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technical memorandum

date	March 14, 2024 [Revised August 2, 2024]
to	City of Culver City
from	Luci Hise-Fisher, AICP, ESA Janelle Firoozi, ESA
subject	Class 32 Categorical Exemption for the 5835 Washington Boulevard Project

Introduction

ESA has prepared this analysis to assist Culver City in their assessment of the potential for environmental effects associated with the 5835 Washington Boulevard Project (Project), pursuant to the California Environmental Quality Act (CEQA). The analysis below, along with supporting technical studies, concludes that the Project qualifies under CEQA for a Class 32 (Infill Development) Categorical Exemption, that it would not have a significant effect on the environment, and is exempt from review under CEQA.

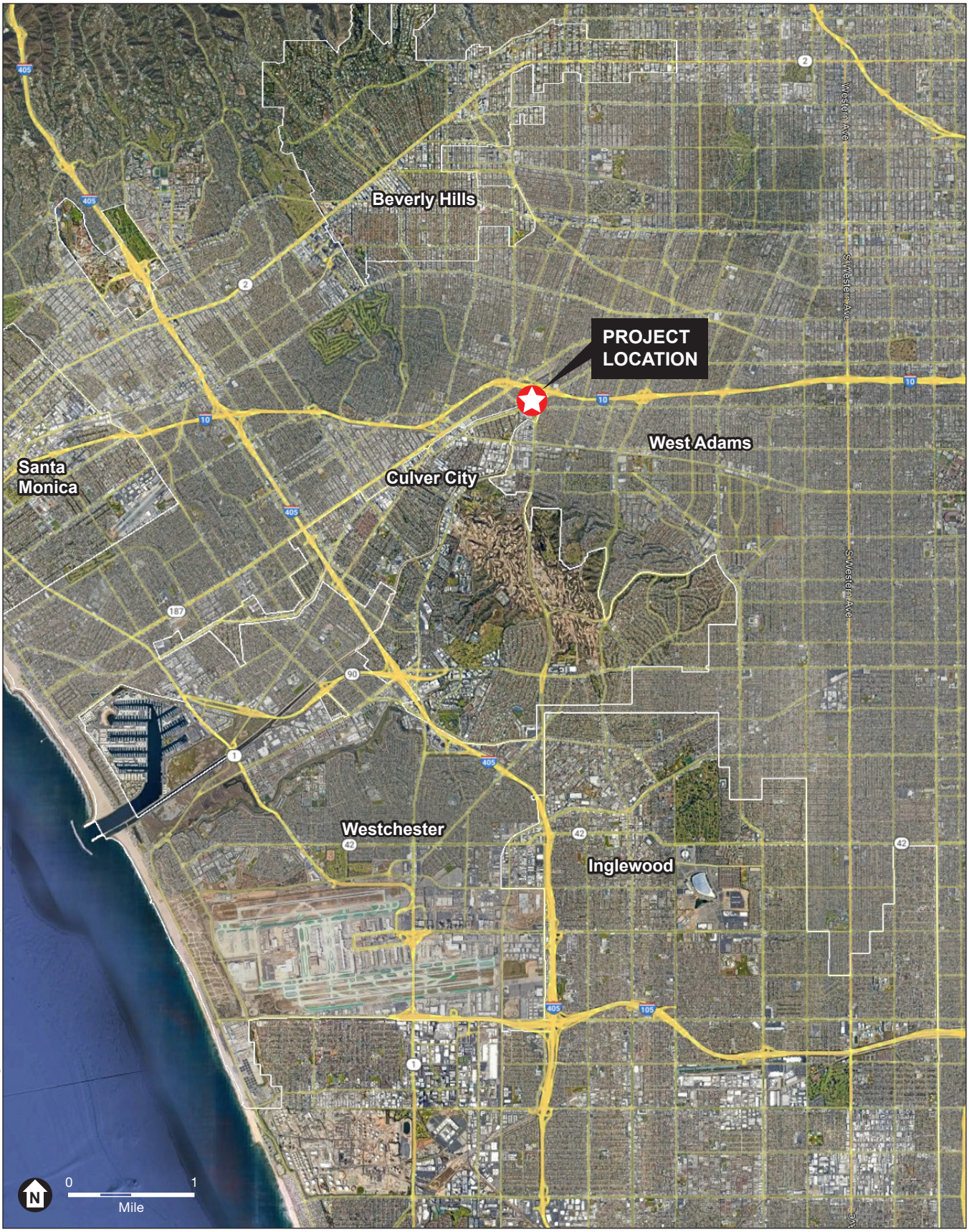
Project Description

Project Location and Existing Conditions

The approximately 22,425-square-foot (sf) (0.51-acre) Project Site consists of three parcels [Assessor Parcel Numbers (APNs) 5065-019-002, -030, and -031] in the northeastern portion of Culver City. The Project Site is bound by an alley to the northwest, Ernest Avenue to the northeast, Washington Boulevard to the southeast, and Dauphin Avenue to the southwest. The Project Site is approximately 7 miles east of the Pacific Ocean and approximately 7.5 miles west of Downtown Los Angeles. The alley immediately to the north is also the boundary between Culver City and the City of Los Angeles. **Figure 1**, *Regional and Project Vicinity Location*, shows the location of the Project Site from a regional and local perspective.

As shown in **Figure 2**, *Aerial Photograph*, the Project Site is currently developed with three one-story buildings, totaling approximately 10,516 sf, on the eastern and western portions of the site with a surface parking lot in the central portion of the site. The two buildings on the eastern portion of the Site are approximately 2,801 sf and 610 sf and are 14 feet in height. The building on the western portion of the Site is approximately 7,105 sf and 24 feet in height.[1] While the two larger buildings are currently occupied by commercial uses, the eastern building also contains a small residential dwelling unit, which, while never leased, is permitted as a caretaker's quarters. The surface parking lot and ornamental landscaping occupy the remainder of the Project Site. An existing AT&T cell tower and associated equipment is located along the northwestern property boundary adjacent to the alleyway.

[1] JRN Civil Engineers, 2021. Alta/NSPS Land Title Survey for 5833, 5835, & 5813 Washington Boulevard, Culver City.



SOURCE: Google Earth Pro, 2023; ESA, 2023

5835 Washington Boulevard

Figure 1
Regional and Project Vicinity Location

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SOURCE: Google Earth Pro, 2023; ESA, 2023

5835 Washington Boulevard

Figure 2
Aerial Photograph

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Vehicular access to the Project Site is provided via Washington Boulevard and is secured by an automatic, keycode-controlled, rolling metal gate. In addition, there is a non-gated surface parking lot accessed from Washington Boulevard located in the western portion of the Project Site. A total of 23 standard vehicle parking spaces are provided throughout the central and western portions of the Project Site. Onsite landscaping consists primarily of 11 ornamental trees, bushes and shrubs planted around the building and along the perimeters of the parking areas.

The Los Angeles County Metropolitan Transportation Authority (Metro) E (Expo) Line is located south of Washington Boulevard; the Project Site is located approximately 0.5-mile north of the Metro E Line La Cienega/Jefferson Station and approximately 1-mile northeast of the Metro E Line Culver City Station. Therefore, the Project Site is located within a City-designated Transit Priority Area (TPA).

In addition, according to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) (No. 06037C1611G), the Project Site is within Flood Zone X, which is an area identified as having minimal risks of flood hazards.[2]

Surrounding Uses and Development

The Project Site is located in an urbanized area, including residential and commercial uses. Surrounding land uses include:

- North – An alley borders the Project Site to the north, with residential uses on the other side of the alley.
- East – Ernest Avenue borders the Project Site to the east, with commercial and industrial uses on the other side of the street.
- South – Washington Boulevard borders the Project Site to the south, with industrial uses beyond.
- West – Dauphin Avenue borders the Project Site to the west, with industrial uses beyond.

Planning and Zoning

The Project Site is designated as General Corridor in the Culver City General Plan, which allows for a range of small- to medium-scale commercial uses, with an emphasis on community-serving retail to which patrons often travel by car.[3] The General Corridor designation is intended to support desirable existing and future neighborhood and community-serving commercial uses. The Project Site is zoned Industrial General (IG) and is also within the East Washington Boulevard Overlay (EW Overlay). The IG zone permits a wide variety of industrial, manufacturing, and processing uses; some recreation and education uses; retail uses; transportation uses; and service uses (including offices and storage facilities). The EW Overlay includes the Washington Boulevard frontage between National Boulevard and Fairfax Avenue and is intended to provide the special zoning regulations necessary for the successful implementation of the East Washington Boulevard Revitalization Program. For projects within the EW Overlay zone, the EW Overlay standards related to setbacks, height limits, building design, and parking and loading would precede the primary zoning designation standards. For IG zoned parcels within the EW Overlay, proposed buildings should be located at the property line along the Washington Boulevard frontage.

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2 FEMA FIRM No. 06037C1611G. 2018. Available: https://msc.fema.gov/portal/search?AddressQuery=5835%20washington%20blvd%20culver%20city.

3 Note that the City is currently in the process of updating the General Plan.

Project Characteristics

The Project includes the demolition of the existing buildings and the associated surface parking lots and construction of a three-story, approximately 46,309 sf office building with two levels of subterranean parking. **Figure 3,** *Conceptual Site Plan*, illustrates the conceptual site plan for the Project. The office building would have a central courtyard that would extend from the lobby to the roof deck and would be open to the sky. The building's façade would consist of recessed fenestration[4] with windows and terraces across the three floors. The building would have different patterned materials for the ground floor, which would create a geometric pattern across the ground level of the building. Ornamental landscaping would be planted along various terraces with the plants overhanging at various points along the outer walls of the building.

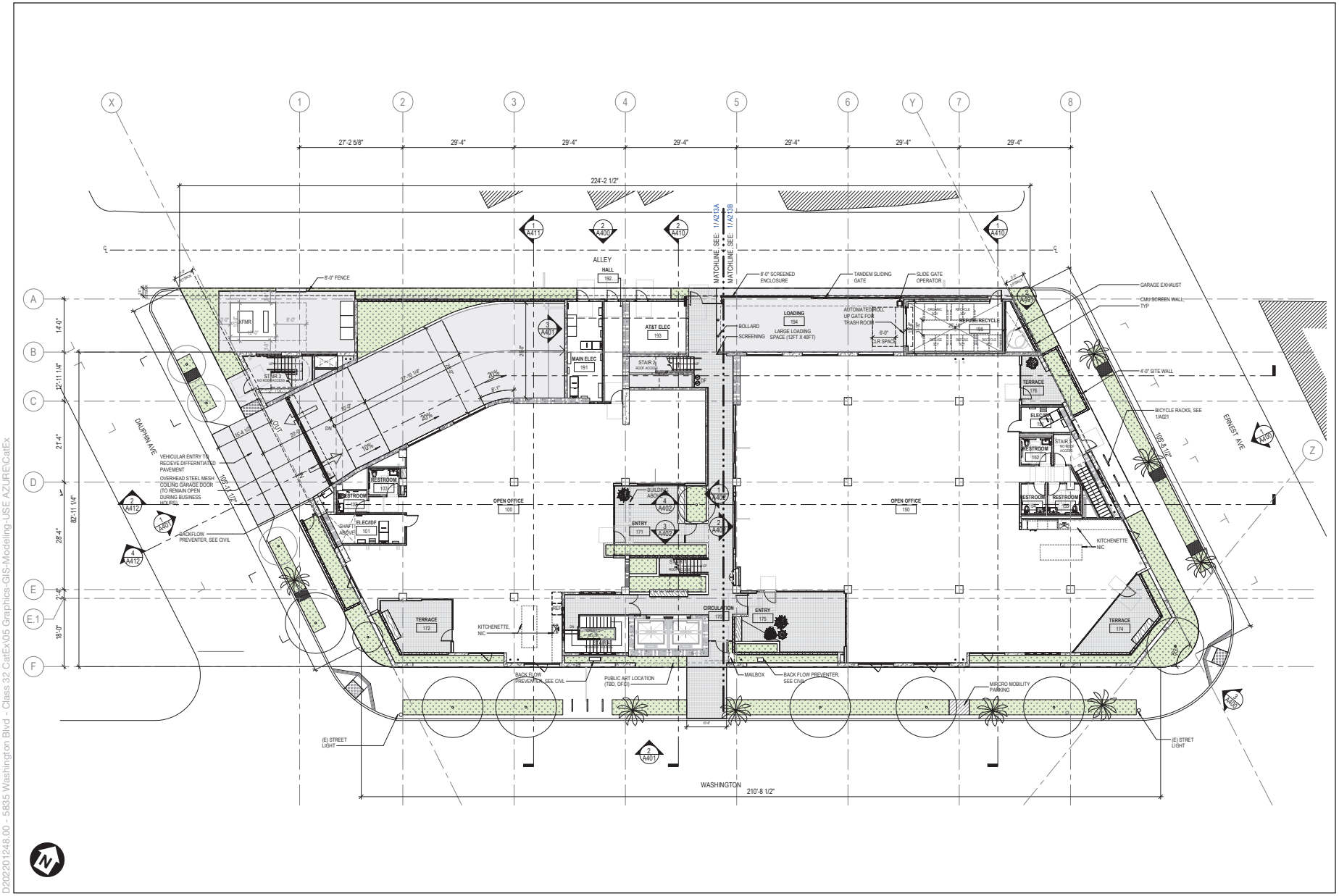
Table 1, *Proposed Square Footage Summary*, provides a breakdown of the proposed square footage by level. As shown in Table 1, Level 1 would consist of approximately 13,375 sf of office space; Level 2 would consist of approximately 14,296 sf of office space; and Level 3 would consist of approximately 13,658 sf of office space. In addition, the Project would provide approximately 14,544 sf of open space, with 5,428 sf being located on the roof deck. A total of 82 parking spaces would be provided on two subterranean levels. Specifically, 38 parking spaces would be provided on Level B1 and 44 parking spaces would be provided on Level B2. The parking garage would include a combination of standard, compact, and tandem parking spaces as well as reserved spaces for electric vehicles (EVs) and accessible vehicles in accordance with the City's Municipal Code (CCMC).

TABLE 1
PROPOSED PROJECT SQUARE FOOTAGE SUMMARY

Level	Square Footage or Spaces
Office Building (Levels B1-3)	
Level B1 (interior space only)	2,570 sf
Level B2 (interior space only)	2,410 sf
Level 1	13,375 sf
Level 2	14,296 sf
Level 3	13,658 sf
Total	**46,309 sf**
Open Space (Levels 1-3, and Roof Deck):	
Level 1	4,703 sf
Level 2	2,376 sf
Level 3	2,037 sf
Roof Deck	5,428 sf
Total	**14,544 sf**
Vehicle Parking	
Level B1	38 spaces
Level B2	44 spaces
Total	**82 spaces**
Vehicle and Bicycle Parking	
Short-term Bicycle Parking	6 spaces
Long-term Bicycle Parking	16 spaces

sf = square feet
SOURCE: HGA, 2024.

[4] Fenestration is an architectural term that refers to the arrangement of windows, alcoves, and doors.



SOURCE: HGA, 2024

5835 Washington Boulevard

Figure 3
Conceptual Site Plan

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Elevations from Washington Boulevard and Dauphin Avenue are provided in **Figure 4**, *Proposed Elevations*. As shown in Figure 4, the building would be approximately 41 feet in height with a central elevator tower extending to approximately 60 feet. Mechanical equipment [e.g., heating, ventilation, and air conditioning (HVAC)] and solar photovoltaic (PV) panels would be located on the rooftop, reaching a maximum height of approximately 52 feet. The equipment would be screened from view along Washington Boulevard. The existing AT&T antenna would be relocated from the northwestern property line to the roof deck and would extend 13.5 feet above the building height. Relocation of the existing AT&T cell tower would comply with the siting and installation requirements established in CCMC Section 17.400.110. As required by the CCMC, the applicant is requesting an Administrative Use Permit (AUP) for the installation of the cell tower on the roof.[5] In addition, the Project would include the installation of a new transformer in the westerly portion of the Site adjacent to the entrance to the subterranean parking garage.

The Project would incorporate a variety of building materials, including brick, concrete, steel, glazing, metal, and wood. An eight-foot-tall gate and perimeter wall would be installed along the Project's northern boundary and six-foot-tall perimeter walls would be installed along the Project's eastern and western boundaries. **Figures 5a through 5c,** *Renderings,* provides conceptual views of the proposed office building from Washington Boulevard, the alleyway, Dauphin Avenue, and Ernest Avenue, respectively.

Open Space and Landscaping

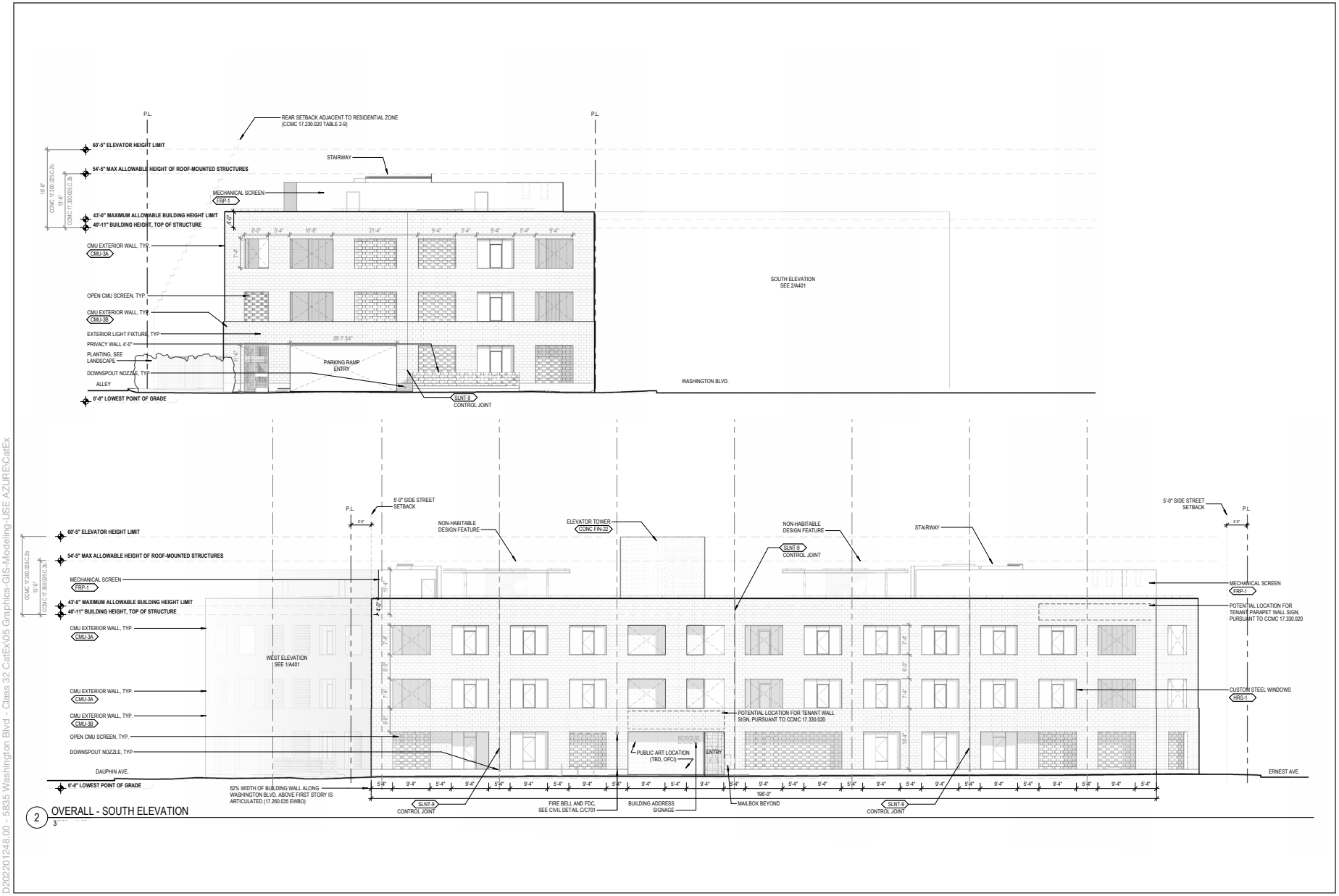
Terraces would be provided on each of the levels to provide open space in accordance with CCMC requirements. More specifically, the building would have 12 terraces located throughout Levels 1 through 3. In addition, the Project would include approximately 5,428 sf of open space on the roof deck with tables and seating areas.

The Project would include approximately 5,131 sf of landscaping on the terraces, along the perimeter of the Project Site and within the public right-of-way. Landscaping would include a diverse planting palette, including native and drought tolerant species. Balconies and terraces would include a similar planting palette including trees to provide shade for the building and exterior gathering spaces with built-in seating. Raised patio spaces bordered by drought tolerant plantings and shaded built-in seating areas would be provided within the building. The building would be set back five feet along Ernest Avenue and Dauphin Avenue and would be located at the property line along the Washington Boulevard frontage. Along the Washington Boulevard frontage, the ground floor of the building would include glazing and screened areas, which would be setback from the street façade by 10 and 3 feet, respectively. Landscaped planters would be provided in the 3-foot setbacks along the screened areas along Washington Boulevard. The 11 existing trees within the public right-of-way would remain. The Project would plant an additional seven street trees along the Project Site perimeter. Biofiltration planters would be incorporated into the landscaping to slow and spread stormwater leaving the Project Site. The Project would also include the installation of public art adjacent to the main entrance on Washington Boulevard. The public art would be visible to visitors to the site and people passing by.

Access and Parking

The Project would result in the removal of the two existing driveways along Washington Boulevard and the construction of a new driveway on Dauphin Avenue. The new driveway would provide direct vehicular access

[5] The AUP would be processed separately from the Site Plan Review. Since the AT&T cell tower is part of the overall project, it is evaluated in this Categorical Exemption.



SOURCE: HGA, 2024

5835 Washington Boulevard

Figure 4
Washington Boulevard Elevation

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View from Washington Boulevard

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SOURCE: HGA, 2024

5835 Washington Boulevard

Figure 5a
Renderings

ESA

View from Alleyway

SOURCE: HGA, 2024

5835 Washington Boulevard

Figure 5b
Renderings

ESA

Dauphin Avenue

Ernest Avenue

SOURCE: HGA, 2024

5835 Washington Boulevard

Figure 5c
Renderings

ESA

to a ramp leading to the two levels of subterranean parking. The ramp would include one ingress lane and one egress lane.

The Project would provide 82 vehicle parking spaces within the two subterranean parking levels. The Project's subterranean parking garage would be designed to accommodate vehicles through a combination of standard, tandem, standard accessible, and van accessible parking spaces. The subterranean parking garage would also include nine EV full vehicle parking spaces, nine EV ready parking spaces, and 17 EV capable vehicle parking spaces.[6] In addition, the Project would include a total of 22 bicycle parking spaces, consistent with the CCMC Section 17.320.045, including 6 short-term spaces and 16 long-term spaces. The long-term spaces would be located on Level B1 and three City-approved bicycle racks for short-term parking would be located within the public right-of-way on Washington Boulevard.

As shown in Figure 3, primary pedestrian access would be provided from Washington Boulevard, leading into the main lobby. Pedestrian access would also be provided via a gate along the alley and a stairwell access point along Ernest Avenue. A loading zone and a new mechanical gate would be provided in the rear of the building adjacent to the refuse and recycling staging area. The Project would include a commercial loading zone, located on the northern side of the Project Site. The commercial loading zone would be accessed via the adjacent alley and trucks accessing the loading zone would approach the loading area from either Dauphin Avenue or Ernest Street. The loading zone would provide access to the Project Site for solid waste removal services as well as delivery and other small trucks.

Sustainable Design Elements

Energy saving and sustainable design elements would be incorporated into the Project. Energy efficient LED light fixtures and lighting controls; tankless water heaters; dual-flush toilets; and low-flow faucets would be installed. High efficiency HVAC units and solar panels would be installed on the roof of the building. In addition, the Project would include nine EV full vehicle parking spaces, nine EV ready parking spaces, and 17 EV capable parking spaces in the subterranean parking garage. In addition, landscaping would be native and drought tolerant to help reduce landscaping water demand. Biofiltration planters would be incorporated into the landscaping to slow and spread stormwater leaving the Project Site.

Construction Schedule/Activities

Construction activities would occur for a total of 19 months, commencing as early as the second quarter of 2024 with completion in the first quarter of 2026. Construction phasing would include demolition, grading and excavation, paving, foundation, building construction, and exterior finishes/painting. Vendor supply trucks and concrete trucks would be used during construction of foundations and building construction. The Project would export approximately 9,452 cubic yards (cy) of building demolition debris. Excavation for the new foundations would be up to approximately 20 feet below ground surface and would result in the exportation of approximately 12,500 cy of soil. Haul trucks would exit the Project Site onto Washington Boulevard, which is a designated truck route in the City (CCMC Section 7.02.210) and would connect to Interstate 10 (I-10) Freeway.

[6] EV full space = fully functioning stand-alone charger; EV ready space = electrical panel capacity and raceway with conduit to terminate in a junction box; EV capable = electrical panel capacity with a dedicated circuit and a continuous raceway from the panel to the future EV parking spot.

Construction of the Project would occur between 8:00 a.m. to 8:00 p.m. Monday through Friday, and from 9:00 a.m. to 7:00 p.m. on Saturday in accordance with CCMC Section 9.07.035. No nighttime construction activities would occur. The Project would include a Construction Management Plan in accordance with City requirements, including haul routes, a staging plan, street closure information, and a detour plan, for City review. The Construction Management Plan would include measures to ensure pedestrian and bicycle safety along the affected sidewalks, bicycle facilities, and temporary walkways (e.g., use of light-duty barriers and cones, use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering). Appropriate signage would be installed to provide detour routes, if needed.

Since noise sensitive land uses are located in proximity to the Project Site, as is standard practice for infill development, temporary noise barriers would be installed. In addition, muffling devices would be used on equipment, hydraulic or electrical powered impact tools would be used, and buffers would be established. A Construction Relations Officer would be designated to serve as a liaison with adjacent residences, who would be responsible for responding to any concerns regarding construction noise and vibration. These construction features and protocols have been incorporated as Project Design Features 1 through 3, as detailed below:

Project Design Feature 1: Construction Equipment Noise Shielding and Muffling Devices: The Project will implement noise reduction strategies to reduce noise levels from construction activities at the noise-sensitive residential receptors located to the north, northeast, and northwest of the Project Site, with a performance standard of achieving a construction noise level of less than 60 dBA Leq at the noise-sensitive residential receptors located to the north of the Project Site. Noise reduction measures consist of the following:

- Contractors will ensure all construction equipment, fixed or mobile, are equipped with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' standards. Prior to the issuance of demolition permits, certification of muffler installation will be submitted to the City for review. The construction contractor will keep documentation onsite demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications. The contractor will use muffler systems that provide a minimum reduction of 10 dBA compared to the same equipment without an installed muffler system, reducing maximum construction noise levels.
- Impact tools used for Project construction will be hydraulically or electrically powered wherever practicable to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where pneumatic tools are employed, quieter procedures will be used such as an exhaust muffler on the compressed air exhaust and external jackets to minimize noise impacts. Temporary abatement techniques will include the use of temporary and/or movable shielding for both specific and nonspecific operations.
- Buffer distances of noise construction activities whose specific location on the Project Site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) will be implemented to minimize noise impacts.
- Construction and demolition activities will be scheduled so as to minimize or avoid operating multiple heavy pieces of equipment such as a large dozer, industrial saw, and excavator, simultaneously at the perimeter of the Project Site along the northern boundary of the Project Site.

Project Design Feature 2: Noise Barrier: Temporary noise barriers will be installed along the north, east and west sides of the Project boundary to help shield the nearest residences from construction noise, with a minimum height of 12 feet (above finished grade) to reduce noise levels. Temporary noise barriers

will be made of plywood or use sound blankets rated at a sound transmission class (STC) capable of reducing sound levels by 20 dBA at sensitive receptors.

Project Design Feature 3: Construction Relations Officer: The Applicant will designate a Construction Relations Officer to serve as a liaison with adjacent residences, who will be responsible for responding to any concerns regarding construction noise and vibration. The liaison's telephone number(s) will be prominently displayed at the Project Site. Signs will also be posted at the Project Site that include permitted construction days and hours.

Necessary Approvals

Required approvals for the Project would include, but may not be limited to, the following:

- Site Plan Review
- Administrative Modification for 10 Percent Standard Parking Space Modification (reduction in parking space size from 9 feet by 18 feet to 9 feet by 16 feet, 3 inches)
- Parking Plan Director Approval for Tandem Parking
- Administrative Use Permit for the relocation of the existing AT&T cell tower
- Construction permits, including building, grading, excavation, foundation, and associated permits
- Other approvals, as needed

Assessment of Class 32 In-Fill Development Project Exemption

Exemption Criteria

Article 19 of the California Environmental Quality Act (CEQA Guidelines Sections 15300 to 15333), includes a list of classes of projects that have been determined to not have a significant effect on the environment and as a result, are exempt from review under CEQA.

This document demonstrates that the Project, which includes the demolition of existing buildings and surface parking and the construction of a three-story office building with two levels of subterranean parking, qualifies for an exemption under CEQA Guidelines Section 15332, In-Fill Development Projects, as a Class 32 project that meets the following conditions:

a. The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
b. The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
c. The project site has no value as habitat for endangered, rare or threatened species.
d. Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
e. The site can be adequately served by all required utilities and public services.

The analysis below describes the Project's consistency with the applicable Class 32 exemption criteria.

Criterion (a): The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

The Project Site is located in the McManus neighborhood in Culver City and in the Eastern Sub-Area, which includes the McManus and Lucerne-Higuera neighborhoods. The Project Site is designated General Corridor, which allows for small- to medium-scale commercial uses, emphasizing community-serving retail, office, and service uses, and may accommodate mixed use and live/work developments.[7] The Project Site is zoned Industrial General (IG) and is located within the East Washington Boulevard Overlay (-EW Overlay).[8] The IG zone permits a wide variety of industrial, manufacturing, and processing uses; some recreation and education uses; retail uses; transportation uses; and service uses (including offices and storage facilities). The -EW Overlay includes the Washington Boulevard frontage between National Boulevard and Fairfax Avenue and is intended to provide zoning regulations necessary for the successful implementation of the East Washington Boulevard Revitalization Program. For projects within the -EW Overlay zone, the standards related to setbacks, height limits, building design, and parking and loading precede the primary zoning designation standards. The Project's proposed office use is consistent with the General Plan land use designation and zoning of the Project Site.

The City's General Plan Land Use Element has several land-use policies that are relevant to the Project. **Table 2,** *Consistency with Applicable Culver City General Plan Objectives and Policies*, presents an evaluation of the Project's consistency with applicable Culver City General Plan objectives and policies.

As discussed in Table 2, the Project would be consistent with the applicable policies and objectives of the City's General Plan Land Use, Circulation, Open Space, Noise, and Public Safety Elements. As discussed above, the Project would be consistent with the City's General Plan designation of General Corridor, which allows small- to medium-scale commercial uses, emphasizing community-serving retail, office, and service uses, and may accommodate mixed use and live/work developments.[9] The Project would also be consistent with the IG zoning, which permits industrial, manufacturing and processing uses; some recreation and education uses; retail uses; transportation; and service uses (including offices and storage facilities).

TABLE 2
CONSISTENCY WITH APPLICABLE CULVER CITY GENERAL PLAN OBJECTIVES AND POLICIES

Objectives and Policies	Consistency Analysis
Land Use Element	
Objective 6: Commercial Corridors. Revitalize the physical character and economic wellbeing of the City's commercial corridors.	**Consistent.** The Project's proposed office uses would provide new office floor area, thereby creating opportunities for new businesses on the commercial corridor. Therefore, the Project would increase employment opportunities and revenues in the City. The Project's building façade would consist of recessed fenestration that would have windows and terraces across the three floors, with different patterned materials for the ground floor. In addition, the Project would include the installation of public art adjacent to the building's main entrance on Washington Boulevard and would provide seven new street trees along the Site perimeter. Therefore, the Project would contribute positively to the physical character and economic well-being within the McManus neighborhood and City.

7 City of Culver City General Plan Land Use Element Map, general-plan-land-use-map.pdf (culvercity.org). Accessed November 1, 2023.

8 City of Culver City, City of Culver City Zoning Map, August 2007, map15_zoning.pdf (culvercity.org). Accessed November 1, 2023.

9 Note that the City is in the process of updating the General Plan.

Objectives and Policies	Consistency Analysis
Policy 6.1: Plan for streetscape improvements (street trees, landscaping, street furniture, special lighting, decorative paving, screening walls), and façade improvements along commercial corridors that complement each focus area and improve the physical environment.	**Consistent.** The Project would result in the development of a building with visual interest through the site plan and design. The building would include articulation on the facades and the use of a variety of building materials, including brick, concrete, wood, steel, and metal, which contribute to the visual interest. In addition, the Project would include landscaping that would be visible from the streets inclusive of seven street trees along the Site perimeter and ornamental landscaping along various terraces. The plants on upper levels would overhang along the outer walls of the building and landscaping would be provided along the perimeter of the building. Landscaping would be native and drought tolerant. Public art adjacent to the main entrance along Washington Boulevard and bicycle parking would also be provided. Therefore, the Project would improve the streetscape and overall pedestrian experience in the area.
Objective 10: ***Visual Open Space.*** Extend the City's parklike qualities into neighborhoods and business districts through streetscape and urban design improvements.	**Consistent.** The Project includes the demolition of the existing buildings and associated surface parking lot and construction of a three-story office building with two levels of subterranean parking. The Project would provide articulation and visual interest through the design and incorporation of a variety of building materials, including brick, concrete, steel, glazing, metal, and wood. The Project would include landscaping that would be visible from the streets inclusive of seven new street trees along the Project Site perimeter and ornamental landscaping along various terraces, where the plants would overhang the various points along the outer walls of the building. Additionally, the Project would include public art adjacent to the main entrance along Washington Boulevard, which would contribute to the visual quality of the streetscape. Therefore, the Project would be consistent with this objective.
Policy 10.F: Continue to require the undergrounding of utilities in all new developments and during replacement of existing service whether alone or as a part of a remodeling project, wherever feasible.	**Consistent.** The Project would connect to existing infrastructure and utilities, including wastewater, water, and electricity. The Project would install a transformer on the westerly portion of the site adjacent to the entrance of the subterranean parking garage. Therefore, the Project would be consistent with this policy.
Objective 12: Urban Design. Ensure that new construction and renovation of existing residential and non-residential buildings and streetscapes are accomplished with the highest quality of architectural and site design.	**Consistent.** Development of the Project would result in a high-quality architectural design achieved through the overall site improvements, articulation of the structure, the incorporation of landscaping throughout the Project Site, and the use of a variety of materials. The Project design provides a variety of building planes and materials, including brick, concrete, steel, glazing, metal, and wood. The Project would be compatible in terms of size and character with the surrounding uses. Therefore, the Project would be consistent with this objective.
Policy 23I: Improve aesthetic, safety, and traffic conditions in the area between La Cienega Boulevard and Fairfax Avenue and between La Cienega Boulevard and Ballona Creek.	**Consistent.** The Project Site is located area addressed by this policy, between La Cienega Blvd and Fairfax Avenue, bounded by an alley to the northwest, Ernest Avenue to the northeast, Washington Boulevard to the southeast, and Dauphin Avenue to the southwest. The Project would result in the development of a building with articulation and visual interest and would incorporate a variety of building materials including brick, concrete, steel, glazing, metal, and wood. In addition, the Project would improve the streetscape and pedestrian environment by providing public art as well as planting new street trees and landscaping throughout the Project Site. Ornamental landscaping would be planted along various terraces and would overhang along the outer walls of the building. With regard to safety, the Project Site is located in an urban area that is well served by the Culver City Police Department (CCPD). The Project would include security lighting within common areas and entryways and would comply with the CCMC Section 17.300.040 (Outdoor Lighting) requirements. In addition, pursuant to CCMC Section 17.560, Project plans would be submitted to the CCPD for review and approval to ensure that the site design incorporates required security and crime reduction features. With regard to traffic, the Project would result in the removal of two existing driveways along Washington Boulevard and the construction of a new driveway on Dauphin Avenue. The new driveway would provide direct vehicular access to a ramp leading to the subterranean parking structure. Additionally, 22 bicycle parking spaces would be provided including 6 short-term spaces and 16 long-term spaces to encourage active transportation. The Project is located within a City-designated TPA and the Project Site is located approximately 0.5-mile north of the Metro E Line La Cienega/Jefferson Station and approximately 1-mile northeast of the Metro E Line Culver City Station. Therefore, the Project would be consistent with this policy.
Circulation Element	
Policy 4.D: Enhance the aesthetic qualities of pedestrian access routes by increasing amenities, such as	**Consistent.** The Project would improve streetscape and the pedestrian environment by providing new street trees and landscaping throughout the Project Site. Ornamental landscaping would be planted along various terraces and would overhang at various points along the outer walls of the building. Specifically, the Project would provide a total of 14,544 sf of open space with

Objectives and Policies	Consistency Analysis
trees, awnings, lighting, street furniture, and drinking fountains, etc.	approximately 9,166 sf located on Levels 1 through 3, including 12 terraces, and approximately 5,428 sf on the roof deck. Balconies and terraces would include a similar planting palette including trees to provide shade for the building and exterior gathering spaces with built-in seating. Eleven street trees would remain, and the Project would provide seven new trees along the Project Site perimeter. Public art adjacent to the main entrance along Washington Boulevard and bicycle parking would also be provided. Therefore, the Project would be consistent with this policy.
Policy 4.E: Ensure actual and perceived safety of pedestrian areas through crime prevention measures.	**Consistent.** The Project Site is located in an urban area that is well served by the CCPD. The Project would include security lighting within common areas and entryways and would comply with the CCMC Section 17.300.040 (Outdoor Lighting) requirements. In addition, pursuant to CCMC Section 17.560, Project plans would be submitted to the CCPD for review and approval to ensure that the site design incorporates required security and crime reduction features. Therefore, the Project would be consistent with this policy.
Policy 4.I: Encourage business signage which is easily readable and visually attractive for pedestrians.	**Consistent.** Project signage would include building identification, wayfinding, and security markings. All signage would comply with the requirements of CCMC Section 17.330. Therefore, the Project would be consistent with this policy.
Policy 6.B: Reduce pressure on on-street parking through provision of private and public off-street parking facilities.	**Consistent.** The Project would include 82 parking spaces, including nine EV full vehicle parking spaces, nine EV ready parking spaces, and 17 EV capable parking spaces. In addition, the Project would provide 22 bicycle parking spaces, including 6 short-term and 16 long-term spaces. The Project Site is located in an area that is well served by public transit. Therefore, the Project would reduce pressure on on-street parking with the provision of onsite vehicle and bicycle parking.
Open Space Element	
Policy 5.I: Underground utility lines as part of new developments, as part of ongoing maintenance and upgrades to existing services whenever feasible.	**Consistent.** As discussed in Policy 10.F above, the Project would connect to existing infrastructure and utilities, including wastewater, water, and electricity. The Project would install a transformer on the westerly portion of the site adjacent to the entrance of the subterranean parking garage. The Project would be consistent with this policy.
Noise Element	
Objective 1: Land Use Compatibility. Ensure the compatibility of adjacent land uses with regard to noise sources and receptors.	**Consistent.** The Project would involve the demolition of the existing buildings totaling 10,516 sf and the construction of a three-story, 46,309 sf office building. While the Project would intensify the use of the Site through the addition of 35,793 sf of office uses compared to existing conditions, the proposed office use is consistent with the General Plan and zoning for the Project Site and the surrounding area. The Project would be compatible with land uses immediately surrounding the Project Site, which include industrial uses located to the east, south, and west of the Project Site, within the General Corridor and -EW Overlay. Based on the noise analysis, which is summarized below under Criterion (d), impacts related to noise during construction and operation of the Project would be less than significant. Since noise sensitive land uses are located in proximity to the Project Site, as is standard practice for infill development, temporary noise barriers would be installed. In addition, muffling devices would be used on equipment, hydraulic or electrical powered impact tools would be used, and buffers would be established to reduce the effects of construction noise and vibration. A Construction Relations Officer would be designated to serve as a liaison with adjacent residences, who would be responsible for responding to any concerns regarding construction noise and vibration. Once operational, the Project would be similar to adjacent land uses for noise levels and would not generate substantial noise or vibration levels that would affect adjacent residential uses. Therefore, the Project would be consistent with this objective.
Public Safety Element	
Policy 9: Require all new development and selected existing development to comply with established fire and geologic safety standards.	**Consistent.** The Project would comply with applicable fire protection design standards provided in the Culver City Building Code and the California Building Code. The building would be sprinkled. In addition, the Project would be designed and constructed in accordance with California Building Code to resist the effects of seismic ground motions. Therefore, the Project would be consistent with this policy.

SOURCE: City of Culver City, Land Use Element, 2000; Circulation Element; 1996; Open Space Element; 1996; Noise Element; 1996; Public Safety Element, 1975; ESA, 2024.

In addition to the General Plan, the Design for Development for East Washington Boulevard has several design standards that are relevant to the Project. **Table 3,** *Consistency with Design for Development for East Washington Boulevard*, provides an analysis of the Project's consistency with applicable standards.

TABLE 3
CONSISTENCY WITH DESIGN FOR DEVELOPMENT FOR EAST WASHINGTON BOULEVARD

Design Standards	Consistency Analysis
D. Infill Design Standards	
1. Site Planning Standards	
a. Setbacks and "Build To" Lines	
Any new infill building located at a corner intersection should incorporate architectural features on the ground floor which emphasize the importance of pedestrian movement. These features may include building cut-offs, walk-though covered arcades, trellis structures, and other elements which focus visual interest on the corners.	**Consistent.** The Project Site is a corner property that is located along Washington Boulevard at the intersection with Ernest Avenue and also with Dauphin Avenue. The proposed three-story office building would incorporate articulation in the façade frontage and a variety of building materials to enhance the pedestrian experience along Washington Boulevard. Glazing at the street level façade would break up the building surface and provide visual interest and connection between the pedestrian and office environments. The screen walls would be recessed three feet to provide additional façade variation. The building would incorporate color variation at the ground floor through the use of burnished concrete block at the ground level. The pavement at the Washington Street entry would be decorative to define the main building entryway and create visual interest. In addition, public art visible from the sidewalk would be installed adjacent to the building entrance. The Project would include landscaped planters in the 3-foot setbacks in front of the screen walls at street level to soften the building façade. New landscaped parkways would be created along Washington Boulevard, Ernest Avenue, and Dauphin Avenue. Seven new street trees would be planted in the public rights-of-way to further enhance the pedestrian environment. As such, the Project would enhance the pedestrian environment and experience, particularly along Washington Boulevard, and therefore, would be consistent with this standard.
New buildings are encouraged to set back the corner of buildings at the intersections of create pedestrian places as well as improve visual sight lines for vehicles. The corner setback minimum dimension shall be 10 feet from the corner property lines. This design feature shall be coordinated with applicable setback standards and pedestrian amenity requirements specified in the applicable Zone and Overlay.	**Consistent.** As shown in Figure 3, the building corners at the intersections of Washington Boulevard with Ernest Avenue and Dauphin Avenue would be setback from the corner property lines. The corner at Washington Boulevard with Ernest Avenue would be setback approximately five feet and would provide adequate sight lines for drivers. This corner would be landscaped and could be used by pedestrians as a gathering place. In addition, the Project would include landscaped courtyards at the corners of the ground floor along the Washington Boulevard frontage, which would be visible to pedestrians. Improvements would also include additional landscaping and seven new street trees in the right-of-way to further enhance the pedestrian environment. Therefore, the Project would be consistent with this standard.
b. Street Orientation	
Angled frontages, inconsistent setbacks and blank walls at the street level are discouraged.	**Consistent.** The building would be located at the property line along Washington Boulevard and would be setback 5 feet from the property lines along Ernest Avenue and Dauphin Avenue. The building would not be angled along the frontages and setbacks would be consistent. The Project would include various design details at the street level, including glazing to break up blank surfaces and provide connection between the pedestrian and office environments and articulation through recessed screen walls. Therefore, the Project would be consistent with this standard.
Major pedestrian access for all buildings shall be orientated to Washington Boulevard or the side street upon which it is located. Secondary rear pedestrian entries are encouraged.	**Consistent.** The entrance to the proposed office building would be located on Washington Boulevard, where the main building entryway would be defined using pavement differentiated from the adjacent sidewalks. In addition, public art would be located adjacent to the primary pedestrian access. Therefore, the Project would be consistent with this standard.
c. Parking Orientation	
Vehicular entry points to parking lots shall receive special paving accents where the driver crosses the public sidewalk.	**Consistent.** The Project would include a new driveway on Dauphin Avenue to access the subterranean parking garage and would include paving and painted features where the driveway crosses the pedestrian sidewalk in accordance with Section 17.320 (Off-Street Parking and Loading). The differentiation of paving and inclusion of painted features would clearly identify the entrance to the subterranean parking garage for drivers while also altering drivers of a pedestrian crossing. Therefore, the Project would be consistent with this standard.

Design Standards	Consistency Analysis
The number of driveways on all street frontages shall be kept to a minimum	**Consistent.** The Project would remove the two existing driveways along Washington Boulevard and would construct a new driveway on Dauphin Avenue, thereby minimizing the number of driveways. Therefore, the Project would be consistent with this standard.
2. Building Architecture	
a. Façade Proportion	
Whenever an infill building is proposed which is much "wider" than the existing characteristic facades on the street, the infill façade should be broken down into a series of appropriately proportioned "structural bays".	**Consistent.** The Site is located in an area that consists primarily of one- to two- story commercial, residential, and industrial buildings. Generally, surrounding existing buildings tend to lack architectural variation and articulation along the Washington Boulevard frontage. While the Project Site would be wider than other properties in the area, the mass of the building would be broken up through the design. The building would be divided into two smaller buildings connected through a central atrium with landscaping and open space areas. The street wall of the building would be articulated through the division of the ground floor into 15 feet bays. The bays would be created through the use of glazing and recessed screen walls, which would create visual interest along the building's frontage. The screen walls would be visually permeable to create connection with the pedestrian environment. The screen walls would also be recessed three feet from the street façade to provide additional façade variation, which would reduce the building's bulk and create a pedestrian-scale building frontage. In addition, while the building scale and mass would be larger than existing buildings in the surrounding area, the Project would incorporate the design features discussed above to create a visually interesting and pedestrian-scaled development, which would be aligned with the development standards and future development the City envisions for this area. Therefore, the Project would be consistent with this standard.
A good infill building should not appear to be much higher or lower than the height of surrounding structures. New development height should "transition" from the height of adjacent development to the maximum height of the proposed building.	**Consistent.** The Project would result in a three-story, approximately 41 ft office building along Washington Boulevard. The Site, which is bounded by streets and an alley, is located in an area that consists primarily of one- to two- story commercial, residential, and industrial buildings. While the proposed office building would be taller than the surrounding buildings, the Project would be less than the allowable 75 ft height limit for the Project Site. In addition, the building height would be compatible with the types of development the City envisions for this area in the future. Therefore, the Project would be consistent with this standard.
b. Proportion of Openings	
There should be a much greater transparent or glazed open area at the storefront level (than upper levels). For non-retail facades, features that obscure visibility but maintain pedestrian oriented glazing may be considered.	**Consistent.** As discussed previously, the Project would include glazing at the street level. Approximately 18 percent of the ground level would consist of glazing to create transparency between the pedestrian and office environments. In addition, recessed screen walls along the ground level would obscure visibility where appropriate and would provide additional façade variation. Therefore, the Project is consistent with this standard.
e. Wall Articulation	
Divide long unarticulated street wall facades into horizontal bays 35-feet in width.	**Consistent.** The street wall of the proposed office building would be articulated through the division of the ground floor into 15 feet bays. The bays would be created through the use of glazing and recessed screen walls. Therefore, the Project would be consistent with this standard.
Monolithic street wall facades shall be broken by vertical and horizontal articulation, offsets in the surfaces of the wall, the location of window and door opening, and location of appropriate balconies, awnings, and canopies	**Consistent.** The ground floor of the proposed office building would be broken up through the use of a combination of windows, recessed screen walls, and the main building entryway to create a visual interesting and pedestrian-scaled frontage. This combination of architectural and design features would create a varied building frontage that breaks up blank spaces. The upper levels would be stepped back from the ground floor and would utilize a different color scheme to further enhance the building's design. The Project would include approximately 62 percent articulation above the ground floor. The proposed office building would also incorporate a variety of building materials, including brick, concrete, steel, glazing, metal, and wood. Therefore, the Project would be consistent with this standard.
The scale of building elements on the lower façade shall relate to the pedestrian scale, including use of the small-scaled materials such as tile or glass block, integration of canopies and awnings, etc.	**Consistent.** As discussed above, **t**he ground floor of the proposed office building would relate to the pedestrian scale along Washington Boulevard through the use of features such as windows, building articulation, recessed screens, and stepped back the upper levels of the building. In addition, the pedestrian scale would be enhanced through the provision of landscaping along the building at street level. The Project would also install a landscaped parkway along Washington Boulevard with new street trees in the public right-of-way. Therefore, the Project would be consistent with this standard.

Design Standards	Consistency Analysis
f. Roofs	
Roof shall be designed to screen rooftop equipment.	**Consistent.** The Project would screen mechanical equipment that would be installed on the rooftop in accordance with CCMC Section 17.300.035. Therefore, the Project would be consistent with this standard.
h. Mechanical Equipment Screening	
Screening shall be accomplished by primary building elements, instead of after-the fact add-on screening, where possible.	**Consistent.** The Project would locate mechanical equipment in various mechanical/operational rooms throughout the building. The Project would screen mechanical equipment that would be installed on the rooftop in accordance with CCMC Section 17.300.035. The screening would extend to a height of approximately 52 feet. Relocation of the existing AT&T cell tower to the roof would comply with the siting and installation requirements in CCMC Section 17.400.110. The new transformer would be located in an enclosed, fenced area and would be screened from view from Washington Boulevard by the proposed office building. Therefore, the Project would be consistent with this standard.
E. Storefront Design	
2. Storefront Proportions	
For commercial retail storefronts, a minimum of 50% of the strong façade shall be glass area.	**Not Applicable.** The Project does not include any commercial or retail uses on the Project Site. Therefore, this standard is not applicable to the Project.
For office buildings, the storefront walls shall be treated to effectively break up flat, single-face appearance through varying building materials, building planes, articulation of walls, windows, projections, and other City-approved building elements.	**Consistent.** As discussed above, the street wall of the building would be articulated through the division of the ground floor into 15 feet bays, which would break up the building surface and provide visual interest and connection between the pedestrian and office environments. The screen walls would be recessed three feet and landscaped planters would be located in front of the screen walls to provide additional façade variation. In addition, the Project includes approximately 62 percent articulation above the ground floor. The upper levels would be stepped back from the ground floor. A variety of building materials and color would enhance the building and the pedestrian experience. Therefore, the Project would be consistent with this standard.
5. Door and Windows	
Where offices occur in storefronts along Washington Boulevard, blinds, café curtains, or other City-approved design feature may be used for privacy; storefront windows must not be eliminated.	**Consistent.** The ground floor consists of approximately 18 percent glazing to create transparency between the pedestrian and office environments. Typical office screening features, such as blinds, may be used during work hours. Therefore, the Project would be consistent with this standard.
Building shall be sited to minimize shade, light, and/or glare, and related impacts on nearby residential properties	**Consistent.** The Project would incorporate a variety of building materials, including brick, concrete, steel, glazing, metal, and wood, which is typical in urban structures. For the exterior glazing, the Project would use non-reflective glazing to minimize glare effects to pedestrians and passing vehicles. In addition, the Project would include screening along the frontage of the building to minimize glare and lighting effects. The building height would be approximately 41 feet, which would be less than the allowable 75 ft height limit for the Project Site. Typically, significant shading impacts are associated with mid- to high-rise structures, which are generally 5 to 12 stories and at least 13 stories, respectively. Since the Project would be considered a low-rise building as it is under 4 stories, the Project is not anticipated to result in substantial shade effects on nearby residential uses. Therefore, the Project would be consistent with this standard.
G. Façade Renovation Concepts	
Building façade should be visually permeable and treated with glazing; avoid solid/closed facades along the street.	**Consistent.** As discussed above, the street wall of the building would have windows that would provide visual interest and connection between the pedestrian and office environments. In addition, the screen walls would be visually permeable to further enhance the connection with the pedestrian environment. The screen walls would also be recessed three feet from the street façade to provide additional façade variation, which would reduce the building's bulk and create a pedestrian-scale building frontage. The main entryway along Washington Boulevard would include another open view into the building. Therefore, the Project would be consistent with this standard

* This design feature shall be coordinated with applicable setback standards and pedestrian amenity requirements specified in the applicable Zone and Overlay.

Source: Culver City, 2024; ESA, 2024.

As shown in Table 3, the Project would be consistent with the design standards included in the Design for Development for East Washington Boulevard.

In summary, the Project would be consistent with the land use designation and zoning for the Project Site. In addition, based on the analysis provided above, the Project would be consistent with relevant objectives and policies of the General Plan, and the Design for Development for East Washington Boulevard. Therefore, the Project would meet this criterion.

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

The Project Site is located within the City limits on an approximately 0.51-acre site. The Project Site is located within a developed urban neighborhood and is surrounded by urban uses as shown in Figure 2. Therefore, the Project would meet this criterion.

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

The Project Site is located within a highly developed urban area, which lacks habitat that would be suitable for sensitive animal or plant species. The Project Site is currently developed with three one-story buildings, totaling approximately 10,516 sf, on the eastern and western portions of the site with a surface parking lot in the central portion of the site and minimal landscaping. The existing landscaping and vegetation do not provide habitat for sensitive species due to the small size, lack of native vegetation, and highly urban context. Thus, the Project Site does not have habitat suitable for sensitive animal or plant species. Therefore, the Project would meet this criterion.

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

Traffic

The following analysis of potential traffic impacts is based on the Transportation Study for 5835 Washington Boulevard prepared by Gibson Transportation Consulting, Inc., which is provided in **Attachment A** of this memorandum. The Transportation Study evaluates the potential transportation impacts associated with development of the Project. The findings of the Transportation Study that apply to the transportation related questions included in Appendix G of the CEQA Guidelines, are summarized below.

Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycles, and pedestrian facilities?

The Project would remove the two existing driveways on Washington Boulevard and would construct a new driveway on Dauphin Avenue. The new driveway would be designed and constructed in accordance with the driveway requirements established in CCMC Section 17.320 (Off-Street Parking and Loading) and reviewed and approved by the City to ensure compatibility with existing roadway conditions. Since the Project would redevelop the Project Site, which is already integrated into the City's circulation system, implementation of the Project would

not substantially change the existing circulation system for vehicles, transit, bicyclists, or pedestrians and would improve Site access with the installation of the new driveway off Dauphin Avenue. In addition, the Project would provide short- and long-term bicycle parking, which would promote the use of alternative transportation, especially as the Project Site is located within a City-designated TPA. The Project would also provide landscaping within the public right-of-way to enhance the pedestrian environment along the frontage of Washington Boulevard.

As summarized from the Transportation Study (refer to Attachment A), the Project would be consistent with applicable programs, plans, ordinances, and/or policies including the Circulation and Land Use Elements of the Culver City General Plan, the Traffic Code: Motor Vehicle Air Quality Management, Bicycle and Pedestrian Action Plan, Complete Streets Policy, and the Local Road Safety Plan. The Project is consistent with the Circulation Element for public right-of-way classification standards and dedications; policy alignment with Project-initiated changes; and network access. In addition, the Project is consistent with the Short Range Transit Plan since the Project would provide bicycle parking and is located in close proximity to multiple transit routes, thereby encouraging the use of alternate transportation modes. The Project is consistent with the Bicycle and Pedestrian Action Plan through the provision of bicycle parking and walkable sidewalks and the Project would not interfere with the City's goals in the Complete Streets Policy. As such, the development of the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system. *Impacts would be less than significant.*

Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Based on the VMT Evaluation Tool results, the VMT screening determined that the Project is located within a City-designated TPA. Therefore, the Project meets the screening criteria and is not required to perform a VMT analysis. The Project, therefore, does not cause a significant impact relative to CEQA Guidelines Section 15064.3, Subsection (b). *No impacts would occur.*

Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

As discussed above, the Project would remove two driveways on Washington Boulevard, eliminating a potential conflict point between vehicles, pedestrians, and cyclists. A new driveway would be installed on Dauphin Avenue, which is a lower volume Local Street, at the Project Site's western boundary. The relocation and reduction in the number of driveways would minimize potential hazards to pedestrians and cyclists. Vehicular access/egress would be provided via a right-turn-only ingress and left-turn only egress driveway along Dauphin Avenue. The new driveway would be designed and constructed in accordance with requirements in CCMC Section 17.320 (Off-Street Parking and Loading) and reviewed and approved by the City to ensure compatibility with existing roadway conditions. Dauphin Avenue provides two travel lanes, one in each direction, and metered street parking on both sides of the street. Pedestrian access to the Project Site would be provided via the main building entryway on Washington Boulevard as well as entrances along Dauphin Avenue and the alleyway. Sidewalks would be provided on all three street frontages adjacent to the Project Site. All Project-related loading activity would occur within the on-site commercial loading zone, which would be accessed via the alleyway north of the Project site.

The Bicycle and Pedestrian Action Plan proposes improvements along Washington Boulevard for the installation of future bicycle facilities. The Project would be consistent with the City's Bicycle and Pedestrian Action Plan since the Project's driveway is located on Dauphin Avenue, which is not a major roadway through the City, and would also include bicycle facilities to promote the use of alternative transportation. In addition, under the Project, no unusual or new obstacles would be included in the Project design that would be considered hazardous to motorized

vehicles or pedestrians or cyclists along Washington Boulevard. Therefore, the Project would not substantially increase hazards due to a geometric design feature or incompatible uses. *Impacts would be less than significant.*

Result in inadequate emergency access?

A majority of construction activities for the Project would be confined on-site, although construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. However, a Construction Management Plan would be prepared in accordance with City requirements, including haul routes, a staging plan, street closure information, and a detour plan, for City review and approval. The Construction Management Plan would ensure that adequate emergency access is maintained during construction. With regard to operation, internal and external circulation configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons and employees. The Project would remove two existing driveways on Washington Boulevard, eliminating a potential conflict point between vehicles, pedestrians, and cyclists, which is consistent with the Bicycle and Pedestrian Action Plan. In accordance with City requirements, Project Site access and circulation plans would be reviewed and approved by the Culver City Fire Department (CCFD), to ensure that adequate emergency access would be provided. Therefore, the Project would not result in inadequate emergency access. *Impacts would be less than significant.*

Conclusion: Based on the Transportation Study, the Project would not result in a significant transportation impact pursuant to CEQA. For additional details, refer to the Transportation Study provided in Attachment A of this memorandum.

Noise

The following discussion of potential noise impacts is based on the Noise and Vibration Technical Report prepared by ESA for the Project and included as **Attachment B** of this memorandum. The Noise and Vibration Technical Report evaluates the potential noise and vibration impacts associated with construction activities, surface transportation, and other aspects of Project construction and operations that have the potential to impact noise sensitive land uses.[10] The findings of the Noise and Vibration Technical Report that apply to the noise related questions included in Appendix G of the CEQA Guidelines are summarized below:

Would the Project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

As analyzed in the Noise and Vibration Technical Report, construction of the Project has the potential to generate an increase in temporary or periodic noise through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. Construction activities would occur during the City's allowable construction hours of between 8:00 A.M. and 8:00 P.M. Mondays through Friday, 9:00 A.M. and 7:00 P.M. Saturdays, and 10:00 A.M. and 7:00 P.M. Sundays, and would be temporary in nature. The Project would incorporate general industry standard best practices to minimize noise and vibration impacts resulting from heavy duty construction equipment (Project Design Feature 1 through 3). Project construction activities would not exceed applicable significance thresholds. The addition of haul truck trips to roadways during construction would be less than the current traffic volumes on access roads and result in less

[10] The analysis in the Noise and Vibration Technical Report is conservative since it analyzed a previous iteration of the Project with larger building square footages, which were refined through the design process.

than a 3 dBA barely perceptible noise level increase and would not increase noise levels by a "clearly noticeable" increase of 5 dBA over the ambient condition. Off-site haul truck trips would not substantially increase noise levels over the ambient condition. *Impacts would be less than significant.*

As analyzed in the Noise and Vibration Technical Report, the overall sound environment at the sensitive receptors surrounding the Project Site would include contributions from each individual noise source associated with maximum daily operation of the Project. Principal noise sources associated with the Project would include open space, including terraces and the rooftop, and traffic noise along the alleyway between Dauphin Avenue and Ernest Avenue to access the loading dock and refuse collection areas. Based on the analysis (Table 13 in Attachment B), composite on-site operational noise levels from the Project would not increase noise levels over the threshold. Additionally, Project compliance with the City's noise standards as well as Project-related operational noise levels being below the prevailing ambient noise-based thresholds (ambient noise level + 5 dBA) at off-site sensitive receptors would ensure that operational noise impacts are less than significant. The Project's noise impacts on existing offsite development from onsite operational stationary noise sources and traffic would not exceed established thresholds of significance. Development of the Project would not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards. *Impacts would be less than significant.*

Generation of excessive groundborne vibration or groundborne noise levels?

As analyzed in the Noise and Vibration Technical Report, construction of the Project would generate groundborne construction vibration during construction activities. The Project would incorporate general industry standard best practices to minimize vibration impacts resulting from heavy duty construction equipment. Vibration velocities from operation of construction equipment would range from approximately 0.002 to 0.103 inches per second (in/sec) PPV at a receptor distance of 35 feet from the source of activity. Off-site sensitive receptors or buildings would be exposed to vibration levels below the threshold of 0.5 in/sec PPV from onsite construction activity. *Impacts would be less than significant.*

As analyzed in the Noise and Vibration Technical Report, Project operation would include typical commercial-grade stationary mechanical and electrical equipment that would produce vibration. The primary sources of transient vibration would include passenger vehicle circulation within the parking area. Groundborne vibration generated by each of the operational activities would generate approximately up to 0.005 inches per second PPV adjacent to the Project Site. Vibration impacts associated with operation of the Project would be below the significance threshold. *Impacts would be less than significant.*

For a project located within the vicinity of a private airstrip or 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?

The Project Site is not located within an airport land use plan or within two miles of an airport. The nearest airports are the Santa Monica Municipal Airport, located approximately 5.6 miles west of the Project Site, and Los Angeles International Airport, located approximately 7.5 miles south of the Project Site. Therefore, the Project would not expose people in the Project vicinity to excessive noise levels from airport use. *No impacts would occur.*

Conclusion: Based on the Noise and Vibration Technical Report, the Project would not result in a significant noise impact pursuant to CEQA. For additional details, refer to the Noise and Vibration Technical Report provided in Attachment B of this memorandum.

Air Quality

The following review of potential air quality impacts is based on the Air Quality Technical Report prepared by ESA for the Project and included as **Attachment C** of this memorandum. The Air Quality Technical Report evaluates the potential air quality impacts associated with construction activities, mobile sources, building energy demand, and other aspects of Project construction and operations that have the potential to generate criteria air pollutant emissions.[11] The findings of the Air Quality Technical Report that apply to the air quality related questions included Appendix G of the CEQA Guidelines are summarized below.

Conflict with or obstruct implementation of the applicable air quality plan?

In response to Criterion 1, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for ozone. In addition, in response to Criterion 2, the Project would incorporate appropriate control strategies set forth in the 2022 AQMP for achieving emission reduction goals and would be consistent with the demographic and economic assumptions upon which the plan is based. Furthermore, the Project would be consistent with and not conflict with the City's General Plan. Based on the analysis provided in Attachment C of this memorandum, the Project would not conflict with or obstruct implementation of applicable air quality plans. *Impacts would be less than significant.*

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?

Construction of the Project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from grading and construction activities. However, construction criteria pollutant emissions would be reduced through compliance with SCAQMD Rule 403 requirements (Control of Fugitive Dust), such as watering twice daily, and with SCAQMD Rule 1113 requirements (Architectural Coatings) for fugitive VOC. As analyzed further in Attachment C of this memorandum, construction-related daily emissions would not exceed the SCAQMD numeric indicators of significance and emissions levels would be below the applicable numeric indicators. As it relates to operational emission, and as discussed in Attachment C of this memorandum, operational criteria pollutant emissions were calculated for mobile and area, and stationary sources for the Project operational year. Operations would adhere to the applicable codes including 2022 Title 24 Green Building Code. Operational emission estimates include compliance with SCAQMD Rule 1113 (Architectural Coatings), which limits the VOC content of architectural coatings used during operation. The Project's operational-related daily emissions would not exceed the SCAQMD numeric indicators for any criteria pollutants. Based on the above, development of the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment. *Impacts would be less than significant.*

Expose sensitive receptors to substantial pollutant concentrations?

Localized construction emissions would not exceed the SCAQMD localized significance thresholds. The Project would comply with regulatory control measures including the California Air Resources Board (CARB) Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and would exceed the CARB In-Use Off-Road Diesel Vehicle Regulation that requires fleets to retire, replace, or

[11] The analysis in the Air Quality Technical Report is conservative since it analyzed a previous iteration of the Project with larger building square footages, which were refined through the design process.

repower of older, dirtier engines with newer emission-controlled models; compliance with these would minimize emissions of TACs during construction. During operation, localized operational emissions would also not exceed the SCAQMD localized significance thresholds. As discussed in Attachment C of this memorandum, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed office uses within the Project Site. Based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal, regulated, and controlled, and would not be expected to exceed the SCAQMD numerical indicator of significance. Therefore, development of the Project would not expose sensitive receptors to substantial pollution concentrations. *Impacts would be less than significant.*

Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

During construction, through mandatory compliance with SCAQMD Rules, no construction activities or materials are expected to create objectionable odors affecting a substantial number of people. In addition, as it relates to operation, the Project does not include any uses identified by the SCAQMD as being associated with substantial odors. As a result, the Project is not expected to discharge contaminants into the air in quantities that would cause a nuisance, injury, or annoyance to the public or property pursuant to SCAQMD Rule 402. As such, development of the Project would not result in other emissions adversely affecting a substantial number of people. *Impacts would be less than significant.*

Conclusion: Based on the Air Quality Technical Report, the Project would not result in a significant air quality impact. For additional details, refer to the Air Quality Technical Report provided in Attachment C of this memorandum.

Water Quality

The following discussion of potential water quality impacts is based on the Hydrology Memorandum prepared by Sherwood Design Engineers, provided in **Attachment D** of this memorandum. The Hydrology Memorandum evaluates the existing and post-Project drainage and water quality conditions of the Site.

Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Point-source pollutants are discharged from vehicles, pipes, or drains. The Project consists of the demolition of the existing buildings and the associated surface parking lot and the construction of a three-story building with a subterranean parking garage. The Project does not propose any uses that would generate point source pollutants. Non-point-source pollutants (NPS), which cannot be traced to a specific original source, are caused by rainfall or snowmelt moving over and through surface areas. As the runoff moves, it picks up and carries away natural and human-made pollutants, depositing them into lakes, rivers, wetlands, coastal waters, and even underground sources of drinking water. These pollutants can include herbicides/pesticides from landscaping and residential areas; oil, grease, and toxic chemicals from urban runoff and energy production; sediment from improperly managed construction sites, and eroding stream banks; pet wastes, and faulty septic systems; and atmospheric deposition and hydro modification.

The Project would be subject to all existing regulations associated with the protection of water quality. Construction activities would be carried out in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit issued by the Los Angeles Regional Water

Quality Control Board (LARWQCB), as applicable. Pursuant to CCMC Section 5.05.035 (Requirements for Industrial/Commercial and Construction Activities), the Project would submit a local SUSMP, and Wet Weather Erosion Control Plan for construction activities consistent with the NPDES General Construction Permit to the City of Culver City Public Works Department. Therefore, development of the Project would not result in any significant effects relating to water quality due to construction activities.

Based on the Geotechnical Investigation by Feffer Geological Consulting, provided in **Attachment E** of this memorandum, groundwater was encountered at depths of 26 and 26.5 feet below ground surface (bgs). The highest historical groundwater level is mapped as being 10 feet bgs. The Project is required to mitigate the runoff from the 85th percentile storm and comply with the stormwater management regulations and the County's Low Impact Development (LID) Guidelines. Since infiltration was found to be not feasible at the Site, the Project would incorporate a rainwater harvesting and reuse system via cistern capture that would capture 100 percent of the 85th percentile storm event volume. Runoff conveyed via roof downspouts and on grade drains would be directed through an in-line pretreatment filter before entering the cistern. Capture rainwater would be reused as irrigation.

As an urban office development, operation of the Project would add typical, urban, nonpoint-source pollutants to storm water runoff during operation. These pollutants are permitted by the countywide municipal separate storm sewer system (MS4) permit and would not exceed any receiving water limitations. Runoff would be collected and directed through a pretreatment filter and used for irrigation. Construction and operation of the Project would not violate any water quality standards or waste discharge requirements and would have no related significant impacts. *Impacts would be less than significant.*

Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

As required by Section 303(d) of the Clean Water Act, the State and the Regional Water Boards assess water quality data for California's waters every two years to determine if they contain pollutants at levels that exceed protective water quality criteria and standards.[12] The LARWQCB prepared a list of impaired waterbodies in the region as part of the 2020-2022 assessment cycle. This list is referred to as the 303(d) list. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). The Project Site is approximately 450 feet east of Ballona Creek, which is listed on the CWA 303(d) list as impaired due to the prevalence of Copper, Trash, Cyanide (Toxic Organics), Zinc, Lead, Viruses (enteric), Toxicity, and Indicator Bacteria.

In terms of polluted runoff, the Project's proposed office use would not introduce substantial sources of polluted water that a use such as an industrial use would generate. As described above and in the Hydrology Memorandum, the Project is required to comply with County and City LID requirements, which require implementation of a stormwater treatment system that captures the 85th percentile runoff volume for treatment. In compliance with this requirement, the Project would incorporate a rainwater harvesting and reuse system via cistern capture. Runoff conveyed via roof downspouts and on grade drains would be directed through an in-line pretreatment filter before entering the cistern. Capture rainwater would be used for irrigation. Since the Project Site is currently almost entirely developed with impervious surfaces, the Project Site is not a source of groundwater recharge. Implementation of LID-compliant infiltration gallery BMP system would ensure that stormwater runoff quality during construction and operation is not substantially polluted with contaminates

[12] State Water Resources Control Board, Impaired Water Bodies, https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2020_2022_integrated_report.html. Accessed November 1, 2023.

including the pollutants of concern to Ballona Creek. The Project would not conflict with or obstruct any water quality control plans for Ballona Creek. No other water quality control plans or sustainable groundwater management plans would be affected by the development of the Project. *Impacts would be less than significant.*

Conclusion: Based on the Hydrology Memorandum, the Project would not result in a significant water quality impact. For additional details, refer to the Hydrology Memorandum provided in Attachment D of this memorandum.

Conclusion for Criterion (d)

As the Project would result in less than significant impacts with respect to traffic, noise, air quality, and water quality, the Project would meet this criterion.

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

The Project would be located on a developed urban site in an area that is served by existing public utilities and services, which are addressed below.

Utilities

Water

Water would be provided by Golden State Water Company and the Los Angeles Department of Water and Power (LADWP). As indicated in the Will Serve Letter from Golden Water Company, there are adequate water supplies to serve the Project. The following summarizes the information provided in the Water Civil Technical Memorandum prepared by Sherwood Design Engineers, which is provided as **Attachment F**. There are water lines ranging in size from 2- to 8-inches in Washington Boulevard that currently serve the Project Site. For domestic water, the Project would continue to use the existing water lines in Washington Boulevard as the existing infrastructure is adequate to serve the Project. A 6-inch fire hydrant with a gate valve is located on the sidewalk along Washington Boulevard, approximately 88 feet south of the Site. The Project would include the installation of a new lateral connection to the public water main southeast of Washington Boulevard for fire service. Within the Project Site, fire water service lines would be provided along with a 6-inch and 2-inch back flow device located outside of the building, approximately 30 feet from the centerline of Ernest Avenue.

Stormwater

Based on information provided in the Hydrology Memorandum prepared by Sherwood Design Engineers, which is provided as Attachment D to this memorandum, runoff from the Project Site primarily sheet flows over the impervious surfaces and into the gutters along Washington Boulevard which directs flow through an 18-inch line along Washington Boulevard, then into the Ballona Creek channel.

The Project would comply with County and City LID requirements, which require implementation of a stormwater treatment system that captures the 85th percentile runoff volume for treatment. In compliance with this requirement, the Project would implement a capture and reuse system that would capture 100 percent of the 85th percentile storm event volume. Since infiltration was found to be not feasible at the Site, the Project would incorporate a rainwater harvesting and reuse system via cistern capture. The cistern would be sized and designed in accordance with City stormwater LID Standards. Runoff conveyed via roof downspouts and on grade drains

would be directed through an in-line pretreatment filter before entering the cistern. Captured rainwater would be routed to at grade landscaped areas for irrigation. The Project would not include any underground storm drainpipes as Culver City does not allow direct tie-ins to the City's storm drain system. With the proposed improvements onsite, impacts regarding storm drains would be less than significant.

Sanitary Sewer

Sanitary sewer service to the Project Site from the surrounding streets is provided by the Culver City Public Works Department. Based on the Wastewater Civil Technical Memorandum prepared by Sherwood Design Engineers, provided in **Attachment G** of this memorandum, there is an existing 8-inch VCP sewer line flowing southeasterly along Washington Boulevard. There is one manhole near the southeast corner of the property at the corner of Ernest and Washington Boulevard. An additional manhole is located in the right-of-way in the southwestern corner of the Project Site at the intersection of Dauphine Avenue and Washington Boulevard. The 8-inch sanitary sewer line, located between the road centerline and the property line across the street on Washington Boulevard, feeds into the 63-inch concrete La Cienega Interceptor Sewer owned and operation by the City of Los Angeles. The Project would reuse existing sanitary sewer lines. As indicated in the Wastewater Civil Technical Memorandum, there is sufficient capacity within the system to serve the Project.

Electricity

The Project Site is located in a developed and urbanized area in the city that is served by existing electrical power. Electricity would be provided by Southern California Edison (SCE), which currently obtains 36 percent of its energy from renewable resources.[13] The Project would incorporate energy saving and sustainable design elements aimed at reducing energy consumption, as described in the Project Description above. Some of the Project's sustainable design elements to reduce energy consumption would include energy efficient LED light fixtures and lighting controls, a capture and reuse system, EV charging stations, bicycle parking, solar panels, and high efficiency HVAC units.

Regarding existing electrical distribution lines, the Applicant would be required to coordinate electrical infrastructure removals or relocations with SCE and comply with site-specific requirements set forth by SCE, which would ensure that service disruptions and potential impacts associated with grading, construction, and development within SCE easements would be minimized. Therefore, impacts would be less than significant.

Natural Gas

Southern California Gas (SoCalGas) would be the natural gas supplier for the Project Site. However, the Project would not use natural gas and therefore, no impact would occur.

Telecommunications

The Project Site is located in a developed and urbanized area in the city that is served by existing telecommunication services. The Project may require the installation of new underground telecommunication lines (for internet, telephone, and other services) to serve the office uses. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. As telecommunication providers already deliver their services to a large

[13] Southern California Edison, 2018 Power Content Label, July 2019.

number of properties in the Project vicinity, it is anticipated that existing telecommunications facilities would be sufficient to support the Project's needs for telecommunication services. Therefore, no impacts would occur.

Solid Waste

Solid waste collection services are provided to the Project Site by haulers contracted by the City of Culver City and by the City of Culver City's Public Works Environmental Programs and Operations (EPO) Division. All commercial properties are required to have garbage, recycling, and organics service, which is provided by the EPO Division. Both recyclables and organics are hauled to private processing facilities to recycle or compost material. Culver City operates a transfer station. However, the City does not own or operate any landfill, recycling, or composting facilities.

Construction of the Project would generate demolition debris from the removal of existing buildings and surface lot that would be diverted to a construction and demolition debris facility. CCMC Section 15.02.1140 requires a minimum of 75 percent of non-hazardous construction and demolition waste to be recycled or salvaged. Accordingly, the Applicant would submit a construction and demolition recycling and waste assessment plan prior to issuance of the permit and would not cause any significant impacts related to solid waste during construction.

Operation of the office uses would generate solid waste at the Project Site. Waste would be regulated by state and local waste diversion policies (CCMC Chapter 5.07). Recycling would be provided on Site in accordance with City requirements. While the change in use would increase the number of employees on the Site, with diversion of waste there is sufficient capacity to serve the Project. Therefore, the Project would not cause any significant impacts from conflicting with statutes or regulations related to solid waste during operation, and the Project meets this criterion.

Public Services

Fire Protection

Fire protection and emergency medical services for the Project Site are provided by the Culver City Fire Department (CCFD). The CCFD is supported, when needed, through mutual aid agreements with the fire departments in the City of Los Angeles and Los Angeles County, with further assistance from the cities of Beverly Hills, Santa Monica, and West Hollywood. The Project Site is located within Fire District 1,[14] Rescue/EMS District 1, and Fire Management Zone 8. The closest fire station to the Project Site is Fire Station 1 (headquarters), located at 9600 Culver Boulevard, approximately 1.4 miles west of the Project Site.

As indicated above in the discussion regarding water, the Project would include the installation of a new lateral connection to the public water main southeast of Washington Boulevard for fire service. Additionally, the Project would provide a 6-inch and 2-inch back flow device located outside of the building, approximately 30 feet from the centerline of Ernest Avenue. Existing fire hydrants along Washington Boulevard would be used. Based on flow tests by the CCFD, there is adequate flow pressure. In addition, sprinklers, and other fire safety features, such as fire alarm pull stations and fire extinguishers, would be installed in the building in accordance with the California Fire Code.

[14] City of Culver City, Fire Districts. Available at City of Culver City, Fire Districts. Available at https://www.culvercity.org/files/assets/public/v/1/documents/information-technology/maps/culver_city_fire_districts_map.pdf. Accessed November 1, 2023.

The Project would be constructed in accordance with the California Building Code, California Fire Code, and the CCMC. In addition, the City's standard conditions of approval require that the CCFD review the plans prior to issuance of permits to ensure adequate fire protection is provided. With compliance with applicable requirements, including the California Building Code, California Fire Code, and the CCMC, as well as CCFD review and approval of plans and the Project Site's proximity to Fire Station 1, the Project would be adequately served with fire protection services.

Police Protection

The Project Site is currently served by Culver City Police Department (CCPD). The Project Site is located in an urbanized area within the city and is already served by CCPD. The nearest CCPD station is located at 4040 Duquesne Avenue, approximately 1.8 miles southwest of the Project Site. Since the Project would introduce non-residential uses on the Site and is already within the CCPD service area, the Project would not increase demand on police protection services.

Conclusion for Criterion (e)

As the Project would result in less than significant impacts with respect to utilities and public services, the Project would adequately by served by all required utilities and public services.

Exceptions to Categorical Exemption

CEQA Guidelines Section 15300.2 lists six exceptions to a categorical exemption. These exceptions include the following conditions:

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

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

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

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

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

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

The analysis below demonstrates that the Project or its circumstances would not result in any exceptions identified in CEQA Guidelines Section 15300.2.

Criterion Section 15300.2(a): Location

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

This exception applies to CEQA exemptions under Classes 3, 4, 5, 6, and 11. This Project qualifies as a Class 32 (Infill Development) Categorical Exemption, and therefore this criterion section is not applicable to this exemption. In addition, the Project Site is located in a developed urban location, surrounded by existing urban uses, and constitutes infill development. The Project Site is not located in a particularly sensitive environment.

Criterion Section 15300.2(b): Cumulative Impact

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

As summarized from the Transportation Study prepared for the Project, cumulative projects within a 1.5-mile radius of the Project Site are identified in **Table 4,** *Related Projects List*. As shown in Table 4, there are five cumulative project within the 1.5-mile radius, three of which are located in the City of Los Angeles and two in Culver City. Of the five cumulative projects, three are residential projects, one is industrial and retail uses, and one is office and retail uses.

TABLE 4
RELATED PROJECTS LIST

Project Name and Address	Proposed Use
City of Los Angeles	
5775 W Adams Blvd	65 apartment unit; 2,500 sf retail
3200 S La Cienega Blvd	254 apartment units
5741 W Jefferson Blvd	307,968 sf mini-warehouse; 6,720 sf retail
City of Culver City	
5863 Washington Blvd	16,900 sf creative office; 638 sf retail
Helms Ave/Washington Blvd	236 apartment units; 22,000 sf retail; 5,000 sf restaurant; 30,000 sf office

Note: Related projects include developments within 1.5 miles from the Project Site. Culver City projects are based on project information provided by the Culver City Planning Department. City of Los Angeles projects are based on available information provided by LADOT.
SOURCE: Gibson Transportation Consulting, Inc., *Transportation Study for 5835 Washington Boulevard*, February 2024 (see Attachment A).

As noted previously, the Project Site is designated General Corridor based on the City's General Plan Land Use Element Map, zoned IG, and is within the EW Overlay. As described in the CCMC, Chapter 17.230, the IG zoning designation permits a wide variety of industrial, manufacturing, and processing uses; some recreation and education uses; retail uses; transportation uses; and service uses (including offices and storage facilities). The EW Overlay includes the Washington Boulevard frontage between National Boulevard and Fairfax Avenue and is intended to provide the special zoning regulations necessary for the successful implementation of the East Washington Boulevard Revitalization Program. The Project's proposed office use is consistent with the General Plan and zoning designations for the Project Site.

With regard to transportation, since the Project Site is located within a City-designated TPA, the Project has been screened out from requiring a VMT analysis and therefore, would not contribute to a cumulative VMT impact. The Project would be consistent with all applicable plans, programs, and policies related to transportation and circulation and would not create hazardous roadway conditions. Therefore, the Project would not result in cumulative transportation impacts, as described in the Transportation Study.

As it relates to noise, the maximum cumulative noise increase from the Project plus related Project traffic would be 4.6 dBA CNEL, which would occur along Dauphin Avenue north of Washington Boulevard and would not exceed the significance thresholds of an increase of 5 dBA CNEL in an area characterized by conditionally acceptable noise levels.

With regard to air quality, the Project would not result in significant cumulative air quality since the Project's incremental contribution to long-term emissions of non-attainment pollutants and ozone precursors, considered together with cumulative projects, would not be cumulatively considerable, as discussed in the Air Quality Technical Report.

As it relates to water quality impacts with regards to the Project and buildout of the related projects, the Project would improve water quality as it would introduce drainage features or water quality measures on a site that currently does not include these features. In addition, related projects would be subject to similar water quality requirements as the Project. As such, the Project would not result in a significant cumulative water quality impact.

With regard to utilities, the existing utility service systems would be adequate to serve the Project Site and therefore, would not require the expansion or construction of new utilities, which could have environmental impacts. Similar to the Project, other cumulative projects would be required to confirm existing utilities would be adequate to serve their sites as part of the planning process and would be required to pay the applicable development fees to mitigate impacts to utilities. Therefore, the Project would not contribute to cumulative impacts on utilities.

With regard to historic resources, cumulative impacts can occur if a project and other related projects in the adjacent area would together affect in an adverse manner the eligibility of a historical resource and/or resources. There are five related projects within 0.25-mile of the Project Site, three located south of the Project Site and two located west of the Project Site, with direct views of the site. As discussed in greater detail below, the Project would not have a direct impact on historical resources as the Project Site does not meet the definition of a historical resource as outlined in CEQA Guidelines Section 15064.5(a)(1) or (2). In addition, the Project would not result in an indirect impact on the nearby structure that qualifies as a historic resource as defined by CEQA as the Project would not block street views or affect the integrity of the resource. Therefore, the Project would not contribute to cumulative impacts on the nearby historical resource.

As described in the analysis above, the Project would not result in any significant impacts. As such, the Project, in conjunction with the related projects would not result in significant cumulative impacts. Any subsequent project in the Project vicinity would be required to undergo its own environmental analysis. As a result, there is no evidence of significant cumulative impacts from successive projects of the same type in the same place, over time. Therefore, the exception under CEQA Guidelines Section 15300.2(b) does not apply to this Project.

Criterion Section 15300.2(c): Significant Effect

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

There are no known unusual circumstances applicable to the Project or Project Site which could result in a significant effect on the environment. As described above, the Project would include demolition of the existing onsite buildings and surface parking lots and construction of a three-level office building. The Project would comply with all applicable requirements for construction, including geotechnical and structural engineering requirements contained in the California Building Code and City Building Code. The Project would not exceed the maximum allowable building height for the Project Site based on the requirements of the existing land use and zoning designations. The Project is infill development within an existing urban neighborhood, would provide office floor area with convenient access to nearby high-quality public transit options, and is surrounded by urban uses in all directions. As analyzed above, the Project is consistent with the General Plan and zoning of the Site and would be consistent with applicable General Plan objectives and policies. The Project is similar in size to other buildings in the area. Thus, there are no unusual circumstances that may lead to a significant effect on the environment. Therefore, the exception under CEQA Guidelines Section 15300.2(c) does not apply to this Project.

Criterion Section 15300.2(d): Scenic Highway

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

According to the Caltrans' California State Scenic Highway System Map database, there are no designated State- or County-designated scenic highways within the vicinity of the Project Site as the closest designated State scenic highway is State Route 27 (SR 27), located approximately eight miles to the northwest of the Project Site.[15] In addition, the City has not designated any scenic highways within its city limits and therefore, the Project Site is not located within a City-designated scenic highway. There are also no rock outcroppings, or similar visual resources on the Project Site within the vicinity of State-designated scenic highway, a State-designated County highway, or a City-designated scenic highway. Therefore, the exception under CEQA Guidelines Section 15300.2(d) does not apply to this Project. Refer to Criterion Section 15300.2(f): Historical Resources for further analysis on the Project's impacts on historical resources.

Criterion Section 15300.2(e): Hazardous Waste Sites

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

DTSC maintains the EnviroStor database, which identifies potentially hazardous sites where cleanup actions (such as a removal action) or extensive investigations are planned or have occurred. The database provides a listing of Federal Superfund sites [National Priorities List (NPL)]; State Response sites; Voluntary Cleanup sites; and School Cleanup sites. The Project Site is not classified as a hazardous waste or remediation site on the

[15] Caltrans. 2024. Caltran's California State Scenic Highways System Map. Available at: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed February 2024.

EnviroStor database that is compiled by the DTSC.[16] The Project Site is not identified as a cleanup site on the State Water Board's Geotracker Database, which provides a list of leaking underground storage tanks.[17] As such, no impacts with regard to listing as a hazardous materials site would occur. Therefore, the exception under CEQA Guidelines Section 15300.2(e) does not apply to this Project.

Criterion Section 15300.2(f): Historical Resources

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

To evaluate potential impacts to historical resources, a Historical Resources Assessment (HRA) was prepared by ESA, which is included as **Attachment H** to this memorandum.

The Project Site is currently developed with two buildings[18] and associated surface parking. As detailed in the HRA, the two buildings were constructed circa 1929. The 5835 Washington Boulevard building was constructed as a nightclub and restaurant in the Spanish Colonial Revival style and was later renovated and used as a plastics manufacturing factory, an industrial laundry service, and is presently used as commercial office space. The 5813 Washington Boulevard building was constructed as a restaurant in the Spanish Colonial Revival Style and was later renovated into a variety of cocktail bars and restaurant and later to commercial office space. The buildings on the Project Site lack both historical significance as well as architectural integrity and, therefore, are ineligible as historical resources. The buildings do not qualify as either an individual historical resource or as a district contributor as defined by Local, State, and Federal requirements. As such, the Project Site does not meet the definition of a historical resource as outlined in CEQA Guidelines Section 15064.5(a)(1) or (2), and the Project would not have a direct impact on historical resources.

In addition, indirect impacts were analyzed to determine if the Project would result in a substantial material change to the integrity of any historical resources within 0.25 miles of the Project Site. There are three buildings listed as a Culver City "Landmark" structure within 0.25 miles and, therefore, qualify as historical resources as defined by CEQA: 5788-90 Washington Boulevard, located 310 feet northeast of the Project Site; 5812 Washington Boulevard, located 184 feet northeast of the Project Site; and 5879 Washington Boulevard, located 500 feet southwest of the Project Site. The impacts analysis concluded that these resources would remain unchanged and in their original locations after implementation of the Project. Additionally, the Project would not block important street views of the resources, and would not affect the integrity of location, design, materials, or workmanship of the aforementioned resources. As a result, the Project would not affect the resources' integrity of setting. After construction of the Project, the aforementioned historical resources would remain intact and continue to convey their historic significance and would retain their eligibility as Culver City Landmark structures. Therefore, the Project would not result in significant impacts to these buildings.

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16 California Department of Toxic Resources (DTSC), 2024. EnviroStor: 5835 Washington Boulevard, Culver City. Available at: https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=culver+city. [DTSC website: EnviroStor Database (ca.gov)]. Accessed November 1, 2023.

17 State Water Resources Control Board (SWRCB). 2024. Geotracker Mapping Database. Available at: https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=5838+Washington+Boulevard%2C+culver+city. Accessed February 2024.

18 While the ALTA survey identifies three buildings on Site, the Historic Resources Assessment considers the 5835 Washington Boulevard building, which consists of the 2,801sf building and the 610 sf caretaker quarters on the eastern portion of the Site, as one building.

The Noise and Vibration Technical Report (Attachment B) evaluates potential for vibration to cause structural damage to historic buildings. All of the aforementioned buildings are located far enough away from the Project Site that impacts related to construction vibration would be less than significant and onsite project construction would not result in any building damage to the nearby historic resources.

With regard to archaeological resources, an Archaeological Assessment Report was prepared by ESA and is included as **Attachment I** of this memorandum. The Archaeological Assessment Report consists of the results of archaeological resources record searches conducted through the South-Central Coastal Information Center (SCCIC) and the Native American Heritage Commission (NAHC) for the Project Site. The records search results indicate that five cultural resources studies have been conducted within a 0.50-mile radius of the Project Site. None of the previous cultural resources studies overlap with the Project Site. The record search also revealed that five cultural resources were previously recorded within the 0.50-mile radius of the Project Site. These five resources include one (1) prehistoric archaeological site, and four (4) historic-era built-in environment resources. None of the resources are located within the Project Site. The Sacred Lands File (SLF) records search results through the NAHC were negative.

Per a review of historical topographic maps, aerials, and the HRA, the previous uses within the Project Site were agricultural. The aerial photograph from 1928 shows the initial preparation for the improvements on the lot. The building was constructed in around 1938, and the first evidence of construction appears on the site, with two buildings appearing in the same locations as the present buildings. Previous research indicates that grading of the tract was conducted, but this was likely minimal as the area was agricultural and plotted before the development. There is between 5 to 10-feet of artificial fill layer in the area, probably due to plowing activities and subsequent grading. Fill likely overlies the Quaternary Alluvium (QA), extending approximately up to 35 feet below the surface. The Project Site has a low to moderate potential to encounter subsurface historic-period and prehistoric archaeological resources in soils more than 5-feet in depth at the Project Site. In the unlikely event such resources are encountered during construction, the City's standard conditions of approval, which apply to any excavation that occurs up to 10-feet in depth, would ensure that potential impacts to buried archaeological resources are avoided. Compliance with the City's conditions of approval would ensure that potential impacts to buried archaeological resources and human remains are avoided. Therefore, with implementation of the City's standard conditions of approval, the Project would result in less than significant impacts to buried archaeological resources and human remains.

Summary/Conclusions

A project qualifies for a Class 32 (Infill Development) Categorical Exemption if it is developed on an infill site and meets the five (5) conditions described in this report. Based on the technical analyses above, and consistent with the attached technical reports, the 5835 Washington Boulevard Project meets the criteria for a Class 32 (Infill Development) Categorical Exemption. Furthermore, none of the exceptions to a Class 32 (Infill Development) Categorical Exemption listed in the CEQA Guidelines Section 15300.2 apply to the Project, as supported by the technical analyses provided above. Therefore, based on the analyses and findings presented in this technical memorandum and in the attached technical reports, the Project qualifies for a Class 32 (Infill Development) Categorical Exemption, and can be found exempt from further review under CEQA.

Attachments

Attachment A – Transportation Study
Attachment B – Noise and Vibration Technical Report
Attachment C – Air Quality Technical Report
Attachment D – Hydrology Memorandum
Attachment E – Geotechnical Investigation Report
Attachment F – Water Civil Technical Memorandum and Golden State Water Company Will Serve Letter
Attachment G – Wastewater Civil Technical Memorandum
Attachment H – Historic Resources Assessment
Attachment I – Archeological Resources Assessment