



# Culver CITY

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## PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

### ATTACHMENT NO. 6

### PROPOSED MITIGATED NEGATIVE DECLARATION

**Project Title and File No.:** Willows Community School (Zoning Code Amendment, ZCA P-2011154; Conditional Use Permit Modification, CUP/M P-2011156; and Mitigated Negative Declaration, MND P-2011155)

**Project Location:** 8479, 8509 Higuera Street; 8476, 8490, 8520 Warner Drive; and 8510 Warner Drive and 8525 Higuera Street

**Project Sponsor:** The Willows Community School

**Project Description:** Proposal for a Zoning Code Amendment to amend Section 17.230.015, Table 2-8 of the Culver City Municipal Code, to allow for the expansion of existing private schools located in the Industrial General (IG) Zone. Concurrently, a request for Modification to an existing Conditional Use Permit to permit the expansion of The Willows Community School onto the property at 8476 Warner Drive and an increase in student enrollment from 425 to 475; and a Development Agreement.

#### Environmental Determination:

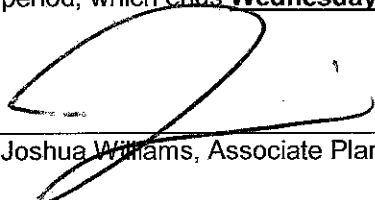
This is to advise that the City of Culver City, acting as the lead agency, has conducted an Initial Study to determine if the project may have a significant effect on the environment and is proposing this MITIGATED NEGATIVE DECLARATION based on the following finding:

- ☐ The Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
- ☒ The Initial Study identified potentially significant effects, but:
1. Revisions in the project plans or proposals made by, or agreed to by the applicant before this proposed MITIGATED NEGATIVE DECLARATION AND INITIAL STUDY was released for public review would avoid the effects or mitigate the effects or mitigate the effects to a point where clearly no significant effects would occur, and
  2. There is no substantial evidence before the agency that the project as revised may have a significant effect on the environment.

A copy of the Initial Study, and any applicable mitigation measure, and any other material which constitute the record of proceedings upon which the City based its decision to adopt this MITIGATED NEGATIVE DECLARATION may be obtained at:

**City of Culver City, Planning Division  
9770 Culver Boulevard, Culver City, CA 90232**

The public is invited to comment on the proposed MITIGATED NEGATIVE DECLARATION during the review period, which ends Wednesday, June 13, 2012.

  
Joshua Williams, Associate Planner

5/24/2012  
Date



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## PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

### INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM AND ENVIRONMENTAL DETERMINATION

<b>Project Title:</b>	The Willows Community School		
<b>Lead Agency Name &amp; Address:</b>	City of Culver City 9770 Culver Blvd., Culver City, CA 90232		
<b>Contact Person &amp; Phone No.:</b>	Joshua Williams, Associate Planner (310) 253-5706		
<b>Project Location/Address:</b>	<i>The Willows Community School:</i> 8509 Higuera Street, 8479 Higuera Street, 8520 Warner Drive, 8490 Warner Drive and 8476 Warner Drive; <i>World Pac:</i> 8510 Warner Drive; and <i>California Stay:</i> 8525 Higuera Street.		
<b>Nearest Cross Street:</b>	Hayden Avenue and Higuera Street; Hayden Avenue and Warner Drive	<b>APN:</b>	4205-024-018, 4205-024-014, 4205-024-002, 4205-024-021, 4205-024-005; 4205-024-020; 4205-024-011.
<b>Project Sponsor's Name &amp; Address:</b>	The Willows Community School 8509 Higuera Street Culver City, CA 90232 Attn: Lisa Rosenstein (Phone: 310-815-0411)		
<b>General Plan Designation:</b>	Industrial Park	<b>Zoning:</b>	Industrial General (IG)
<b>Redevelopment Project Area:</b>	Redevelopment Project Area No. 3		
<b>Overlay Zone/Special District:</b>	None		

**Project Description and Requested Action:** *(Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary)*

The Willows Community School (the "Applicant") is requesting a Zoning Code Text Amendment, a Development Agreement, and a Modification to a Conditional Use Permit to allow for the expansion and phased development of the private school.

This Mitigated Negative Declaration was previously issued on June 7, 2011 by the City of Culver City Redevelopment Agency, acting as lead agency under the California Environmental Quality Act (CEQA). With the changes to State Redevelopment law, the Redevelopment Agency was dissolved effective February 1, 2012. As a result, this MND is being reissued by the City of Culver City, acting as lead agency, with respect to the project described in the prior MND. Modifications from the previously approved MND consist of the following:

1. City as Lead Agency. The City is the lead agency for purposes of this Mitigated Negative Declaration. Comments related to the MND should be directed to Joshua Williams, Associate Planner at the address specified above.

2. Deletion of the Owner Participation Agreement (OPA). As the Redevelopment Agency has ceased to exist, an OPA will not be prepared. Matters previously addressed by the OPA will, at the discretion of the City, be included in a Development Agreement.

3. Change of Comprehensive Plan to Master Plan. The City has determined that a Comprehensive Plan is not required for this project. Instead, the City has requested that the Applicant prepare a Master Plan document providing details on the Phase I development and conceptual plans for Phases II and III, as contemplated for the school's future development. The Master Plan will supplement the request for the Modification to the Conditional Use Permit.

None of the changes described above affect or modify the environmental analysis described in the prior MND or result in any changes in the extent of environmental impacts related to the project.

The Zoning Code Amendment (the "ZCA") to Section 17.230.015 of the Culver City Municipal Code pertains to Private Schools in the Industrial General (IG) zone. Presently, private schools are not a permitted use in the IG zone. Existing private schools are considered legal non-conforming uses and are not permitted to expand. The proposed ZCA will add a footnote to the Table 2-8-Land Use to allow an existing private school in the IG Zone, operating under a previously approved Conditional Use Permit (CUP), to modify its physical facilities and operations subject to the approval of a Modification to their CUP. Concurrently, the request will include a Modification to the Applicant's existing CUP to allow for the removal of one building, the construction of a surface parking lot to serve the school, and the addition of 50 students (25 students immediately after approval of the entitlements and 25 additional students after completion of tenant improvements and construction of the surface parking lot). In addition, the Applicant is requesting to enter into a Development Agreement with the City for the proposed phased development of the Willows Community School site, which at completion will encompass seven parcels, totaling approximately 109,000 square feet of lot area.

The Modification to the Conditional Use Permit includes a Master Plan document that identifies a development plan for Phase 1, which includes the removal of an existing building located at 8476 Warner Drive and the construction of a surface parking lot to accommodate additional on-site parking for the School. Phase 1 also proposes to add 50 students to the school's current enrollment of 425 students, for a total of 475 students.

Conceptual development scenarios for Phases 2 and 3, occurring over a 20 year period, include the acquisition of two abutting parcels, the demolition of existing outdated structures and the construction of new school buildings, and the addition of new landscaping and play areas. Phase 2 and 3 will also include the addition of 100 additional students bringing the school's maximum enrollment to 575 students.

**Existing Conditions of the Project Site:**

The Willows Community School is comprised of five parcels with the addresses 8479 and 8509 Higuera Street; and 8476, 8490 and 8520 Warner Drive. Presently, all parcels are developed with school uses except for 8476 Warner Drive, which is presently developed with a single story, 6,332 square foot building that has remained empty since it was vacated by a gymnastics school.

The School site is improved with five buildings, four of which are used for school operations (as noted above, the fifth building located at 8476 Warner Drive is owned by the School but is not currently occupied). The School site also includes a 33-space surface parking lot accessible off of Higuera Street and limited landscaped and play areas which are located in an internal courtyard area surrounded by school buildings to the east, west, and north, and the surface parking area to the south. The building located at 8509 Higuera Street includes approximately 10,984 square feet of floor area and is occupied by kindergarten through second grade classrooms, offices and mechanical space. The property at 8479 Higuera Street is developed with an 8,819 square foot building which contains classrooms for third through fifth grades, offices and a library. The building located at 8490 Warner Drive includes 13,270 square feet of floor area and contains the school's sixth through eighth grade classrooms. The building also includes a large multi-purpose room and a rooftop playground and eating area. The property located at 8520 Warner Drive is developed with a 19,264 square foot building housing the school's gymnasium, a theater, music rooms, and office and storage space.

The two buildings located at 8525 Higuera Street and 8510 Warner Drive, occupied by California Stay and World Pac, respectively, have been identified for potential purchase and redevelopment by the Willows Community School as part of the conceptual development plan for Phase 3 of the Master Plan. Both buildings are currently occupied by light industrial and office uses.

**Surrounding Land Uses and Setting:** *(Briefly describe the project's surrounding)*

The project site is located in the Hayden Tract, within the Industrial General (IG) Zoning District. Abutting properties to the west and east are primarily developed with single story buildings occupied by light industrial, warehouse and office uses. The property to the north of the project site at 8511 Warner Drive is developed with a large surface parking lot known as the Warner Lot. The Warner Lot presently serves as off-street parking for a number of surrounding businesses in the Hayden Tract. It has been entitled for development with a multi-level parking structure and commercial retail center. To the south of the subject property across Higuera Street, the properties are developed with light industrial and warehouse uses surrounded by surface parking lots. The property located at 8550 Higuera Street was occupied by Discus Dental, and is now proposed for use as offices and the construction of a parking garage.

**Other public agencies whose approval is required:** *(e.g., permits, financing approval, or participation agreement)*  
None.

### ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

*The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a 'Potentially Significant Impact' as indicated by the checklist on the following pages:*

- |                                                        |                                                             |
|--------------------------------------------------------|-------------------------------------------------------------|
| <input type="checkbox"/> Aesthetics                    | <input type="checkbox"/> Mineral Resources                  |
| <input type="checkbox"/> Agriculture Resources         | <input type="checkbox"/> Noise                              |
| <input type="checkbox"/> Air Quality                   | <input type="checkbox"/> Population / Housing               |
| <input type="checkbox"/> Biological Resources          | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Cultural Resources            | <input type="checkbox"/> Recreation                         |
| <input type="checkbox"/> Geology /Soils                | <input type="checkbox"/> Transportation/Traffic             |
| <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Utilities / Service Systems        |
| <input type="checkbox"/> Hydrology / Water Quality     | <input type="checkbox"/> Mandatory Findings of Significance |
| <input type="checkbox"/> Land Use / Planning           |                                                             |

### ENVIRONMENTAL DETERMINATION:

On the basis of this initial evaluation:

- ☐ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- ☐ I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- ☐ I find that the proposed project **MAY** have a 'potentially significant impact' or 'potentially significant unless mitigated' impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

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Joshua Williams, Associate Planner

Date

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>I. AESTHETICS -- Would the project:</b>				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Responses:</b>				
<p>a) - c) <u>Less Than Significant Impact.</u> There are no scenic vistas or resources in the vicinity of the Willows Community School. No significant adverse impacts relative to scenic vistas and resources will occur because of the proposed project. The Zoning Code Amendment (ZCA) will allow a previously existing private school, operating under a Conditional Use Permit (CUP), to request a modification to its CUP in order to expand its operations. The project site is presently developed with multiple buildings and surface parking lots occupied by the school and commercial/industrial uses. The approval of the ZCA and Modification to the Conditional Use Permit will result in the removal of the building at 8476 Warner Drive, and the redevelopment of the site as a surface parking lot to service the school (Phase I). The project will also result in the addition of 50 additional students, increasing the student enrollment to 475 students. The Master Plan document includes conceptual development and enrollment plans for Phases II and III, which are intended to provide a path for development over the next 20 years. The Master Plan document identifies scenarios for expansion and development of the School property, requested through future Modifications to the Conditional Use Permit. The heights, massing, setbacks, and architecture of new buildings will be similar to existing structures and will conform to Zoning Code regulations. Therefore, the project impacts will be less than significant.</p>				
<p>d) <u>Less than significant impact.</u> During Phase 1 of the school's proposed development, no additional lighting would be provided on the Willows School site except for security lighting in the new parking lot along Warner Drive (the former Willows V building). As envisioned in the Master Plan document, during Phase 2 the Willows III building (8479 Higuera Street) would be removed and additional parking would be located on a portion of the cleared site. A new building would occupy the remainder of the cleared Willows III site. The envisioned scenario for Phase 3 includes the removal of the Willows I building (8509 Higuera Street), and the acquisition and removal of the WorldPac Building (8510 Warner Drive) and the California Stay Building (8525 Higuera Street), and the construction of new school buildings in their place. All lighting associated with the new buildings and parking area will be required to comply with Section 17.300.040 of the Zoning Code (Outdoor Lighting), which requires that exterior lighting be directed downward and away from adjoining properties and public rights-of-way.</p>				
<p>In addition, the types of materials used in the architectural design of the new buildings will be similar to those already found on the school site. The project will not, as proposed, introduce substantial sources of light and glare onto abutting properties or the surrounding neighborhood. Therefore, the project impacts will be less than significant.</p>				
<p><b>Mitigation Measure(s):</b> None Required</p>				

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>II. AGRICULTURE RESOURCES:</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Responses:</b>				
a) - e) <u>No Impact</u> . The project area, comprised of those areas located in the Industrial General zone and developed with a private school and industrial uses, is predominantly urbanized and is surrounded by existing disturbed land and development. The Culver City General Plan Land Use Element Map identifies no agricultural land or uses within the city boundaries. The project area is not identified, utilized, or zoned for agricultural purposes, and there is no known Williamson Act contract in effect on the project site. In addition, the project will not result in the loss or conversion of farmland or forest land into another use, as the project site is located in a fully-developed urbanized area. Therefore, no impact would occur.				
<b>Mitigation Measure(s):</b> None Required.				
<b>III. AIR QUALITY</b> -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>Responses:</b></p> <p>a) <u>Less Than Significant Impact.</u> The entire South Coast Air Basin (which includes Culver City) does not meet National Ambient Air Quality Standards. Future new development (or redevelopment) in any portion of Culver City will contribute, both at the project level and cumulatively, to pollutant emissions over this existing non-attainment area (at both construction and operation phases). For projects proposed within Culver City or elsewhere in the South Coast Air Basin, the applicable plan is the 2007 Air Quality Management Plan (AQMP), which is prepared by the South Coast Air Management District (SCAQMD). The SCAQMD is the agency principally responsible for comprehensive air pollution control in the South Coast Air Basin. SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures through educational programs or fines, when necessary. Projects that do not exceed or are consistent with the projections of employment and population forecasts identified in the Growth Management Chapter of the Regional Comprehensive Plan and Guide (RCPG) are considered consistent with AQMP growth projections, since the Growth Management Chapter forms the basis of the land use and transportation control portion of the AQMP. Since SCAG's regional growth forecasts are based upon, among other things, land uses specified in city general plans, a project that is consistent with the land-use designated in a city's general plan would also be consistent with the SCAG's regional forecast projections. Subsequently, a project that is consistent with SCAG's regional forecast projections would then also be consistent with the AQMP growth projections.</p> <p>The project does not include the development of housing or new infrastructure. The project would add 150 students and 12 staff members over a 20 year period, as envisioned in the school's Master Plan document. The project under consideration in this instance will result in the removal of one structure (8476 Warner Drive, also known as Willows V) and an increase of the student enrollment from 425 students to 475 students. The increase in student population would serve the existing need for school services and employment in the project region. Thus, the project will not induce substantial growth. The project will not result in population, housing, or employment growth in excess of what was considered for the project site and the City in the AQMP. Therefore, the project will be consistent with the AQMP, and no significant impact related to the project will occur.</p> <p>b) <u>Less Than Significant Impact.</u> A project may have significant impacts where project-related emissions would exceed federal, state, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. Analysis of daily construction and operational emissions was prepared by CAJA Environmental Services (2011) using the California Emissions Estimator Model (CalEEMod) recommended by SCAQMD.</p> <p><u>Construction Emissions.</u> The proposed project will generate pollutant emissions from the following construction activities: 1) demolition, grading and excavation; 2) travel to and from the project site by construction workers; 3) delivery and hauling of construction supplies and debris to and from the Project site; 4) the fuel combustion by onsite construction equipment; and 5) building construction, including the application of architectural coatings. It is anticipated that the above construction activities will result in temporary emissions of dust, fumes, exhaust and other air contaminants. Construction activities involving site preparation and grading would primarily generate PM<sub>10</sub> emissions. Mobile source emissions (use of diesel-fueled equipment onsite, and traveling to and from the project site) would primarily generate nitrogen oxide (NO<sub>x</sub>) emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time. As part of the project, appropriate dust control measures will be implemented during each phase of development, as required by SCAQMD Rule 403 – Fugitive Dust. Rule 403 requires that water is sufficiently added to the construction site to prevent the generation of visible dust plumes; that soil binders are applied to uncovered areas; and that ground cover is reestablished as quickly as possible. In addition, a wheel and undercarriage washing system are required to remove bulk material from vehicles leaving the construction site. The amount of emissions generated by construction activities on-site are not expected to exceed current SCAQMD thresholds, based on the CalEEMod analysis of peak construction days for each of the construction activities. Therefore, project impacts will be less than significant.</p> <p><u>Operational Emissions.</u> Operational emissions generated by both stationary and mobile sources will result</p>				



<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>from normal day-to-day activities on the project site after occupation. Stationary emission sources would be generated from school operations (primarily natural gas consumption) and landscape maintenance. Mobile emissions will be generated by vehicles travelling to and from the project site. Based on the analysis using CalEEMod software, the amount of emissions generated by operational activities will not exceed SCAQMD thresholds for any phase of development. Therefore, impacts associated with operational emissions from the project will be less than significant.</p> <p>c) <u><i>Less Than Significant Impact.</i></u> SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.</p> <p>As discussed in the response to III.b (above), the proposed project will not generate emissions from construction or operational activities in excess of SCAQMD thresholds (SCAQMD CEQA Handbook, 1993; Revised March 2011). Therefore, the project will not result in a cumulatively considerable increase in emissions. Cumulative impacts will be less than significant with the implementation of recommended measures per SCAQMD – Rule 403.</p> <p>d) <u><i>Less Than Significant Impact.</i></u> A sensitive receptor, as defined by AQMD, is a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant. The following are land uses (sensitive sites) where sensitive receptors are typically located: schools, playgrounds and child care centers; long-term healthcare facilities; rehabilitation facilities; convalescent centers; hospitals; retirement homes; and residences.</p> <p>The average peak daily emissions generated within the project site during the construction phases would not exceed the applicable construction localized significant thresholds (LSTs). The SCAQMD defines a localized significance threshold as “the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor, taking into consideration ambient concentrations in each source report area (SRA), project, size, distance to the sensitive receptor, etc.” LSTs are provided for each of SCAQMD’s 38 source receptor areas at various distances from the source of emissions. The project site is located within SRA 2, which covers the Northwest Coastal Los Angeles County Area.</p> <p>To determine the significance of operational emissions generated by the project, the net operational emissions of the Project were compared to SCAQMD’s operational LSTs. The use of operational LSTs is limited because they only consider stationary or on-site operational activities associated with the project site. Trips to and from the project site are not included in the SCAQMD analysis. Analysis of operational emissions generated by the project (see III.b, above) shows that the project will not exceed the established SCAQMD localized thresholds for NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>.</p> <p>A separate analysis looked at localized emissions associated with motor vehicle trips generated by the project. The analysis prepared by CAJA Environmental Services used the CALINE4 (<a href="http://www.dot.ca.gov/hq/env/air/pages/calinesw.htm">http://www.dot.ca.gov/hq/env/air/pages/calinesw.htm</a>) screening procedure to analyze four intersections in the immediate vicinity of the project site: National and Washington; Jefferson and Washington; Robertson and Washington; and Jefferson and Rodeo. Based on anticipated trips generated by the project in addition to traffic growth associated with cumulative development, the future 1-hour and 8-hour CO concentrations near the four intersections will not exceed federal or state ambient air qualities. Therefore, project impacts related to CO concentrations from vehicle trips will be less than significant.</p> <p>e) <u><i>Less Than Significant Impact.</i></u> The project is not anticipated to result in the generation of any objectionable odors. During the construction phase, building materials, including paint and adhesives, may produce discernible odors typical of most construction sites. These odors would be temporary in nature and will not result in a significant environmental impact. Therefore, the impact of objectionable odors in the project vicinity will be less than significant.</p> <p><b>Mitigation Measure(s):</b> None Required.</p>				

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IV. BIOLOGICAL RESOURCES – Would the project:</b>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b><u>Responses:</u></b>				
a) - f) <u>Less Than Significant Impact.</u> The project area is located in an urbanized area that is developed with commercial, light industrial and parking land uses. The site does not include any habitat that would support sensitive plant or animal species. There is no riparian habitat or other sensitive natural community on the site. The project site supports no federally-protected wetlands or waters of the United States as defined by Section 404 of the Clean Water Act. The project site is completely surrounded by development and within an urbanized area and has not been identified as part of a resident migratory wildlife corridor or wildlife nursery site. The expansion of school operations will not result in a substantial effect on habitat for any protected species and will not impact any wetland areas, therefore development of the project site will result in less than significant impacts.				
<b><u>Mitigation Measure(s):</u></b> None Required.				

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>V. CULTURAL RESOURCES -- Would the project:</b>				
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Responses:</b>				
<p>a) <u>Less Than Significant Impact.</u> The analysis of project impacts related to historical resources is based on the <i>Willows Community School Historical Report</i>, prepared by Galvin Preservation Associates (March 2011).</p> <p>The historical report analyzed the five existing buildings owned or leased by the Willows Community School and the two buildings abutting the site (8510 Warner Drive and 8525 Higuera Street) identified for future expansion. The report identified that the buildings located at 8479 and 8509 Higuera Street and 8490 and 8510 Warner Drive have been substantially altered and lack sufficient integrity for individual landmark designation at the national, state, and local levels. Therefore they do not merit further evaluation. The buildings located at 8525 Higuera Street and 8476 and 8520 Warner Drive remain substantially intact. However, based on the Historical Report, none of the buildings appear to be historically, culturally, or architecturally significant.</p> <p>None of the five buildings located on the existing school site, nor the two buildings proposed for future expansion are listed as landmarks at the national, state, or local levels, nor have they been identified as being potentially significant in any historic resource survey for the area. None of the buildings are historic buildings subject to CEQA. Therefore, the proposed project will not cause substantial adverse change in the significance of a historical resource.</p>				
<p>b) - d) <u>Less Than Significant Impact with Mitigation.</u> While the project will result in the removal of existing buildings and the disturbance of land, it is unlikely that archaeological, paleontological or human remains will be discovered. During the original construction and development of the area, resources of this nature were likely to have been encountered and removed. However, in order to ensure that project impacts will be less than significant the project will be subject to Mitigation Measure CR-1 in the event that unknown resources are encountered during construction.</p>				
<p><b>Mitigation Measure(s):</b> Because the project could result in potentially significant impacts related to cultural resources, the City requires implementation of following Standard Mitigation Measure to ensure that no significant impacts would occur:</p>				
<p><b>CR-1:</b> If any archaeological materials, paleontological materials, or human remains are encountered during the course of the project development, work in that area must be halted and the City of Culver City must be notified. Prior to resumption of work, a Phase 1 Archaeological/Paleontological Survey shall be completed and submitted to the Planning Division and Building Safety Division for review. If the Phase 1 Archaeological/Paleontological Survey indicates the presence of archaeological and/or paleontological resources, then an archaeological and/or paleontological professional(s), approved by the City, shall monitor</p>				

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
all phases of excavation for the project site. Work will be halted in that area of the detected resource until the City of Culver City's archaeologist and paleontologist have been contacted to evaluate the resources and permission to commence work in that area has been given by the City of Culver City. If the human remains are determined by the County coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains.				

#### VI. GEOLOGY AND SOILS – Would the project:

- |                                                                                                                                                                                                                                                                                        |                          |                                     |                                     |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:                                                                                                                                                       |                          |                                     |                                     |                                     |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| ii) Strong seismic ground shaking?                                                                                                                                                                                                                                                     | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| iii) Seismic-related ground failure, including liquefaction?                                                                                                                                                                                                                           | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| iv) Landslides?                                                                                                                                                                                                                                                                        | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b) Result in substantial soil erosion or the loss of topsoil?                                                                                                                                                                                                                          | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?                                                     | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?                                                                                                                                       | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?                                                                                                   | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

#### Responses:

- a)
- i) No Impact. The Willows Community School is not located within a state designated Alquist-Priolo Zone. Therefore, no impacts will result.
  - ii) Less Than Significant Impact. Development of the project site with new buildings would expose future users/tenants to seismic ground shaking. However, conformance with the City's Municipal Code and the International Building Code (IBC) will minimize potential impacts to buildings and the building occupants from seismic ground shaking. Therefore, project impacts will be less than significant.
  - iii) Less Than Significant Impact with Mitigation. The analysis of seismic-related ground failure, including liquefaction is based on the *Report of Preliminary Geotechnical Evaluation*, prepared by Mactec, for the proposed project. The report assessed the potential for liquefaction at the project site. Based on testing of soils taken from borings at the project site, the potential for liquefaction at the project site is low. However Mactec recommends the following actions: 1) provide further testing for liquefaction by preparing additional borings prior to the final design and construction of buildings on-site; and 2) implement Mitigation Measures GS-1 and GS-2, in order to reduce potential impacts related to liquefaction to less than significant.

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>iv) <u>No impact.</u> The project site and surrounding area are relatively flat and are not subject to landslides. Therefore, no impacts will result.</p> <p>b) <u>Less Than Significant Impact.</u> During construction, grading would expose minimal amounts of soil for a limited time, allowing for possible erosion. Although the project development has the potential to result in minor erosion of soils during site preparation and construction activities, erosion would be reduced by implementation of erosion controls imposed during grading and construction. Runoff associated with the project would be directed to landscape areas and/or pre-manufactured stormwater quality best management practices (BMPs) for infiltration and water quality purposes or directed to an impervious drainage system. While the construction and related ground disturbance will alter the existing drainage patterns on the site, the standard erosion control measures identified will reduce the project impacts to less than significant.</p> <p>c) <u>Less Than Significant Impact with Mitigation.</u> Analysis by Mactec of sample borings has indicated that the potential for liquefaction on the project site is low. However, Mactec recommends additional borings be tested prior to final design and construction of the proposed structures. With the implementation of Mitigation Measures GS-1 and GS-2, impacts related to geology and soils will be less than significant.</p> <p>d) <u>Less Than Significant Impact with Mitigation.</u> Based on the analysis by Mactec, the upper soils located on the project site are not considered to be expansive and would not cause damage to at-grade buildings. Mitigation Measures GS-1 and GS-2 require additional borings be tested to determine if soils at a lower level and located in other areas on the project site may be subject to expansion. With the implementation of the two mitigation measures, impacts related to expansive soils will be less than significant.</p> <p>e) <u>No Impact.</u> The project will not utilize septic tanks or alternative wastewater disposal systems. It will be served by City of Culver City wastewater services. Therefore, there will be no impacts.</p> <p><b>Mitigation Measure(s):</b> With implementation of the following mitigation measures, Project impacts related to geology and soils will be less than significant:</p> <p><b>GS-1:</b> Prior to issuance of a grading permit by the City, the Applicant shall submit to the City, for review and approval, a comprehensive geotechnical investigation for the project, including additional soil borings.</p> <p><b>GS-2:</b> The design and construction of the project shall occur in accordance with the applicable recommendations identified in the comprehensive geotechnical investigation.</p>				
<b>VII. GREENHOUSE GAS EMISSIONS –Would the project:</b>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Responses:</b>				
a) – b) <u>Less Than Significant Impact.</u> The <i>Greenhouse Gas Inventory and Analysis</i> prepared by CAJA Environmental Services identifies that the greenhouse gas emissions associated with the proposed project construction and operation will be less than significant. In addition, the project will not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing emissions of greenhouse gases.				

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>The emissions generated by the project (and any project) are too small to influence global climate change individually. Even if an individual project's greenhouse gas (GHG) emissions were large enough to influence global climate change, the significance of the impact of a single project on the global climate cannot be determined at this time. First, no guidance exists to indicate what level of GHG emissions would be considered substantial enough to result in a significant impact on the global climate. Second, global climate change models are not sensitive enough to be able to predict the effect of a single project on global temperatures and the resultant effect on climate; therefore they cannot be used to evaluate the significance of a project's impact. In addition, there are currently no adopted thresholds or guidance adopted by the SCAQMD or other agencies in California to assess the significance of potential impacts associated with greenhouse gases. In the absence of established GHG thresholds, the Governor's Office of Planning and Research (OPR) recommends in its 2008 technical advisory that lead agencies should make a good faith effort to calculate, model, or estimate the amount of CO<sub>2</sub> and other GHG emissions from a project. In response to the Governor's Executive Order (S-3-05) to reduce statewide GHG emissions to targeted levels (specifically to reduce GHG emissions to 80 percent below 1990 levels by 2050), the Secretary of Cal/EPA created the Climate Action Team (CAT), which in March 2006, published the Climate Action Team Report to Governor Schwarzenegger and the Legislature (the "2006 CAT Report"). The 2006 CAT Report identifies a recommended list of strategies that the State could pursue to reduce climate change GHGs. These are strategies that could be implemented by various State agencies to ensure that the Governor's targets are met and can be met with existing authority of the State agencies.</p> <p>In analyzing potential impacts related to the construction and operation of the project, the report notes that in the absence of regulatory guidance, evaluation of the project's impacts associated with GHG emissions is done qualitatively by determining consistency of the project to any of the emission reduction strategies identified by the CAT Report and by the California Air Resources Board (ARB). If the project is consistent with the guidelines established by the CAT Report and by the ARB, project specific impacts related to GHG emissions would be less than significant, and the project's contribution to any potential cumulative impact related to GHG emissions would not be considerable.</p> <p>Project <u>construction</u> will result in the following CO<sub>2</sub>e emissions (metric tons/annual):</p> <ul style="list-style-type: none"> <li>• Phase 1: 5,155.5</li> <li>• Phase 2: <ul style="list-style-type: none"> <li>○ 2018 – 2,123.20</li> <li>○ 2019 – 1,613.35</li> </ul> </li> <li>• Phase 3: <ul style="list-style-type: none"> <li>○ 2028 – 4,420.74</li> <li>○ 2029 – 3,160.38</li> </ul> </li> </ul> <p>Project <u>operations</u> will result in the following CO<sub>2</sub>e emissions (metric tons/annual):</p> <ul style="list-style-type: none"> <li>• Phase 1: Mobile emissions – 1,024.49</li> <li>• Phase 2: Energy emissions – 72.44 Mobile emissions – 1,331.77</li> <li>• Phase 3: Energy emissions – 132.80 Mobile emissions – 403.89</li> </ul> <p>The project's impacts from GHG emissions will be less than significant due to the improved sustainability of modern construction and design compared to the existing buildings on-site. It is anticipated that greenhouse gas emissions would be reduced by the following sustainable design and construction features integrated into the project:</p> <p>Zero Waste – High Recycling: Efforts to exceed the 50 percent goal of recycling would allow for additional reductions in climate change emissions. The project will be subject to the requirements of AB 939 (The Integrated Waste Management Act), which required cities to divert at least 50 percent of solid waste away from the landfills through a variety of measures. The City is currently exceeding the State-mandated 50 percent and has set a target of 70 percent diversion by 2015. The project will be subject to all applicable State and City requirements for solid waste reduction.</p>				

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Water Use Efficiency: Approximately 19 percent of all electricity, 30 percent of all natural gas, and 88 million gallons of diesel are used to convey, treat, distribute and use water and wastewater. Increasing the efficiency of water transport and reducing water use will reduce greenhouse gas emissions. The project will be designed with water saving and energy efficient features.</p> <p>Building Energy Efficiency Standards in Place and in Progress: The project will be required to be constructed in compliance with the standards of Title 24 (The Energy Efficiency Standards for Residential and Non-Residential Buildings) that are in effect at the time of development.</p> <p>Smart Land Use and Intelligent Transportation Systems (ITS): The project includes the development of parcels that have already been developed and are served by existing roadway infrastructure and transit. The project will provide school services and employment for people living in the project area/region, thereby encouraging a jobs/housing balance for the City.</p> <p>Green Building Initiative/ Green Building Strategy: The Green Building Executive Order, S-20-04 sets a goal of reducing energy use in public and private buildings by 20 percent by the year 2015, as compared with 2003 levels. In order to achieve the 20 percent reduction target, the project will be required to be constructed in compliance with the standards of Title 24 that are in effect at the time of development. In addition, development under all phases will be guided by Leadership in Energy and Environmental Design (LEED) principles and could incorporate design elements such as: green wall systems, natural lighting strategies, photovoltaic panels, post-consumer materials, and high fly-ash concrete. New landscaping will be designed to incorporate low-water native plants, with a water-saving irrigation system.</p> <p>California Solar Initiative: Although solar roofs are not proposed as part of the project, the design of the new school structures will not preclude the installation and use of solar equipment in the future.</p> <p>Energy Efficiency: The ARB recommends that projects maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy implementation mechanisms. In order to meet energy efficiency standards, the project will be required to be constructed in compliance with the standards of Title 24 that are in effect at the time of development.</p> <p><b><u>Mitigation Measure(s):</u></b> None Required.</p>				

**VIII. HAZARDS AND HAZARDOUS MATERIALS –Would the project:**

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school??	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Responses:**

a) Less Than Significant Impact. The project will utilize potentially hazardous materials as part of its construction and operation, including solvents, paints, petroleum products and pesticides. All potentially hazardous materials will be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. The transport of these materials, typically sold as consumer goods, would not pose a significant hazard to the public or the environment. Therefore project impacts related to the routine transport, use or disposal of hazardous materials will be less than significant.

b) Less Than Significant Impact. According to the California Department of Toxic Substances Control (DTSC), the school site was vacant or used for agricultural purposes until the mid-1940s. Between that time and the early/mid-1990s, the school site was used for light industrial purposes, including a plastics factory until the 1970s. An environmental investigation and some remediation work were performed at the school site in 1995 and 1996. The investigation identified chlorinated solvent contamination at the southerly portion of the site in both shallow soil and groundwater (at approximately 25 feet below ground surface). A soil vapor extraction system was installed to address the contamination in shallow soil, and that system operated off and on over an approximately six-month period between 1995 and 1996.

A completion report was submitted to the Los Angeles Regional Water Quality Control Board (RWQCB) in March 1996. The RWQCB then requested additional confirmation sampling, and a limited amount of soil vapor sampling was performed. In a June 1996 letter, the RWQCB noted that residual concentrations were below then available interim screening values and no further action was required in connection with the soil contamination, but no closure was provided in regards to groundwater since the remediation system had not been designed to address the groundwater aspect of the site.

During the spring and summer of 2007, the school engaged Geomatrix to perform additional site investigation work as part of the school's pre-purchase due diligence. That work included soil, groundwater, and soil gas sampling; indoor and ambient air sampling; and preliminary feasibility analysis on various remedial options. Geomatrix's data confirmed significant residual levels of chlorinated solvents in soil gas samples 5 to 15 below grade; limited soil contamination; and limited VOC impacts in perched groundwater.

RWQCB recommended installation of a soil vapor extraction system, which was installed at the school site and is currently in operation. On-going operation and maintenance reports are prepared and submitted to DTSC on a quarterly basis. Through continued use of the existing soil vapor extraction system and reporting, the project will not result in any substantial hazards. The project will not create a significant hazard to the public through new or ongoing operations and therefore impacts will be less than significant.



<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>		Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	<u>No Impact.</u> The types of potentially hazardous materials associated with the project include solvents, paints, petroleum products and pesticides that would be used in the construction and operation of the project. All potentially hazardous materials will be contained, stored and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Therefore, the project will not result in any impacts.				
d)	<u>No Impact.</u> The school is not located on a site which is included on a list of hazardous materials sites pursuant to Government Code Section 65962.5. Therefore, there is no impact.				
e)	<u>No Impact.</u> The project site is not located within an airport land use plan or within two miles of any airport. Therefore, there is no impact.				
f)	<u>No Impact.</u> The project site is not located within the vicinity of a private airstrip. Therefore, there is no impact.				
g)	<u>Less Than Significant Impact.</u> The project will not inhibit access to hospitals, emergency response centers, school locations, communication facilities, highways and bridges, or airports. The project will comply with all applicable City policies related to disaster preparedness and emergency response. Therefore, the project will not impair implementation of or physically interfere with an adopted emergency response or evacuation plan, and no impact will occur.				
h)	<u>No Impact.</u> The project is located in a highly urbanized area of the City where the possibility of wild land fires is remote. Implementation of the project will not result in any increase in exposure of people or structures to wildfire dangers, therefore there is no impact.				

**Mitigation Measure(s):** None Required.

#### IX. HYDROLOGY AND WATER QUALITY -- Would the project:

a)	Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e)	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f)	Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Responses:</b>				
a) <u>Less Than Significant Impact.</u> The project does not include any point-source discharge. The project development will conform to all requirements of the Regional Water Quality Control Board (RWQCB) and Municipal Code and will not result in unpermitted discharges into the sanitary sewer and storm water systems. Therefore, implementation of the project will result in less than significant impacts related to this issue.				
b) <u>Less Than Significant Impact.</u> The project site is fully developed and covered almost entirely by impervious surfaces in the form of building and parking lot areas. Presently, stormwater does not infiltrate into the ground, but sheetflows across the site to the local stormdrain system. The site is not a significant source or area for groundwater recharge. In addition, water usage for the project will not be supplied through the depletion of groundwater supplies. Therefore, the project will result in less than significant impacts.				
c) – e) <u>Less Than Significant Impact.</u> The project includes the removal of an existing structure in Phase 1 with the potential removal and construction of structures in Phases 2 and 3. The project will not increase the amount of impervious surfaces on the site, and as proposed, may result in additional landscaped areas that will allow greater ground infiltration, thereby reducing run-off. As proposed, the run-off associated with the project will be either directed to landscaped areas and/or pre-manufactured storm water quality BMPs for infiltration and water quality purposes or directed to the stormdrain system. As such, the alteration of the existing drainage pattern would not result in substantial erosion or siltation on- or off-site. The project will also not result in any increase in runoff to local stormdrains. Therefore, project impacts related to altering drainage patterns will be less than significant.				
f) <u>Less Than Significant Impact.</u> For each project construction phase, the applicant will be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), which details the construction activities, materials, and wastes and lists the best management practices (BMPs) to control pollutant discharge during construction. For construction activities disturbing more than one acre (proposed Phases 2 and 3), the project applicant will be required to prepare and implement a Standard Urban Stormwater Management Plan (SUSMP), in accordance with the National Pollution Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with construction activity. The SUSMP would detail the treatment measures and BMPs to control pollutants and would include an erosion plan that outlines erosion and sediment control measures that would be implemented during the construction and post-construction phases of the project development. The SUSMP would also describe the post-construction BMPs used to reduce pollutant loading in runoff and percolate once the site is occupied and would set forth the BMP monitoring and maintenance schedule. It will also identify responsible entities during the construction and post construction phases. Preparation of the SWPPP and SUSMP and compliance with the City's Minimum Storm Water Protection Requirements would ensure that the project will not violate any water quality standards. Therefore, the project impacts related to water quality will be less than significant.				
g) - h) <u>No Impact.</u> The project site does not include any housing nor is it located within a 100 year flood hazard area. Therefore, there will be no impacts.				

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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- i) Less Than Significant Impact. The project site is located within the Mulholland Dam Inundation Zone. The project will not impede escape routes or access of emergency vehicles in the event of a major flood incident. The project will adhere to all emergency procedures to minimize impacts to building occupants
- j) Less Than Significant Impact. The project site is located at a significant distance to the nearest coastal area subject to tsunami and seismic sea waves, and has not been identified as being within range of potentially damaging waves. In addition, the project site is not located downslope of any large bodies of water that could adversely affect the site in the event of earthquake-induced failures or seiches or wave oscillations in an enclosed or semi-enclosed body of water. Therefore, impacts are less than significant.

**Mitigation Measure(s):** None Required

**X. LAND USE AND PLANNING -- Would the project:**

- |                                                                                                                                                                                                                                                                                                             |                          |                          |                                     |                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Physically divide an established community?                                                                                                                                                                                                                                                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c) Conflict with any applicable habitat conservation plan or natural community conservation plan?                                                                                                                                                                                                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

**Responses:**

- a) and c) No Impact. The project site is currently developed with the Willows Community School and two commercial industrial businesses. The project (specifically, the phased development of the Willows School and its entitlements) will not physically divide an established community. The project site, located within the Industrial General zone, is not subject to a habitat conservation plan or natural community conservation plan.
- b) Less Than Significant Impact. The project will include the phased development of the Willows Community School. The applicant is requesting approval of a Zoning Code Amendment, a Modification to a Conditional Use Permit Modification, which will allow the existing private school the opportunity to modify and expand the schools' facilities and operations, and a Development Agreement. Because of the industrial nature of the area, the presence of sensitive receptors (i.e., school children) may limit the opportunities for new industrial uses to locate within the immediate vicinity of any school site. In addition, the conversion of the industrial zoned land into a school use will remove the opportunity for new industrial manufacturers and similar businesses that work with hazardous materials to locate in the area. However, the number of pollutant emitting industrial uses within a 1,000-foot radius of the project site and the other two private school uses is relatively low – between four and seven uses. These uses were varied, and included small manufacturers, automotive and auto-body repair, and a dry cleaning operation facility. A further review of businesses adjacent to the private school sites identified several manufacturing operations, but primarily entertainment production, creative offices, warehousing, and import/export businesses. These businesses could be characterized as "clean industries". The presence of these clean industries will not impact the operation of the school.

Furthermore, the project will be consistent with the City of Culver City's General Plan. The General Plan's Land Use Element, Policy 23.H, proposes an appropriate range of uses and standards for the Hayden Tract (the location of the Willows Community School) that will "encourage viable and creative development and minimize environmental hazards". Policy 5.C encourages development of cultural, educational, and entertainment uses that will provide leisure activities for Culver City's residents and enhance the image of

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>the City. Policy 8.B seeks to ensure that development impact fees mitigate all resultant costs burdened on City infrastructure and services. Lastly, Policy 6.B seeks to reduce pressure on on-street parking through private and public off-street parking facilities.</p> <p>As part of the application, the applicant is requesting a Zoning Code Text Amendment to permit existing private schools within the Industrial General zone the opportunity to request a modification to their existing conditional use permits (CUPs). The Applicant is also requesting a modification to the existing CUP to allow for an increase of 150 students and 12 employees over the 20 year phased development of the school, as proposed in the Master Plan. The proposed phased development will be consistent with all height, massing, setback, and parking requirements of the Zoning Code. Impacts related to the phased development of the project site will be less than significant. Overall, environmental impacts due to the presence of the private school within the IG Zone will be minimal.</p> <p><b>Mitigation Measure(s):</b> None Required.</p>				

#### **XI. MINERAL RESOURCES -- Would the project:**

- |                                                                                                                                                                       |                          |                          |                                     |                          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?                                | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

**Responses:**

- a) - b) Less Than Significant Impact. The Project will not result in any disturbance to known mineral resources in the immediate vicinity. The project area is predominantly urbanized and is surrounded by existing disturbed land and development. The area adjacent to the Willows Community School is located in the Industrial General zone and is presently developed with other uses.

**Mitigation Measure(s):** None Required.

#### **XII. NOISE --Would the project result in:**

- |                                                                                                                                                                                     |                          |                          |                                     |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?                                                                             | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?                                                      | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?                                          | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Responses:**

- a) Less Than Significant Impact. Impacts related to the generation of noise levels in excess of community standards are analyzed separately, as part of construction and school operation activities. The Culver City Noise Ordinance (Chapter 9, Section 9.07.035 "Construction") exempts noise sources associated with construction when performed between the hours of 8:00 AM and 8:00 PM on weekdays, 9:00 AM and 7:00 PM on Saturdays, and 10:00 AM and 7:00 PM on Sundays. The phased construction of the project will require the use of heavy equipment for demolition, grading and excavation as part of activities related to the construction of the foundation and building fabrication. During construction, activities will not be constant. A different mix of equipment operating and noise levels will vary based on the amount of equipment in operation and the location of each activity.

Land uses on the properties surrounding the project site are primarily developed with light industrial, office and warehouse uses, which are not considered noise sensitive. Due to the use of construction equipment during the construction phase, the project will expose students and staff associated with the school to increased ambient exterior noise levels. The project applicant will also notify surrounding residential communities in advance of construction activities, and both the Applicant's and City's contact information will be posted on the project site to direct residents wishing to report noise and other construction activity complaints. Through compliance with the City's Noise Ordinance, temporary noise levels associated with construction activities will be less than significant.

During the ongoing operation of the project, on-site operational noise will typically be generated by heating, ventilation, and air conditioning (HVAC) equipment. However, the noise levels generated by this equipment will not be substantially greater than those generated by existing HVAC equipment serving the school site. Additionally, the design and construction of the new school structures will have to comply with Title 24 of the California Code of Regulations, which requires interior noise levels not to exceed 45 dBA. Through compliance with Title 24, occupants (i.e., students, faculty and staff) will not be exposed to excessive interior noise levels. Therefore, project impacts related to on-site noise will be less than significant.

Lastly, the Applicant submitted data related to noise arising from traffic generated by the project. The Traffic Noise Model lookup tables developed by the Federal Highway Administration (FHWA) were used to estimate existing (2010) and future (2015 and 2020) traffic noise levels during the morning peak hour, school peak hour, and afternoon peak hour along the roadways associated with the study intersections both with and without the project's anticipated traffic. The results of the modeling show that traffic associated with the project will not result in a noticeable increase in noise levels at any of the studied intersections. Therefore, project impacts related to traffic noise will be less than significant.

- b) Less Than Significant Impact. During construction of the project, the use of machinery including bulldozers, trucks, drills, etc. will be typical. The amount of groundborne vibration that is created by the use of equipment during the construction of the project, although noticeable, is not excessive. Additionally, construction of the project will occur intermittently over several months and over several phases, lessening the impact of prolonged vibration or noise. In regards to the operation of the school, uses of this type, specifically educational facilities, do not generate strong ground vibrations or noise. Thus, the project will not result in impacts related to groundborne vibration or noise and will therefore be less than significant.
- c) Less Than Significant Impact. The project site is presently developed with the Willows Community School. The project includes the phased development of the school, with the immediate consideration for the addition

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>of 50 students and the removal of the Willows V building (8476 Warner Drive) and construction of a surface parking lot and play area. . Future phases may also include an increase in enrollment to 575 students and the expansion of school operations onto sites with existing light industrial uses, as envisioned in the school's Master Plan for development over the next 20 years. While the addition of students may result in an increase in the use of the playground facilities where noise is typically generated, the staggered scheduling of play area usage will maintain noise at current levels. In addition, conceptual plans for future site development as part of Phases 2 and 3 envision a central playground area surrounded by school structures on all four sides, which would help to muffle noise, thereby reducing potential noise impacts on abutting properties. The ambient noise level is not expected to substantially increase from the usage on a permanent or temporary basis. Therefore, impacts will be less than significant.</p> <p>d) <u>Less Than Significant Impact.</u> The project will result in periodic increases in ambient noise levels during construction and demolition activities related to the phased development of the project. As noted previously, all construction activities will comply with the Municipal Code regarding hours of construction. In addition, notice will be placed at the construction site providing contact information for the Applicant and the City should there be concerns or complaints regarding ongoing noise issues at the project site.</p> <p>e) <u>No Impact.</u> The project site is not located within an adopted airport land use plan or within two miles of an airport. The project will not expose people in the project area to excessive noise levels, therefore there is no impact.</p> <p>f) <u>No impact.</u> The project is not located within the vicinity of a private airstrip, therefore there is no impact.</p> <p><b>Mitigation Measure(s):</b> None Required</p>				

**XIII. POPULATION AND HOUSING -- Would the project:**

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Responses:**

- a) Less Than Significant Impact. The project includes the phased development of the Willows Community School with an expansion of school operations and facilities to accommodate 150 additional students over a 20 year period, increasing the school enrollment to 575 students. While the project does not involve the addition or removal of housing, the addition of school facilities may induce population growth in the areas near the school site. However, as this is a private school, attendance is not limited by geographic boundary. Students attending the school may live outside of Culver City in a neighboring jurisdiction. Therefore, impacts on population growth in the area are anticipated to be less than significant.
- b) & c) No Impact. The project will not result in the displacement of any housing units or people. Therefore, there will be no impact.

**Mitigation Measure(s):** None Required.

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIV. PUBLIC SERVICES --</b>				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Responses:</b>				
a) <u>Less Than Significant Impact.</u> Fire and Police Protection. The project potentially could increase the need for fire protection services at the project site by increasing the number of students and staff, however according to the Culver City Fire Department (CCFD), the existing CCFD staffing and equipment could accommodate the project's need for fire protection services.				
<p>The Culver City Police Department, like the CCFD, could potentially be impacted when the school increases the number of students and staff. However, based on existing staffing and equipment, the City's police resources will be able to adequately serve the project. Neither the Fire Department nor the Police Department during the internal review of the project identified impacts to their response times as noted above; further they did not identify impacts to their ability to provide adequate services. Therefore, impacts related to fire and police protection will be less than significant.</p> <p>Schools. The project will result in the expansion of facilities and operations at the Willows Community School, a private school facility serving students from Culver City and the region. The increase in student enrollment and expansion of facilities will not result in impacts on existing school services in the community.</p> <p>Parks. The Willows Community school currently rents parkland at Syd Kronenthal Park from 3:00 PM to 5:00 PM during the school week and from 10:30 AM to 2:30 PM during the summer week days. The school's usage of the parkland will continue under the project. According to the City's Parks and Recreation Department, the school's usage of the parkland does not and would not preclude the use of other portions of the park or other parks in the area by other people/parties, especially since the school uses the parkland during non-peak hours. Additionally, the project includes recreational amenities, such as play areas, a play court, a multi-purpose room, a theater, etc. Thus, the project will not create the need for new or expanded parks and recreation facilities. Therefore, the project will have less than significant impacts on park facilities.</p> <p>Other Public Facilities. No other facilities will be impacted by the project.</p>				
<b>Mitigation Measure(s):</b> None Required				

<b>XV. RECREATION --</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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**Responses:**

a) & b) *Less Than Significant Impact.* As identified previously, the school currently and will in the future, use local public recreational facilities, specifically Syd Kronenthal Park from 3:00 PM to 5:00 PM during the school week and from 10:30 AM to 2:30 PM during the summer weekdays. While an increase in the size of operations may result in more students utilizing the school facilities during school hours and use of public recreation facilities both during and after school, such use is not anticipated to result in overuse of existing facilities that would cause substantial physical deterioration of the facilities. The City's Parks and Recreation Department provides usage of the parks on a reservation basis. The Willows School must apply and be approved, and pay a fee for usage of the parkland (i.e. the ball fields) just as all other users seeking to utilize that space. The Parks and Recreation Department has stated that the usage of the parks by the school is typically done during non-peak hours. The project will not include the development of off-site recreation facilities; however the phased development of the school conceptualized in the Master Plan identifies new soft- and hard-scape play areas built on the project site which is not expected to result in negative impacts on the environment.

**Mitigation Measure(s):** None Required

**XVI. TRANSPORTATION/TRAFFIC – Would the project:**

a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Responses:**

- a) *Less Than Significant Impact.* This analysis is based on the following report:
- *Traffic Impact Analysis for the Willows Community School, Overland Traffic Consultants, Inc. April 2011.*

As part of its analysis for the project, the Applicant's consultant in concert with City staff selected nine intersections:

1. National boulevard and Washington Boulevard
2. National Boulevard and Hayden Avenue
3. National Boulevard and Eastham Drive
4. National Boulevard and Jefferson Boulevard
5. Robertson Boulevard/Higuera Street and Washington Boulevard



<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>6. Warner Drive and Hayden Avenue 7. Higuera Street and Hayden Avenue 8. Higuera Street and Eastham Drive 9. Higuera Street and Rodeo Road</p> <p>Future traffic volume projections at each intersection are typically analyzed under several scenarios, including existing traffic with ambient growth (1 percent per year), traffic with the project and related growth, traffic with related growth but without the project, and traffic with mitigations (if necessary).</p> <p>As part of the analysis, the Applicant's consultant obtained development lists from the City of Culver City and the City of Los Angeles Department of Transportation. These lists were reviewed to identify those projects that could produce additional traffic at the study intersections by the future study year. It should also be noted that the future impact analysis does consider the current Exposition light rail project modifications to National Boulevard from Jefferson Boulevard to Washington Boulevard. These modifications include changes to intersection configurations and traffic controls.</p> <p>The cumulative traffic impact of future traffic growth has been calculated by adding the existing traffic volume, the ambient growth factor and traffic from other development projects. Based on the three-phased development scenario for the Willows Community School identified in the Master Plan, the following analysis is provided:</p> <p><u>Project Phase 1 (2015).</u> Traffic generated at the completion of Phase 1 would not result in significant impacts at any of the study intersections.</p> <p><u>Project Build-out (2020).</u> Traffic associated with the build-out of the project would not result in significant impacts at any of the study intersections.</p> <p>The study also included an analysis of the potential impacts of project traffic on the residential streets located to the northwest of the project site. The study segments include the following:</p> <ol style="list-style-type: none"> <li>1. Schaefer Street between Higuera Street and National Boulevard</li> <li>2. Helms Avenue between Higuera Street and National Boulevard</li> <li>3. Wesley Street between Higuera Street and National Boulevard</li> <li>4. Lucerne Avenue between Higuera Street and Ince Boulevard</li> <li>5. Higuera Street between Lucerne Avenue and Wesley Street</li> </ol> <p>The method for determining neighborhood impacts is based on the daily traffic on each street. A comparison of the future-without-project and future-with-project conditions was then conducted by the percent increase in daily traffic. As shown in the traffic study, traffic generated by the project would not exceed any significance threshold along any study area residential street segments. Therefore, project impacts related to neighborhood streets would also be less than significant.</p> <p>b) <u>Less Than Significant Impact.</u> The CMP is a State-mandated program that serves as the monitoring and analytical basis for transportation funding decisions in the County made through the Regional Transportation Improvement Program (RTIP) and State Transportation Improvement Program (STIP) processes. The CMP requires that a Traffic Impact Analysis be performed for all CMP arterial monitoring intersections where a project would add 50 or more trips during either morning or afternoon weekday peak hour and all mainline freeway monitoring locations where a project would add 150 or more trips (in either direction) during the morning or afternoon weekday peak hours.</p> <p>The following CMP intersection monitoring locations are in the project vicinity:</p> <ul style="list-style-type: none"> <li>• La Cienega Boulevard and Jefferson Boulevard</li> <li>• Venice Boulevard and Overland Avenue</li> </ul> <p>The project will not add more than 50 trips to either CMP monitoring intersections. Therefore, because the project will not add 50 or more trips during the morning or afternoon peak hours at CMP monitoring</p>				

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>intersections, no further review of potential impacts to intersection monitoring locations that are part of the CMP highway system is required.</p> <p>The closest CMP freeway monitoring location to the project site is Santa Monica Freeway east of Overland Avenue. The CMP TIA guidelines require that freeway monitoring locations must be examined if a project will add 150 or more trips (in either direction) during either the morning or afternoon weekday peak periods. The project will not add 150 or more trips (in either direction) during either the morning or afternoon weekday peak hours to the CMP freeway monitoring location. Therefore, no further review of potential impacts to freeway monitoring locations that are part of the CMP highway system is required.</p> <p>c) <u>No Impact</u>. The project site is not located near any airports, nor will it include any characteristics that might result in the alteration of air traffic patterns. Therefore, there are no impacts.</p> <p>d) <u>No Impact</u>. The projects will not alter the street configuration in the area. In addition, as part of the project development, alterations to on-site parking and stacking configurations during drop-off and pick-up periods will alleviate issues related to traffic congestion near the entrance to the school. The project will not increase any hazards, and therefore there will be no impacts.</p> <p>e) <u>Less Than Significant Impact</u>. The design and construction of the project will be required to incorporate all applicable City standards related to emergency access to ensure that emergency access would be adequate. Therefore, implementation of the project will result in less than significant impacts related to this issue.</p> <p>f) <u>No impact</u>. The project site is located in an urbanized portion of the City. As proposed, the project will not conflict with any public transit, bicycle or pedestrian facilities. In addition, the project will not affect the performance or safety of any alternative modes of transportation. No impacts will result.</p> <p><b>Mitigation Measure(s):</b> None Required</p>				

**XVII. UTILITIES AND SERVICE SYSTEMS –Would the project:**

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>Responses:</b></p> <p>a) <u>No Impact.</u> The project will not exceed any point-source discharge, and thus, no cumulative impacts related to wastewater treatment requirements will occur.</p> <p>b) <u>Less Than Significant Impact.</u> Water treatment needs of the City are accommodated by the Metropolitan Water District's (MWD) Joseph Jensen Treatment Plant in the City of Los Angeles. The treatment plant has a design capacity of 750 million gallons per day (MGD). The project will result in a net water consumption increase of approximately 1,200 gallons of water per day, for an approximate total school water consumption of 4,600 gallons of water per day. According to Rich Yates, the Interim Operations Compliance Team Manager of the Water Quality Section with MWD, the treatment plant has sufficient capacity to accommodate the project's demand for water treatment.</p> <p>Wastewater generated within the western portion of Los Angeles County is treated at the Hyperion Treatment Plant (HTP), which has the capacity to treat approximately 450 MGD of wastewater to full secondary treatment level and currently treats 340 MGD.</p> <p>The existing school use generates approximately 3,600 gallons of wastewater per day. The project (the addition of 150 students and 12 staff members) will generate a net increase of approximately 1,200 gallons of wastewater per day, for a total generation of approximately 4,800 gallons of wastewater per day. The wastewater generated by the project will be accommodated by the HTP with minimal impact. Additionally, according to the City's Public Works Department, the project site is served by 8-inch sewer lines in Higuera Street and Warner Drive. The sewer lines are adequate to service the project. Therefore, project impacts related to wastewater treatment will be less than significant.</p> <p>c) <u>Less Than Significant Impact.</u> The project will not increase the amount of impervious surfaces at the project site, and in fact, could decrease the amount of impervious surfaces by adding landscaped areas and other water quality stormwater best management practices for infiltration and water quality purposes, thereby slightly reducing the overall amount of runoff from the site. The project will not result in any increase in runoff to the local storm drains. Implementation of the project will not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, therefore impacts will be less than significant.</p> <p>d) <u>Less Than Significant Impact.</u> Water service for this project site is provided by the Golden State Water Company (GSWC) which contracts with the Metropolitan Water District for its supply. GSWC was contacted by the City during the preliminary project review stage to determine potential impacts related to water service at this location. At that time, GSWC did not identify any impacts to water service. Therefore, the proposed project will have less than significant impacts to the water system.</p> <p>e) <u>Less Than Significant Impact.</u> The wastewater treatment provider will have adequate capacity to accommodate the project. Refer to response to Checklist Question 17(b).</p> <p>f) <u>Less Than Significant Impact.</u> The City of Culver City operates a transfer station at 9255 Jefferson Boulevard. The transfer station receives a maximum of 500 tons of solid waste per day, with an average of 250 tons of solid waste per day. Solid waste from the transfer station is sent to Puente Hills Landfill, Chiquita Canyon Landfill, or the Southeast Resource Recovery Facility (SERRF). Existing uses at the project site generate approximately 0.09 tons of solid waste per day.</p> <p>The project will generate solid waste from construction activities and ongoing operations. The primary types of demolition and construction debris that would be removed from the project site include cement, scrap lumber, metal, masonry materials, and soil/dirt. The projects demolition and construction phase will generate approximately 5,745 tons of debris. The demolition and construction debris would be primarily classified as inert waste and would be recycled to the extent possible, and any remaining debris would be disposed of at Peck Road gravel pit or Azusa Land Reclamation, which have a combined remaining capacity of 56 million tons. Conservatively assuming that none of the construction debris will be recycled, these facilities will have adequate capacity to accommodate the project's demolition and construction debris. Therefore, the project's construction related impacts to solid waste will be less than significant.</p>				

<b>EVALUATION OF ENVIRONMENTAL IMPACTS:</b>	Potentially Significant Impact	Potentially Significant Impact Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>The project will generate approximately 0.04 tons of solid waste per day (not accounting for the effectiveness of recycling efforts), resulting in an estimated generation for the whole school of 0.14 tons of solid waste per day. Both Chiquita Canyon Landfill and Puente Hills Landfill have adequate capacity to accommodate short-term (Phase 1) and long-term (Phase 2 and 3) disposal needs of the project. Therefore, project impacts related to solid waste service will be less than significant.</p>				
<p>g) <u>Less Than Significant Impact.</u> The project will comply with all federal, state, and local statutes and regulations related to solid waste. Therefore, implementation of the project will result in less than significant impacts related to this issue.</p>				
<p><b>Mitigation Measure(s):</b> None Required</p>				
<p><b>XVIII. MANDATORY FINDINGS OF SIGNIFICANCE –</b></p>				
<p>a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>b) Does the project have impacts that are individually limited, but cumulatively considerable? ('Cumulatively considerable' means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>Responses:</b></p>				
<p>a) <u>Less Than Significant Impact with Mitigation.</u> With implementation of the mitigation measures identified in this initial study, the project will protect against the potential degradation of the quality of the environment and the potential of substantially reducing the habitat of wildlife. No rare or endangered plants or animals have been identified on the project site. In addition, no examples of the major periods of California history or prehistory have been identified; however mitigation measures are in place in the event that discovery is made during construction activities on the project site.</p>				
<p>b) <u>Less Than Significant Impact.</u> The project will not result in any impacts that are cumulatively considerable. As noted, traffic impacts from the project when considered in light of other developments in the vicinity remain below the threshold of significance. Any potential cumulative impacts will be substantially reduced to less than significant due to standard City code requirements and conditions of approval.</p>				
<p>c) <u>Less Than Significant Impact with Mitigation.</u> For the reasons stated in this Initial Study, with mitigation, project impacts related to adverse effects on human beings, either directly or indirectly (refer to the discussion of Geology and Soils) will be less than significant.</p>				
<p><b>Mitigation Measure(s):</b> None Required</p>				

### **XVIII. EARLIER ANALYSES:**

None.

### **References Utilized:**

1. Culver City Natural Hazards Map (Faults, Fire, Flooding), created on June 1, 1999
2. South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, pages 5-1
3. South Coast Air Quality Management District, Facility Information Detail (FIND). URL: [www.aqmd.gov/webappl/fim/default.htm](http://www.aqmd.gov/webappl/fim/default.htm); accessed September 22, 2009.
4. Willows Community School Historic Report, Galvin Preservation Associates, March 2011
5. Report of Preliminary Geotechnical Evaluation, Mactec, 2011
6. Culver City Address Master List, June-July 2009. Excel Database; accessed September 24, 2009.
7. FHWA Traffic noise Model, Version 2.5 Look-Up Table, User's Guide, U.S. Department of Transportation, Federal Highway Administration, Final Report, December 2004.
8. Traffic Impact Analysis for the Willows Community School, Overland Traffic Consultants, Inc., April 2011
9. County of Los Angeles Countywide Integrated Waste Management Plan, County of Los Angeles Department of Public Works, February 2011
10. CalRecycle, Estimated Solid Waste Generation Rates for Institutions, <http://www.calrecycle.ca.gov/wastechar/wastegenrates/Institution.htm>, March 2011
11. City of Culver City General Plan

## MITIGATION MONITORING PROGRAM

The following environmental mitigation measures shall be incorporated into the project development as conditions of approval. The project applicant shall secure a signed verification for each of the mitigation measures which indicate that mitigation measures have been complied with and implemented, and fulfills the City environmental and other requirements (Public Resources Code Section 21081.6.). Final clearance shall require all applicable verification as included in the following table. The City of Culver City will have primary responsibility for monitoring and reporting the implementation of the mitigation measures unless otherwise indicated. The mitigation measures have been identified by impact category and numbered for ease of reference.

MITIGATION MONITORING PROGRAM				
Willows Community School May 23, 2012				
MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<u>Cultural Resources</u>  <b>CR-1:</b> If any archaeological materials, paleontological materials, or human remains are encountered during the course of the project development, work in that area must be halted and the City of Culver City must be notified. Prior to resumption of work, a Phase 1 Archaeological/Paleontological Survey shall be completed and submitted to the Planning Division and Building Safety Division for review. If the Phase 1 Archaeological/Paleontological Survey indicates the presence of archaeological and/or paleontological resources, then an archaeological and/or paleontological professional(s), approved by the City, shall monitor all phases of excavation for the project site. Work will be halted in that area of the detected resource until the City of Culver City's archaeologist and paleontologist have been contacted to evaluate the resources and permission to commence work in that area has been given by the City of Culver City. If the human remains are determined by the County coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains.	Condition of Approval	Plan Check note and Field Inspection	Prior to Issuance of a Building Permit and On-Going during Construction	Building Safety Division and Building Safety Inspector
<u>Geology and Soils</u>  <b>GS-1:</b> Prior to issuance of a grading permit by the City, the Applicant shall submit to the City, for review and approval, a comprehensive geotechnical investigation for the project, including additional soil borings.	Condition of Approval	Field Inspection	Prior to Issuance of Grading Permit	Building Safety Division and Building Safety Inspector

### MITIGATION MONITORING PROGRAM

Willows Community School  
May 23, 2012

MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<b>GS-2:</b> The design and construction of the project shall occur in accordance with the applicable recommendations identified in the comprehensive geotechnical investigation.	Condition of Approval	Plan Check Note and Field Inspection	Prior to Issuance of Building Permit	Building Safety Division and Building Safety Inspector