



PETALUMA CITY SCHOOLS

Office of Chris Thomas - Chief Business Official

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PETALUMA CITY (ELEMENTARY) SCHOOL DISTRICT * PETALUMA JOINT UNION HIGH SCHOOL DISTRICT
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September 12, 2018

Olivia Ervin
Heather Hines
City of Petaluma
Planning Division
11 English Street
Petaluma CA 94952


Re: Proposed Safeway Fuel Center Project

Dear Ms. Ervin and Ms. Hines:

In light of the appeal on the Proposed Safeway Fuel Center Project that is being brought before the City Council on Monday, September 17th, and in response to numerous concerns raised by staff and parents at McDowell Elementary School, the District retained another expert to take a deeper look into the Mitigated Negative Declaration (MND). Please find attached Meridian Consultant's comments on the MND identifying a number of failings that indicate that an Environmental Impact Report (EIR) needs to be prepared. We look forward to addressing the City Council at the Appeal Hearing next week. Please note that representatives from the District and Meridian Consultants will be available on Monday to answer any questions.

Based on the attached Meridian Comment Letter and findings, the District respectfully requests that the appeal be granted and that an EIR be ordered for the project.

Very Truly Yours,


Chris Thomas,
Chief Business Official

Attachment

CC: Gary Callahan, Superintendent
Sheri Chlebowski, Board President, Petaluma City Schools
Stan Barankiewicz, Attorney, Orbach Huff Suarez & Henderson, LLP
Eric Danly, City Attorney

GARY CALLAHAN, SUPERINTENDENT

BOARD OF TRUSTEES: MICHAEL BADDELEY, SHERI CHLEBOWSKI, PHOEBE ELLIS, FRANK LYNCH, ELLEN WEBSTER

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September 12, 2018

Petaluma City Schools
200 Douglas Street
Petaluma, CA 94952

Attn.: Ms. Christine Thomas
Chief Business Official, Petaluma City Schools

Re: Review of Proposed Safeway Fuel Center MND, Petaluma

Dear Ms. Thomas,

Meridian Consultants is pleased to submit this letter containing our review of the Mitigated Negative Declaration (MND) and associated technical studies dated March 29, 2018, prepared by the City of Petaluma (City) for the proposed Safeway Fuel Center located at 335 South McDowell Boulevard (proposed Project).

Summary and Understanding of the Proposed Project

As described in the Draft MND, the proposed Project would be located on an 0.71-acre site currently occupied by 13,770 square feet of retail space with associated surface parking. The proposed Project consists of a Safeway Fuel Center featuring 16 covered fuel-pumping positions, a 697-square-foot retail convenience store, landscaping, and associated surface parking.

The MND was prepared by the City to comply with the California Environmental Quality Act (CEQA) and was released for public review in April 2018 (State Clearinghouse No. 2018042017). The Project was considered by the Planning Commission at meetings in May and June 2018 and has been appealed to the City Council.

The MND followed the standard CEQA Initial Study checklist. The proposed Project would be located immediately across Maria Drive from the McDowell Elementary School and the 4Cs Petaluma Child Development Center. Several topics within the Initial Study are relevant to potential impacts on school-age children.

Our review focused on the discussion and analysis contained within the MND and associated materials with respect to air quality, including the health risk assessment (HRA); greenhouse gas (GHG) emissions; hazards and hazardous materials; noise; and transportation/traffic.

Air Quality

The *Safeway Fuel Center Air Pollutant and Greenhouse Gas Emissions Assessment* (GHG Assessment; January 8, 2014; revised September 18, 2017) concludes construction air pollutant emissions would be well below the Bay Area Air Quality Management District (BAAQMD) significance thresholds with implementation of best management practices for fugitive dust. The study also concludes operational emissions from traffic generation, vehicle idling, and fuel vapor emissions would be below the BAAQMD significance thresholds for air pollutant emissions.

Air quality impacts were estimated using the California Emissions Estimator Model (CalEEMod). According to **Attachment 1: CalEEMod Output of the Air Pollutant and Greenhouse Gas Assessment**, the following assumptions were applied to the model:

- CO₂ intensity was adjusted to the 2019 Pacific Gas and Electric Company projected rate.
- The land use designation was set as Gasoline/Service Station with user input of 16 pumps, resulting in CalEEMod defaults of 2,258 square feet and a lot size of 0.05 acres; these defaults were left unchanged.
- The CalEEMod default construction duration ran from January 1, 2018, through June 20, 2018. Nonoverlapping phases included the following: demolition (10 days); site preparation (1 day); grading (2 days); building construction (100 days); paving (5 days); and architectural coating (5 days).
- CalEEMod default construction equipment type, amount, usage hours, horsepower, and load factor were assumed.
- CalEEMod default worker and vendor trips were assumed; however, the analysis assumed 61 haul trips during demolition and 10 haul trips during architectural coating. Default worker, vendor, and hauling trip lengths were assumed.
- Fleet mixes were adjusted based on EMFAC2014, with no heavy trucks or buses.

The inputs utilized for the CalEEMOD model do not fully address the land uses in the Project description. The description on p. 5 of the MND states the Project site is 32,450 square feet (approximately 0.7 acres) and includes a 697-square-foot retail convenience store, a 5,890-square-foot canopy covering 16 fuel stations, 8,000 square feet of landscaping, two 20,000-gallon underground storage tanks, and appurtenant parking. Adjusting the model inputs to reflect the Project description could cause an increase in emissions. As such, the MND did not adequately disclose potential impacts.

The construction phase types assumed in the model do not accurately depict a construction scenario for a proposed fuel pumping station. We recommend including a trenching phase as opposed to grading, which would include equipment types such as cranes, dumpers/tenders, excavators, plate compactors,

tractors/loaders/backhoes, and cement and mortar mixers. The trenching phase is a more reasonable assumption for the construction activities related to the proposed fuel pumping station, such as the installation of the two 20,000-gallon underground storage tanks. Furthermore, the analysis did not take into consideration any potential export of soil for the installation of these fuel tanks. Therefore, the model underestimates the number of total haul trips during this phase, which would result in an increase in construction-related emissions such as nitrous oxide (NO_x), carbon monoxide (CO) and particulate matter (PM₁₀ and PM_{2.5}).

In addition, the *Safeway Fuel Center Health Risk Assessment* (HRA; January 8, 2014; revised September 19, 2017) concluded the combination of toxic air contaminant (TAC) emissions from construction and operation would not exceed the thresholds of significance for community risk impacts in terms of excess lifetime cancer risk, annual PM_{2.5} concentration, and Hazard Index.

Emissions of toxic pollutant potentially associated with the Project were estimated using the Industrial Source Complex—Short Term, version 3 (ISCST3) dispersion model. The HRA states the ISCST3 dispersion model is a BAAQMD-recommended model for use in modeling analysis of these types of emission activities for CEQA projects. However as of December 2006, the American Meteorological Society/US Environmental Protection Agency (USEPA) Regulatory Model with Plume Rise Model Enhancements (AERMOD-PRIME; hereafter AERMOD) replaced the ISCST3 as the USEPA-preferred regulatory model.¹ The change from ISCST3 to AERMOD will affect prevention of significant deterioration (PSD) increment consumption as well as permit compliance in states where regulatory agencies limit property-line concentrations using modeling analysis. As such, the HRA should have utilized the AERMOD dispersion model to address TAC impacts on nearby sensitive receptors.

The transfer and storage of gasoline results in emissions of volatile organic compounds (VOCs), which are also classified as reactive organic gases (ROGs). Emissions of ROGs and benzene, which is a TAC, were computed using emission factors provided by the BAAQMD. However, the *Safeway Fuel Center Initial Study* (March 2018) states the fueling pumps will dispense both unleaded and diesel fuels that will be available from eight multiproduct fuel dispensers. The analysis fails to assess impacts related to diesel from the fueling pumps, thereby understating potential ROG emissions.

1 US Environmental Protection Agency, 40 CFR Part 51, Rules and Regulations vol. 82, no. 10, January 2017.

Greenhouse Gas Emissions

The GHG Assessment concludes that operational emission from traffic generation, vehicle idling, and fuel vapor emissions would be below the BAAQMD significance thresholds for GHG emissions.

The MND shows that the Project could generate 947 metric tons of carbon dioxide equivalents (CO₂e) and compares that to a threshold of 1,100 metric tons of CO₂e. This conclusion is based on the same CalEEMOD model output discussed above with regard to air quality. Adjusting the model inputs to reflect the issues identified above in **Air Quality** could show an increase in emissions.

The MND discusses the BAAQMD screening criteria for the Convenience Market with Gas Pumps designation. However, this land use subtype “includes convenience markets with gasoline pumps where the primary business is the selling of convenience items, not the fueling of motor vehicles,” while the Project is more appropriately classified as a Gasoline/Service Station, which was how the Project was classified for CalEEMod purposes.² The BAAQMD CEQA Guidelines state: “Minor stationary sources are typically land uses that may require air district permits, such as gasoline dispensing stations,” and “Stationary-source emissions are not included in the screening estimates.”³ Therefore, the screening criteria mentioned in the MND are not relevant.

Hazards and Hazardous Materials

The MND does acknowledge that *“Gasoline storage and dispensing facilities contain potentially hazardous materials including liquid fuels as well as gas vapors”* (emphasis added). However, the MND fails to adequately address potential hazards that may result from the proposed Project on the adjacent McDowell Elementary School and the 4Cs Petaluma Child Development Center located on Maria Drive across from the Project site.

The MND, while acknowledging that the McDowell School is within ¼ mile of the Project site, incorrectly notes that the school is 475 feet from the proposed Project site (Air Quality Section 3.3(d)) and 150 feet (Hazards/Hazardous Materials Section 3.8(c)). The standard for assessing impacts to schools is to use the property line of the school and include all areas that may be available to students, staff, and faculty. As such, the distance to McDowell Elementary School is the width of Maria Drive, or approximately 50 feet from the proposed Project.

² California Emission Estimator Model User Guide.

³ Bay Area Air Quality Management District, *California Environmental Quality Act Air Quality Guidelines* (May 2017), pp. 4-2 and 3-1, accessed September 2018, http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en.

The Initial Study checklist includes the question of whether the Project would “emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.” The Project would handle hazardous substances within ¼ mile of existing schools. The MND does not discuss potential impacts to the school that could result from the release of hazardous materials at the Project site. Rather, it merely notes that “adherence to existing federal, state and local regulations will ensure that all potentially hazardous materials onsite are properly labeled, transported and stored. Established policies and programs set forth by the EPA, DTSC, CAL/OSHA and other regulatory agencies provide that the presence of potential hazardous materials occurs in the safest possible manner by reducing the opportunity for accident release or spills and ensuring that a response plan is in place. Such policies include corrosion and overfill protection, as well as leak detection for underground storage tanks. Above ground storage is also regulated through the federal Oil Spill Prevention, Control Countermeasures regulation.” The Draft MND further notes that “The Petaluma Fire Prevention Bureau regulates hazardous materials including fuel storage. The Fuel Center is required to adhere to local, state and federal regulation regarding the storage and sale of petroleum. A Hazardous Materials Business Plan will be prepared and implemented that addresses spill prevention and response in the event of accidental release.” (Hazards/Hazardous Materials Section 3.8(c)). The Draft MND then concludes, with no analysis of the potential impacts, that impacts would be “less than significant.” Without an understanding of the risk, merely stating that a Hazardous Materials Business Plan will be prepared provides no context for the contents of such a plan, who the responsible parties will be to implement the plan, and who has approval over the development and scope of the plan or when it will be prepared.

Furthermore, emissions of vapor and small spills of liquid fuels would routinely occur in the course of normal operations. Though individually small, the cumulative effect of these small releases can result in a hazard when occurring close to a school.⁴

By not providing an analysis of the potential impacts of the proposed Project on the adjacent school and merely stating that regulatory compliance will reduce these unknown impacts to a less than significant level, the Draft MND is flawed.

4 “Small Spills at Gas Stations Could Cause Significant Public Health Risks Over Time,” Johns Hopkins Bloomberg School of Public Health News Release, October 7, 2014.

Noise

The *Safeway Fuel Center Environmental Noise Assessment* (Noise Assessment; April 14, 2014) concludes that operational noise levels would fall within or below the range of ambient noise levels and would not cause a permanent increase in the ambient noise environment. In addition, the study concludes that construction noise levels have the potential to intermittently expose the adjacent school to noise levels ranging from 70 to 85 dBA; however, construction would not exceed 60 dBA Leq or the ambient noise environment by 5 dBA Leq for a period greater than 1 year. Further, it concludes that adherence to the standards set forth in Section 21.040.A.3.a of the Implementing Zoning Ordinance (IZO)⁵ for the City of Petaluma and implementation of mitigation measures, the temporary noise environment would be reduced to less than significant levels.

The analysis calculates distances from the fueling stations to the front facades of residences across S. McDowell Boulevard and to the school buildings across Maria Drive. However, the analysis does not calculate noise levels at the property line, which would decrease the distance between the proposed use and the sensitive receptors, resulting in increased noise levels. As stated in the City's IZO, public or private open/outdoor spaces should be taken into for both the residences across S. McDowell Boulevard and the school playfield across Maria Drive. Adjusting the analysis for appropriate distance to the sensitive receptors would result in noise impacts greater than what is discussed in the MND.

The study concludes that existing residences and the nearby school would intermittently be exposed to high levels of noise (70 to 85 dBA) throughout construction period. However, the MND also states that construction would not result in noise levels exceeding 60 dBA Leq or the ambient noise environment by 5 dBA Leq for a period greater than 1 year. The analysis does not provide any justification for this conclusion and assumes the construction duration reduces noise levels to the acceptable limits. The study does not fully assess the noise impacts to the nearby residences and the school from each type of construction equipment to be used during construction.

The analysis assumes the sound of a passing car at 15 mph typically ranges from 55 dBA to 65 dBA at 25 feet, 70 to 75 dBA at 50 feet for heavy trucks and 70 to 80 dBA at 3 feet for mechanical equipment. However, there is no source or reference that verifies these assumptions. According to the California Department of Transportation's *Technical Noise Supplement*,⁶ heavy traffic at 300 feet from the source is approximately 60 dBA. Assuming a standard attenuation of 4.5 dBA per doubling of distance, noise

5 City of Petaluma, Implementing Zoning Ordinance (IZO), adopted May 19, 2008.

6 California Department of Transportation, *Technical Noise Supplement* (September 2013), Table 2-5: Typical Noise Levels, accessed September 2018, http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf.

levels would range from approximately 72 dBA to 63 dBA at 50 to 200 feet, respectively. As shown in Figure 10-1 of the City's General Plan, S. McDowell Boulevard is located along the 65 and 70 dB CNEL Roadway Noise Contour. Based on the analysis, it is unclear if the increase in trips would result in an increase in the existing roadway network, thus causing unacceptable noise limits at the surrounding sensitive uses.

The study states traffic noise increases were calculated for roadways within and leading to the Project area using the AM and PM peak-hour traffic volumes contained in the final traffic study. However, the study fails to provide a methodology on how increases and decreases in existing and traffic noise levels are derived and calculated. Without a description of the appropriate methodology, it is unclear how conclusions were derived to result in less than significant impacts.

The City's IZO states that "no person shall cause or allow to cause, any source of sound at any location within the incorporated City or allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person, which when measured on the property where the noise disturbance is being experienced within public or private open/outdoor spaces that exceeds the maximum exterior noise exposure applicable limits." As shown in Figure 10-2 of the City's General Plan,⁷ Community Noise Exposure Limits for schools are normally acceptable between 50 and 70 dBA, and conditionally acceptable between 60 to 70 dBA. Noise levels above 70 dBA are normally unacceptable. If noise levels are "conditionally acceptable" or "unacceptable," mitigating factors should be identified to reduce the noise to a "normally acceptable" level. The Draft MND does not provide any discussion as to what conditions exist or will exist that would provide for the "conditionally acceptable" noise to be reduced to "normally acceptable." As noted in the legend for "Conditionally Acceptable" noise in Figure 10-2, "New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design." As such, this can be construed as a potentially significant impact that requires Project mitigation to identify the appropriate design features.

Transportation/Traffic

The traffic study prepared for the project focuses on the flow of automobile travel, specifically the measure of intersection Level of Service, and as such does not give sufficient attention to pedestrian

⁷ City of Petaluma, *General Plan 2025* (May 2008), Figure 10-2: Land Use Compatibility Standards.
<https://cityofpetaluma.net/cdd/pdf/general-plan-may08/general-plan-may08.pdf>, accessed September 2018.

circulation and safety considerations. In addition, the traffic analysis makes assumptions about vehicle movements that may not be warranted.

The Transportation/Traffic section of the MND identifies General Plan policies 5-P-10, 5-P-20, 5-P-22, and 5-P-43 as relevant to the Project. Policy 5-P-10 states a minimum level of service (LOS) for intersections. The MND uses that as the threshold of significance for checklist question “a.” Given the existing LOS of intersections in the area, and the relative number of trips associated with the Project, the use of this threshold would not result in significant impacts.

However, LOS is not a complete measure of impacts. Due to the proximity of the school, the following General Plan⁸ policies should have been included in the MND:

- **5-P-24:** Give priority to the pedestrian network and streetscape amenities near schools, transit, shopping, and mixed-use corridors emphasized in the General Plan.
- **5-P-32G:** Participate in and support recommendations of the Safe Routes to Schools program.
- **7-P-15:** Improve and expand safe pedestrian, bicycle, and transit access to all school sites and campuses.

The MND states: “In order to maintain a conservative analysis all project traffic is assumed to enter and exit the project site via the two-way Maria Drive site driveway located closest to the fuel center.” While this may create a “conservative” LOS analysis by not assuming trips exit onto McDowell Boulevard or Washington Street, this assumption allows for approximately 42 percent of the exiting trips to be routed east on Maria Drive away from the intersection with McDowell Boulevard. Elsewhere, the MND states that vehicles would “exit the fuel center via the right-out-only driveway onto Maria Drive.” This makes sense based on the design of the fuel center, which directs multiple rows of vehicles from east to west through the fueling stations where the exit at the west end of the site is more conveniently placed. A conservative analysis should have assumed most trips would exit the site onto Maria Drive at this point, with all vehicles turning to the right.

The MND and the traffic study evaluate potential conflict between vehicles exiting the Safeway parking lot and Petaluma Transit buses stopping along Maria Drive at the East Petaluma Transit Center. However, there are other potential conflicts that the MND does not evaluate. The MND states: “Due to the proximity of the adjacent elementary school there will be elementary school bound pedestrians

⁸ The City of Petaluma General Plan, *General Plan 2025*, was adopted on May 19, 2008, and took effect on June 18, 2008.

walking across the McDowell Boulevard and Maria Drive intersection at the same time as the am peak hour traffic” (p. 57). However, the MND does not acknowledge that the City has identified Maria Drive as part of the Safe Route to School network serving McDowell Elementary.⁹ In addition, the City has indicated that Maria Drive is planned to accommodate a Class III bike route. Though the MND states that new crosswalks would be striped across the two-way driveways into the Safeway parking lot, no pedestrian safety features are described for the exit onto Maria Drive that is approximately 50 feet from the intersection with McDowell Boulevard. Given the concurrent timing of school start, peak traffic, Petaluma Transit bus schedules, and the fuel truck deliveries described in the MND, there would appear to be multiple points of conflict during the AM peak hour that are not evaluated in the MND.

Qualifications of the Reviewers

Attached to this letter are the credentials and resumes of the principal reviewers for this effort. This includes Mr. Joe Gibson, Partner, an expert the application of (CEQA) to hazards and hazardous materials as they relate to schools; Mr. Ned Baldwin, Senior Project Manager, a CEQA expert in land use and education projects; and Mr. Christ Kirikian, Senior Project Manager and air quality and noise specialist.

Should you have any questions regarding this letter and the comments provided herein, please contact Mr. Ned Baldwin at (805) 413-4185 or via email at nbaldwin@meridianconsultantsllc.com.

Sincerely,

Meridian Consultants LLC



Ned Baldwin
Senior Project Manager



Joe Gibson
Partner

Cc: Stan M. Barankiewicz II, Esq., Orbach Huff Suarez & Henderson LLP

⁹ City of Petaluma, *Safe Routes to School Plan* (July 10, 2015), prepared by Whitlock & Weinberger Transportation Inc, accessed September 2018, <https://cityofpetaluma.net/pubworks/pdf/safe-routes.pdf>.



Joe Gibson

Partner

Practice Group Leader, Water and Natural Resources

About

Mr. Gibson has more than 40 years of experience managing and conducting environmental studies related to water resource projects throughout the United States. His clients have included federal, state, and local government agencies as well as private-sector clients.

Mr. Gibson leads the firm's resource management group and has extensive experience in working on projects throughout the western United States. His background includes work with federal agencies such as the Bureau of Land Management, the National Parks Service, and the US Forest Service. Additionally, he has worked with numerous regional and local agencies in California and other western states.

Mr. Gibson is a recognized expert in conservation and open space efforts, including trails management. He is immediate past president of the Association of Water Agencies of Ventura County. In addition, he currently serves as a director on the Conejo Recreation and Park District and the Conejo Open Space Conservation Agency, which collectively manage over 150 miles of multipurpose trails. He oversaw the Ventura County Open Space Technical Advisory Committee, and currently sits on the California Association of Recreation and Park Districts' board of directors.

Among his specialties include the preparation of hydrologic analysis of surface water improvements, and studies requiring analyses of surface hydrology and water quality management.

Education

Bachelor of Science, Environmental Geosciences, Indiana University, Indianapolis, Indiana

Undergraduate studies in Natural and Physical Sciences, Indiana State University, Terre Haute, Indiana

Continuing education studies in land use planning, land use law, and environmental impact analysis, University of California, Los Angeles, California

Affiliations

Board of Directors and President, California Association of Recreation and Park Districts

Board of Directors, Conejo Open Space and Conservation Agency

Board of Directors, Conejo Recreation and Park District

Board of Directors, Immediate Past President, Ventura County Association of Water Agencies

Board of Directors, Vice Chair, Ventura County Economic Development Association

Relevant Project Experience

As California Environmental Quality Act (CEQA) Program Director for the Office of Environmental Health & Safety (OEHS), Mr. Gibson provided CEQA Program Management services and oversight for **Phase I and II New School Construction** program for the Los Angeles Unified School District (LAUSD) in Los Angeles, California. The LAUSD program is a \$19 billion program responsible for constructing more than 150 new schools and is the largest public works project in the United States in the 21st century. Responsibilities included direction and management of all environmental oversight activities for all projects, from site selection through school construction and opening. Projects included elementary schools, middle schools, high schools, span schools, magnet schools, charter schools, primary centers, early education centers, adult schools, and schools for students with special needs. Activities included coordinating and liaising with other jurisdictions and agencies (e.g., City of Los Angeles Department of Transportation); reviewing and approving all CEQA documents; delivering presentations to executive staff at LAUSD; and presenting and liaising with members of the Board of Education. The program consisted of more than 50 schools for Phase II and 45 schools for Phase III, as well as 30 charter school sites and oversight of final CEQA efforts for numerous Phase I schools.

Managed the preparation of the final Environmental Impact Report (EIR) for the proposed **Central Los Angeles Learning Center No. 1** (Ambassador Hotel site) for the Los Angeles Unified School District (LAUSD) in Los Angeles, California. Mr. Gibson coordinated preparation of the response to comments and the final EIR with both LAUSD staff and outside legal counsel (Pillsbury Madison). He also provided the lead in a strategic discussion with LAUSD executive staff and the Board of Education.

Completed the environmental review for LAUSD and Urban Partners of the proposed **Central Los Angeles New Middle School No. 3** in Los Angeles, California. This project is part of LAUSD's new construction program and involved the construction and operation of an 800-student middle school (grades 6–8) in Koreatown in the City of Los Angeles. The project site included a Metropolitan Transportation Authority (MTA) Red Line subway station and presented numerous environmental concerns with respect to joint use of the station and school.

Prepared an EIR under CEQA for the proposed formation of the **Camarillo Unified School District**. The project addressed impacts associated with reorganizing three local school districts (the Oxnard Union High School District, grades 9–12; the Pleasant Valley School District, grades K–8; and the Somis School District, grades K–8) to form the new district in California. The project would result in the transferring of some high school students who attend other high schools in the Oxnard High School District but who would no longer be eligible to attend those schools as a result of the new boundaries. The EIR analyzed impacts associated with options available to the new district to house those students.

Prepared environmental documents to achieve CEQA compliance for a proposed continuation high school for the **Conejo Valley Unified School District**. The proposed project would provide for the relocation of high school students to a new location on a site located adjacent to State Route 23, a six-lane freeway. As such, the site required special consideration and an evaluation to meet California Department of Education (CDE) siting requirements for air quality and freeway-related emissions. The site is located adjacent to a major park site and would include provisions for joint use to accommodate parking and access.

Completed school facility site studies for both a proposed elementary school and a high school in the **City of Santa Paula** to meet CDE requirements for new schools. The two school sites are part of a new specific plan (East Area 1) and are located on parcels that experienced historical agricultural operations. Additionally, the sites are adjacent to or near natural gas and petroleum pipelines and to operating railroad tracks, requiring special risk studies to determine potential hazards.

Managed the preparation of a technical air quality and greenhouse gas emission report for the **Rancho San Geronio Elementary School** project within the Banning Unified School District. The report included an analysis of estimated emissions of criteria air pollutants (CAPs) that would be generated by the project during construction and operation, as well as an analysis of greenhouse gas emissions (GHGs) that would result from project implementation.

Completed a CEQA compliance review for the Coachella Valley Unified School District for the **District Learning**

Center Education Support Complex. The peer review of the technical evaluations included air quality, greenhouse gas, hazards and hazardous materials, hydrology, noise, and traffic. The peer review ensured the EIR's technical accuracy, legal defensibility, and general CEQA compliance prior to public review circulation and District Board of Trustees certification.

Managed the preparation of the Initial Study/Mitigated Negative Declaration (IS/MND) for the Palm Springs Unified School District for the **Palm Springs High School Field House** project in the City of Palm Springs. The District proposed to demolish the existing 4,629-square-foot field house and to replace it with a new 6,196-square-foot field house. Due to the potential historical and architectural significance of the field house, key issues addressed in the IS/MND included cultural resources, geology and soils, air quality, and noise.

Prepared an Initial Study and Categorical Exemption, as listed in Article 19 of the State CEQA Guidelines, for the **Simi Valley High School Parking Lot** project within the Simi Valley Unified School District. The project would replace existing underutilized storage structures with a new parking lot with 141 parking spaces on a 1.4-acre site within an existing institutional facility, the Simi Valley High School campus, to provide parking for existing staff and athletic events.

Completed an Initial Study and Categorical Exemption for the Ventura County Office of Education for the **Albert Einstein Academy of Arts Letters and Sciences** project located in the City of Thousand Oaks. The charter school would provide an educational experience that would focus on college preparatory curricula, current and relevant technology, the visual and performing arts, leadership and service opportunities, and foreign languages, all within a small-school environment. Key issues addressed and important to the Ventura County Office of Education and the City of Thousand Oaks included noise, transportation and traffic, and land use and planning.

Currently managing the preparation the Draft EIR for the **Compton High School Reconstruction Project** within the City of Compton for the Compton Unified School District. This project involves the reconstruction the Compton High School campus, which would consist of (1) the demolition of all existing buildings, facilities, and athletic fields; (2)

the construction of new, modern buildings, facilities, and athletic fields with a design that supports a free-flowing campus; and (3) the relocation of various District facilities to facilitate construction.

Managed the preparation of the IS/MND for the **Palm Springs Unified School District Service Center Expansion** project within the City of Palm Springs, California for the Palm Springs Unified School District (PSUSD). The project proposed to construct an additional office facility adjacent to the existing District Service Center to consolidate all PSUSD operations in one location. The environmental analysis focused on the project's potential impacts to cultural and biological resources, noise, and aesthetics.

Completed the Initial Study and subsequent Draft EIR for the **Agua Caliente Elementary School Relocation** project within Cathedral City for the PSUSD. The project involves the demolition of existing school facilities with the construction of new upgraded facilities.

Managed the effort to prepare the Supplemental EIR for the construction of the **Rancho Mirage K-8 School** located within the PSUSD. This Draft SEIR evaluated new circumstantial changes associated with the proposed K-8 school since the certification of the original DEIR prepared by PSUSD in 2008.

Completed the IS/MND for the **Palm Springs High School Auditorium Project** within the City of Palm Springs for the Palm Springs Unified School District. The District proposed to renovate, modernize, and expand the existing 20,500-square-foot auditorium located in the southern portion of the high school campus. Due to the potential historical and architectural significance of the auditorium, key issues addressed in the IS/MND included cultural resources, geology and soils, air quality, and noise.

Managed the preparation of the IS/MND for the **Bubbling Wells Elementary School Solar** project, out in the Coachella Valley, for the Palm Springs Unified School District. This project consisted of the construction and installation of approximately 300 kW of solar photovoltaic panels to support the power operations of the campus. Due to the prevalence of biological and cultural resources within the Coachella Valley, the environmental analysis focused on the project's potential impacts to these resources.



Ned Baldwin

Senior Project Manager

About

Mr. Baldwin has more than 15 years of varied experience in urban planning, environmental analysis, and real estate consulting. Throughout his career, he has successfully managed and contributed to the preparation of environmental documentation in compliance with the California Environmental Quality Act (CEQA), as well as with the National Environmental Policy Act (NEPA), the New York State Environmental Quality Review Act (SEQRA), and the Massachusetts Environmental Policy Act (MEPA). Mr. Baldwin's project experience includes multifamily developments; retail and commercial sites; schools; parks and recreation facilities; and transportation infrastructure. As a Senior Project Manager with Meridian Consultants, as well as in previous positions, Mr. Baldwin has managed the CEQA documentation process for a range of projects in the Los Angeles area. In addition, Mr. Baldwin has advised government and private-sector clients on entitlement processes, land use strategy, and related real estate issues.

Education

Master of Urban Planning, University of Virginia

Master of Business Administration, Boston University

Bachelor of Arts, Wesleyan University

Project Experience

Project manager of the Environmental Impact Report (EIR) for the **Trident Center Office Expansion** project in the Sawtelle neighborhood of the City of Los Angeles. This project involves design repositions and modifications to an existing office complex consisting of two 10-story towers. The primary goal of the project is to create a reconfigured space with the opportunity to optimize efficiency and interior planning flexibility.

Project manager for the EIR of **The Premier on First Mixed-Use** project in the City of Burbank. This Project involves the demolition of existing uses on a 1.8-acre site and the construction of two 12- to 14-story towers within the City of Burbank. These two towers would consist of a mix of residential, retail, and hotel or office uses to be constructed in two development phases. As planned, the Project comprises 154 apartments and a 230-room hotel, as well as ground-floor retail uses.

Project manager of the EIR for the **Keyes Van Nuys Honda Dealership** project in the Van Nuys neighborhood of the City of Los Angeles. This project involves redevelopment of the site of a former automobile dealership with a new branded Honda dealership.

Project manager of the EIR for the **Los Robles Apartments**. This project involves development of a 307-unit apartment complex in the City of Pasadena.

Project manager for the **San Fernando Corridors Specific Plan Amendment**, a transit-oriented plan to guide future development in downtown San Fernando. The proposed Specific Plan would create a policy framework that would enable the transformation of downtown San Fernando into an attractive, livable, and economically vital core that would differentiate the city from other nearby communities.

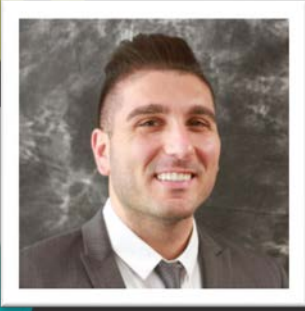
In addition, as part of the Meridian team, Mr. Baldwin contributed to the EIRs for the **Los Angeles Airport (LAX) Landside Access Modernization Program (LAMP)** project, the **Brentwood School** in West Los Angeles, the **Andora Subdivision** in Chatsworth, and the **1311 N. Cahuenga Mixed-Use** project in Hollywood, California.

Mr. Baldwin has also managed the preparation of Initial Studies and Mitigated Negative Declarations (IS/MNDs) for a range of projects in the City of Los Angeles and the City of Burbank, including **8th & Serrano**, a residential mixed-use project in the Koreatown neighborhood of the City of Los Angeles; **Chandler NoHo**, a residential mixed-use project in North Hollywood in the City of Los Angeles; **Lankershim+Otsego**, a residential mixed-use project in North Hollywood in the City of Los Angeles; **City Lights**, a residential mixed-use project in Hollywood in the City of Los Angeles; **Pinnacle Place**, a residential project in the Silver Lake neighborhood of the City of Los Angeles; **8811 Sepulveda**, a residential project in the North Hills neighborhood of the City of Los Angeles; **115 North Screenland**, a residential project in the City of Burbank; **926 James M Wood Boulevard** and **2005 James Wood Boulevard**, hotel projects in downtown Los Angeles; and the **Alameda North Neighborhood Protection Plan**, a roadway improvement project in the City of Burbank.

Prior to joining Meridian Consultants, Mr. Baldwin provided urban planning and regulatory compliance consulting services to the US Department of Veterans Affairs, US Army Corps of Engineers, Los Angeles Unified School District, Massachusetts Bay Transportation Authority, New York City Department of Parks and Recreation, and various real estate development firms.

In previous positions in the Los Angeles area, Mr. Baldwin prepared the CEQA documentation for a range of project types, including several school and residential mixed-use projects. Specifically, Mr. Baldwin was Project Manager for the CEQA review of LAUSD's **Central Elementary School #18** and **Valley Region High School #4**, and the **Soria Elementary School** in Oxnard.

In a prior position, based in Massachusetts, Mr. Baldwin provided NEPA and related project management and analysis services to the US Department of Veterans Affairs with respect to enhanced-use lease projects at VA campuses throughout the northeastern United States.



Christ Kirikian

Senior Project Manager

About

Mr. Kirikian is currently a Senior Project Manager conducting air quality, traffic, and noise assessments with specific expertise in utilizing CalEEMod, AERMOD, SoundPLAN, Aviation Environmental Design Tool, and TNM.

Additional roles include serving as an Environmental Monitoring Manager for large-scale compliance monitoring efforts during construction and operation. Strong working knowledge and experience in the preparation of environmental reports and technical studies pursuant to the full spectrum of CEQA documentation, overseeing complex environmental projects related to urban development and infrastructure projects throughout Southern California; specifically, the Los Angeles Basin, the Central Coast, Coachella Valley, northern Los Angeles, and neighboring counties.

His previous experience with the City of Los Angeles Bureau of Sanitation includes coping with complex problems of water and air pollution, flood control, water supply, solid waste and hazardous materials management, and overall environmental management. He has assisted in the development of numerous environmental documents, including best management practices (BMPs), coordinated monitoring plans (CMPs),

and quality assurance project plans (QAPPs) to meet the requirements of the State Water Resources Control Board (SWRCB).

In addition, Mr. Kirikian has assessed and analyzed physical, chemical, biological, and bacteriological parameters of watersheds, urban lakes, and wetlands; and conducted numerous field surveys and environmental assessments under the Clean Water Act 303(d) list. Mr. Kirikian also solves environmental problems related to stormwater pollution to help implement Total Maximum Daily Load (TMDL) wet- and dry-weather wasteload allocations.

Education

Master of Science, Environmental Science, Loyola Marymount University

Bachelor of Arts, Biology, California State University, Northridge

Affiliations

Institute of Noise Control Engineering (INCE) – Associate

Acoustical Society of America (ASA) – Associate

Project Experience

Responsible for providing the traffic analysis for the **Agua Caliente Elementary School Project**, located in Cathedral City. The Project involves construction of up to 63,151 square feet of new building space, to be used for classrooms, administration offices, a multipurpose room, food services, a library, and other related school uses on the project site.

Played a key role in utilizing the SoundPLAN noise model to assess noise impacts for the **Brentwood School Project**, located on the west side of the City of Los Angeles. Brentwood School will implement campus improvements (East and West Campuses) that include the replacement and enhancement of academic facilities, parking, and circulation. These improvements will be implemented in several phases through year 2040.

Serve as the Dust Control Supervisor for the **Castaic High School Project**. Responsibilities include generating the Dust Control Plan to ensure compliance with mitigation measures set forth in the final EIR and oversee all aspects of Project construction activities including air quality, biology permitting, noise monitoring, stormwater management, geotechnical oversight of excavations, cultural resources monitoring and other associated activities. The proposed project consists of a comprehensive high school in the City of Santa Clarita, including several classroom buildings, library, performing arts building, multipurpose building, physical education building with gymnasium, and an administrative building.

Prepared air quality analysis for the **Palm Springs High School Auditorium** Initial Study/Mitigated Negative Declaration (IS/MND). Able to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations, indirect emissions, and water use. The project is to renovate, modernize, and expand the existing 20,500-square-foot auditorium.

Played a key role in the preparation of the air quality, greenhouse gas emissions, noise, and transportation and traffic analyses for the **Palm Springs Unified School District Service Center (PSUSD)** Initial Study/Mitigated Negative Declaration (IS/MND). The project is proposing

to construct a new PSUSD office building adjacent to the existing District Service Center.

Responsible in the preparation of the SEIR for the **Rancho Mirage High School Video Scoreboard Project** in the City of Rancho Mirage. The Palm Springs Unified School District is proposing to install a video scoreboard located on the southern end of the existing football stadium. The SoundPLAN noise model was utilized to calculate noise impacts from the operation of the video scoreboard to residences immediately adjacent to the stadium.

Evaluated potential impacts generated by construction and operation of the proposed multifamily residential building (**Crenshaw Plaza**) located within the South Coast Air Basin in the City of Los Angeles.

Evaluated the potential impacts of construction and operation of the **Zion Market** project in the City of Los Angeles. The Project consists of the demolition of existing uses and the construction of a 5-story commercial building. The Project site is located at the northeast corner of the intersection of Vermont Avenue and James M. Wood Boulevard in the City of Los Angeles.

Assisted in the preparation for the **DTLA South Park Properties Site 1/1A** Initial Study/Mitigated Negative Declaration (IS/MND). Played a key role in the preparation of the air quality, greenhouse gas emissions, noise, transportation and traffic, and utilities and service systems analyses for the Project. Site 1 will include a 41-story mixed-use building with 461 residential units and approximately 8,700 square feet of ground-floor and basement-level retail space. Site 1A will include a new 12-story hotel building with 300 guest rooms and approximately 8,700 square foot of hotel amenity and back-of-house floor area. Both sites are located in the South Park neighborhood of Downtown Los Angeles within the Central Community Plan Area.