE
ENTRY/EXIT
(N) EXIT
EXIT
(E) FENCE
20' HIGH SAFETY SCREEN
POURED IN PLACE RUBBER SURFACING
SHADE STRUCTURE
PL 175.00'
PL 200.00'
15'-11 1/2" (E) FRONT SETBACK
(E) SIDEWALK
MONUMENT SIGN
RAMP
(E) ENTRY
SHORT TERM BICYCLE PARKING (4)
NEW 5' HIGH MTL FRAME W/ DECORATIVE PERFORATED MTL. PANELS
HC
HC
PROPOSED (8) EV CAPABLE
12 EXIST. PARKING SPACES (2 SPOTS CONVERTED TO HC)
7 PROPOSED SPACES
EXISTING DRIVEWAY
(N) GATE, COMPLETELY OPEN DURING HOURS OF OPERATION
26'-4 3/8" EXISTING AISLE
18 EXIST. PARKING SPACES
PROPOSED (4) EV READY
PROPOSED (4) EV INSTALLED
(E) TRASH
TRASH
RECYCLE
ORGANIC WASTE
215.98 sq ft
GUARD CHECK
EMH
CTVB
WM
GM
EC
CV
HB
S

1 PROPOSED SITE PLAN
SCALE: 1/8" = 1'-0"

ENVIRONMENTAL PROGRAMS AND OPERATIONS NOTES

1) SOLID WASTE, RECYCLABLE WASTE MATERIAL, AND ORGANIC WASTE HANDLING SHALL BE PERFORMED EXCLUSIVELY BY THE CITY OR ITS AUTHORIZED AGENTS. THE CITY COUNCIL MAY REGULATE, BY ORDINANCE OR RESOLUTION, ALL ASPECTS OF SOLID WASTE, RECYCLABLE WASTE MATERIAL, AND ORGANIC WASTE HANDLING, INCLUDING, BUT NOT LIMITED TO, FREQUENCY OF COLLECTION, MEANS OF COLLECTION AND TRANSPORTATION, LEVEL OF SERVICES, CHARGES, FEES, AND NATURE, LOCATION AND EXTENT OF PROVIDING SOLID WASTE HANDLING SERVICES.

2) THE CITY OF CULVER CITY SHALL PROVIDE WASTE DISPOSAL AND RECYCLING SERVICES FOR ALL CONSTRUCTION & DEMOLITION PROJECTS WITHIN CITY LIMITS IN ACCORDANCE WITH CCMC 5.01.010.

SITE PLAN LEGEND

- (N) 6" CMU SITE WALL WITH STUCCO FINISH, 8'-0" HIGH MAX. AT SIDE & REAR YARDS, 42" HIGH MAX. AT FRONT YARD.
- (E) 6" CMU SITE WALL WITH STUCCO FINISH TO REMAIN, 8'-0" HIGH MAX. AT SIDE & REAR YARDS, 42" HIGH MAX. AT FRONT YARD.
- PROPERTY LINE & PROPERTY CORNER
- SETBACK LINE
- CENTERLINE
- 2% SLOPE
- 1-01-01 KEYNOTE, SEE KEYNOTES LIST
- 0'-0" FLOOR ELEVATION
- HB HOSE BIB
- S SEWER CONNECTION
- GM GAS METER
- WM WATER METER
- EC ELECTRICAL CONDUIT
- CV CONTROL VALVE

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Revisions

MARK	DATE	DESCRIPTION

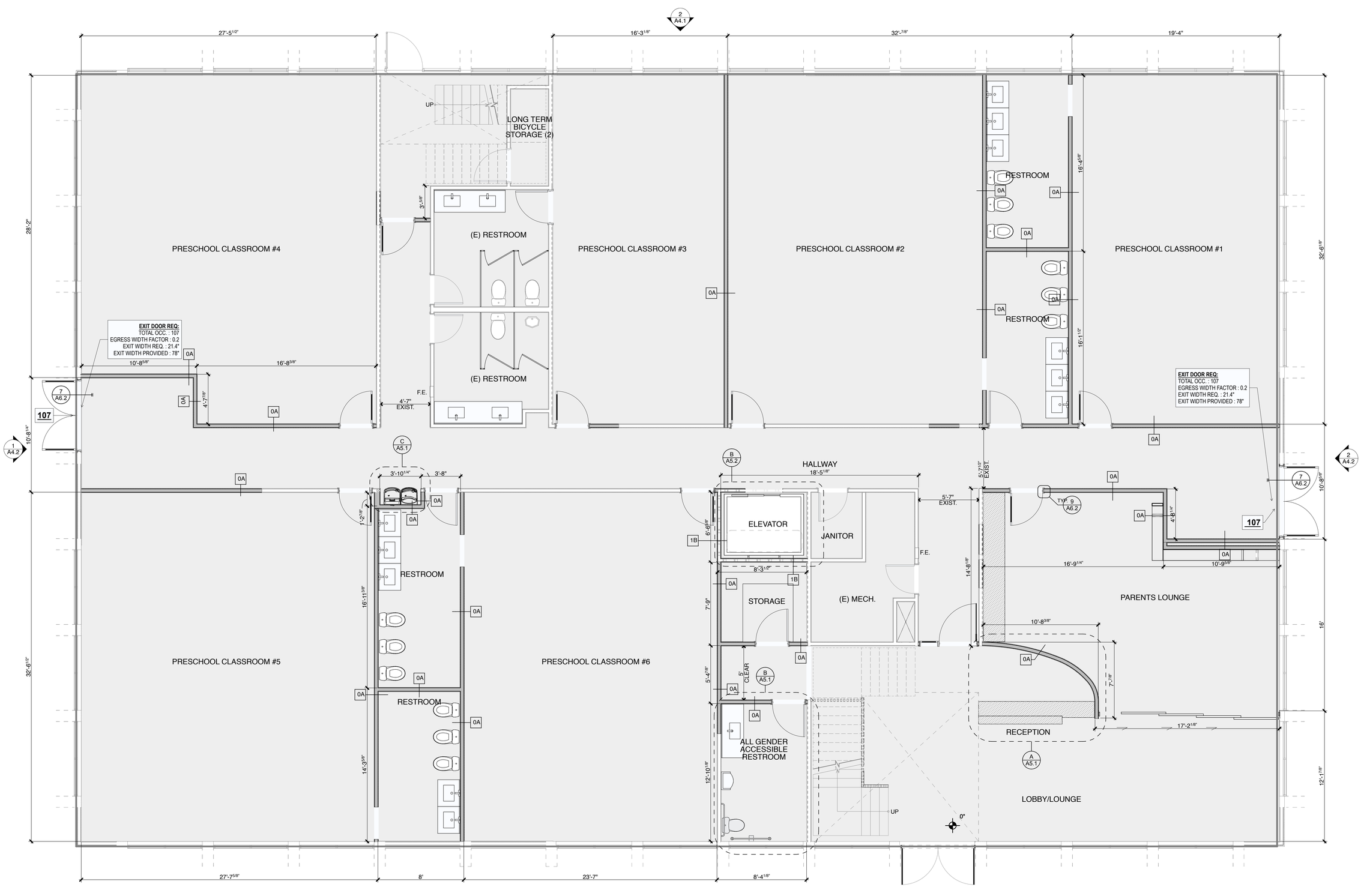
Job No	21-016
Issue Date	11/15/2022
Drawn	AS, YC, FG
Scale	PER DRAWINGS

PROPOSED SITE PLAN

CONSTRUCTION DOCUMENT

A.3

SHEET #LayNoInSubs OF 42



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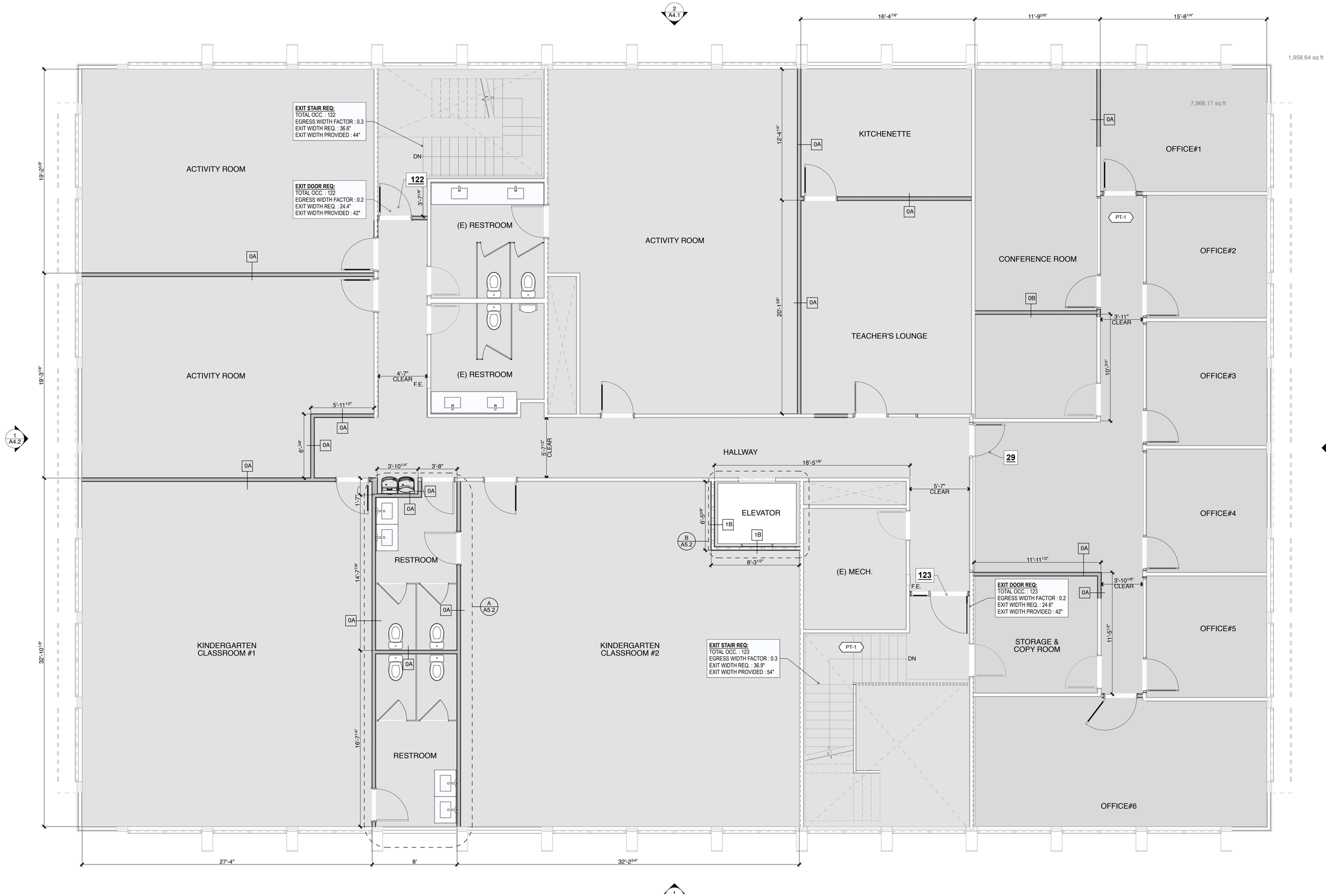
Drawn	AS, YC, FG
Scale	PER DRAWINGS

CONSTRUCTION DOCUMENT

PROPOSED FIRST FLOOR PLAN

A.11

SHEET #LayNoInSubset OF 42



1 PROPOSED SECOND FLOOR

SCALE: 1/4" = 1'-0"

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Revisions

MARK	DATE	DESCRIPTION

Job No	21-016
Issue Date	11/15/2022
Drawn	AS, YC, FG
Scale	PER DRAWINGS

CONSTRUCTION DOCUMENT

PROPOSED SECOND FLOOR PLAN

A.12

ATTACHMENT 2

CULVER CITY MONTESSORI PRESHOOL
STUDENT DROP-OFF/PICK-UP VEHICLE DWELL TIME DATA

CULVER CITY MONTESSORI PRESCHOOL

Student Drop-Off Data Collection Survey - Front of School

Survey Start: **7:45:00 AM** **Survey End:** **8:45:00 AM** **Date:** 9/15/2022

License Plate #	Arrival Time	Departure Time	Dwell Time	# of students
995	7:52:00 AM	8:05:00 AM	0:13:00	1
860	7:53:00 AM	8:00:00 AM	0:07:00	1
581	8:01:00 AM	8:03:00 AM	0:02:00	1
710	8:06:12 AM	8:09:34 AM	0:03:22	1
056	8:07:09 AM	8:09:37 AM	0:02:28	1
075	8:09:06 AM	8:17:12 AM	0:08:06	1
893	8:11:32 AM	8:15:20 AM	0:03:48	1
3A0	8:12:27 AM	8:19:16 AM	0:06:49	1
472	8:20:15 AM	8:22:57 AM	0:02:42	1
982	8:21:12 AM	8:28:18 AM	0:07:06	1
719	8:21:34 AM	8:25:10 AM	0:03:36	2
387	8:23:28 AM	8:25:31 AM	0:02:03	1
ULA	8:24:23 AM	8:27:45 AM	0:03:22	1
V71	8:25:50 AM	8:27:41 AM	0:01:51	1
163	8:26:41 AM	8:30:32 AM	0:03:51	1
868	8:26:46 AM	8:31:03 AM	0:04:17	2
853	8:35:54 AM	8:38:12 AM	0:02:18	1
V85	8:42:52 AM	8:45:13 AM	0:02:21	1

Time	# of Parked Vehicles:
7:45 AM	0
7:48 AM	0
7:51 AM	2
7:54 AM	2
7:57 AM	2
8:00 AM	2
8:03 AM	1
8:06 AM	2
8:09 AM	2
8:12 AM	3
8:15 AM	2
8:18 AM	3
8:21 AM	4
8:24 AM	4
8:27 AM	4
8:30 AM	2
8:33 AM	1
8:36 AM	1
8:39 AM	1
8:42 AM	1
8:45 AM	1
8:48 AM	0
8:51 AM	0
8:54 AM	0
8:57 AM	0
9:00 AM	0

AVERAGE DWELL TIME

FRONT OF SCHOOL: **0:04:27**

BACK OF SCHOOL: **0:05:04**

ENTIRE SCHOOL: **0:04:47**

CULVER CITY MONTESSORI PRESCHOOL

Student Drop-Off Data Collection Survey - Back of School

Survey Start: **7:45:00 AM** **Survey End:** **9:00:00 AM** **Date:** 9/15/2022

License Plate #	Arrival Time	Departure Time	Dwell Time	# of students
Y71	7:56:50 AM	8:01:33 AM	0:04:43	1
217	8:03:45 AM	8:10:07 AM	0:06:22	1
478	8:07:02 AM	8:10:05 AM	0:03:03	1
060	8:11:55 AM	8:15:40 AM	0:03:45	1
489	8:18:40 AM	8:22:08 AM	0:03:28	1
106	8:19:30 AM	8:23:26 AM	0:03:56	2
755	8:19:45 AM	8:26:35 AM	0:06:50	1
283	8:24:30 AM	8:28:45 AM	0:04:15	1
861	8:25:17 AM	8:29:30 AM	0:04:13	1
568	8:27:00 AM	8:37:31 AM	0:10:31	2
084	8:26:20 AM	8:30:47 AM	0:04:27	1
387	8:27:20 AM	8:31:22 AM	0:04:02	1
919	8:27:50 AM	8:30:05 AM	0:02:15	1
752	8:28:50 AM	8:32:00 AM	0:03:10	1
519	8:31:15 AM	8:35:02 AM	0:03:47	1
056	8:32:58 AM	8:41:11 AM	0:08:13	1
637	8:36:20 AM	8:49:10 AM	0:12:50	2
CDW	8:42:20 AM	8:48:40 AM	0:06:20	1
707	8:45:55 AM	8:49:34 AM	0:03:39	1
259	8:47:21 AM	8:49:50 AM	0:02:29	1
710	8:55:37 AM	8:59:40 AM	0:04:03	2

Time	# of Parked Vehicles:
7:45 AM	3
7:48 AM	3
7:51 AM	6
7:54 AM	8
7:57 AM	10
8:00 AM	11
8:03 AM	12
8:06 AM	13
8:09 AM	11
8:12 AM	12
8:15 AM	11
8:18 AM	14
8:21 AM	13
8:24 AM	14
8:27 AM	17
8:30 AM	14
8:33 AM	14
8:36 AM	13
8:39 AM	13
8:42 AM	13
8:45 AM	14
8:48 AM	11
8:51 AM	11
8:54 AM	12
8:57 AM	12
9:00 AM	11

MAXIMUM PARKING DEMAND

FRONT OF SCHOOL: **4**

BACK OF SCHOOL: **17**

ENTIRE SCHOOL: **21**

CULVER CITY MONTESSORI PRESCHOOL

Student Pick-Up Data Collection Survey - Front of School

Survey Start: **4:15:00 PM** **Survey End:** **5:15:00 PM** **Date:** 9/15/2022

License Plate #	Arrival Time	Departure Time	Dwell Time	# of students
174	4:19:58 PM	4:25:38 PM	0:05:40	1
V85	4:20:46 PM	4:24:51 PM	0:04:05	1
995	4:22:35 PM	4:49:42 PM	0:27:07	1
070	4:28:12 PM	4:36:36 PM	0:08:24	1
774	4:31:23 PM	4:36:09 PM	0:04:46	1
860	4:32:52 PM	4:37:40 PM	0:04:48	1
5D1	4:38:16 PM	4:42:54 PM	0:04:38	1
719	4:40:10 PM	4:45:56 PM	0:05:46	2
075	4:41:26 PM	4:46:10 PM	0:04:44	1
710	4:43:43 PM	4:48:04 PM	0:04:21	1
741	4:45:16 PM	4:47:30 PM	0:02:14	1
893	4:46:05 PM	4:49:33 PM	0:03:28	1
056	4:48:24 PM	4:51:35 PM	0:03:11	1
809	4:49:17 PM	4:54:26 PM	0:05:09	1
868	4:50:14 PM	4:53:36 PM	0:03:22	2
V71	4:55:08 PM	5:00:26 PM	0:05:18	1

Time	# of Parked Vehicles:
4:15 PM	0
4:18 PM	2
4:21 PM	3
4:24 PM	3
4:27 PM	1
4:30 PM	2
4:33 PM	4
4:36 PM	4
4:39 PM	4
4:42 PM	4
4:45 PM	4
4:48 PM	4
4:51 PM	2
4:54 PM	1
4:57 PM	1
5:00 PM	1
5:03 PM	0
5:06 PM	0
5:09 PM	0
5:12 PM	0
5:15 PM	0
5:18 PM	
5:21 PM	
5:24 PM	
5:27 PM	
5:30 PM	

AVERAGE DWELL TIME

FRONT OF SCHOOL: **0:06:04**

BACK OF SCHOOL: **0:05:41**

ENTIRE SCHOOL: **0:05:52**

CULVER CITY MONTESSORI PRESCHOOL

Student Pick-Up Data Collection Survey - Back of School

Survey Start: **4:15:00 PM** **Survey End:** **5:15:00 PM** **Date:** 9/15/2022

License Plate #	Arrival Time	Departure Time	Dwell Time	# of students
478	4:15:00 PM	4:16:24 PM	0:01:24	1
885	4:15:45 PM	4:19:23 PM	0:03:38	1
919	4:16:29 PM	4:23:15 PM	0:06:46	1
-	4:24:30 PM	4:32:00 PM	0:07:30	1
303	4:27:05 PM	4:34:53 PM	0:07:48	1
084	4:30:31 PM	4:35:19 PM	0:04:48	1
755	4:34:07 PM	4:39:55 PM	0:05:48	1
637	4:39:25 PM	4:52:27 PM	0:13:02	2
902	4:40:18 PM	4:45:37 PM	0:05:19	1
056	4:41:05 PM	4:46:09 PM	0:05:04	1
568	4:41:11 PM	4:48:15 PM	0:07:04	2
387	4:45:57 PM	4:50:00 PM	0:04:03	1
861	4:47:00 PM	4:51:20 PM	0:04:20	1
710	4:48:31 PM	4:53:37 PM	0:05:06	2
990	4:47:30 PM	4:51:00 PM	0:03:30	1
752	4:50:20 PM	4:55:00 PM	0:04:40	1
283	4:51:10 PM	4:54:13 PM	0:03:03	1
489	4:53:12 PM	5:02:40 PM	0:09:28	1

Time	# of Parked Vehicles:
4:15 PM	13
4:18 PM	14
4:21 PM	13
4:24 PM	12
4:27 PM	12
4:30 PM	13
4:33 PM	13
4:36 PM	12
4:39 PM	12
4:42 PM	15
4:45 PM	16
4:48 PM	18
4:51 PM	16
4:54 PM	14
4:57 PM	11
5:00 PM	8
5:03 PM	1
5:06 PM	1
5:09 PM	0
5:12 PM	0
5:15 PM	0
5:18 PM	
5:21 PM	
5:24 PM	
5:27 PM	
5:30 PM	

MAXIMUM PARKING DEMAND

FRONT OF SCHOOL: **4**

BACK OF SCHOOL: **18**

ENTIRE SCHOOL: **22**

ATTACHMENT 2

USFWS IPaC Resource List

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IPaC **U.S. Fish & Wildlife Service**

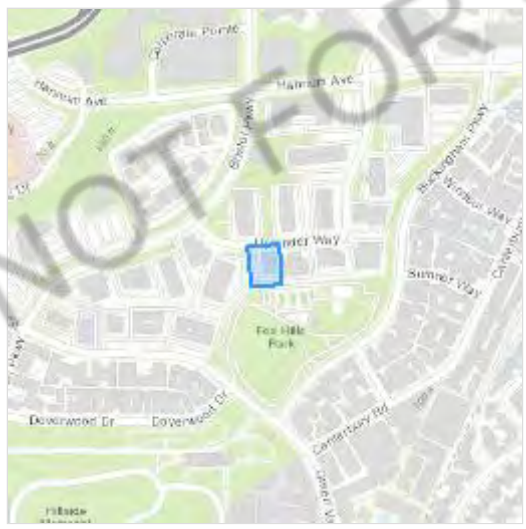
IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Los Angeles County, California



Local office

Carlsbad Fish And Wildlife Office

(760) 431-9440
(760) 431-5901

2177 Salk Avenue - Suite 250

2177 Salk Avenue Suite 250
Carlsbad, CA 92008-7385

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

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1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Birds

NAME	STATUS
California Least Tern Sterna antillarum browni Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/8104	Endangered
Coastal California Gnatcatcher Polioptila californica californica Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/8178	Threatened
Least Bell's Vireo Vireo bellii pusillus Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/5945	Endangered
Western Snowy Plover Charadrius nivosus nivosus There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/8035	Threatened

Insects

NAME	STATUS
Monarch Butterfly Danaus plexippus Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/9743	Candidate

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

There are no critical habitats at this location.

You are still required to determine if your project(s) may have effects on all above listed species.

Bald & Golden Eagles

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act.

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

Additional information can be found using the following links:

- Eagle Managment https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide conservation measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf

There are bald and/or golden eagles in your project area.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list,click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle Haliaeetus leucocephalus This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Jan 1 to Aug 31

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and

understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (▪)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (▪)
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

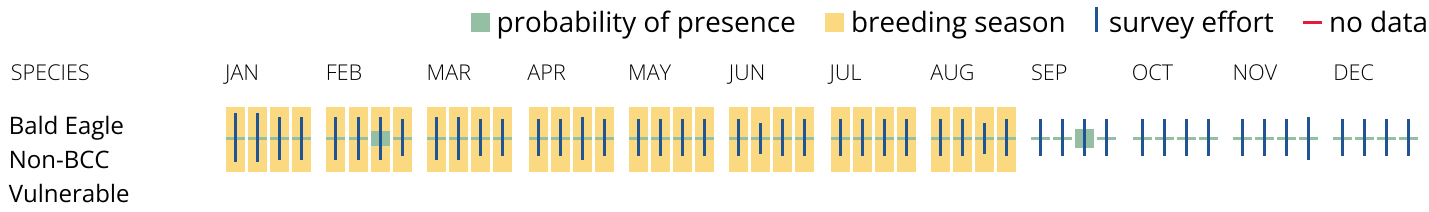
Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



What does IPaC use to generate the potential presence of bald and golden eagles in my specified location?

The potential for eagle presence is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply). To see a list of all birds potentially present in your project area, please visit the Rapid Avian Information Locator (RAIL) Tool.

What does IPaC use to generate the probability of presence graphs of bald and golden eagles in my specified location?

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the Rapid Avian Information Locator (RAIL) Tool.

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur. Please contact your local Fish and Wildlife Service Field Office if you have questions.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern https://www.fws.gov/program/migratory-birds/species
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide conservation measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf

The birds listed below are birds of particular concern either because they occur on the USFWS Birds of Conservation Concern (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ below. This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the E-bird data mapping tool (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found below.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Allen's Hummingbird Selasphorus sasin This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9637	Breeds Feb 1 to Jul 15

Bald Eagle Haliaeetus leucocephalus — Breeds Jan 1 to Aug 31
This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

Belding's Savannah Sparrow Passerculus sandwichensis beldingi — Breeds Apr 1 to Aug 15
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA
https://ecos.fws.gov/ecp/species/8

Black Swift Cypseloides niger — Breeds Jun 15 to Sep 10
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/8878

Bullock's Oriole Icterus bullockii — Breeds Mar 21 to Jul 25
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

California Gull Larus californicus — Breeds Mar 1 to Jul 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

California Thrasher Toxostoma redivivum — Breeds Jan 1 to Jul 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Common Yellowthroat Geothlypis trichas sinuosa — Breeds May 20 to Jul 31
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA
https://ecos.fws.gov/ecp/species/2084

Lawrence's Goldfinch Carduelis lawrencei — Breeds Mar 20 to Sep 20
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9464

Nuttall's Woodpecker Picoides nuttallii — Breeds Apr 1 to Jul 20
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA
https://ecos.fws.gov/ecp/species/9410

Oak Titmouse Baeolophus inornatus — Breeds Mar 15 to Jul 15
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9656

Olive-sided Flycatcher Contopus cooperi — Breeds May 20 to Aug 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/3914

Western Grebe aechmophorus occidentalis — Breeds Jun 1 to Aug 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/6743

Willet Tringa semipalmata — Breeds elsewhere
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Wrentit Chamaea fasciata — Breeds Mar 15 to Aug 10
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

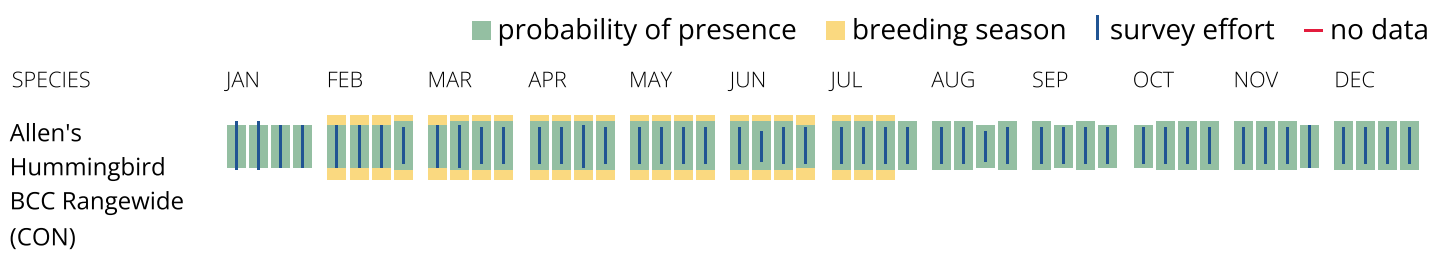
Breeding Season (▬)
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

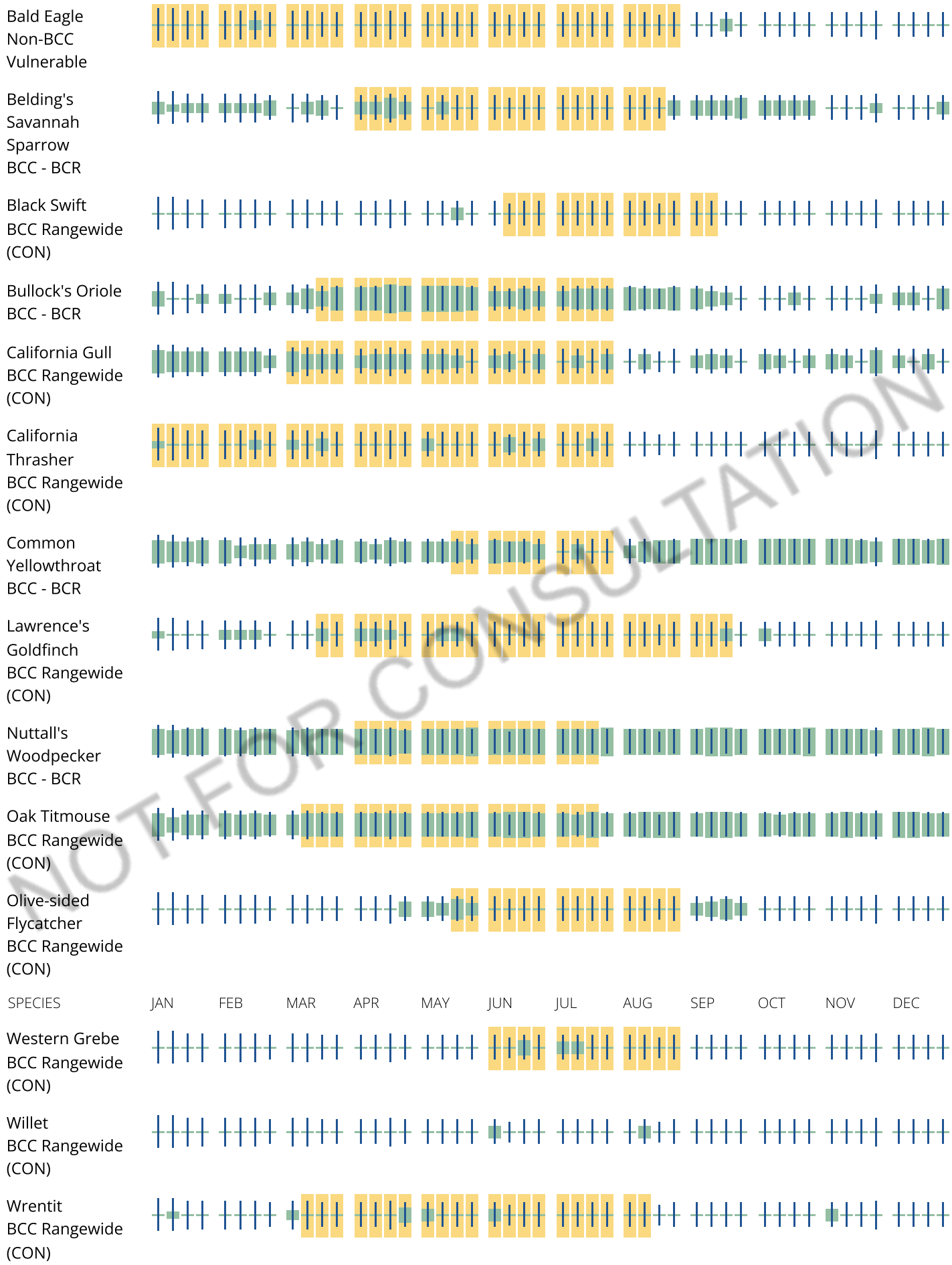
Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.





Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the Rapid Avian Information Locator (RAIL) Tool.

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets.

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the RAIL Tool and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Eagle Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the Diving Bird Study and the nanotag studies or contact Caleb Spiegel or Pam Loring.

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

There are no refuge lands at this location.

Fish hatcheries

There are no fish hatcheries at this location.

Wetlands in the National Wetlands Inventory (NWI)

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

This location did not intersect any wetlands mapped by NWI.

NOTE: This initial screening does **not** replace an on-site delineation to determine whether wetlands occur. Additional information on the NWI data is provided below.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate Federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

ATTACHMENT 3

Memorandum of Understanding for Transportation Study (MOU)

Memorandum of Understanding for Transportation Study

This Memorandum of Understanding (MOU) acknowledges and agrees to all the City of Culver City requirements and fees for the review of a transportation study for the following project.

Date Submitted: November 28, 2022 **MOU Version #** 1

Project Name: Minerva School

Project Address: 5840 Uplander Way, Culver City, CA 90230

Project Description: The project is proposing to renovate and reconfigure an existing 16,080 square-foot office building (inactive since 2020) to provide a private school serving preschool and kindergarten students. Vehicular access would continue to be provided by an existing driveway intersecting the south side of Uplander Way.

Land Use	Population (#)	Residential Units (#)
Preschool	108 Students	
Kindergarten	36 Students	
	20 Employees	

Project Horizon Year: 2023 **Ambient Growth Rate (% per year):** N/A

Directional Distribution (%): N: 53% S: 11% E: 9% W: 27%

Trip Generation Rates: Show AM, PM and daily trip generation rates for each land use and attach total daily trips generation calculations. Indicate ITE Latest Edition/Other Culver City VMT Tool for Daily Trips

Land Use	ITE Code#	AM Trips In	AM Trips Out	PM Trips In	PM Trips Out	Daily Totals In	Daily Totals Out
Day Care Center	565	45	39	40	45		
Private School (K-8)	530	20	16	4	5		
Total						Fewer than 250 daily vehicle trips	

Study Intersections: Show all study intersections, intersections subject to capacity analysis credit for advanced traffic signal control synchronization, whether intersections are signalized or non-signalized, and use the same numbering system for all lists of intersections and figures in the study.

No.	Intersection	Signalized/Non-Signalized	Jurisdiction
The Project will not add 250 or more new daily vehicle trips. Therefore, a transportation study is not required.			

Residential Streets: Show all residential streets to be studied.

No.	Street Name	Limits	Jurisdiction
The Project will not add 250 or more new daily vehicle trips. Therefore, a transportation study is not required.			

Trip Credits: Indicate trip credits to be requested (subject to City approval)

	Trip Credits	Yes/No
Existing Uses		No
Pass-By Trips		No
Internal Trip Capture		No
Transit-Oriented Development (TOD)		No
Transportation Demand Management (TDM)		No

Related Projects: Before the start of any proposed project analysis, consultants shall:

1. Obtain a list of related projects from the Culver City Current Planning Division and other affected jurisdictions.
2. Prepare a draft list of "related projects specific to the proposed project."
3. Obtain written approval from the City of the "related projects specific to the proposed project."

Maps: The following maps shall be attached to the MOU:

1. A map showing the study intersections and street segments to be analyzed, including City limit lines where applicable.
2. A map showing the project's trip distribution percentages for each land use (inbound and outbound) on the area's road network.
3. A map showing the project's trip assignments at the study intersections and project driveways, as well as road segments when applicable.
4. A site plan of the project showing property lines, alleys, project's driveways and nearby driveways and intersections on both sides of the street including dimensions.

Proposed Mitigation and Transportation Improvements: Any proposed transportation improvement(s) or mitigation measure(s) shall be listed and accompanied by plans of the existing and proposed improvements, including city limit lines and existing and proposed property lines. The City may initially accept conceptual plans to be included in the Transportation Study. Detailed design of such improvements will be part of the project's plans submittals.

Post-Occupancy Traffic Counts: By signing below, the Property Owner/ Developer/Applicant hereby agrees to pay for and submit to the City a post-occupancy traffic count analysis of the development to the satisfaction of the City. The analysis shall determine the amount of actual traffic (motor vehicle, bicycle, and pedestrian) generated by the development compared to the ITE trip generation rates. The analysis shall include a traffic count of all onsite driveways taken upon reaching eighty-five percent (85%) occupancy of the total building gross floor area or within one (1) year of the issuance of the first Temporary Certificate of Occupancy (TCO), as determined by the City. The data shall be used to confirm the findings in the approved study and not result in any additional traffic mitigation measures and/or conditions of approval on the subject project.

Fees: Payment of a fee to the City's PWD for the City's processing of the MOU shall be required before the City approves the MOU. Payment for review of the Transportation Study shall be paid before the City's PWD completes its review of the Transportation Study. Said fees shall be per the most recent Fee Schedule as approved by the City Council.

Applicant Information:

	Property Owner/Applicant	Developer/Applicant	Traffic Consultant
Name		Shaneel Poonja	Ryan Kelly, TE
Title			Senior Engineer
Company		Uplander Campus, LLC	KOA Corporation
Street Address		5840 Uplander Way	300 Corporate Pointe, Ste. 470
City, State, Zip		Culver City, CA 90230	Culver City, CA 90230
Office			(310) 473-6508
Cell			
Fax			
Email		shaneelpoonja@gmail.com	rkelly@koacorp.com

Public Agency Information: If any of the intersection(s) to be studied as part of this study are located within the City of Los Angeles, the unincorporated areas of Los Angeles County and/or impact any other public agency (i.e., Caltrans), then this MOU shall also be approved by the reviewing staff representative from each agency:

	City of Los Angeles	County of Los Angeles	Other Public Agency
Name	N/A	N/A	N/A
Title			
Company			
Street Address			
City, State, Zip			
Office			
Cell			
Fax			
Email			

Signatures/Expiration: This MOU shall become valid as of the date of the City's signature and expire one year thereafter. If the administrative draft of the study has not been filed with the City by the expiration date, the MOU shall expire and a new MOU filing, fee, review, and approval process shall be required.

Approved By: Date:

_____ _____
Property Owner/Applicant

_____ _____
Developer/Applicant

_____ _____
Traffic Consultant

_____ _____
City of Culver City

ATTACHMENT 1

CONCEPTUAL PROJECT SITE PLAN

UPLANDER WAY

NEW 4' HIGH BLACK MTL PICKET FENCE

NEW 6' HIGH BLACK MTL PICKET FENCE

EMH

CV

(E) TRANSFORMER

(E) ELEC. PANEL

215.98 sq ft

-8 3/4" 109.81

-1" 110.54

HB

(E) EXIT 0" 110.62

LONG TERM BICYCLE PARKING (2)

(N) 4' HIGH BLOCK WALL WITH STUCCO FINISH

(N) 6' WIDE GATE

107.51

ENTRY CANOPY ABOVE

(N) EXIT

ENTRY/EXIT 0" 110.62

-1" 110.54

-3'-1 1/4"

3' 4' 4'

CTVB

EC

PL 175.00'

(N) 4' HIGH BLOCK WALL WITH STUCCO FINISH

15'-11 1/2" (E) FRONT SETBACK

(E) SIDEWALK

WM

GM

EXISTING 2- STORY BUILDING

PROPOSED USE:
LEVEL 1 - PRESCHOOL
LEVEL 2 - KINDERGARTEN & OFFICES
16,080 SF (NO ADDED SF)

NEW 6' HIGH BLACK MTL PICKET FENCE

(E) FENCE

20' HIGH SAFETY SCREEN

POURED IN PLACE RUBBER SURFACING

POURED IN PLACE RUBBER SURFACING

FENCED PRESCHOOL PLAY YARD

EXIT

(N) EXIT

POURED IN PLACE RUBBER SURFACING

SHADE STRUCTURE

SHADE STRUCTURE

POURED IN PLACE RUBBER SURFACING

POURED IN PLACE RUBBER

SHADE STRUCTURE

PL 175.00'

0" 110.62

-1" 110.54

-1 1/4"

(E) ENTRY

-1'-2 1/2" 109.63

-2" 110.37

SHORT TERM BICYCLE PARKING (4)

RAMP

6'-6"

4'

2'-9 1/2"

4'

ENTRY CANOPY ABOVE

-1'-8" 109.33

4'

6' 6'

NEW 5' HIGH MTL FRAME W/ DECORATIVE PERFORATED MTL. PANELS

MONUMENT SIGN

HC HC

15'-8" EXIST

PROPOSED (8) EV CAPABLE

8'-3 3/4" 8'-3 3/4" 8'-3 3/4" 8'-3 3/4" 5'-5 3/8" 8'-5 1/8" 8'-5 1/8" 8'-5 1/8" 8'-5 1/8" 10'-5 1/8" 9' 9' 8' 9'-5" 4'-5 1/8" 9' 9' 9' 9' 9' 9' 9' 9' 3'-6 7/8"

12 EXIST. PARKING SPACES (2 SPOTS CONVERTED TO HC)

7 PROPOSED SPACES

EXISTING DRIVEWAY

(N) GATE, COMPLETELY OPEN DURING HOURS OF OPERATION

28'-1 1/4"

(E)PARKING LOT

26'-4 3/8" EXISTING AISLE

26'-9 3/4"

18 EXIST. PARKING SPACES

8'-6" 8'-5 1/2" 8'-5 3/4" 8'-5 3/4" 4'-10 1/4" 8'-5 3/4" 8'-5 3/4" 8'-5 3/4" 8'-5 3/4" 4'-7 3/4" 8'-5 1/4" 8'-5 1/4" 8'-5 1/4" 8'-5 1/4" 4'-11 7/8" 8'-5 1/8" 8'-5 1/8" 8'-5 1/8" 8'-5 1/8" 8'-5 1/8" 8'-5 1/8"

PROPOSED (4) EV READY

PROPOSED (4) EV INSTALLED

10'

(E) TRASH

215.98 sq ft

TRASH

RECYCLE

ORGANIC WASTE

16'-10 1/2"

12'-9 1/2"

GUARD CHECK

15'-3 1/4" EXIST

3'

(N) 4' HIGH BLOCK WALL WITH STUCCO FINISH,

PL 200.00'

ENVIRONMENTAL PROGRAMS AND OPERATIONS NOTES

1) SOLID WASTE, RECYCLABLE WASTE MATERIAL, AND ORGANIC WASTE HANDLING SHALL BE PERFORMED EXCLUSIVELY BY THE CITY OR ITS AUTHORIZED AGENTS. THE CITY COUNCIL MAY REGULATE, BY ORDINANCE OR RESOLUTION, ALL ASPECTS OF SOLID WASTE, RECYCLABLE WASTE MATERIAL, AND ORGANIC WASTE HANDLING, INCLUDING, BUT NOT LIMITED TO, FREQUENCY OF COLLECTION, MEANS OF COLLECTION AND TRANSPORTATION, LEVEL OF SERVICES, CHARGES, FEES, AND NATURE, LOCATION AND EXTENT OF PROVIDING SOLID WASTE HANDLING SERVICES.

2) THE CITY OF CULVER CITY SHALL PROVIDE WASTE DISPOSAL AND RECYCLING SERVICES FOR ALL CONSTRUCTION & DEMOLITION PROJECTS WITHIN CITY LIMITS IN ACCORDANCE WITH CCMC 5.01.010.

SITE PLAN LEGEND

- (N) 6" CMU SITE WALL WITH STUCCO FINISH, 8'-0" HIGH MAX. AT SIDE & REAR YARDS, 42" HIGH MAX. AT FRONT YARD.
- (E) 6" CMU SITE WALL WITH STUCCO FINISH TO REMAIN, 8'-0" HIGH MAX. AT SIDE & REAR YARDS, 42" HIGH MAX. AT FRONT YARD.
- PROPERTY LINE & PROPERTY CORNER
- SETBACK LINE
- CENTERLINE
- 2% SLOPE
- 1-01-01 KEYNOTE, SEE KEYNOTES LIST
- 0'-0" FLOOR ELEVATION
- HB HOSE BIB
- S SEWER CONNECTION
- GM GAS METER
- WM WATER METER
- EC ELECTRICAL CONDUIT
- CV CONTROL VALVE

1 PROPOSED SITE PLAN
SCALE: 1/8" = 1'-0"

SweisKloss
Design + Construct

1424 4th Street, Suite 501
Santa Monica, CA 90401
T 310-394-6460
F 310-394-8322
sweiskloss.com

N

UPLANDER CAMPUS LLC
5840 UPLANDER WAY
CULVER CITY, CA 90230-6608

Revisions

MARK	DATE	DESCRIPTION

Job No	21-016
Issue Date	11/15/2022
Drawn	AS, YC, FG
Scale	PER DRAWINGS

CONSTRUCTION DOCUMENT

PROPOSED SITE PLAN

A.3

SHEET #LayNoInSubset OF 42

ATTACHMENT 2

WEEKDAY PEAK-HOUR TRIP GENERATION RATES AND SUMMARY

ATTACHMENT 2

MINERVA SCHOOL (5840 UPLANDER WAY, CULVER CITY)
WEEKDAY PEAK-HOUR TRIP GENERATION RATES AND SUMMARY[1]

Land Use/Trip Type	ITE Code	Intensity[2]	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Trip Generation Rates								
Day Care Center/Vehicle	565	1 stu	53%	47%	0.78	47%	53%	0.79
Private School (K-8)/Vehicle	530	1 stu	56%	44%	1.01	46%	54%	0.26
Trip Generation Summary								
Description		**Size**	**AM Peak Hour**			**PM Peak Hour**		
			In	**Out**	**Total**	**In**	**Out**	**Total**
PROPOSED USES								
Institutional								
Day Care Center		108 stu	45	39	84	40	45	85
Private School (K-8)		36 stu	20	16	36	4	5	9
Proposed Project Total External Project Trips by Vehicle			**65**	**55**	**120**	**44**	**50**	**94**
Net Project Trips			**65**	**55**	**120**	**44**	**50**	**94**

Notes:

1) ITE *Trip Generation Manual* (11th Edition, 2021) trip generation rates and directional distributions were applied for Land Use Code 565 (Day Care Center) and Land Use Code 530 (Private School [K-8]) to develop baseline vehicle trip estimates for the existing and proposed land uses. The General Urban/Suburban setting was selected as most appropriate for the Project location. Transit and walk/bicycle trip adjustments were conservatively not applied to the baseline vehicle trip calculations.

2) stu = Number of students

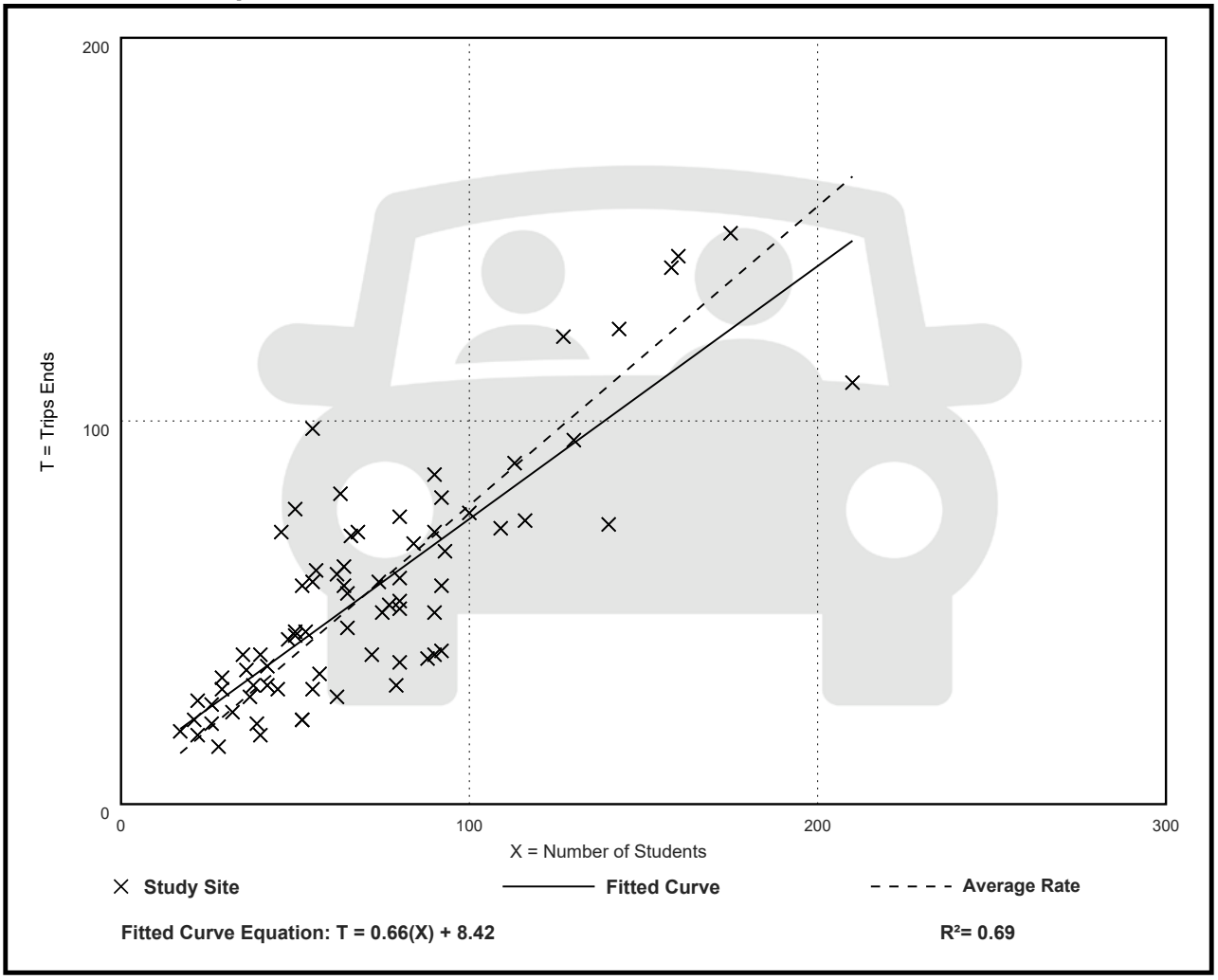
Day Care Center
(565)

Vehicle Trip Ends vs: Students
On a: Weekday,
Peak Hour of Adjacent Street Traffic,
One Hour Between 7 and 9 a.m.
Setting/Location: General Urban/Suburban
Number of Studies: 75
Avg. Num. of Students: 71
Directional Distribution: 53% entering, 47% exiting

Vehicle Trip Generation per Student

Average Rate	Range of Rates	Standard Deviation
0.78	0.39 - 1.78	0.25

Data Plot and Equation



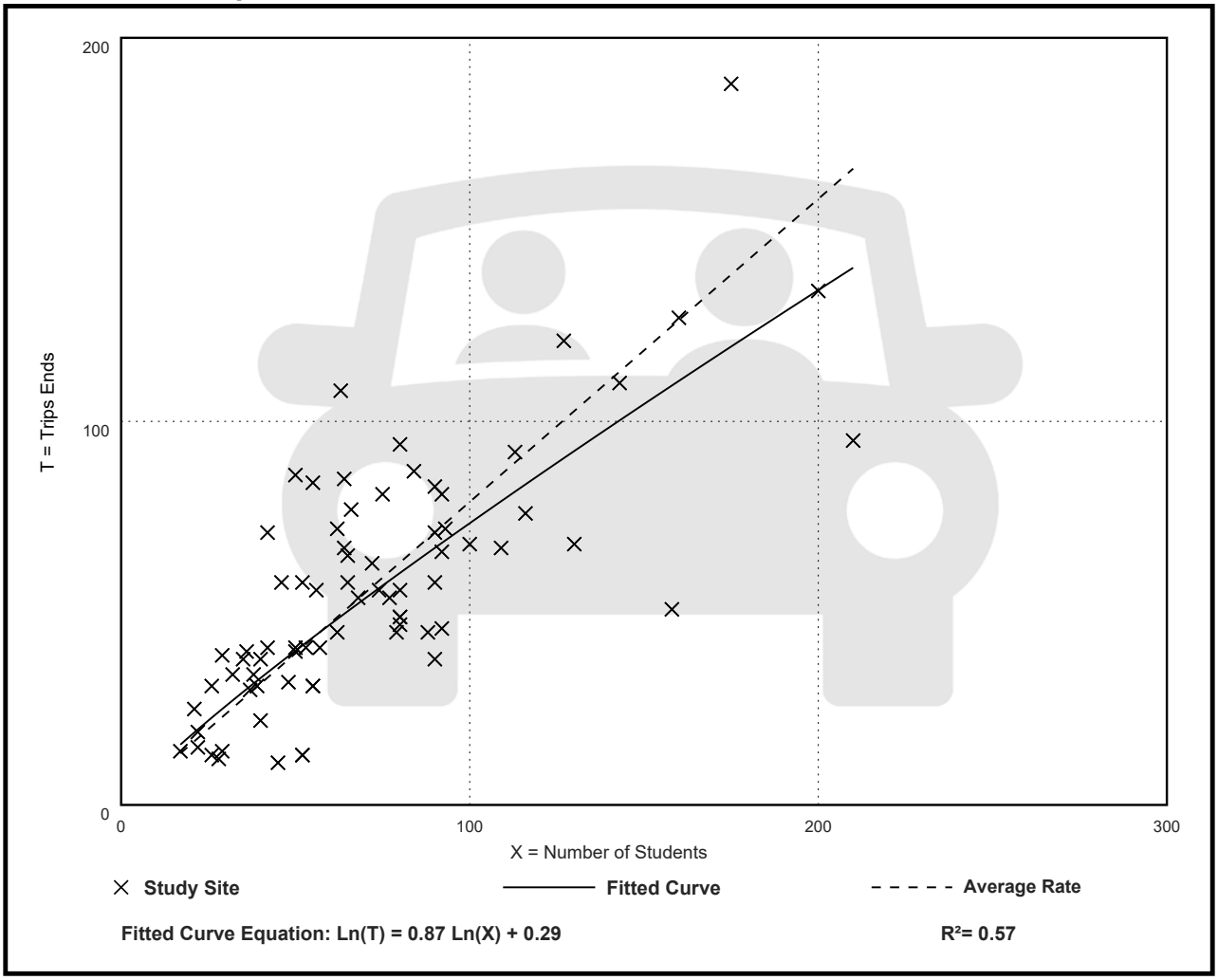
Day Care Center
(565)

Vehicle Trip Ends vs: Students
On a: Weekday,
Peak Hour of Adjacent Street Traffic,
One Hour Between 4 and 6 p.m.
Setting/Location: General Urban/Suburban
Number of Studies: 75
Avg. Num. of Students: 72
Directional Distribution: 47% entering, 53% exiting

Vehicle Trip Generation per Student

Average Rate	Range of Rates	Standard Deviation
0.79	0.24 - 1.72	0.30

Data Plot and Equation



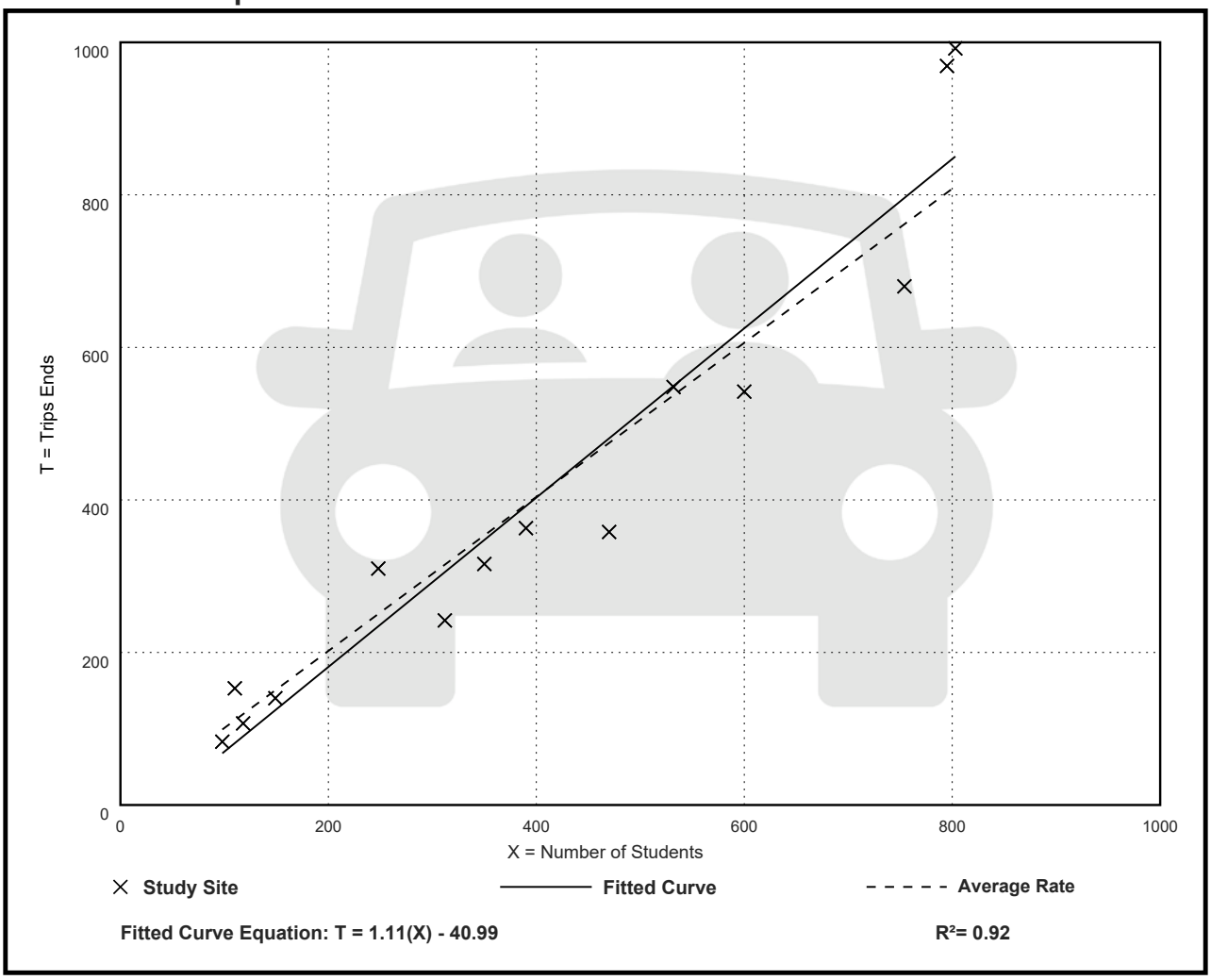
Private School (K-8)
(530)

Vehicle Trip Ends vs: Students
On a: Weekday,
Peak Hour of Adjacent Street Traffic,
One Hour Between 7 and 9 a.m.
Setting/Location: General Urban/Suburban
Number of Studies: 14
Avg. Num. of Students: 409
Directional Distribution: 56% entering, 44% exiting

Vehicle Trip Generation per Student

Average Rate	Range of Rates	Standard Deviation
1.01	0.76 - 1.39	0.18

Data Plot and Equation



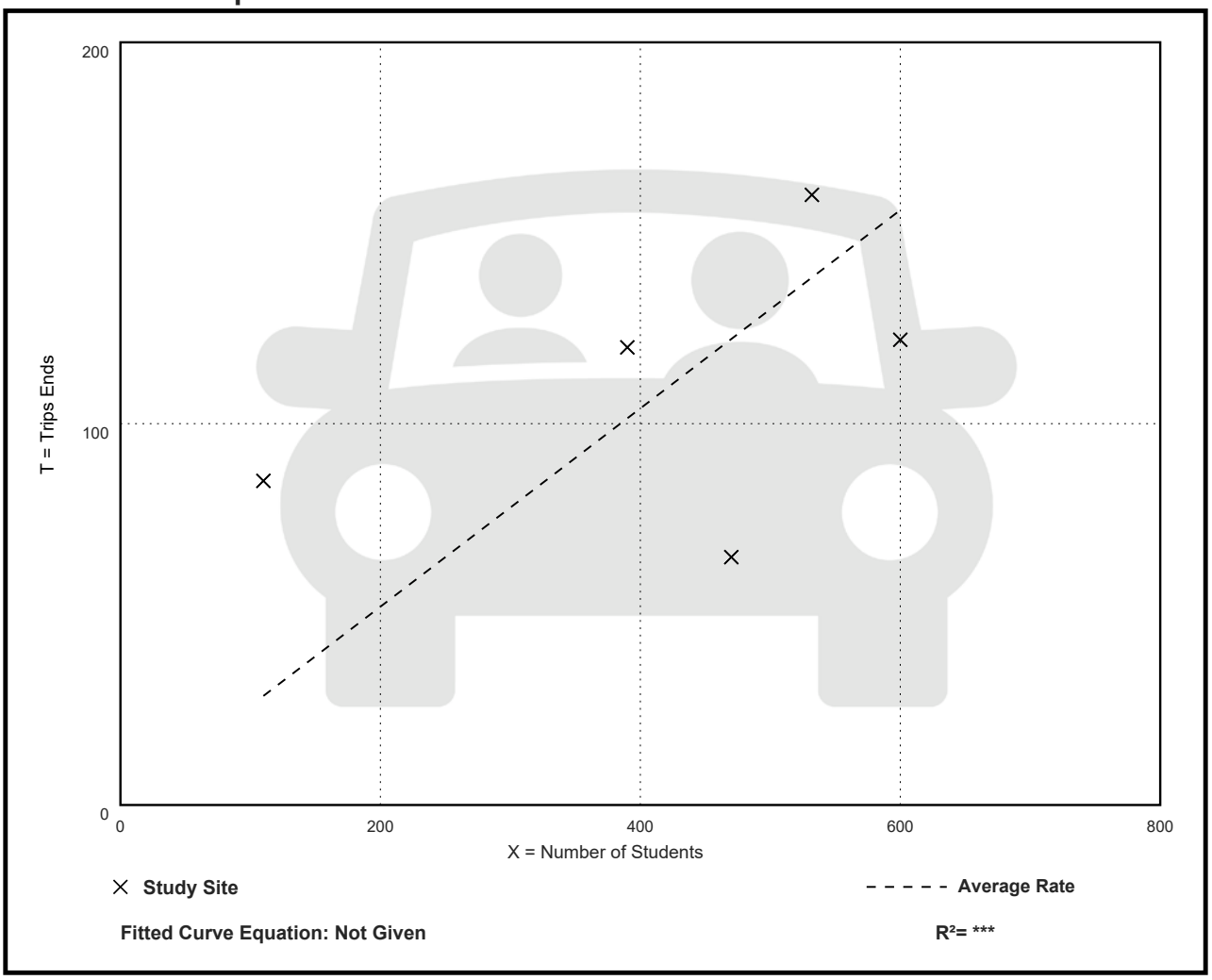
Private School (K-8)
(530)

Vehicle Trip Ends vs: Students
On a: Weekday,
Peak Hour of Adjacent Street Traffic,
One Hour Between 4 and 6 p.m.
Setting/Location: General Urban/Suburban
Number of Studies: 5
Avg. Num. of Students: 420
Directional Distribution: 46% entering, 54% exiting

Vehicle Trip Generation per Student

Average Rate	Range of Rates	Standard Deviation
0.26	0.14 - 0.77	0.15

Data Plot and Equation



ATTACHMENT 3

VMT TOOL SCREENING RESULTS

Culver CITY VMT Tool

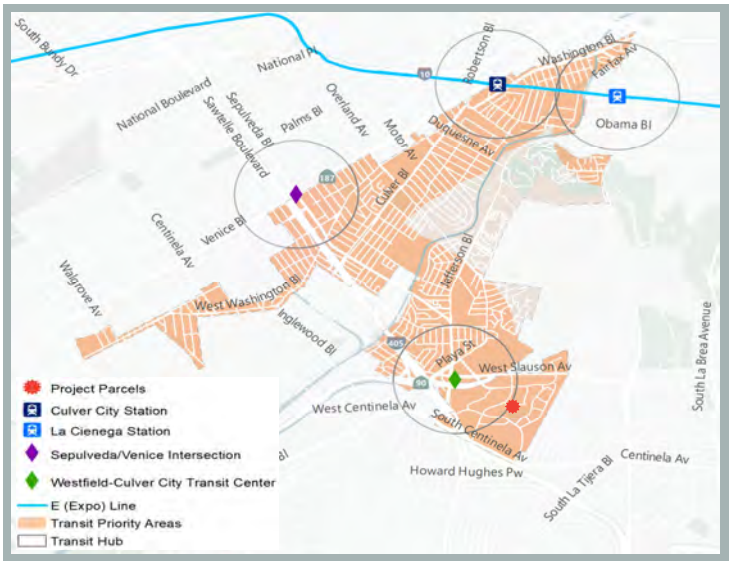
No analysis required. This project meets the screening criteria.

Project Name

Minerva School (5840 Uplander Way)

Project Parcel Click here for parcel viewer

4134005009



Project Screening

Apply to Full Project

Is this project within ½ mile of one of the following transit hubs? - Culver City Expo Station - La Cienega/Jefferson Expo Station - Westfield-Culver City Transit Center - Sepulveda/Venice intersection	No
Is the project located within any TPA and are at least 15% of the on-site residential units are affordable?	N/A
Does this project generate fewer than 250 daily trips?	Yes

Apply to Specific Land Uses

Is the retail component of project fewer than 50,000 square feet in size at every store?	
Is this residential component of the project 100% affordable housing?	N/A

Project Daily Trips	40

Project Land Use

Residential	Value (du)
Single Family	
Multi-Family	
Affordable Housing	
Family	
Senior	
Special Needs	
Permanent Supportive	

Office	Value (ksf)
Standard	

Medical	Value (ksf)
Medical Office	
Hospital	

Industrial	Value (ksf)
Light Industrial	
Manufacturing	
Warehousing / Self-Storage	

Movie Studio	Value (ksf)
Office	
Post Production	
Stage	
Support	

The following land uses will require separate impact analysis (outside of this tool) if not screened out. Please leave the land uses in the table below if they are part of a mixed use project.

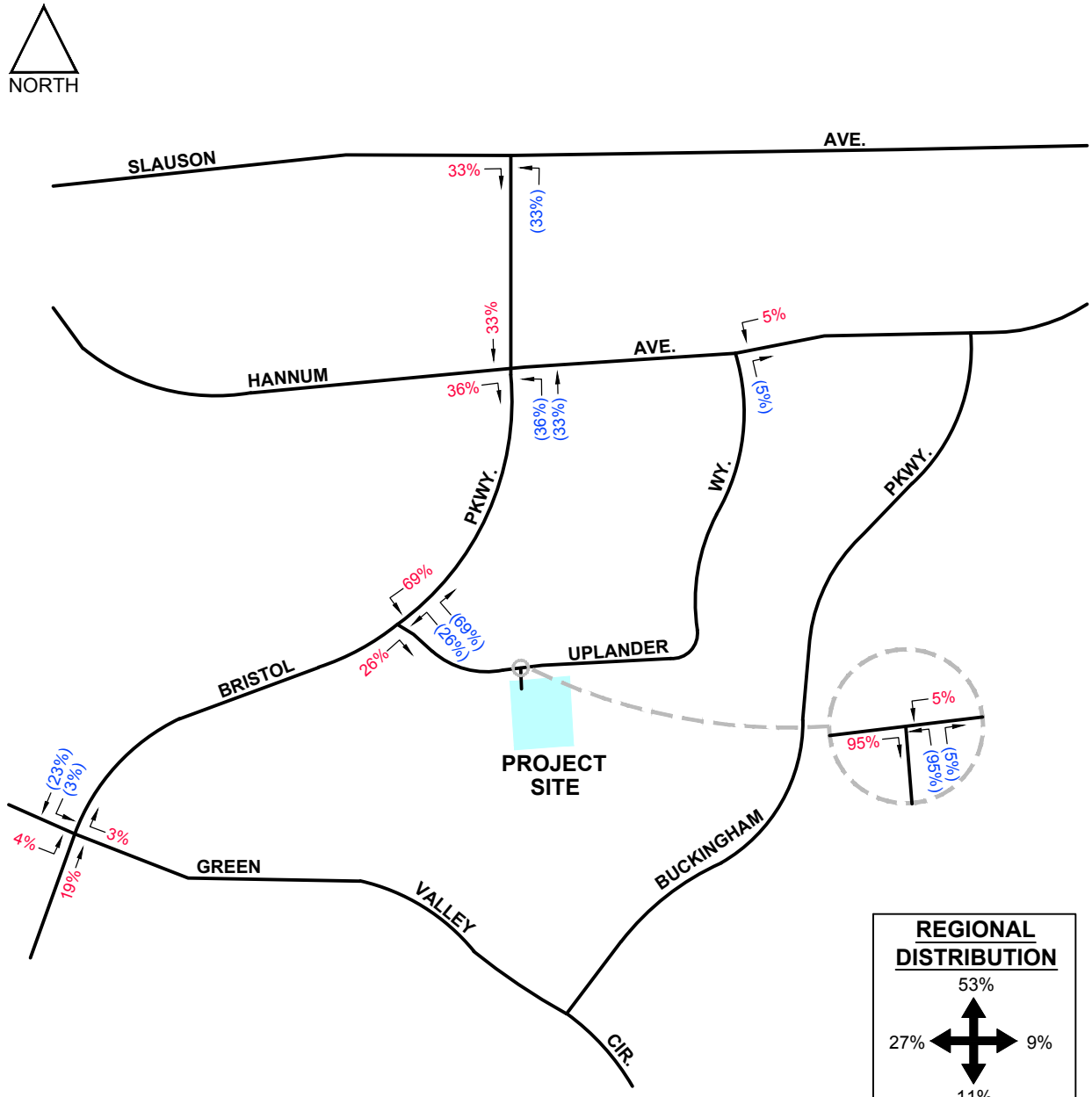
Retail	Value (ksf)
General	
Supermarket	
Bank	
Health Club	
Gas Station	
Auto Repair	
Home Improvement Superstore	
Free-Standing Discount	
Restaurant Non-fast-food	
Restaurant Fast-food	
	Value (seats)
Theater w/ Matinee	

Hotel	Value (rooms)
Hotel	
Motel	

School	Value (students)
University	
High School	
Middle School	
Elementary	144

ATTACHMENT 4

PROJECT TRIP DISTRIBUTION PERCENTAGES



ATTACHMENT 4

11/3/2022

FN: JC28118 MINERVA 5840 UPLANDER WAY CULVER CITY\PROJ-DIST

PROJECT TRIP DISTRIBUTION PERCENTAGES

KOA
300 Corporate Pointe, Suite 470
Culver City, California 90230
PH (310) 473 6508 F (310) 444 9771
www.koacorp.com

ATTACHMENT 4

Noise Calculations Worksheets

[Page left intentionally blank.]

Source: Google Earth, Aerial View, 2020.

Noise Monitoring and Sensitive Receptor Location Map

Measurement Report

Report Summary

Meter's File Name	831_Data.143.s	Computer's File Name	831C_10304-20230713 110516-831_Data.143.ldbin
Meter	831C 10304		
Firmware	04.5.1R0		
User	Adrianna Gjonaj and Cole Scherer	Location A:	On the south side of Uplander Way, adjacent to the Project Site
Job Description	Uplander Campus		
Noise Sources:	Light vehicle traffic		
Start Time	2023-07-13 11:05:16	Duration	0:15:00.0
End Time	2023-07-13 11:20:16	Run Time	0:15:00.0
		Pause Time	0:00:00.0

Results

Overall Metrics

LA_{eq}	60.1 dB		
LAE	89.6 dB	SEA	--- dB
EA	102.1 µPa²h	LAFTM5	68.4 dB
LZ_{peak}	101.0 dB	2023-07-13 11:05:31	
LAS_{max}	77.2 dB	2023-07-13 11:05:16	
LAS_{min}	51.9 dB	2023-07-13 11:09:51	
LA_{eq}	60.1 dB		
LC_{eq}	67.9 dB	LC_{eq} - LA_{eq}	7.8 dB
LAI_{eq}	68.7 dB	LAI_{eq} - LA_{eq}	8.6 dB

Exceedances

	Count	Duration
LAS > 65.0 dB	30	0:01:39.5
LAS > 85.0 dB	0	0:00:00.0
LZpeak > 135.0 dB	0	0:00:00.0
LZpeak > 137.0 dB	0	0:00:00.0
LZpeak > 140.0 dB	0	0:00:00.0

Community Noise

LDN	LDay	LNight
60.1 dB	60.1 dB	0.0 dB

LDEN	LDay	LEve	LNight
60.1 dB	60.1 dB	--- dB	--- dB

Any Data

	A		C		Z	
	Level	Time Stamp	Level	Time Stamp	Level	Time Stamp
L_{eq}	60.1 dB		67.9 dB		74.9 dB	
$Ls_{(max)}$	77.2 dB	2023-07-13 11:05:16	94.2 dB	2023-07-13 11:05:16	98.1 dB	2023-07-13 11:05:16
$LF_{(max)}$	80.7 dB	2023-07-13 11:05:31	82.2 dB	2023-07-13 11:05:31	90.4 dB	2023-07-13 11:05:46
$LI_{(max)}$	93.3 dB	2023-07-13 11:05:16	110.7 dB	2023-07-13 11:05:16	113.1 dB	2023-07-13 11:05:16
$LS_{(min)}$	51.9 dB	2023-07-13 11:09:51	63.7 dB	2023-07-13 11:06:11	66.6 dB	2023-07-13 11:06:11
$LF_{(min)}$	51.3 dB	2023-07-13 11:09:50	62.2 dB	2023-07-13 11:06:11	64.7 dB	2023-07-13 11:06:10
$LI_{(min)}$	51.6 dB	2023-07-13 11:09:50	64.6 dB	2023-07-13 11:06:11	67.3 dB	2023-07-13 11:10:51
$L_{Peak(max)}$	99.8 dB	2023-07-13 11:05:31	101.4 dB	2023-07-13 11:05:31	101.0 dB	2023-07-13 11:05:31

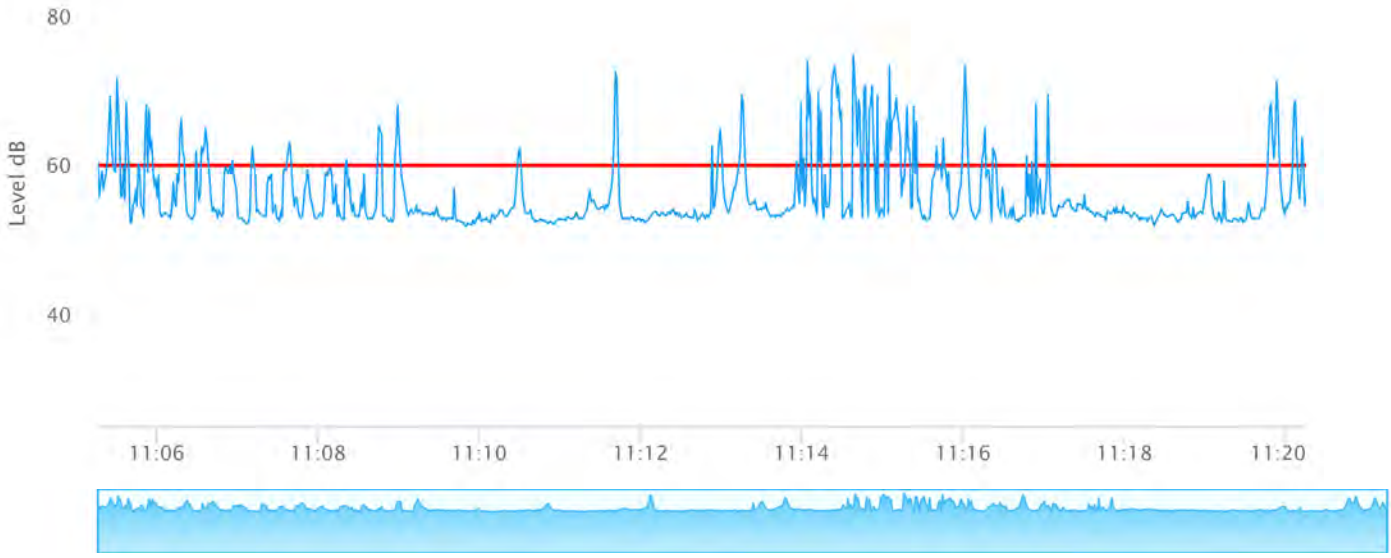
Overloads

Count	Duration
0	0:00:00.0

Statistics

LAS 5.0	67.1 dB
LAS 10.0	63.9 dB
LAS 33.3	56.7 dB
LAS 50.0	54.3 dB
LAS 66.6	53.5 dB
LAS 90.0	52.8 dB

Time History



Report date: 7/24/23
Project: Uplander Campus
Phase: Architectural Coating

RECEPTOR #1

Description	Land Use	Ambient/Baseline (dBA) Daytime
Adjacent commercial building located east of the Project Site	Commercial	60.1

Equipment							Without Attenuation			With Attenuation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Receptor Distance to Centerline of Project Site (Feet)	Estimated Shielding (dBA)	Calculated (dBA) *Lmax	Calculated (dBA) Leq	Estimated Shielding (dBA)	Calculated (dBA) *Lmax	Calculated (dBA) Leq
Air Compressor	No	50	80	78	15	75	20	54.5	51.5			
Air Compressor	No	50	80	78	15	75	20	54.5	51.5			
						Construction Noise Level (dBA Leq)			54.5		Results	
						Noise Level Above Ambient			-5.6		Noise Level Above Ambient	

RECEPTOR #2

Description	Land Use	Ambient/Baseline (dBA) Daytime
Adjacent commercial building located west of the Project Site	Commercial	60.1

Equipment							Without Attenuation			With Attenuation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Receptor Distance to Centerline of Project Site (Feet)	Estimated Shielding Shielding (dBA)	Calculated (dBA) *Lmax	Calculated (dBA) Leq	Estimated Shielding Shielding (dBA)	Calculated (dBA) *Lmax	Calculated (dBA) Leq
Air Compressor	No	50	80	78	70	190	20	46.4	43.4			
Air Compressor	No	50	80	78	70	190	20	46.4	43.4			
						Construction Noise Level (dBA Leq)			46.4		Results	
						Noise Level Above Ambient			-13.7		Noise Level Above Ambient	

RECEPTOR #3

Description	Land Use	Ambient/Baseline (dBA) Daytime
Commercial buildings located north, northeast, west, southwest, and northwest of the Project Site	Commercial	60.1

Equipment							Without Attenuation			With Attenuation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Distance to Centerline of Project Site (Feet)	Estimated Shielding Shielding (dBA)	Calculated (dBA) *Lmax	Calculated (dBA) Leq	Estimated Shielding Shielding (dBA)	Calculated (dBA) *Lmax	Calculated (dBA) Leq
Air Compressor	No	50	80	78	85	160	20	47.9	44.9			
Air Compressor	No	50	80	78	85	160	20	47.9	44.9			
						Construction Noise Level (dBA Leq)			47.9		Results	
						Noise Level Above Ambient			-12.2		Noise Level Above Ambient	

Notes:
1. Daytime noise level is based on the actual noise measurement taken at the Project Site.
2. An attenuation factor was applied for interior-exterior noise reduction for businesses and professional office uses as these land uses operate indoors.
3. Calculations based on the loudest two pieces of heavy construction equipment specific to each phase.

Source: Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 7/24/23
Project: Uplander Campus
Phase: Interior Renovations

RECEPTOR #1

Description	Land Use	Ambient/Baseline (dBA) Daytime
Adjacent commercial building located east of the Project Site	Commercial	60.1

Equipment							Without Attenuation			With Attenuation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Receptor Distance to Centerline of Project Site (Feet)	Estimated Shielding (dBA)	Calculated (dBA) *Lmax	Calculated (dBA) Leq	Estimated Shielding (dBA)	Calculated (dBA) *Lmax	Calculated (dBA) Leq
Flat Bed Truck	No	40	84	74	15	75	20	50.5	46.5			
Pick up Truck	No	40	55	75	15	75	20	51.5	47.5			
						Construction Noise Level (dBA Leq)			50.0		Results	
						Noise Level Above Ambient			-10.1		Noise Level Above Ambient	

RECEPTOR #2

Description	Land Use	Ambient/Baseline (dBA) Daytime
Adjacent commercial building located west of the Project Site	Commercial	60.1

Equipment							Without Attenuation			With Attenuation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Receptor Distance to Centerline of Project Site (Feet)	Estimated Shielding (dBA)	Calculated (dBA) *Lmax	Calculated (dBA) Leq	Estimated Shielding (dBA)	Calculated (dBA) *Lmax	Calculated (dBA) Leq
Flat Bed Truck	No	40	84	74	15	75	20	50.5	46.5			
Pick up Truck	No	40	55	75	15	75	20	51.5	47.5			
						Construction Noise Level (dBA Leq)			50.0		Results	
						Noise Level Above Ambient			-10.1		Noise Level Above Ambient	

RECEPTOR #3

Description	Land Use	Ambient/Baseline (dBA) Daytime
Commercial buildings located north, northeast, west, southwest, and northwest of the Project Site	Commercial	60.1

Equipment							Without Attenuation			With Attenuation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Distance to Centerline of Project Site (Feet)	Estimated Shielding (dBA)	Calculated (dBA) *Lmax	Calculated (dBA) Leq	Estimated Shielding (dBA)	Calculated (dBA) *Lmax	Calculated (dBA) Leq
Flat Bed Truck	No	40	84	74	15	75	20	50.5	46.5			
Pick up Truck	No	40	55	75	15	75	20	51.5	47.5			
						Construction Noise Level (dBA Leq)			50.0		Results	
						Noise Level Above Ambient			-10.1		Noise Level Above Ambient	

Notes:
1. Daytime noise level is based on the actual noise measurement taken at the Project Site.
2. An attenuation factor was applied for interior-exterior noise reduction for businesses and professional office uses as these land uses operate indoors.
3. Calculations based on the loudest two pieces of heavy construction equipment specific to each phase.

Source: Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 7/24/23
Project: Uplander Campus
Phase: Paving

RECEPTOR #1

Description	Land Use	Ambient/Baseline (dBA) Daytime
Adjacent commercial building located east of the Project Site	Commercial	60.1

Equipment							Without Attenuation			With Attenuation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Receptor Distance to Centerline of Project Site (Feet)	Estimated Shielding (dBA)	Calculated (dBA) *Lmax	Calculated (dBA) Leq	Estimated Shielding (dBA)	Calculated (dBA) *Lmax	Calculated (dBA) Leq
Roller	No	20	85	80	15	100	20	59.0	52.0			
Tractor/Loader/Backhoe	No	40	84	84	15	100	20	58.0	54.0			
						Construction Noise Level (dBA Leq)			56.1		Results	
						Noise Level Above Ambient			-4.0		Noise Level Above Ambient	

RECEPTOR #2

Description	Land Use	Ambient/Baseline (dBA) Daytime
Adjacent commercial building located west of the Project Site	Commercial	60.1

Equipment							Without Attenuation			With Attenuation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Receptor Distance to Centerline of Project Site (Feet)	Estimated Shielding Shielding (dBA)	Calculated (dBA) *Lmax	Calculated (dBA) Leq	Estimated Shielding Shielding (dBA)	Calculated (dBA) *Lmax	Calculated (dBA) Leq
Roller	No	20	85	80	70	155	20	55.2	48.2			
Tractor/Loader/Backhoe	No	40	84	84	70	155	20	54.2	50.2			
						Construction Noise Level (dBA Leq)			52.3		Results	
						Noise Level Above Ambient			-7.8		Noise Level Above Ambient	

RECEPTOR #3

Description	Land Use	Ambient/Baseline (dBA) Daytime
Commercial buildings located north, northeast, west, southwest, and northwest of the Project Site	Commercial	60.1

Equipment							Without Attenuation			With Attenuation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Distance to Centerline of Project Site (Feet)	Estimated Shielding Shielding (dBA)	Calculated (dBA) *Lmax	Calculated (dBA) Leq	Estimated Shielding Shielding (dBA)	Calculated (dBA) *Lmax	Calculated (dBA) Leq
Roller	No	20	85	80	85	185	20	53.6	46.6			
Tractor/Loader/Backhoe	No	40	84	84	85	185	20	52.6	48.7			
						Construction Noise Level (dBA Leq)			50.8		Results	
						Noise Level Above Ambient			-9.3		Noise Level Above Ambient	

Notes:
1. Daytime noise level is based on the actual noise measurement taken at the Project Site.
2. An attenuation factor was applied for interior-exterior noise reduction for businesses and professional office uses as these land uses operate indoors.
3. Calculations based on the loudest two pieces of heavy construction equipment specific to each phase.

Source: Roadway Construction Noise Model (RCNM),Version 1.1

PARKER ENVIRONMENTAL CONSULTANTS

Construction Noise Impact Summary Without Project Design Features

Sensitive Receptor	Ambient Noise (dBA Leq)	Noise Level Impact (dBA Leq) by Phase			Construction Noise Threshold (dBA Leq)**	Noise Impact Above Threshold
		Interior Renovations	Architectural Coating	Paving		
Receptor #1	60.1	50.0	56.1	54.5	65.1	0.0
Receptor #2	60.1	50.0	52.3	46.4	65.1	0.0
Receptor #3	60.1	50.0	50.8	47.9	65.1	0.0

** Significance criteria is based on a 5- dBA noise increase above ambient threshold .

Construction Noise Impact Summary With Project Design Features

Sensitive Receptor	Ambient Noise (dBA Leq)	Noise Level Impact (dBA Leq) by Phase			Construction Noise Threshold (dBA Leq)**	Noise Impact Above Threshold
		Interior Renovations	Architectural Coating	Paving		
Receptor #1	60.1	0.0	0.0	0.0	65.1	0.0
Receptor #2	60.1	0.0	0.0	0.0	65.1	0.0
Receptor #3	60.1	0.0	0.0	0.0	65.1	0.0

** Significance criteria is based on a 5- dBA noise increase above ambient threshold .

Estimated Playground Noise Levels

Project: Minerva School
Date: September 2023

Outdoor Noise Sources	Area	Est. Occupancy
Playground Noise	6,201	144

Composite Reference Noise Levels

	Total Playground Noise
Playground Noise	69.0

ID		Distance (feet)	Est. Playground Noise @ Source (dBA)	Estimated Shielding (dBA)	Estimated Noise Level @ Reciever (dBA)
1	**5830 Uplander Way**				
		15	69.00	8	61.00
				Results (dBA Leq)	61.00
2	**5860 Uplander Way**				
		150	69.00	0	49.00
				Results (dBA Leq)	49.00
3	**5835 Uplander Way, 6076 Bristol Parkway, 5815 Uplander Way**	225	69.00	8	37.48
				Results (dBA Leq)	37.48

Note: formulas provided by Caltrans Technical Noise Supplement (September 2013)

ATTACHMENT 5

Air Quality Modeling and Greenhouse Gas Emissions Worksheets

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Uplander Campus v2 Custom Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Uplander Campus v2
Construction Start Date	1/2/2024
Operational Year	2024
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.50
Precipitation (days)	8.20
Location	5840 Uplander Way, Culver City, CA 90230, USA
County	Los Angeles-South Coast
City	Culver City
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4444
EDFZ	16
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.14

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description

Elementary School	16.0	1000sqft	0.60	16,080	6,201	6,201	—	—
Parking Lot	37.0	Space	0.20	0.00	0.00	0.00	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-2*	Limit Heavy-Duty Diesel Vehicle Idling
Transportation	T-7	Implement Commute Trip Reduction Marketing
Transportation	T-8	Provide Ridesharing Program
Transportation	T-9	Implement Subsidized or Discounted Transit Program
Transportation	T-14*	Provide Electric Vehicle Charging Infrastructure
Transportation	T-34*	Provide Bike Parking
Water	W-7	Adopt a Water Conservation Strategy
Waste	S-1/S-2	Implement Waste Reduction Plan

* Qualitative or supporting measure. Emission reductions not included in the mitigated emissions results.

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.54	4.28	5.51	0.01	0.19	0.11	0.30	0.18	0.03	0.20	—	900	900	0.04	0.02	0.64	908
Mit.	0.54	4.28	5.51	0.01	0.19	0.11	0.30	0.18	0.03	0.20	—	900	900	0.04	0.02	0.64	908
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	11.2	8.34	10.8	0.02	0.33	0.23	0.56	0.31	0.05	0.36	—	1,734	1,734	0.07	0.03	0.03	1,745
Mit.	11.2	8.34	10.8	0.02	0.33	0.23	0.56	0.31	0.05	0.36	—	1,734	1,734	0.07	0.03	0.03	1,745
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.50	1.03	1.30	< 0.005	0.05	0.03	0.07	0.04	0.01	0.05	—	214	214	0.01	< 0.005	0.07	216
Mit.	0.50	1.03	1.30	< 0.005	0.05	0.03	0.07	0.04	0.01	0.05	—	214	214	0.01	< 0.005	0.07	216
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.09	0.19	0.24	< 0.005	0.01	< 0.005	0.01	0.01	< 0.005	0.01	—	35.4	35.4	< 0.005	< 0.005	0.01	35.7
Mit.	0.09	0.19	0.24	< 0.005	0.01	< 0.005	0.01	0.01	< 0.005	0.01	—	35.4	35.4	< 0.005	< 0.005	0.01	35.7
% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	75.0	100	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Mit.	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	75.0	100	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—
Mit.	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.54	4.28	5.51	0.01	0.19	0.11	0.30	0.18	0.03	0.20	—	900	900	0.04	0.02	0.64	908
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.54	4.29	5.43	0.01	0.19	0.11	0.30	0.18	0.03	0.20	—	895	895	0.04	0.02	0.02	902
2024	11.2	8.34	10.8	0.02	0.33	0.23	0.56	0.31	0.05	0.36	—	1,734	1,734	0.07	0.03	0.03	1,745
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.13	1.03	1.30	< 0.005	0.05	0.03	0.07	0.04	0.01	0.05	—	214	214	0.01	< 0.005	0.07	216
2024	0.50	0.69	0.90	< 0.005	0.03	0.02	0.05	0.03	< 0.005	0.03	—	147	147	0.01	< 0.005	0.04	148
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.02	0.19	0.24	< 0.005	0.01	< 0.005	0.01	0.01	< 0.005	0.01	—	35.4	35.4	< 0.005	< 0.005	0.01	35.7
2024	0.09	0.13	0.16	< 0.005	0.01	< 0.005	0.01	< 0.005	< 0.005	0.01	—	24.3	24.3	< 0.005	< 0.005	0.01	24.4

2.3. Construction Emissions by Year, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.54	4.28	5.51	0.01	0.19	0.11	0.30	0.18	0.03	0.20	—	900	900	0.04	0.02	0.64	908
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2023	0.54	4.29	5.43	0.01	0.19	0.11	0.30	0.18	0.03	0.20	—	895	895	0.04	0.02	0.02	902
2024	11.2	8.34	10.8	0.02	0.33	0.23	0.56	0.31	0.05	0.36	—	1,734	1,734	0.07	0.03	0.03	1,745
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.13	1.03	1.30	< 0.005	0.05	0.03	0.07	0.04	0.01	0.05	—	214	214	0.01	< 0.005	0.07	216
2024	0.50	0.69	0.90	< 0.005	0.03	0.02	0.05	0.03	< 0.005	0.03	—	147	147	0.01	< 0.005	0.04	148
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.02	0.19	0.24	< 0.005	0.01	< 0.005	0.01	0.01	< 0.005	0.01	—	35.4	35.4	< 0.005	< 0.005	0.01	35.7
2024	0.09	0.13	0.16	< 0.005	0.01	< 0.005	0.01	< 0.005	< 0.005	0.01	—	24.3	24.3	< 0.005	< 0.005	0.01	24.4

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.54	0.72	7.48	0.01	0.02	1.15	1.17	0.02	0.29	0.31	12.1	1,641	1,653	1.32	0.07	5.33	1,711
Mit.	1.47	0.68	7.05	0.01	0.02	1.08	1.10	0.02	0.27	0.29	6.32	1,552	1,558	0.73	0.06	4.99	1,600
% Reduced	4%	6%	6%	—	—	6%	6%	—	6%	6%	48%	5%	6%	44%	7%	6%	6%
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.41	0.77	6.47	0.01	0.02	1.15	1.17	0.02	0.29	0.31	12.1	1,582	1,594	1.32	0.07	0.20	1,648
Mit.	1.34	0.73	6.05	0.01	0.02	1.08	1.10	0.01	0.27	0.29	6.32	1,497	1,503	0.74	0.07	0.19	1,541
% Reduced	5%	6%	6%	—	—	6%	6%	—	6%	6%	48%	5%	6%	44%	7%	4%	6%
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Unmit.	1.19	0.59	5.20	0.01	0.01	0.82	0.84	0.01	0.21	0.22	12.1	1,222	1,234	1.30	0.05	1.69	1,283
Mit.	1.14	0.55	4.90	0.01	0.01	0.77	0.79	0.01	0.20	0.21	6.32	1,160	1,166	0.71	0.05	1.58	1,200
% Reduced	4%	5%	6%	—	—	6%	6%	—	6%	6%	48%	5%	5%	45%	7%	6%	7%
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.22	0.11	0.95	< 0.005	< 0.005	0.15	0.15	< 0.005	0.04	0.04	2.00	202	204	0.21	0.01	0.28	212
Mit.	0.21	0.10	0.89	< 0.005	< 0.005	0.14	0.14	< 0.005	0.04	0.04	1.05	192	193	0.12	0.01	0.26	199
% Reduced	4%	5%	6%	6%	3%	6%	6%	3%	6%	6%	48%	5%	5%	45%	7%	6%	7%
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	55.0	55.0	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	No	No	No	No	Yes	—	No	—	—	No	—	—	—	—	—	—	—
Mit.	No	No	No	No	Yes	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	55.0	55.0	550	150	—	—	150	—	—	55.0	—	—	—	—	—	—	—
Unmit.	No	No	No	No	Yes	—	No	—	—	No	—	—	—	—	—	—	—
Mit.	No	No	No	No	Yes	—	No	—	—	No	—	—	—	—	—	—	—
Exceeds (Annual)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3,000
Unmit.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	No
Mit.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	No

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.03	0.63	6.71	0.01	0.01	1.15	1.16	0.01	0.29	0.30	—	1,361	1,361	0.09	0.06	5.27	1,388
Area	0.50	0.01	0.70	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.88	2.88	< 0.005	< 0.005	—	2.89
Energy	< 0.005	0.09	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	271	271	0.02	< 0.005	—	271
Water	—	—	—	—	—	—	—	—	—	—	0.89	6.10	6.99	0.09	< 0.005	—	9.93
Waste	—	—	—	—	—	—	—	—	—	—	11.2	0.00	11.2	1.12	0.00	—	39.2
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Total	1.54	0.72	7.48	0.01	0.02	1.15	1.17	0.02	0.29	0.31	12.1	1,641	1,653	1.32	0.07	5.33	1,711
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.02	0.69	6.39	0.01	0.01	1.15	1.16	0.01	0.29	0.30	—	1,305	1,305	0.09	0.07	0.14	1,327
Area	0.39	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	< 0.005	0.09	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	271	271	0.02	< 0.005	—	271
Water	—	—	—	—	—	—	—	—	—	—	0.89	6.10	6.99	0.09	< 0.005	—	9.93
Waste	—	—	—	—	—	—	—	—	—	—	11.2	0.00	11.2	1.12	0.00	—	39.2
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Total	1.41	0.77	6.47	0.01	0.02	1.15	1.17	0.02	0.29	0.31	12.1	1,582	1,594	1.32	0.07	0.20	1,648
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.72	0.50	4.65	0.01	0.01	0.82	0.83	0.01	0.21	0.22	—	943	943	0.06	0.05	1.62	961
Area	0.46	< 0.005	0.48	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.97	1.97	< 0.005	< 0.005	—	1.98
Energy	< 0.005	0.09	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	271	271	0.02	< 0.005	—	271
Water	—	—	—	—	—	—	—	—	—	—	0.89	6.10	6.99	0.09	< 0.005	—	9.93
Waste	—	—	—	—	—	—	—	—	—	—	11.2	0.00	11.2	1.12	0.00	—	39.2
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06

Total	1.19	0.59	5.20	0.01	0.01	0.82	0.84	0.01	0.21	0.22	12.1	1,222	1,234	1.30	0.05	1.69	1,283
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.13	0.09	0.85	< 0.005	< 0.005	0.15	0.15	< 0.005	0.04	0.04	—	156	156	0.01	0.01	0.27	159
Area	0.08	< 0.005	0.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.33	0.33	< 0.005	< 0.005	—	0.33
Energy	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	44.8	44.8	< 0.005	< 0.005	—	44.9
Water	—	—	—	—	—	—	—	—	—	—	0.15	1.01	1.16	0.02	< 0.005	—	1.64
Waste	—	—	—	—	—	—	—	—	—	—	1.86	0.00	1.86	0.19	0.00	—	6.49
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	0.22	0.11	0.95	< 0.005	< 0.005	0.15	0.15	< 0.005	0.04	0.04	2.00	202	204	0.21	0.01	0.28	212

2.6. Operations Emissions by Sector, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.97	0.59	6.28	0.01	0.01	1.08	1.09	0.01	0.27	0.28	—	1,274	1,274	0.08	0.06	4.93	1,298
Area	0.50	0.01	0.70	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.88	2.88	< 0.005	< 0.005	—	2.89
Energy	< 0.005	0.09	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	271	271	0.02	< 0.005	—	271
Water	—	—	—	—	—	—	—	—	—	—	0.71	4.88	5.59	0.07	< 0.005	—	7.95
Waste	—	—	—	—	—	—	—	—	—	—	5.60	0.00	5.60	0.56	0.00	—	19.6
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Total	1.47	0.68	7.05	0.01	0.02	1.08	1.10	0.02	0.27	0.29	6.32	1,552	1,558	0.73	0.06	4.99	1,600
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.95	0.64	5.98	0.01	0.01	1.08	1.09	0.01	0.27	0.28	—	1,221	1,221	0.09	0.06	0.13	1,242
Area	0.39	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	< 0.005	0.09	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	271	271	0.02	< 0.005	—	271

Water	—	—	—	—	—	—	—	—	—	—	0.71	4.88	5.59	0.07	< 0.005	—	7.95
Waste	—	—	—	—	—	—	—	—	—	—	5.60	0.00	5.60	0.56	0.00	—	19.6
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Total	1.34	0.73	6.05	0.01	0.02	1.08	1.10	0.01	0.27	0.29	6.32	1,497	1,503	0.74	0.07	0.19	1,541
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.67	0.46	4.35	0.01	0.01	0.77	0.78	0.01	0.20	0.20	—	882	882	0.06	0.04	1.52	899
Area	0.46	< 0.005	0.48	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.97	1.97	< 0.005	< 0.005	—	1.98
Energy	< 0.005	0.09	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	271	271	0.02	< 0.005	—	271
Water	—	—	—	—	—	—	—	—	—	—	0.71	4.88	5.59	0.07	< 0.005	—	7.95
Waste	—	—	—	—	—	—	—	—	—	—	5.60	0.00	5.60	0.56	0.00	—	19.6
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Total	1.14	0.55	4.90	0.01	0.01	0.77	0.79	0.01	0.20	0.21	6.32	1,160	1,166	0.71	0.05	1.58	1,200
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.12	0.08	0.79	< 0.005	< 0.005	0.14	0.14	< 0.005	0.04	0.04	—	146	146	0.01	0.01	0.25	149
Area	0.08	< 0.005	0.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.33	0.33	< 0.005	< 0.005	—	0.33
Energy	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	44.8	44.8	< 0.005	< 0.005	—	44.9
Water	—	—	—	—	—	—	—	—	—	—	0.12	0.81	0.93	0.01	< 0.005	—	1.32
Waste	—	—	—	—	—	—	—	—	—	—	0.93	0.00	0.93	0.09	0.00	—	3.25
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	0.21	0.10	0.89	< 0.005	< 0.005	0.14	0.14	< 0.005	0.04	0.04	1.05	192	193	0.12	0.01	0.26	199

3. Construction Emissions Details

3.1. Building Construction (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.50	4.14	4.91	0.01	0.19	—	0.19	0.17	—	0.17	—	716	716	0.03	0.01	—	719
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.50	4.14	4.91	0.01	0.19	—	0.19	0.17	—	0.17	—	716	716	0.03	0.01	—	719
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.99	1.17	< 0.005	0.05	—	0.05	0.04	—	0.04	—	171	171	0.01	< 0.005	—	172
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.18	0.21	< 0.005	0.01	—	0.01	0.01	—	0.01	—	28.3	28.3	< 0.005	< 0.005	—	28.4
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.04	0.55	0.00	0.00	0.09	0.09	0.00	0.02	0.02	—	97.5	97.5	< 0.005	< 0.005	0.41	99.0
Vendor	< 0.005	0.11	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	86.2	86.2	< 0.005	0.01	0.23	90.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.04	0.47	0.00	0.00	0.09	0.09	0.00	0.02	0.02	—	92.4	92.4	< 0.005	< 0.005	0.01	93.5
Vendor	< 0.005	0.11	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	86.3	86.3	< 0.005	0.01	0.01	89.9
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.12	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	22.4	22.4	< 0.005	< 0.005	0.04	22.7
Vendor	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	20.6	20.6	< 0.005	< 0.005	0.02	21.5
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.71	3.71	< 0.005	< 0.005	0.01	3.76
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.41	3.41	< 0.005	< 0.005	< 0.005	3.56
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.2. Building Construction (2023) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.50	4.14	4.91	0.01	0.19	—	0.19	0.17	—	0.17	—	716	716	0.03	0.01	—	719
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.50	4.14	4.91	0.01	0.19	—	0.19	0.17	—	0.17	—	716	716	0.03	0.01	—	719
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.99	1.17	< 0.005	0.05	—	0.05	0.04	—	0.04	—	171	171	0.01	< 0.005	—	172
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.18	0.21	< 0.005	0.01	—	0.01	0.01	—	0.01	—	28.3	28.3	< 0.005	< 0.005	—	28.4
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.04	0.55	0.00	0.00	0.09	0.09	0.00	0.02	0.02	—	97.5	97.5	< 0.005	< 0.005	0.41	99.0
Vendor	< 0.005	0.11	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	86.2	86.2	< 0.005	0.01	0.23	90.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.04	0.47	0.00	0.00	0.09	0.09	0.00	0.02	0.02	—	92.4	92.4	< 0.005	< 0.005	0.01	93.5
Vendor	< 0.005	0.11	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	86.3	86.3	< 0.005	0.01	0.01	89.9
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.12	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	22.4	22.4	< 0.005	< 0.005	0.04	22.7
Vendor	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	20.6	20.6	< 0.005	< 0.005	0.02	21.5

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.71	3.71	< 0.005	< 0.005	0.01	3.76
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.41	3.41	< 0.005	< 0.005	< 0.005	3.56
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Building Construction (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.48	3.98	4.89	0.01	0.17	—	0.17	0.15	—	0.15	—	716	716	0.03	0.01	—	719
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.50	0.61	< 0.005	0.02	—	0.02	0.02	—	0.02	—	89.7	89.7	< 0.005	< 0.005	—	90.0
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.09	0.11	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	14.8	14.8	< 0.005	< 0.005	—	14.9
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.04	0.43	0.00	0.00	0.09	0.09	0.00	0.02	0.02	—	90.4	90.4	< 0.005	< 0.005	0.01	91.5
Vendor	< 0.005	0.10	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	85.1	85.1	< 0.005	0.01	0.01	88.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.06	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	11.5	11.5	< 0.005	< 0.005	0.02	11.6
Vendor	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	10.7	10.7	< 0.005	< 0.005	0.01	11.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.90	1.90	< 0.005	< 0.005	< 0.005	1.93
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.76	1.76	< 0.005	< 0.005	< 0.005	1.84
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.4. Building Construction (2024) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.48	3.98	4.89	0.01	0.17	—	0.17	0.15	—	0.15	—	716	716	0.03	0.01	—	719
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.50	0.61	< 0.005	0.02	—	0.02	0.02	—	0.02	—	89.7	89.7	< 0.005	< 0.005	—	90.0
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.09	0.11	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	14.8	14.8	< 0.005	< 0.005	—	14.9
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.04	0.43	0.00	0.00	0.09	0.09	0.00	0.02	0.02	—	90.4	90.4	< 0.005	< 0.005	0.01	91.5
Vendor	< 0.005	0.10	0.05	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	85.1	85.1	< 0.005	0.01	0.01	88.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.06	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	11.5	11.5	< 0.005	< 0.005	0.02	11.6
Vendor	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	10.7	10.7	< 0.005	< 0.005	0.01	11.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.90	1.90	< 0.005	< 0.005	< 0.005	1.93

Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.76	1.76	< 0.005	< 0.005	< 0.005	1.84
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Paving (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.30	2.54	2.92	< 0.005	0.13	—	0.13	0.12	—	0.12	—	442	442	0.02	< 0.005	—	444
Paving	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.10	0.12	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	18.2	18.2	< 0.005	< 0.005	—	18.2
Paving	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.01	3.01	< 0.005	< 0.005	—	3.02
Paving	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.04	0.48	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	100	100	< 0.005	< 0.005	0.01	102
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.19	4.19	< 0.005	< 0.005	0.01	4.24
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.69	0.69	< 0.005	< 0.005	< 0.005	0.70
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.6. Paving (2024) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.30	2.54	2.92	< 0.005	0.13	—	0.13	0.12	—	0.12	—	442	442	0.02	< 0.005	—	444
Paving	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.10	0.12	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	18.2	18.2	< 0.005	< 0.005	—	18.2
Paving	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.01	3.01	< 0.005	< 0.005	—	3.02
Paving	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.04	0.48	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	100	100	< 0.005	< 0.005	0.01	102
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.19	4.19	< 0.005	< 0.005	0.01	4.24
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.69	0.69	< 0.005	< 0.005	< 0.005	0.70
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Architectural Coating (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	1.63	1.93	< 0.005	0.04	—	0.04	0.03	—	0.03	—	281	281	0.01	< 0.005	—	282
Architectural Coatings	10.1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.07	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.6	11.6	< 0.005	< 0.005	—	11.6
Architectural Coatings	0.42	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.91	1.91	< 0.005	< 0.005	—	1.92
Architectural Coatings	0.08	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	18.1	18.1	< 0.005	< 0.005	< 0.005	18.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.75	0.75	< 0.005	< 0.005	< 0.005	0.76
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.12	0.12	< 0.005	< 0.005	< 0.005	0.13
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.8. Architectural Coating (2024) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.18	1.63	1.93	< 0.005	0.04	—	0.04	0.03	—	0.03	—	281	281	0.01	< 0.005	—	282
Architectural Coatings	10.1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.07	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.6	11.6	< 0.005	< 0.005	—	11.6
Architectural Coatings	0.42	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.91	1.91	< 0.005	< 0.005	—	1.92
Architectural Coatings	0.08	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.09	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	18.1	18.1	< 0.005	< 0.005	< 0.005	18.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.75	0.75	< 0.005	< 0.005	< 0.005	0.76
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.12	0.12	< 0.005	< 0.005	< 0.005	0.13
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Elementary	1.03	0.63	6.71	0.01	0.01	1.15	1.16	0.01	0.29	0.30	—	1,361	1,361	0.09	0.06	5.27	1,388
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.03	0.63	6.71	0.01	0.01	1.15	1.16	0.01	0.29	0.30	—	1,361	1,361	0.09	0.06	5.27	1,388
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	1.02	0.69	6.39	0.01	0.01	1.15	1.16	0.01	0.29	0.30	—	1,305	1,305	0.09	0.07	0.14	1,327
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	1.02	0.69	6.39	0.01	0.01	1.15	1.16	0.01	0.29	0.30	—	1,305	1,305	0.09	0.07	0.14	1,327
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	0.13	0.09	0.85	< 0.005	< 0.005	0.15	0.15	< 0.005	0.04	0.04	—	156	156	0.01	0.01	0.27	159
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.13	0.09	0.85	< 0.005	< 0.005	0.15	0.15	< 0.005	0.04	0.04	—	156	156	0.01	0.01	0.27	159

4.1.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	0.97	0.59	6.28	0.01	0.01	1.08	1.09	0.01	0.27	0.28	—	1,274	1,274	0.08	0.06	4.93	1,298
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Total	0.97	0.59	6.28	0.01	0.01	1.08	1.09	0.01	0.27	0.28	—	1,274	1,274	0.08	0.06	4.93	1,298
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	0.95	0.64	5.98	0.01	0.01	1.08	1.09	0.01	0.27	0.28	—	1,221	1,221	0.09	0.06	0.13	1,242
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.95	0.64	5.98	0.01	0.01	1.08	1.09	0.01	0.27	0.28	—	1,221	1,221	0.09	0.06	0.13	1,242
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	0.12	0.08	0.79	< 0.005	< 0.005	0.14	0.14	< 0.005	0.04	0.04	—	146	146	0.01	0.01	0.25	149
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.12	0.08	0.79	< 0.005	< 0.005	0.14	0.14	< 0.005	0.04	0.04	—	146	146	0.01	0.01	0.25	149

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	—	157	157	0.01	< 0.005	—	157
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	11.1	11.1	< 0.005	< 0.005	—	11.2
Total	—	—	—	—	—	—	—	—	—	—	—	168	168	0.01	< 0.005	—	168

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	—	157	157	0.01	< 0.005	—	157
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	11.1	11.1	< 0.005	< 0.005	—	11.2
Total	—	—	—	—	—	—	—	—	—	—	—	168	168	0.01	< 0.005	—	168
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	—	25.9	25.9	< 0.005	< 0.005	—	26.0
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	1.84	1.84	< 0.005	< 0.005	—	1.85
Total	—	—	—	—	—	—	—	—	—	—	—	27.8	27.8	< 0.005	< 0.005	—	27.9

4.2.2. Electricity Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	—	157	157	0.01	< 0.005	—	157
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	11.1	11.1	< 0.005	< 0.005	—	11.2
Total	—	—	—	—	—	—	—	—	—	—	—	168	168	0.01	< 0.005	—	168
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Elementary	—	—	—	—	—	—	—	—	—	—	—	157	157	0.01	< 0.005	—	157
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	11.1	11.1	< 0.005	< 0.005	—	11.2
Total	—	—	—	—	—	—	—	—	—	—	—	168	168	0.01	< 0.005	—	168
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	—	25.9	25.9	< 0.005	< 0.005	—	26.0
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	1.84	1.84	< 0.005	< 0.005	—	1.85
Total	—	—	—	—	—	—	—	—	—	—	—	27.8	27.8	< 0.005	< 0.005	—	27.9

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	< 0.005	0.09	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	103	103	0.01	< 0.005	—	103
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	0.09	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	103	103	0.01	< 0.005	—	103
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	< 0.005	0.09	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	103	103	0.01	< 0.005	—	103
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

Total	< 0.005	0.09	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	103	103	0.01	< 0.005	—	103
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	17.0	17.0	< 0.005	< 0.005	—	17.1
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	17.0	17.0	< 0.005	< 0.005	—	17.1

4.2.4. Natural Gas Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	< 0.005	0.09	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	103	103	0.01	< 0.005	—	103
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	0.09	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	103	103	0.01	< 0.005	—	103
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	< 0.005	0.09	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	103	103	0.01	< 0.005	—	103
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	0.09	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01	—	103	103	0.01	< 0.005	—	103
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Elementary	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	17.0	17.0	< 0.005	< 0.005	—	17.1
Parking Lot	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	17.0	17.0	< 0.005	< 0.005	—	17.1

4.3. Area Emissions by Source

4.3.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.34	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.11	0.01	0.70	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.88	2.88	< 0.005	< 0.005	—	2.89
Total	0.50	0.01	0.70	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.88	2.88	< 0.005	< 0.005	—	2.89
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.34	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	0.39	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.01	< 0.005	0.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.33	0.33	< 0.005	< 0.005	—	0.33
Total	0.08	< 0.005	0.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.33	0.33	< 0.005	< 0.005	—	0.33

4.3.1. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.34	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.11	0.01	0.70	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.88	2.88	< 0.005	< 0.005	—	2.89
Total	0.50	0.01	0.70	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.88	2.88	< 0.005	< 0.005	—	2.89
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Consumer Products	0.34	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.39	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.01	< 0.005	0.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.33	0.33	< 0.005	< 0.005	—	0.33
Total	0.08	< 0.005	0.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.33	0.33	< 0.005	< 0.005	—	0.33

4.4. Water Emissions by Land Use

4.4.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	0.89	6.10	6.99	0.09	< 0.005	—	9.93
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	0.89	6.10	6.99	0.09	< 0.005	—	9.93

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	0.89	6.10	6.99	0.09	< 0.005	—	9.93
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	0.89	6.10	6.99	0.09	< 0.005	—	9.93
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	0.15	1.01	1.16	0.02	< 0.005	—	1.64
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	0.15	1.01	1.16	0.02	< 0.005	—	1.64

4.4.1. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	0.71	4.88	5.59	0.07	< 0.005	—	7.95
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	0.71	4.88	5.59	0.07	< 0.005	—	7.95
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Elementary	—	—	—	—	—	—	—	—	—	—	0.71	4.88	5.59	0.07	< 0.005	—	7.95
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	0.71	4.88	5.59	0.07	< 0.005	—	7.95
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	0.12	0.81	0.93	0.01	< 0.005	—	1.32
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	0.12	0.81	0.93	0.01	< 0.005	—	1.32

4.5. Waste Emissions by Land Use

4.5.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	11.2	0.00	11.2	1.12	0.00	—	39.2
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	11.2	0.00	11.2	1.12	0.00	—	39.2
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	11.2	0.00	11.2	1.12	0.00	—	39.2

Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	11.2	0.00	11.2	1.12	0.00	—	39.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	1.86	0.00	1.86	0.19	0.00	—	6.49
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	1.86	0.00	1.86	0.19	0.00	—	6.49

4.5.1. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	5.60	0.00	5.60	0.56	0.00	—	19.6
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	5.60	0.00	5.60	0.56	0.00	—	19.6
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	5.60	0.00	5.60	0.56	0.00	—	19.6
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	5.60	0.00	5.60	0.56	0.00	—	19.6

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	0.93	0.00	0.93	0.09	0.00	—	3.25
Parking Lot	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	0.93	0.00	0.93	0.09	0.00	—	3.25

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01

4.6.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.06	0.06
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Elementary School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.7.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipme Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipme nt Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Interior Remodeling	Building Construction	9/1/2023	3/4/2024	5.00	132	—
Paving/Landscaping	Paving	2/13/2024	3/4/2024	5.00	15.0	—
Architectural Coating	Architectural Coating	2/13/2024	3/4/2024	5.00	15.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Interior Remodeling	Forklifts	Diesel	Average	1.00	6.00	82.0	0.20
Interior Remodeling	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Interior Remodeling	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Interior Remodeling	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving/Landscaping	Cement and Mortar Mixers	Diesel	Average	1.00	6.00	10.0	0.56
Paving/Landscaping	Pavers	Diesel	Average	1.00	7.00	81.0	0.42
Paving/Landscaping	Rollers	Diesel	Average	1.00	7.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48
Architectural Coating	Aerial Lifts	Diesel	Average	1.00	8.00	46.0	0.31

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Interior Remodeling	Forklifts	Diesel	Average	1.00	6.00	82.0	0.20

Interior Remodeling	Tractors/Loaders/Backh	Diesel	Average	1.00	8.00	84.0	0.37
Interior Remodeling	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Interior Remodeling	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving/Landscaping	Cement and Mortar Mixers	Diesel	Average	1.00	6.00	10.0	0.56
Paving/Landscaping	Pavers	Diesel	Average	1.00	7.00	81.0	0.42
Paving/Landscaping	Rollers	Diesel	Average	1.00	7.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48
Architectural Coating	Aerial Lifts	Diesel	Average	1.00	8.00	46.0	0.31

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Interior Remodeling	—	—	—	—
Interior Remodeling	Worker	6.75	18.5	LDA,LDT1,LDT2
Interior Remodeling	Vendor	2.64	10.2	HHDT,MHDT
Interior Remodeling	Hauling	0.00	20.0	HHDT
Interior Remodeling	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	1.35	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT
Paving/Landscaping	—	—	—	—
Paving/Landscaping	Worker	7.50	18.5	LDA,LDT1,LDT2
Paving/Landscaping	Vendor	—	10.2	HHDT,MHDT
Paving/Landscaping	Hauling	0.00	20.0	HHDT

Paving/Landscaping	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Interior Remodeling	—	—	—	—
Interior Remodeling	Worker	6.75	18.5	LDA,LDT1,LDT2
Interior Remodeling	Vendor	2.64	10.2	HHDT,MHDT
Interior Remodeling	Hauling	0.00	20.0	HHDT
Interior Remodeling	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	1.35	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT
Paving/Landscaping	—	—	—	—
Paving/Landscaping	Worker	7.50	18.5	LDA,LDT1,LDT2
Paving/Landscaping	Vendor	—	10.2	HHDT,MHDT
Paving/Landscaping	Hauling	0.00	20.0	HHDT
Paving/Landscaping	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)

Architectural Coating	0.00	0.00	24,120	8,040	523

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Paving/Landscaping	0.00	0.00	0.00	0.00	0.20

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Elementary School	0.00	0%
Parking Lot	0.20	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	532	0.03	< 0.005
2023	0.00	532	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Elementary School	312	0.00	0.00	81,426	1,628	0.00	0.00	424,456

Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Elementary School	292	0.00	0.00	76,182	1,523	0.00	0.00	397,121
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.1.2. Mitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	24,120	8,040	523

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.10.4. Landscape Equipment - Mitigated

Season	Unit	Value
Snow Days	day/yr	0.00

Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Elementary School	107,517	532	0.0330	0.0040	320,479
Parking Lot	7,632	532	0.0330	0.0040	0.00

5.11.2. Mitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Elementary School	107,517	532	0.0330	0.0040	320,479
Parking Lot	7,632	532	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Elementary School	463,951	193,259
Parking Lot	0.00	0.00

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Elementary School	371,161	154,607
Parking Lot	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Elementary School	20.8	—
Parking Lot	0.00	—

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Elementary School	10.4	—
Parking Lot	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Elementary School	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
Elementary School	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Elementary School	Stand-alone retail refrigerators and freezers	R-134a	1,430	< 0.005	1.00	0.00	1.00
Elementary School	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced

Elementary School	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
Elementary School	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Elementary School	Stand-alone retail refrigerators and freezers	R-134a	1,430	< 0.005	1.00	0.00	1.00
Elementary School	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.15.2. Mitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

—	—

8. User Changes to Default Data

Screen	Justification
Land Use	Project date per April 21, 2023 site plans.
Construction: Construction Phases	Assumes approximate 6-month construction timeline.
Construction: Off-Road Equipment	Assumes equipment use on worst-case day.
Operations: Vehicle Data	Vehicle trips are conservatively based on default ITE Trip Generation data and do not reflect the local trip demand model for Culver City' VMT tool.

ATTACHMENT 6

Culver City Related Projects Map

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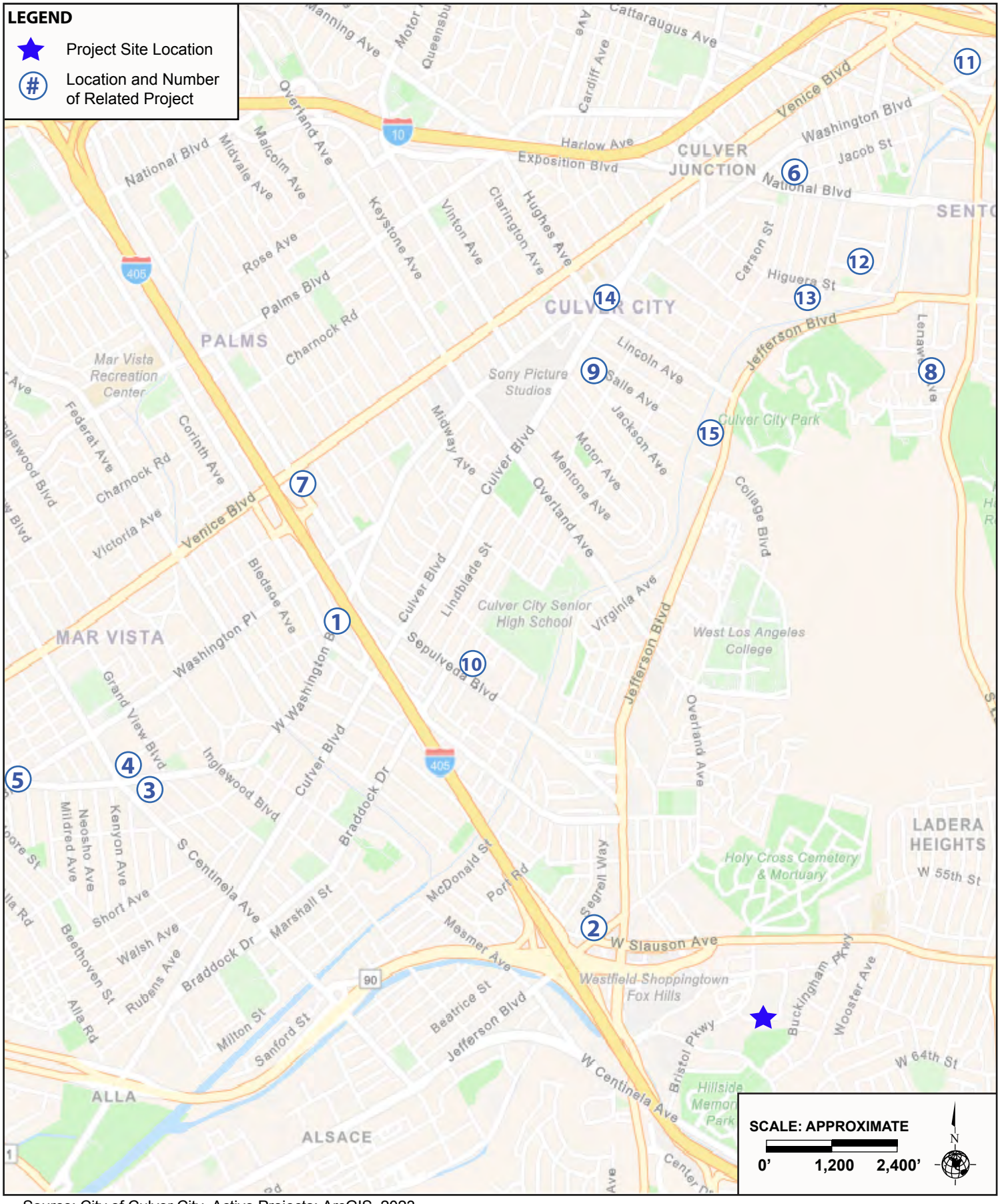
Table 1
Related Projects List

Project No.	Address	Project Description	Size	Units	Case No.	File Date	Status
1	11259 Washington Boulevard	Commercial Office	8,958	sf	P2018-0179-ASPR	N/A	Entitlement Review
2	11469 Jefferson Boulevard	Hotel	175	rm	P2019-0194-SPR P2019-0194-CUP P2019-0194-AUP	April 2021	Extension of Time (expires July 12, 2024)
3	12300 W. Washington Boulevard	Office	11,100	sf	P2021-0261-SPR P2021-0261-AUP	June 2022	Building Permit Plan Check
4	12337-12423 Washington Boulevard	Commercial	26,83f	sf	P2017-0042-GPMA P2017-0042-ZCMA P2017-0042-CP	October 2017	Minor Modification Approved 8/15/2022
5	12727 Washington Boulevard	Residential Commercial	104 19,012	du sf	P2021-0103-SPR/AUP P2021-0103-DOBI	August 2022	LA City Approved portion in LA April 2023
6	3434 Wesley Street	Residential Office/Gallery	15 14,237	du sf	P2016-0087-ZCMA	February 2017	Under Construction
7	3800 Sepulveda Boulevard	Commercial	13,000	sf	P2021-0276-CUP	July 2022	Building Permit Plan Check
8	3814 Lenawee Avenue	Single Family Assisted Living	8 95	du du	P2015-054-CP P2015-055-ZCMA P2015-056-GPMA P2015-057-TTM P2015-058-MND	N/A	Under Construction
9	4055 Jackson Avenue	Residential	9	du	P2018-0056-ASPR P2018-0056-TTM	N/A	Entitlement Review
10	4464 Sepulveda Boulevard	Residential Religious Facility Accessory Structure	95 6,730 7,200	du sf sf	N/A	June 2022	Applicant Revising Plans
11	5861-5863 Washington Boulevard	Office/Retail	16,900	sf	P2021-0171-SPR/AM/AUP	April 2022	Site Plan Review Approved
12	8511 Warner Drive	Parking Structure Retail/Restaurant	307,522 51,520	sf sf	P2008-047-SPR	N/A	Plan Check
13	8631-8635 Hayden Place	Office	244,000	sf	P2022-0056-SPR/AUP	July 2022	Extension of Time
14	9763 & 9739 Culver Boulevard	Residential Retail	34 2,724	du sf	P2022-0178-SPR/DOBI	September 2022	Site Plan Review Approved
15	9925 Jefferson Boulevard	Office	51,178	sf	P2021-0218-SPR	February 2022	Building Permit Plan Check

Notes: sf = square feet ; rm = room; du = dwelling unit
Source: City of Culver City, Active Projects, website: https://www.culvercity.org/Active-Projects, accessed August 2023.



Source: City of Culver City, Active Projects; ArcGIS, 2023.

Figure 1
Related Projects Map