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memorandum

date	June 16, 2026
to	Emily Stadnicki
cc	
from	Mike Harden
subject	11111 Jefferson Project – Extended Construction Hours CEQA Implications

Extended Construction Hours Request

Project Understanding

In September 2021, the City certified the Environmental Impact Report (State Clearinghouse No. 2020090329) (Certified EIR) for the 11111 Jefferson Boulevard Mixed-Use Project (Original Project). An Addendum to the Project's Certified EIR was approved in May 2025, which modified the Project to reduce the commercial space and increase the residential units (Modified Project). Collectively, the Original Project and Modified Project are referred to herein as the Project.

11111 Jefferson Property Owner LLC (Project Applicant) has submitted an Extended Construction Hours Request to the City of Culver City (City) and is submitting an application to the City to obtain a temporary use permit (TUP) to allow for the extended hours. Per Culver City Municipal Code (CCMC) Section 9.07.035, construction is prohibited between the hours of 8:00 p.m. and 8:00 a.m. Monday through Friday, between 7:00 p.m. and 9:00 a.m. on Saturday, and between 7:00 p.m. and 10:00 a.m. on Sunday. The Project Applicant is requesting the City to allow construction to occur Monday through Friday from 7:00 a.m. to 8:00 p.m. and on Saturdays and Sundays from 7:00 a.m. to 7:00 p.m. for a total of 109 days pursuant to the specific construction activities described below, with no other changes to the allowable construction start/end times. In other words, the Applicant is requesting to start construction one hour early during weekdays, two hours early on Saturdays, and three hours early on Sundays during the extended-hour days for the specified construction activities.

<u>Earthwork Shoring/Excavation Phase</u>

- 90 extended-hour days over the course of a 150-day period beginning in the 5th month of construction.

<u>Concrete Phase</u>

- Four extended-hour days during the 5th month of construction.

- Twelve extended-hour days over the course of an eighth-month period beginning in the 12th month of construction.

Crane Erection/Disassembly

- Six extended-hour days, one each in the 7th, 8th, 9th, 10th, 12th, and 14th months of construction.

This extended hours request would result in the following:

- A reduction in haul trip days by approximately 22 days.
- A reduction in the concrete phase by approximately 30 days.

This request is limited in scope and will extend the time of daily construction activities during certain phases with the intent to shorten the overall construction duration. It will not serve to intensify or otherwise increase the extent of construction that was thoroughly analyzed in the Certified EIR and subsequent Addendum.

The concrete phase in particular will benefit from the extra hours because it will reduce the total number of concrete deck pours by six (6) and ensuring that only one mat foundation pour is required. Reducing the number of pours will give the concrete more time to set and dry, producing stronger concrete and minimizing the chance of cracking. This will also enable the construction team to work more efficiently and accomplish larger areas of work each day. As each area of concrete can be completed more efficiently, the workers can move more quickly to other parts of the Property, thereby minimizing the impacts on adjacent properties. Overall, the extended hours should reduce the concrete phase by 30 days.

Additionally, the early start during these phases will also help mitigate any traffic impacts that could otherwise be caused by early morning hauling, deliveries, and worker arrivals. By starting earlier, these activities can ideally occur before the peak morning commute hours, and thus they will be less impactful. Without the early start, the first delivery and haul trips of the day would otherwise fall during peak traffic hours.

Lastly, the extended hours are being requested for the safety of the construction crew. Certain tasks, such as tower crane erection and disassembly, have physical limitations for how much can safely be completed within one work day. Thus, the extra hours will allow the construction crew to most safely accomplish the large-scale tasks.

CEQA Implications

Air Quality

The Certified EIR was prepared to analyze the environmental impacts of the Project's construction and operational activities. Construction-related air quality impacts are evaluated in Section 4.1, *Air Quality*, of the Certified EIR and, subsequently in the Addendum to the Certified EIR under Section 3.1, *Air Quality*. Section 4.1 of the Certified EIR identifies a significant impact if construction activities would (1) Conflict with or obstruct implementation of the applicable air quality plan; (2) Result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard; or (3) Expose sensitive receptors to substantial pollutant concentrations.

The Certified EIR evaluates construction air quality impacts using conservative, worst-case assumptions intended to represent maximum daily construction emissions. Specifically, the analysis assumes a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date within the boundaries of the

Project Site, all equipment for a particular phase would be operational at the same time) and hence represent a worst-case day and does not represent the emissions that would occur for every day of Project construction. Based on these assumptions, the Certified EIR concludes that construction activities would have potentially significant impacts for the applicable thresholds of significance. Construction air quality impacts are identified as potentially significant and mitigation measures are required.

To address construction emission impacts, the Certified EIR incorporates Mitigation Measures and Project Design Features (PDFs) that are required to be implemented throughout construction. Specifically, the Project includes PDF-TRAF-1 (Construction Management Plan or "CMP"), which would address construction-related traffic impacts. Mitigation Measure AIR-1 requires the use of cleaner construction equipment, implementation of enhanced dust-control measures, and limitations on haul truck trips to reduce construction-related emissions. Mitigation Measure AIR-2 requires the use of electric or non-diesel-powered equipment wherever feasible and the use of on-site electricity instead of diesel generators to minimize toxic air contaminant emissions during construction. With implementation of Mitigation Measures AIR-1 and AIR-2, the Project's potentially significant construction impacts would be reduced to a less than significant level after mitigation.

The identified PDFs and mitigation measures are not dependent on specific construction hours, but instead apply to construction equipment, site controls, and management practices. As such, they would be fully implemented during any construction activity occurring under approved extended hours. The Extended Construction Hours Request would not alter or affect the implementation or effectiveness of these measures, which would continue to reduce construction emissions and exposure at nearby receptors regardless of whether construction begins at 7:00 a.m. or later. Accordingly, approval of the extended hours would not result in new air quality impacts or increase the severity of previously identified impacts, as the same mitigation framework analyzed in the Certified EIR and Addendum would remain in effect.

Air Quality Plan

The Extended Construction Hours Request would allow limited construction activities to occur during extended hours but would not alter the nature, intensity, or overall scope of the approved construction activities, increase the amount of construction equipment utilized, or result in additional development beyond that previously analyzed in the certified EIR and Addendum. Construction activities would continue to be subject to all applicable air quality regulations, permit conditions, and required mitigation measures, including compliance with South Coast Air District (SCAQMD) rules governing fugitive dust control, equipment emissions, and idling restrictions. Although the Extended Construction Hours Request would increase the maximum daily construction emissions for specific phases, regional and localized emissions (see *Criteria Air Pollutant* subsection, below) would be below applicable significance thresholds and impacts would be less than significant after mitigation, as was determined in the Certified EIR and Addendum. Therefore, approval of the Extended Construction Hours Request would not conflict with or obstruct implementation of the applicable Air Quality Management Plan (AQMP), would not increase the frequency or severity of any existing air quality violation, and would not result in a new significant air quality impact or a substantial increase in the severity of previously identified air quality impacts under CEQA.

Regional and Localized Criteria Air Pollutants

The Certified EIR disclosed mitigated regional maximum daily construction emissions in Table 4.1-10, *Mitigated Regional Maximum Daily Construction Emissions.* For the purposes of this extended hours analysis, regional construction emissions disclosed in the Certified EIR were scaled based the description of the Extended Construction Hours Request for applicable phases, specifically the Grading/Excavation and Building Construction phases. The

construction air quality analysis of the Certified EIR assumed up to 8 hours of daily equipment operation for any given phase except for the Foundation Pour (Extended Day) phase. For the Grading/Excavation and Building Construction phases, under the Extended Construction Hours Request, the calculated regional emissions in the Certified EIR are conservatively doubled to represent the use off-road equipment for up to a 16-hour workday, a doubling of onsite fugitive dust for the applicable Grading/Excavation phase[1], worker and vendor trips. For haul truck trips during the Grading/Excavation phase, the Certified EIR assumed up to 200 haul truck trips per day throughout the phase. Under Mitigation Measure AIR-1, haul truck activity would be limited to a maximum of 240 truck trips per day under the Extended Construction Hours Request and were assumed to occur for the Grading/Excavation phase. The Certified EIR had previously analyzed an extended construction workday in the Foundation Pour (Extended Day) phase, which assumed off-road equipment for up to a 16-hour workday, worker and vendor trips, and a maximum of 240 truck trips per day under Mitigation Measure AIR-1, which covers construction activities under the Extended construction Hours Request.[2] Therefore, emissions for the Foundation Pour (Extended Day) phase are not scaled. As shown in **Table 1**, *Mitigated Regional Maximum Daily Construction Emissions,* with the implementation of Mitigation Measure AIR-1, the scaled regional Grading/Excavation and Building Construction and overlap scenario 3 that includes the Building Construction phase emissions would be below the applicable SCAQMD daily significance thresholds.

Similarly, the Certified EIR also disclosed mitigated localized construction emissions in Table 4.1-11, *Mitigated Localized Construction Emissions*. As with the regional construction emissions, for the purposes of this extended hours analysis, the localized construction emissions disclosed in the Certified EIR were scaled based the description of the Extended Construction Hours Request for applicable phases. Specifically, for the Grading/Excavation and Building Construction phases, under the Extended Construction Hours Request, the calculated localized on-site emissions in the Certified EIR are conservatively doubled to represent the use off-road equipment for up to a 16-hour workday and a doubling of onsite fugitive dust for the applicable Grading/Excavation phase.[3] The Certified EIR had previously analyzed an extended construction workday in the Foundation Pour (Extended Day) phase, which assumed off-road equipment for up to a 16-hour workday, which covers construction activities under the Extended construction Hours Request.[4] Therefore, emissions for the Foundation Pour (Extended Day) phase are not scaled. As shown in **Table 2**, *Mitigated Localized Construction Emissions,* with the implementation of Mitigation Measure AIR-1, localized emissions would be below the applicable SCAQMD daily significance thresholds.

Therefore, although the requested extended hours could result in increased daily emissions on certain construction days, the request would not introduce construction activities, equipment types, or construction methods beyond those evaluated in the Certified EIR and Addendum. Approval of the Extended Construction Hours Request would therefore not result in a new significant regional or localized construction emission impact or a substantial increase in the severity of previously identified impacts under CEQA.

Health Risk Assessment

Construction-related health risk impacts are evaluated in Section 4.1, *Air Quality*, of the Certified EIR and, subsequently, in the Addendum to the Certified EIR. The construction health risk assessment evaluates diesel particulate matter (DPM) emissions that would be generated by construction equipment, haul trucks, and vendor trucks. The health risk assessment identified a maximum residential receptor cancer risk of 3.55 in one million and a maximum

[1] Note, there are no onsite fugitive dust emissions associated with the Building Construction phase.
[2] Note, there are no onsite fugitive dust emissions associated with the Foundation Pour phase.
[3] Note, there are no onsite fugitive dust emissions associated with the Building Construction phase.
[4] Note, there are no onsite fugitive dust emissions associated with the Foundation Pour phase.

school receptor cancer risk of 1.53 in one million. The maximum residential receptor hazard index would be 0.005 and the maximum school receptor hazard index would be 0.01. These values are below the applicable SCAQMD significance thresholds of 10 in one million for cancer risk and 1.0 for hazard index.

TABLE 1
MITIGATED REGIONAL MAXIMUM DAILY CONSTRUCTION EMISSIONS (POUNDS PER DAY)[a]

Source	VOC	NO_X	CO	SO_2	PM10	PM2.5
Demolition	1	10	34	<1	1	<1
Site Preparation	3	69	54	<1	12	5
Grading/Excavation	4	90	92	<1	12	5
Drainage/Utilities/Trenching	<1	3	22	<1	<1	<1
Foundation Pour (Typical Day)	3	46	72	<1	6	2
Foundation Pour (Extended Day)	5	91	145	<1	13	4
Building Construction	3	16	147	<1	9	3
Paving	<1	3	19	<1	1	<1
Architectural Coating	38	2	8	<1	1	<1
Overlap 1[b]	4	79	88	<1	1	<1
Overlap 2a[b]	3	49	94	<1	6	2
Overlap 2b[b]	5	94	167	<1	13	4
Overlap 3	41	22	174	<1	11	3
Maximum Daily Emissions	**40**	**94**	**167**	**0**	**13**	**5**
Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Threshold?	No	No	No	No	No	No

[a] Table 1 modifies Table 4.1-10 in the Certified EIR. Emissions for off-road construction equipment, onsite fugitive dust, and worker and vendor trips from the Grading/Excavation and Building Construction phases were conservatively doubled in this Table 1 to account for the Extended Hours Request. Additionally, per Mitigation Measure AIR-1, haul truck activity were assumed to be limited to a maximum of 240 truck trips per day. See Attachment A for air quality calculations.

b Overlap scenarios are as follows: 1. Demolition and site preparation; 2. Drainage/utilities/trenching with foundation pouring (2a is a typical foundation pouring day, 2b is an extended foundation pouring day); and 3. Building construction with both paving and architectural coating.

SOURCE: ESA, 2026.

The Extended Construction Hours Request would allow discrete construction activities to occur during extended hours on 109 days over an approximately 15-month period, including earthwork shoring/excavation, limited concrete activities, and crane erection and disassembly. As detailed above, the majority of the requested extended-hour activities are associated with earthwork shoring/excavation activities, while the requested concrete and crane activities are limited in duration. Although the requested extended hours could result in increased daily emissions on certain construction days, the request would not introduce construction activities, equipment types, or construction methods beyond those evaluated in the Certified EIR and Addendum. The requested schedule is also expected to shorten the overall construction duration by approximately two to three months, including approximately 22 fewer haul-trip days and approximately 30 fewer concrete-phase days.

TABLE 2
MITIGATED LOCALIZED CONSTRUCTION EMISSIONS (POUNDS PER DAY)[a]

Source	NO_X	CO	PM10	PM2.5
Demolition	2	30	<1	<1
Site Preparation	3	27	5	3
Grading/Excavation	8	56	4	2
Drainage/Utilities/Trenching	3	21	<1	<1
Foundation Pour (Typical Day)	7	50	<1	<1
Foundation Pour (Extended Day)	13	100	<1	<1
Building Construction	14	121	<1	<1
Paving	3	18	<1	<1
Architectural Coating	2	6	<1	<1
Overlap 1[b]	5	56	5.7	3
Overlap 2a[b]	10	72	<1	<1
Overlap 2b[b]	16	122	<1	<1
Overlap 3	19	144	<1	<1
Maximum Daily Emissions	19	144	5.7	3
Threshold	82	827	6	4
Exceeds Threshold?	No	No	No	No

[a] Table 2 modifies Table 4.1-11 in the Certified EIR. Emissions for off-road construction equipment and onsite fugitive dust from the Grading/Excavation and Building Construction phases were conservatively doubled in this Table 2 to account for the Extended Hours Request. See Attachment A for air quality calculations.

b Overlap scenarios are as follows: 1. Demolition and site preparation; 2. Drainage/utilities/trenching with foundation pouring (2a is a typical foundation pouring day, 2b is an extended foundation pouring day); and 3. Building construction with both paving and architectural coating.

SOURCE: ESA, 2026.

Mitigation Measures AIR-1 and AIR-2 would remain in effect during all approved extended construction hours, including requirements for the use of construction equipment certified to meet the Tier 4 emissions standards, Best Available Control Technology devices, enhanced fugitive dust suppression, electric or non-diesel fueled equipment, and limits on haul truck activity. These measures are not dependent on the hours during which construction occurs and would continue to reduce emissions from construction equipment and truck activity during any approved extended-hour construction activities.

The health risk assessment evaluated the grading/excavation phase as contributing a residential receptor cancer risk of 0.88 in one million and a school receptor cancer risk of 0.358 in one million and assumed up to 200 haul truck trips per day throughout the phase. The construction air quality and health risk analyses generally assumed up to 8 hours of daily equipment operation during this phase. Since the requested extended-hour earthwork shoring/excavation activities would occur over much of the earthwork phase, this phase represents the construction activity most directly affected by the requested extended hours. Under Mitigation Measure AIR-1, haul truck activity would remain limited to a maximum of 240 truck trips per day. Even under a highly conservative scenario in which the entire grading/excavation cancer risk contribution were doubled to account for potential increases in daily equipment usage associated with extended construction hours, the total residential receptor cancer risk would increase from 3.55 to approximately 4.43 in one million and the total school receptor cancer risk would increase from 1.53 to approximately

1.89 in one million. Both values remain below the SCAQMD significance threshold of 10 in one million. This evaluation reflects an increase in emissions that is substantially greater than would reasonably be expected from the requested extended-hour earthwork activities and demonstrates that the resulting cancer risks would remain well below the applicable SCAQMD significance threshold.

The health risk assessment evaluated the foundations/concrete pour phase as the largest contributor to residential cancer risk, with a cancer risk contribution of 1.0 in one million and conservatively assumed 16-hour workdays during approximately 50 percent of the 151-day foundations/concrete pour phase and up to 240 truck trips per day during those periods. These assumptions already reflect extended-duration activity and substantial truck volumes comparable to the activities associated with the requested extended construction hours. The requested extended-hour concrete activities would take place for only 16 days and are expected to reduce the overall duration of the concrete phase by approximately 30 days.

The health risk assessment also evaluated the building construction phase over an approximately 397-day period and identified residential and school cancer risk contributions of 0.93 in one million and 0.374 in one million, respectively. The construction air quality and health risk analyses generally assumed up to 8 hours of daily equipment operation during this phase. However, the requested extended-hour crane erection and disassembly activities would occur for only six days, representing approximately 1.5 percent of the overall building construction duration. As a result, any increase in daily equipment operating hours associated with these limited activities would represent a very small fraction of the overall building construction phase and would not be expected to materially affect the evaluated health risk results.

The health risk assessment also identified a maximum residential receptor hazard index of 0.005 and a maximum school receptor hazard index of 0.01. A hazard index of 1.0 represents the SCAQMD threshold at which non-cancer health impacts may become a concern. Similarly, even if the evaluated hazard index values were conservatively doubled, they would increase to only approximately 0.01 and 0.02, respectively. These values would remain only about one to two percent of the applicable significance threshold.

The conclusions discussed above are further supported by the conservative assumptions incorporated into the health risk assessment. As discussed in the Certified EIR, the construction health risk assessment assumed that the maximum construction activity and associated emissions anticipated during each construction phase would occur every day throughout the duration of that phase, representing a highly conservative estimate of construction emissions and health risk. The Certified EIR further notes that average daily emissions associated with typical construction activity would be lower than the emissions used to quantify risk. Therefore, while the cancer risk analysis was based on a conservative estimate of construction activity and emissions, the evaluated residential receptor and school receptor cancer risks of 3.55 in one million and 1.53 in one million, respectively, remained below the applicable SCAQMD significance threshold following implementation of Mitigation Measures AIR-1 and AIR-2.

In addition, the timing of those emissions was considered because the requested extended hours would shift a portion of construction activity to earlier morning periods. During early morning hours, wind speeds and atmospheric mixing can sometimes be lower than during afternoon periods, which can reduce pollutant dispersion and result in slightly higher localized pollutant concentrations from a given amount of emissions. However, any such increase would be expected to be limited because the requested extended-hour activities represent a relatively small portion of the overall construction schedule and would not materially alter the overall quantity of construction activity evaluated in the Certified EIR and Addendum. Furthermore, the evaluated cancer risks and hazard indices remain substantially below

the applicable SCAQMD significance thresholds, providing a considerable margin between the evaluated health risk results and the threshold of significance. Accordingly, any potential increase in localized concentrations associated with the timing of the requested activities would not be expected to materially alter the conclusions of the health risk assessment.

In summary, the cancer risks and hazard indices identified in the Certified EIR's health risk assessment are below applicable SCAQMD significance thresholds. The same mitigation measures evaluated in the Certified EIR and Addendum would continue to be implemented, and the limited extended-hour activities would not materially alter the health risk conclusions presented in the Certified EIR and Addendum. Approval of the Extended Construction Hours Request would therefore not result in a new significant health risk impact or a substantial increase in the severity of previously identified impacts under CEQA.

Noise

Construction-related noise impacts are evaluated in Section 4.8, *Noise*, of the Certified EIR and, subsequently in the Addendum to the Certified EIR under Section 3.8, *Noise*. Section 4.8 identifies a significant impact if construction activities would (1) generate noise levels exceeding applicable thresholds at sensitive receptors, or (2) occur outside of the construction hours established by the Culver City Municipal Code (CCMC), which generally limits construction to between 8:00 a.m. and 8:00 p.m. on weekdays, 9:00 a.m. and 7:00 p.m. on Saturdays, and 10:00 a.m. and 7:00 p.m. on Sundays.

The Certified EIR evaluates construction noise using conservative, worst-case assumptions intended to represent peak construction activity. Specifically, the analysis assumes that multiple pieces of heavy equipment would operate concurrently, including the loudest equipment located at the closest feasible distances to nearby sensitive receptors, and that overlapping construction phases may occur. Noise levels are calculated as hourly equivalent sound levels (Leq), representing the maximum intensity of construction activity during a given day. Based on these assumptions, the Certified EIR concludes that construction activities would generate noise levels that exceed the applicable thresholds at all analyzed sensitive receptor locations. Therefore, construction noise impacts are identified as potentially significant, and mitigation measures are required.

To address construction noise impacts, the Certified EIR incorporates both Mitigation Measures and PDFs that are required to be implemented throughout construction. Specifically, the Project includes PDFs such as PDF-NOISE-1 (advance construction notification), PDF-NOISE-3 (construction rules signage and complaint contact information), PDF-NOISE-4 (equipment mufflers and maintenance), and PDF-TRAF-1 (Construction Management Plan), which together establish construction best practices, coordination procedures, and noise control requirements. In addition, Mitigation Measure NOI-MM-1 requires installation of temporary noise barriers (e.g., sound walls or blankets) along the site perimeter, where feasible, to reduce noise levels at nearby sensitive receptors, while Mitigation Measure NOI-MM-2 requires that all construction equipment be properly maintained and equipped with effective mufflers and sound control devices. These measures represent the maximum feasible noise reduction identified in the Certified EIR, and would reduce potentially significant construction noise impacts to a less than significant level.

The construction noise analysis is driven by the intensity and combination of equipment operating during peak activity, rather than the specific hour of the day during which construction occurs within the allowable daytime period. The modeled worst-case noise levels reflect the maximum noise-generating conditions anticipated during construction of the Project, regardless of time of day. The Extended Construction Hours Request would allow construction to begin at 7:00 a.m., which is earlier than the standard CCMC-permitted start time. However, the request would not alter the

types or number of equipment used, the construction methods, or the maximum level of concurrent activity occurring during peak construction periods. As such, the request would not increase the maximum construction noise levels previously evaluated in the Certified EIR.

The identified PDFs and mitigation measures are not dependent on specific construction hours, but instead apply to construction equipment, site controls, and management practices. As such, they would be fully implemented during any construction occurring under approved extended hours. Because the Extended Construction Hours Request would not increase the intensity of construction activity, the number of daily haul or worker trips, or the resulting on-site or off-site noise levels, and may reduce the overall duration of hauling activities, it would not result in a new significant construction noise impact or a substantial increase in the severity of previously identified impacts under CEQA.

Off-site construction noise, including noise associated with haul trucks, worker trips, and material deliveries along surrounding roadways, was also evaluated conservatively in the Certified EIR. As with on-site construction noise, off-site noise impacts are driven by the maximum daily volume and intensity of construction-related activity, rather than the specific hours during which trips occur. The Extended Construction Hours Request would not increase the total number of daily haul trips or construction-related vehicle trips evaluated in the Certified EIR, and therefore would not increase peak hourly noise levels along affected roadways. The extended start time would allow construction activities to be distributed over a longer portion of the day, which would reduce the concentration of truck trips during any single time period and, as noted above, would reduce the total number of required hauling days. A shorter hauling duration would in turn reduce the overall exposure of nearby receptors to construction-related noise. In addition, PDF-TRAF-1 (Construction Management Plan) would continue to govern haul routing, scheduling, and coordination with the City to minimize off-site disturbances, including noise effects along adjacent roadways. Therefore, off-site construction noise impacts would remain consistent with the impacts analyzed in the Certified EIR and Addendum and would not result in a new significant impact or a substantial increase in the severity of previously identified impacts.

Other CEQA Issue Areas

With regard to traffic/transportation, from a CEQA perspective, the transportation impact analyses and conclusions included in the Certified EIR and Addendum are not directly tied to construction hours. Under the Extended Construction Hours Request, the same number of overall haul truck trips would occur during the Project's construction activities. However, the excavation activities would occur over a shorter number of days. Thus, the overall number of worker vehicle trips would be reduced compared to the Project. The early start during the extended hours phases will also help reduce traffic impacts that could otherwise be caused by early morning hauling, deliveries, and worker arrivals. By starting earlier, these activities can occur before the peak morning commute hours, and thus they will be less impactful to traffic conditions. Without the early start, the first delivery and haul trips of the day would otherwise fall during peak traffic hours. Although traffic congestion is not a CEQA environmental transportation issue, avoiding the peak traffic hours would be a beneficial result of the Extended Construction Hours Request. Also, it is acknowledged that the Project would continue to implement a CMP per PDF-TRAF-1. As peak construction hour traffic would be reduced with the Extended Construction Hours Request, the goals and objectives of the CMP related to minimizing construction traffic impacts and maintaining adequate emergency access would be supported. Based on the above, the transportation-related impact analysis and conclusions in the Certified EIR and Addendum would not be affected by the Extended Construction Hours Request.

With regard to lighting, the Certified EIR disclosed that development of the Project would generate new sources of short-term lighting during the construction phase of the Project. However, the Certified EIR acknowledged that the Project area is an urbanized setting characterized by a high level of nighttime lighting. The Certified EIR indicates that

construction-related nighttime lighting would be used at the construction site only for safety and security purposes. The Certified EIR states that construction lighting will be shielded, directed downward, and as required by Project Design Feature AES-PDF-4 to avoid undue glare or light trespass onto adjacent uses. In addition, eight-foot-tall security fencing will be provided around the construction site as required by AES-PDF-1, which will block ground-level views of the construction site and reduce light spillover onto adjacent properties. Finally, the Certified EIR indicates that Project construction lighting would be intermittent during certain stages of the construction period. As such, the Certified EIR concludes that the Project would not create a new source of light or glare during construction which would adversely affect day or nighttime views in the area.

The Project's off-hours construction would end at the same time as allowed under the current Municipal Code, which was evaluated in the Certified EIR and Addendum. That is, the Extended Construction Hours Request would only allow for earlier start times in the morning, which would be during daylight hours. As such, there would be no changes to the maximum extent of nighttime lighting associated with the Extended Construction Hours Request. As with the Project, construction under the Extended Construction Hours Request would include a lighting scheme that contains performance measures to reduce glare and light trespass, including appropriate lighting pole height and location, and lamp shielding. Pole heights for the Project's night construction would meet industry standards for lighting this type of activity. Strategic placement of the poles in relation to construction activities is key to the proper lighting of the site in relation to the neighboring properties. Lamp sources would vary in multiple combinations based on the luminance level requirements of the site facilities. The proposed lighting would include external shielding reflectors to provide light shielding and glare control, decreasing the visibility of any high intensity lamps. Lighting would be strategically located and aimed toward the targeted construction areas of the project site with visor shields to minimize off-site lighting impacts. The lighting design would prevent disability glare (i.e., reduction of the ability to see or identify objects). Glare and light spill would be minimized based on the design scheme. Therefore, off-site lighting impacts would remain consistent with the impacts analyzed in the Certified EIR and Addendum and would not result in a new significant impact or a substantial increase in the severity of previously identified impacts.

No other environmental impact analyses or conclusions for issues not identified above and evaluated in the Certified EIR or Addendum would be materially changed should an Extended Construction Hours Request be approved for the Project.

Conclusion

Based on the above, the environmental impact analyses and conclusions for all issues evaluated in the Certified EIR and Addendum would not be materially changed should an Extended Construction Hours Request be approved for the Project. Accordingly, approval of an Extended Construction Hours Request would not result in a new significant impact or a substantial increase in the severity of previously identified impacts in the Certified EIR or Addendum.

Attachment A
Air Quality Calculations

ESA

1. **Certified EIR Maximum Daily Unmitigated Construction Emissions**

11111 Jefferson Boulevard
Maximum Daily Unmitigated Construction Emissions

CalEEMod	2016.3.2	Title:	11111 Jefferson Blvd. Construction Emissions	Date:	12/9/2020
EMFAC	2017	Title:	Jefferson - EMFAC2017 (12142020)	Date:	12/14/2020

Unmitigated - Construction

	ROG	NOx	CO	SO_2	PM10 Total	PM2.5 Total	
	Max Daily (lbs/day)						
Demolition	3	38	31	<1	3	2	
Site Preparation	6	107	52	<1	14	7	
Grading/Excavation	5	99	50	<1	10	4	
Drainage/Utilities/ Trenching	2	19	21	<1	1	1	
Foundations/ Concrete Pour	11	231	126	1	22	8	8 hour days
	23	462	253	1	43	16	16 hour days
Building Construction	6	51	70	<1	7	4	
Paving	1	12	17	<1	1	1	
Archetecutal Coating	39	5	8	<1	1	1	
	Construction Overlaps						
Overlap 1	10	145	82	<1	17	8	
Overlap 2a	13	250	147	1	23	9	
Overlap 2b	24	481	274	1	44	17	
Overlap 3	46	69	95	<1	10	5	
Max Daily	46	**481**	274	1	44	17	
Threshold	75	**100**	550	150	150	55	
Exceed Threshold?	No	**Yes**	No	No	No	No	

Overlaps:

1 Demolitoin & Site Prep

2a Drainage & Foundations (8 hr day)

2b Drainage & Foundations (16 hr day)

3 Building Construction & Paving & Architectural Coating

11111 Jefferson Boulevard
Maximum Daily Unmitigated Construction Emissions

Unmitigated - Construction

		ROG	NOx	CO	SO_2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total
		(lbs/day)									
Demolition	Fugitive					0.2093	0	0.2093	0.0317	0	0.0317
	Off-Road	3.1339	30.3233	26.508	0.0485		1.4797	1.4797		1.3851	1.3851
	Haul	0.226194	6.373951	2.395126	0.020682	0.524471	0.038037	0.562508	0.143737	0.036391	0.180128
	Vendor	0.042377	0.845032	0.518554	0.002566	0.06379	0.004888	0.068678	0.01834	0.004676	0.023015
	Worker	0.025714	0.093606	1.274457	0.003853	0.446711	0.002666	0.449377	0.118418	0.002455	0.120873
Site Preparation	Fugitive					5.3205	0	5.3205	2.9246	0	2.9246
	Off-Road	3.8268	40.767	24.2505	0.049		1.9294	1.9294		1.7751	1.7751
	Haul	2.261941	63.73951	23.95126	0.206817	5.244712	0.380369	5.625081	1.437369	0.363914	1.801283
	Vendor	0.127132	2.535097	1.555661	0.007698	0.191369	0.014663	0.206033	0.055019	0.014027	0.069046
	Worker	0.03857	0.140408	1.911686	0.00578	0.670067	0.003999	0.674066	0.177627	0.003682	0.18131
Grading/Excavation	Fugitive					1.7872	0	1.7872	0.9763	0	0.9763
	Off-Road	3.0064	32.7435	22.9544	0.0494		1.4034	1.4034		1.2919	1.2919
	Haul	2.261941	63.73951	23.95126	0.206817	5.244712	0.380369	5.625081	1.437369	0.363914	1.801283
	Vendor	0.127132	2.535097	1.555661	0.007698	0.191369	0.014663	0.206033	0.055019	0.014027	0.069046
	Worker	0.03857	0.140408	1.911686	0.00578	0.670067	0.003999	0.674066	0.177627	0.003682	0.18131
Drainage/Utilities/ Trenching	Fugitive					0	0	0	0	0	0
	Off-Road	1.8754	18.4832	20.5537	0.0287		1.0848	1.0848		0.9996	0.9996
	Haul	0	0	0	0	0	0	0	0	0	0
	Vendor	0	0	0	0	0	0	0	0	0	0
	Worker	0.009643	0.035102	0.477921	0.001445	0.167517	0.001	0.168517	0.044407	0.000921	0.045327
Foundations/ Concrete Pour	Fugitive					0	0	0	0	0	0
	Off-Road	4.3474	39.0466	46.7072	0.0766		2.0024	2.0024		1.9216	1.9216
	Haul	6.785822	191.2185	71.85378	0.62045	15.7341349	1.14110773	16.8752427	4.31210589	1.09174232	5.40384821
	Vendor	0.016951	0.338013	0.207421	0.001026	0.025516	0.001955	0.027471	0.007336	0.00187	0.009206
	Worker	0.154282	0.561634	7.646742	0.02312	2.680266	0.015998	2.696264	0.710508	0.01473	0.725238

11111 Jefferson Boulevard
Maximum Daily Unmitigated Construction Emissions

		ROG	NOx	CO	SO_2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total
		(lbs/day)									
Building Construction	Fugitive					0	0	0	0	0	0
	Off-Road	6.0273	50.1874	56.9595	0.0959		2.6651	2.6651		2.5808	2.5808
	Haul	0	0	0	0	0	0	0	0	0	0
	Vendor	0.016951	0.338013	0.207421	0.001026	0.025516	0.001955	0.027471	0.007336	0.00187	0.009206
	Worker	0.257137	0.936056	12.74457	0.038533	4.467111	0.026663	4.493773	1.18418	0.02455	1.20873
Paving	Off-Road	1.2884	12.3779	15.5382	0.0239		0.6577	0.6577		0.6074	0.6074
	Paving	0					0	0		0	0
	Haul	0	0	0	0	0	0	0	0	0	0
	Vendor	0	0	0	0	0	0	0	0	0	0
	Worker	0.025714	0.093606	1.274457	0.003853	0.446711	0.002666	0.449377	0.118418	0.002455	0.120873
Archetecutal Coating	Arch Coating	37.8298					0	0		0	0
	Off-Road	0.6372	5.092	5.7847	8.73E-03		0.3128	0.3128		0.2977	0.2977
	Haul	0	0	0	0	0	0	0	0	0	0
	Vendor	0	0	0	0	0	0	0	0	0	0
	Worker	0.051427	0.187211	2.548914	0.007707	0.893422	0.005333	0.898755	0.236836	0.00491	0.241746

11111 Jefferson Boulevard
Maximum Daily Unmitigated Construction Emissions

Unmitigated - LST

	ROG	NOx	CO	SO_2	PM10 Total	PM2.5 Total
	Max Daily (lbs/day)					
Demolition		30	27		2	1
Site Preparation		41	24		7	5
Grading/Excavation		33	23		3	2
Drainage/Utilities/ Trenching		18	21		1	1
Foundations/ Concrete Pour		39	47		2	2
		78	93		4	4
Building Construction		50	57		3	3
Paving		12	16		1	1
Archetecutal Coating		5	6		0	0
Overlap 1		71	51		9	6
Overlap 2a		58	67		3	3
Overlap 2b		97	114		5	5
Overlap 3		68	78		4	3
Max Daily		**97**	114		**9**	**6**
Threshold		**82**	827		**6**	**4**
Exceed Threshold?		**Yes**	**No**		**Yes**	**Yes**

11111 Jefferson Boulevard
Maximum Daily Unmitigated Construction Emissions

CalEEMod	2016.3.2	Title:	11111 Jefferson Blvd. Construction Emissions	Date:	12/9/2020
EMFAC	2017	Title:	Jefferson - EMFAC2017 (12142020)	Date:	12/14/2020

Unmitigated - Construction

	ROG	NOx	CO	SO_2	PM10 Total	PM2.5 Total	
	Max Daily (lbs/day)						
Demolition	3	38	31	<1	3	2	
Site Preparation	6	107	52	<1	14	7	
Grading/Excavation	5	99	50	<1	10	4	
Drainage/Utilities/ Trenching	2	19	21	<1	1	1	
Foundations/ Concrete Pour	11	231	126	1	22	8	8 hour days
	23	462	253	1	43	16	16 hour days
Building Construction	6	51	70	<1	7	4	
Paving	1	12	17	<1	1	1	
Archetecutal Coating	39	5	8	<1	1	1	
	Construction Overlaps						
Overlap 1	10	145	82	<1	17	8	
Overlap 2a	13	250	147	1	23	9	
Overlap 2b	24	481	274	1	44	17	
Overlap 3	46	69	95	<1	10	5	
Max Daily	46	**481**	274	1	44	17	
Threshold	75	**100**	550	150	150	55	
Exceed Threshold?	No	**Yes**	No	No	No	No	

Overlaps:

1 Demolitoin & Site Prep

2a Drainage & Foundations (8 hr day)

2b Drainage & Foundations (16 hr day)

3 Building Construction & Paving & Architectural Coating

2. Extended Construction Hours Request Maximum Daily Mitigated Construction Emissions

11111 Jefferson Boulevard
Maximum Daily Mitigated Construction Emissions (Tier 4 Equipment)

CalEEMod	2016.3.2	Title:	11111 Jefferson Blvd. Construction Emissions	Date:	12/9/2020
EMFAC	2017	Title:	Jefferson - EMFAC2017 (12142020)	Date:	12/14/2020

Mitigated - Construction

Extended Construction Hours Request

	ROG	NOx	CO	SO_2	PM10 Total	PM2.5 Total	
	Max Daily (lbs/day)						
Demolition	1	10	34	<1	1	<1	
Site Preparation	3	69	54	<1	12	5	
Grading/Excavation	4	90	92	<1	12	5	
Drainage/Utilities/ Trenching	<1	3	22	<1	<1	<1	
Foundations/ Concrete Pour	3	46	72	<1	6	2	8 hour days
	5	91	145	<1	13	4	16 hour days
Building Construction	3	16	147	<1	9	3	
Paving	<1	3	19	<1	1	<1	
Archetecutal Coating	38	2	8	<1	1	<1	
	Construction Overlaps						
Overlap 1	4	79	88	<1	1	<1	
Overlap 2a	3	49	94	<1	6	2	
Overlap 2b	5	94	167	<1	13	4	
Overlap 3	41	22	174	<1	11	3	
Max Daily	41	94	174	0	13	5	
Threshold	75	100	550	150	150	55	
Exceed Threshold?	No	No	No	No	No	No	

Overlaps:

1 Demolitoin & Site Prep

2a Drainage & Foundations (8 hr day)

2b Drainage & Foundations (16 hr day)

3 Building Construction & Paving & Architectural Coating

Mitigation Measures:

1 Tier 4 Equipment

2 Water 4x per day during Site Preparation and Grading

3 Maximum daily trucks = 120

Mitigated - LST

Extended Construction Hours Request

	ROG	NOx	CO	SO_2	PM10 Total	PM2.5 Total	
	Max Daily (lbs/day)						
Demolition		2	30		0	0	
Site Preparation		3	27		5	3	
Grading/Excavation		8	56		4	2	
Drainage/Utilities/ Trenching		3	21		0	0	
Foundations/ Concrete Pour		7	50		0	0	8 hour days
		13	100		0	0	16 hour days
Building Construction		14	121		0	0	
Paving		3	18		0	0	
Archetecutal Coating		2	6		0	0	
Overlap 1		5	56		5.69	3	
Overlap 2a		10	72		0	0	
Overlap 2b		16	122		0	0	
Overlap 3		19	144		0	0	
Max Daily		19	144		6	3	
Threshold		82	827		6	4	
Exceed Threshold?		**No**	**No**		**No**	**No**	