ESA

626 Wilshire Boulevard
Suite 1100
Los Angeles, CA 90017
213.599.4300 phone
213.599.4301 fax

www.esassoc.com

technical memorandum

date	February 1, 2024 [Revised March 20, 2024]
to	City of Culver City
from	Luci Hise-Fisher, AICP Janelle Firoozi
subject	Class 32 Categorical Exemption for the 5880 Adams Boulevard Project

Introduction

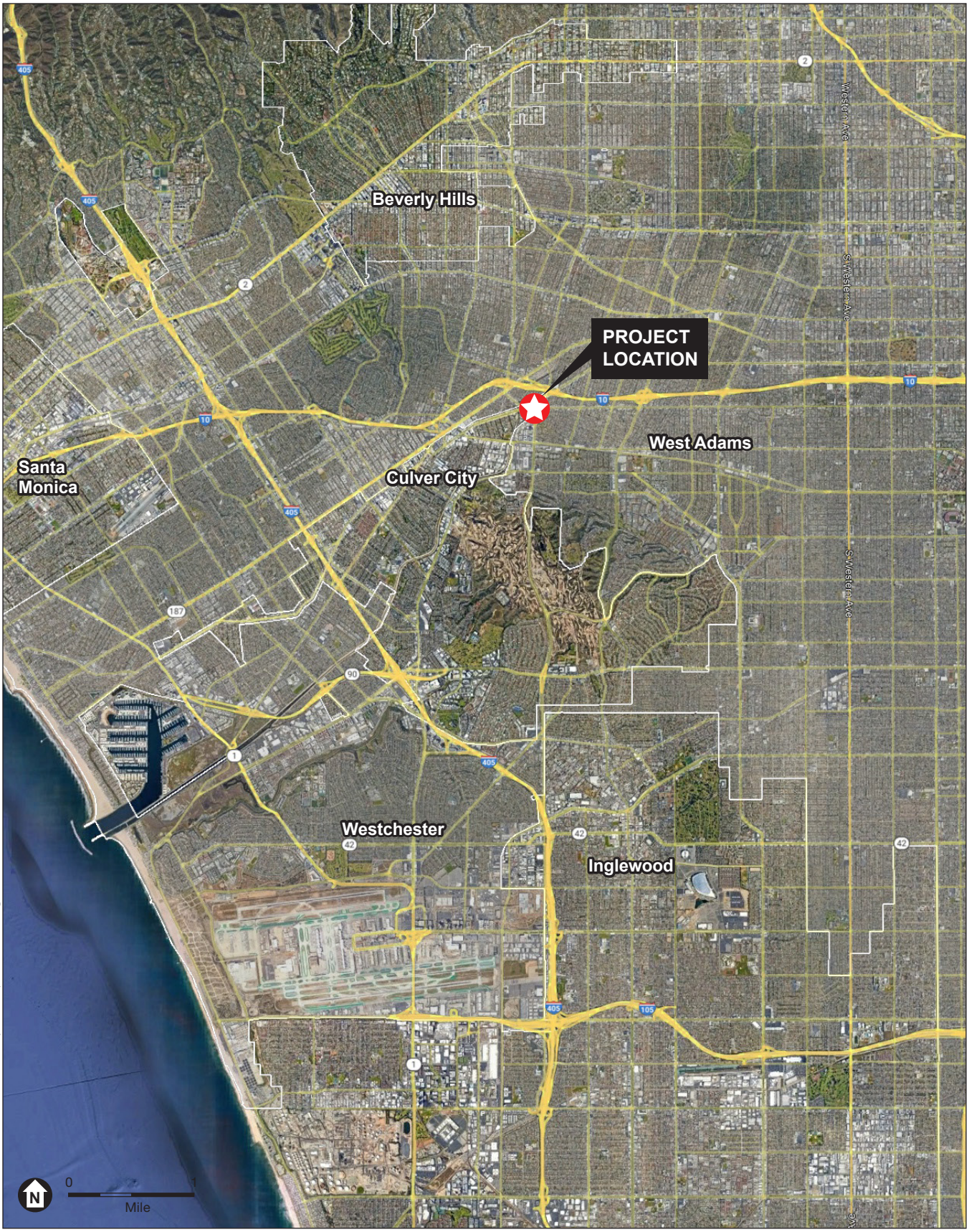
ESA has prepared this analysis to assist the City of Culver City in their assessment of the potential for environmental effects associated with the 5880 Adams Boulevard Project (Project), pursuant to the California Environmental Quality Act (CEQA). The analysis below, along with supporting technical studies, concludes that the Project (described in more detail below) 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 Project Site is an approximately 1.35 acre or 58,654 square feet (SF) property located at 5880 Adams Boulevard (Assessor Parcel No. [APN] 4205-001-069) in the northeastern portion of the City of Culver City (City). The Project Site, which is irregular in shape, is located on the south side of Adams Boulevard and is bounded by Perry Drive to the south, La Cienega Boulevard to the west, and commercial development to the east. The Project Site is approximately 9 miles east of the Pacific Ocean and approximately 6.3 miles west of Downtown Los Angeles. **Figure 1**, *Regional and Project Vicinity Location*, shows the location of the Project Site from a regional and local perspective. The Project Site is located in the northern portion of the City of Culver City and the City of Los Angeles' jurisdictional boundary is approximately 325 feet east of the Project Site along Fairfax Avenue.

As shown in **Figure 2**, *Aerial Photograph*, the Project Site is currently developed with an approximately 21,898 SF, one-story, approximately 24-foot, brick warehouse building and associated surface parking on Tract No. 5345, Parcel A and Parcel C. The building was previously occupied by HAJOCA Plumbing Supplies. The existing building is currently vacant, and the Project Site is periodically used for art exhibitions or as a parking lot rental. The surface parking and limited landscaping occupy the remainder of the Site. Ingress/egress to the Project Site is provided on La Cienega Boulevard and Adams Boulevard. The Project Site boundary extends into Perry Drive, for which there is a public road easement. There are a total of 28 existing vehicle parking spaces throughout the western portion of the Project Site and approximately 430 SF of landscaping provided along the northern boundary of the Project Site adjacent to Adams Boulevard. There are two street trees along the La Cienega Boulevard frontage but there are no existing trees on the Site.

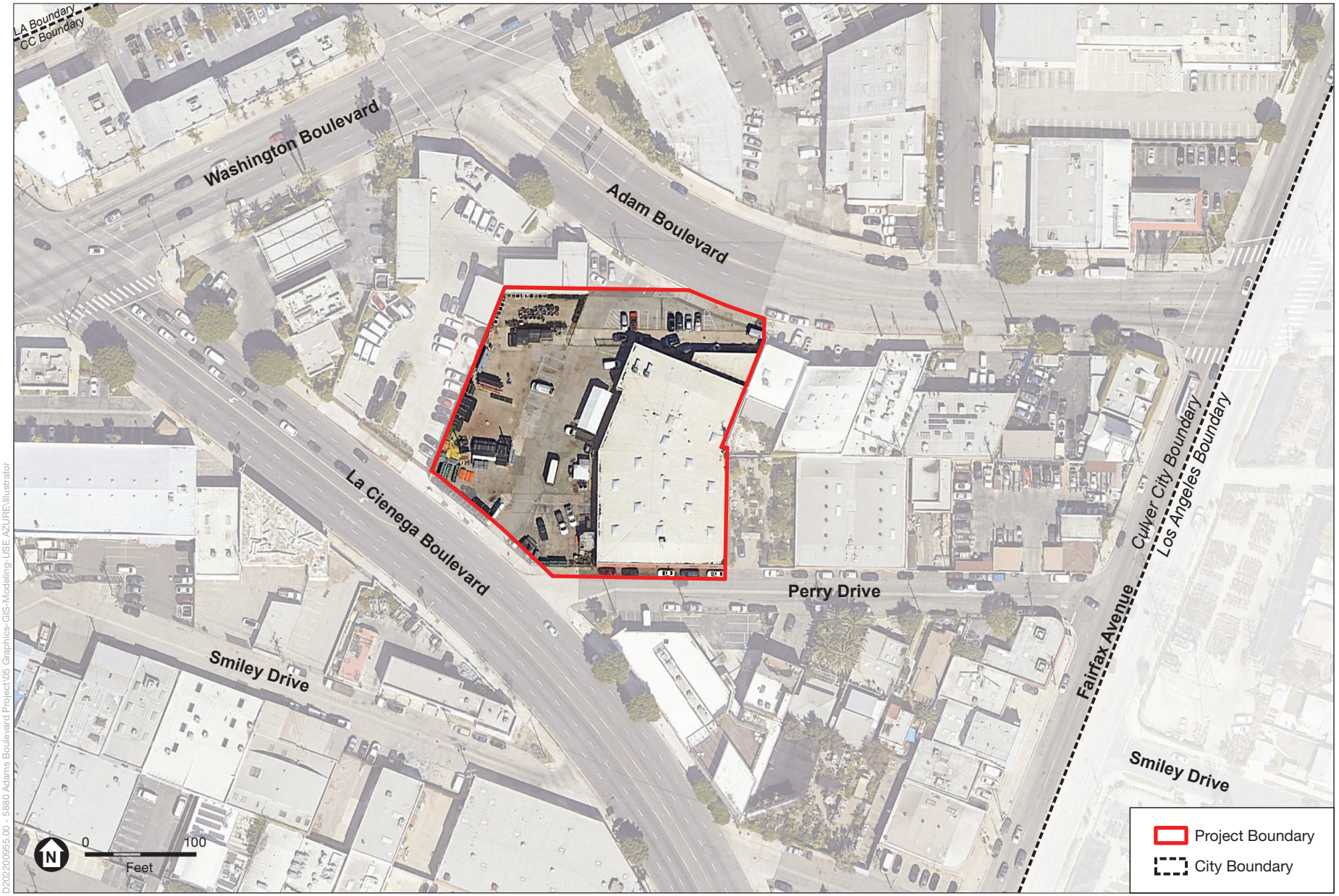


SOURCE: Google Earth Pro, 2023; ESA, 2023

5880 Adams Boulevard

Figure 1
Regional and Project Vicinity Location

ESA



D202200955.00 - 5880 Adams Boulevard Project\05 Graphics-GIS-Modeling-USE AZURE\Illustrator

SOURCE: Google Earth Pro, 2023; ESA, 2023

5880 Adams Boulevard

Figure 2
Aerial Photograph

ESA

As shown in Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06037C1611G, the northern portion of the Project Site is within Flood Zone X, which is an area subject to flooding during the 100-year storm event (0.2 percent annual chance of flooding where base flood elevations (BFE) and flood hazard factors are determined). The southern portion of the Project Site is within Flood Zone AO, which is a river or stream flood hazard area, or area with a one percent or greater chance of shallow flooding each year.[1]

The Los Angeles County Metropolitan Transportation Authority (Metro) E (Expo) Line is located south of Adams Boulevard and the Project Site is located approximately 0.37 miles north of the Metro E Line La Cienega/Jefferson Station and approximately 0.95 mile east of the Metro E Line Culver City Station. Therefore, the Project Site is located within a City-designated Transit Priority Area (TPA).

Surrounding Uses and Development

The Project Site is located in a mixed-use urbanized area, including industrial, office, and commercial uses. Surrounding land uses include:

- North – Adams Boulevard borders the Project Site to the north with industrial uses located further north, across Adams Boulevard.
- South – Perry Drive borders the Project Site to the south, with industrial uses and one single-family residence located across Perry Drive.
- East – Commercial uses are located immediately to the east of the Project Site.
- West –La Cienega Boulevard is located to the west/southwest of the Project Site. Commercial uses are located to the west of the Project Site.

Planning and Zoning

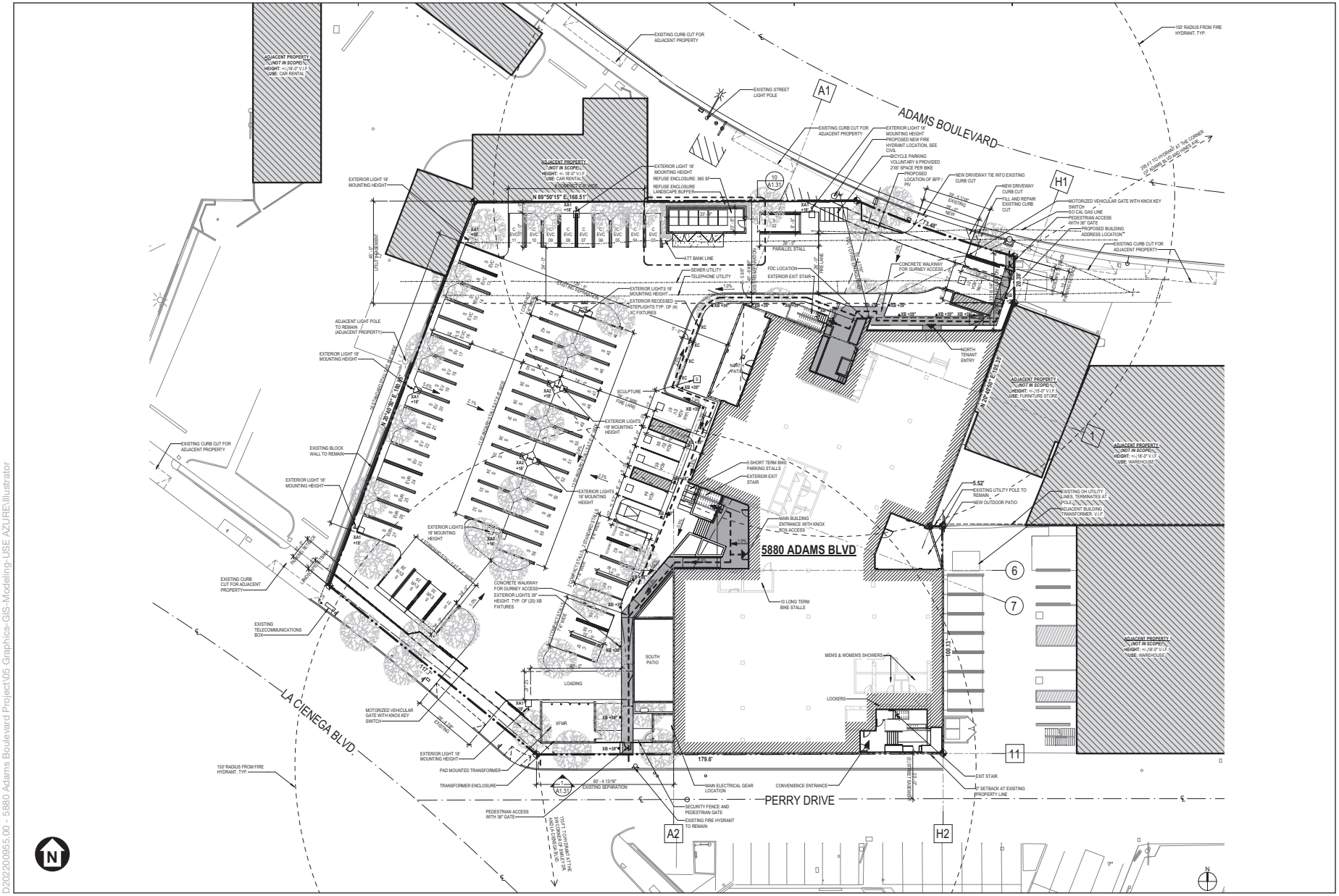
The Project Site is designated Industrial Park in the Culver City General Plan, which allows for industrial uses that can be contained within wholly enclosed structures and permits shared parking.[2] In addition, the Industrial Park designation allows commercial uses such as office and employee-supporting retail but precludes residential and large-scale retail uses. The Industrial Park designation is intended to support low traffic-generating uses with limited parking demands within a visually unified area. The Project Site is zoned Industrial General (IG). The IG zone permits a wide industrial, manufacturing and processing uses; some recreation and education uses; retail uses; transportation; and service uses (including offices and storage facilities).

Project Characteristics

The Project, which includes the renovation and expansion of the existing building generally retaining the existing building footprint, would develop a three-story structure with approximately 48,906 SF of office floor area. The existing first floor would be renovated and would include the demolition of approximately 3,214 SF of floor area. **Table 1**, ***Existing and Proposed Square Footage***, provides a detailed breakdown of the existing and proposed square footage by level. Level 1, after the demolition, would be approximately 18,684 SF, Level 2 would be approximately 15,340 SF, and Level 3 would be approximately 14,882 SF resulting in an expansion in building size to 48,906 SF. The total building square footage on the Project Site would increase from 21,898 SF to 48,906 SF, for a net increase of 27,008 SF. Office space would include a mix of open office areas, conference rooms, and private offices.

1 FEMA FIRM No. 06037C1611G. 2018. Available: https://msc.fema.gov/portal/search?AddressQuery=5880%20Adams#searchresultsanchor.

2 Note that the City of Culver City is currently undergoing a General Plan Update.



SOURCE: ERAS, 2024

5880 Adams Boulevard

Figure 3
Conceptual Site Plan

TABLE 1
EXISTING AND PROPOSED SQUARE FOOTAGE

Building	Existing Square Footage	Proposed (Net New) Square Footage	Total Square Footage
Level 1	21,898 SF	-3,214 SF	18,684 SF
Level 2	-	15,340 SF	15,340 SF
Level 3	-	14,882 SF	14,882 SF
Total	**21,898 SF**	**27,008 SF**	**48,906 SF**

SF = square feet

SOURCE: ERAS, 2024.

The office building would be a maximum of 47.3 feet in height, which represents a 10% increase over the allowable height of 43 feet. The Project includes an Administrative Modification request for a 10 percent increase in permitted building height. The existing finish floor of Level 1 is approximately 3.5 feet above grade. While the Project would lower slightly the Level 1 finish floor, the Project would have a finish floor that would be two feet above grade to account for the flood zone. Mechanical equipment and solar photovoltaic (PV) panels would be provided on the rooftop.

The Project design provides a variety of architectural materials and building planes. The proposed exterior renovations of the existing building would incorporate a variety of building materials, including brick, concrete, steel, glazing, metal, wood, and other contemporary materials, to match the building addition. Elevations from Adams Boulevard and La Cienega are provided in **Figure 4**, *Adams Boulevard/North Elevation* and **Figure 5**, *La Cienega/West Elevation*. In addition, **Figures 6a and 6b**, *Renderings*, illustrate some of the exterior modifications of the Project and provide context of the Project with the surrounding structures.

Open Space and Landscaping

The Project would include private outdoor patios at the ground level located along the northern, eastern, and western sides of the building. The Project would include a total of 5,048 SF of private outdoor area. The outdoor space would be provided as private open space within patios or decks on each level. There would be three patios at the ground level, for a total of 1,758 SF of open space on Level 1. The Project would provide two outdoor decks on Level 2, totaling 1,741 SF of open space. Level 3 would have four outdoor decks, totaling 1,549 SF. The Project also includes a central interior atrium and a kitchenette with direct access to the private outdoor areas.

The Project would include revisions to the landscaping throughout the Project Site. Approximately 8,096 SF of landscaping in total would be provided on the Project Site, for an increase of 7,666 SF from the existing 430 SF of landscaping on the Project Site. Minimally landscaped areas adjacent to Adams Boulevard would be removed and new landscaping would be planted at ground level along the northern, southern, and western sides of the building. New landscaping, including trees, would be installed throughout the parking area. Landscaping would also be provided throughout the parking areas in accordance with Culver City Municipal Code (CCMC) Chapter 17.310.

SOURCE: ERAS, 2024

5880 Adams Boulevard

Figure 4
Adams Boulevard/North Elevation

ESA

SOURCE: ERAS, 2024

5880 Adams Boulevard

Figure 5
La Cienega/West Elevation

ESA

View of west entrance

View of west entrace near La Cienega Boulevard and Perry Drive

D2022009555.00

SOURCE: ERAS, 2024

5880 Adams Boulevard

Figure 6a
Renderings

ESA

View of Adams Boulevard Entrance

Oblique view of the project looking northwest

D202200955.00

SOURCE: ERAS, 2024

5880 Adams Boulevard

Figure 6b
Renderings

ESA

Landscaping would be native and drought tolerant. Biofiltration planters would be incorporated into the landscaping to slow and spread stormwater leaving the Project Site. Raised patio spaces bordered by drought tolerant plantings and shaded built-in seating areas would surround the western elevation of the building. 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. The Project Site does not currently contain any trees; however, the Project includes 36 new trees that would be planted on-site. In addition, two street trees would be planted near the sidewalk along Adams Boulevard.

Access and Parking

The Project would maintain the location of the existing driveways along La Cienega Boulevard and Adams Boulevard. Both driveways would be widened and both driveways would provide right-in/right-out access. A vehicular gate would be located at each driveway.

The surface parking areas would be re-striped to provide a total of 67 vehicle parking spaces. Of the proposed 67 vehicle parking spaces, a total of 28 electric vehicle (EV) parking would be installed. Specifically, 14 vehicle parking spaces (or 20 percent) would be EV capable, 7 vehicle parking spaces (or 10 percent) would be EV ready; and 7 vehicle parking spaces (or 10 percent) would be full EV stations. In addition, the Project would include a total of 21 bicycle parking spaces, consistent with CCMC Section 17.32.045 requirements, including 11 short-term spaces and 10 long-term spaces. The short-term spaces would be located within 50 feet of the main pedestrian entrance to the building.

Other

As part of the Project, trash enclosures would be provided at the northern portion of the Project Site inside the gate adjacent to Adams Boulevard. One unenclosed loading zone, approximately 12 feet by 40 feet would be provided adjacent to the south patio of the building with access from La Cienega. In addition, the Project would install a new 4-inch water line and fire hydrant for fire protection. Water for the building would be provided through a connection to the existing public water main located within Adams Boulevard. Foundations to support Level 2 and Level 3 would be installed. Two infiltration galleries with pervious pavers would be installed in the parking area at a depth of approximately 6 feet. A new transformer would be located adjacent to Perry Drive at the intersection with La Cienega Boulevard.

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, improvements within the parking areas include installation of 14 EV capable, 7 EV ready, and 7 EV station parking spaces. Furthermore, drought tolerant landscaping and drip irrigation would be installed as well as biofiltration planters.

Construction Schedule/Activities

Construction activities would occur for a total of 15 months, commencing as early as the third quarter of 2024 with completion in the fourth quarter of 2025.[3] Construction phasing would include grading and excavation,

[3] Initial construction plans indicated construction would begin as early as the second quarter of 2024. However, if construction commences at a later date, construction emissions would be lower than those estimated in the Air Quality Technical Analysis included

foundations/concrete pour, building construction and exterior finishes, and paving. In addition, vendor supply trucks and concrete trucks would be used during construction of foundations and building construction. The Project would export approximately 453 cubic yards (cy) of building demolition debris. Excavation for the new foundations would be up to approximately 8 feet below ground surface and would result in the exportation of approximately 400 cy of soil export. Construction would also include the importation of approximately 5,500 cy of concrete. Haul trucks would exit the Project Site onto Adams Boulevard then turn left on South Fairfax Avenue to access the Interstate 10 Freeway.

Development of the Project would use construction equipment equipped with industry standard noise minimization strategies and best management practices (BMPs), including the use of mufflers and noise dampening devices on heavy-duty machinery. In addition, a minimum 6-foot-high (above finished grade) temporary noise barrier of plywood or other solid material would be installed along the south-southeastern boundary of the Project Site, in the direction of the sensitive receptors along Perry Drive.

Construction staging would occur within the Project Site along the western boundary between Adams Boulevard and La Cienega Boulevard. 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 Section 9.07.035 of the CCMC. 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 includes 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.

Necessary Approvals

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

- Site Plan Review
- Administrative Modification for 10% Height Increase (from 43 feet to 47.3 feet)
- 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.

in Attachment C due to the use of a more energy-efficient and cleaner burning construction vehicle fleet mix, pursuant to State regulations that require vehicle fleet operators to phase-in less polluting trucks.

This document demonstrates that the Project, which includes the renovation of the existing buildings on the Project Site as well as site improvements, 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 in the Eastern Sub-Area, which includes the McManus and Lucerne-Higuera neighborhoods. The Project Site is designated Industrial Park based on the City's General Plan Land Use Element Map[4] and is zoned Industrial General (IG).[5] As described in the CCMC, Chapter 17.230, the IG zoning designation permits industrial, manufacturing and processing uses; some recreation and education uses; retail uses; and service uses (including offices and storage facilities). The Project's proposed office use is consistent with the General Plan and zoning designations for 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.

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

Objectives and Policies	Consistency Analysis
Land Use Element	
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 would renovate, expand, and convert the existing building from industrial to office use on a property within close proximity to transit. The Project would develop a building with articulation and visual interest and would incorporate a variety of building materials. In addition, the Project would include landscaping that would be visible from the streets. Landscaping would be native and drought tolerant. The Project would improve the streetscape and overall pedestrian experience in the area, with the inclusion of two street trees that would be planted near the sidewalk along Adams Boulevard.

4 City of Culver City, City of Culver City General Plan Land Use Element Map, August 2007, general-plan-land-use-map.pdf (culvercity.org). Accessed May 25, 2023.

5 City of Culver City, City of Culver City Zoning Map, August 2007, map15_zoning.pdf (culvercity.org). Accessed May 24, 2023.

Objectives and Policies	Consistency Analysis
Land Use Element	
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 would be underground where feasible.
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.** The Project design provides a variety of architectural materials and building planes. The Project would retain the footprint of the existing building, renovate the building and add a second floor to the structure. The site plan and architecture would be high quality through the articulation of the structure, the incorporation of landscaping throughout the Site, and the use of a variety of materials. The Project would blend the new portions of the building with the renovated (existing) building. The exterior of the existing building and new portions would incorporate brick, concrete, steel, glazing, metal, wood, and other contemporary materials. The Project would support 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 would renovate, expand, and convert the existing building from industrial to office use on a property within close proximity to transit. The Project would develop a building with articulation and visual interest and would incorporate a variety of building materials. 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.
Circulation Element	
Policy 4.D: Enhance the aesthetic qualities of pedestrian access routes by increasing amenities, such as trees, awnings, lighting, street furniture, and drinking fountains, etc.	**Consistent:** The Project would include a total of approximately 8,096 SF of landscaping, an increase from 430 SF of existing landscaping, on the Project Site. Minimally landscaped areas adjacent to Adams Boulevard would be removed and new landscaping would be installed at ground level along the northern, southern, and western sides of the building. In addition, 36 trees would be planted on Site and two street trees would be planted near the sidewalk along Adams Boulevard. Native, drought tolerant landscaping would be used throughout the surface parking lot. Raised patio area spaces and seating areas would be incorporated into the Project. With the increase in landscaping and aesthetic treatment of areas throughout and adjacent to the Site, the Project would enhance the aesthetic qualities of pedestrian access routes.
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.
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.
Policy 6.B: Reduce pressure on on-street parking through provision of private and public off-street parking facilities.	**Consistent:** While no minimum parking is required, the Project would include 67 parking spaces, including 28 EV parking spaces. In addition, the Project would include 21 bicycle parking spaces. The Project Site is located in an area that is well served by public

Objectives and Policies	Consistency Analysis
Land Use Element	
	transit. Therefore, the Project would reduce pressure on on-street 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:** The Project would connect to existing infrastructure and utilities would be underground where feasible.
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 renovate, expand, and convert the existing building from industrial to office use. While the Project would intensify the use on the Site through the addition of 27,008 SF of office uses, 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 north across Adams Boulevard; industrial uses and one single-family residence located to the south across Perry Drive; commercial uses located immediately to the east; and commercial uses located to the west of the Project Site. 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. The Project would be compatible with the adjacent land uses. The predominant existing noise source surrounding the Project Site is traffic noise from Adams Boulevard, Fairfax Avenue, La Cienega Boulevard, and Washington Boulevard. Secondary noise sources include commercial and educational-related activities, such as loading dock/delivery truck activities, trash compaction, and refuse service activities, from the surrounding commercial land uses. Periodic noise also occurs from residential activities including lawnmowing and landscaping activities. The Project includes office use that would be compatible with the adjacent land uses with regard to noise sources and receptors.
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 as provided in the Culver City Building Code and the California Building Code. The building would be sprinklered. In addition, the would be designed and constructed in accordance with California Building Code to resist the effects of seismic ground motions.

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.

As discussed in Table 2, the Project would be consistent with applicable Culver City General Plan Land Use Element, including the applicable policy for the Eastern Sub-Area of the City of Culver City. In addition, the Project would be consistent with applicable Culver City General Plan Circulation Element, Open Space Element, Noise Element, and Public Safety Element policies. Furthermore, as discussed above, the Project would be consistent with the City's General Plan designation of Industrial Park, which allows a variety of commercial uses, such as office and employee-supporting retail, and the City's zoning code designation of Industrial General (IG), which permits industrial, manufacturing and processing uses; some recreation and education uses; retail uses; transportation; and service uses (including offices and storage facilities).

With regard to consistency with zoning regulations, the Project would provide a five foot street facing setback, as required by CCMC Section 17.230.020. In addition, the Project would be a maximum of 47.3 feet in height, which represents a 10 percent increase over the allowable height of 43 feet as allowed under CCMC Section 17.230.020. The Project includes an Administrative Modification request to allow the 10 percent increase in permitted building height, making the Project in conformance with the CCMC upon approval. While there is no minimum required parking (CCMC Section 17.320.020), the parking provided by the Project would comply with all development standards in CCMC Section 17.320, including parking design, layout standards, and accessible parking. The Project would also provide 11 short-term and 10 long-term bicycle parking spaces in accordance with Section 17.320.045. Landscaping throughout the Project Site would also be provided in accordance with CCMC Section 17.310. 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 of Culver City limits on an approximately 1.35-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. As described above, the Project Site is currently developed with a building and associated asphalt-paved surface parking lot with minimal landscaping. 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 5880 Adams prepared by KOA, 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 renovate, expand, and convert the existing building from industrial to office space. As the Project includes the renovation and expansion of an existing building, it would not preclude compatibility with applicable programs, plans, ordinances, and 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 Projects 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 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 Transit Priority Area. Therefore, the Project met 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)?**
  - Under the Project, vehicular access/egress would be provided via two existing driveways with primary access from La Cienega Boulevard and secondary access from Adams Boulevard. Both driveways would be modified to expand the width of the driveways. The Project driveways would allow right-turn in and right-turn out movements only. The driveway turn restrictions are not anticipated to introduce any hazardous conditions. Instead, they would reduce potential hazards associated with left-turn movements at these driveways. In addition, under the Project, no incompatible uses are proposed. 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 maintain the location of the existing driveways and both driveways would be modified to expand the width of the driveways. The driveways would continue to provide emergency access to the Project Site. 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.*

<u>Conclusion:</u> Based on the Transportation Assessment, the Project would not result in a significant transportation impact pursuant to CEQA. For additional details, refer to the Transportation Assessment 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.[6] 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

[6] The analysis in the Noise and Vibration Technical Report is conservative since it analyzed a previous iteration of the Project with larger building square footage (49,975 SF), which was refined through the design process.

sensitive land uses. 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 Culver 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 vibration impacts resulting from heavy duty construction equipment. In addition, during construction activities, a minimum 6-foot-high (above finished grade) temporary noise barrier of plywood or other solid material would be installed along the south-southeastern boundary of the Project Site. 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 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.*

  - 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 loading docks and refuse collection, outdoor spaces, and an increase in traffic noise levels along Adams and La Cienega Boulevard, and Fairfax Avenue. Based on the analysis (Table 14 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 on-site 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 0.004 to 0.0001 inches per second (in/sec) PPV at a receptor distance of 185 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.*

  - 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 6.5 miles west of the Project Site, and Los Angeles International Airport, located approximately 7.6 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.*

<u>Conclusion:</u> 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.[7] 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. 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 its 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, compliance with SCAQMD Rule 403 requirements (Control of Fugitive Dust) such as watering twice daily and track out prevention measures fugitive VOC control measures required to be implemented by architectural coating emission factors based on SCAQMD Rule 1113 (Architectural Coatings). 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, area, and stationary sources (such as the conservatively assumed emergency generator) for the Project operational

[7] The analysis in the Air Quality Technical Report is conservative since it analyzed a previous iteration of the Project with larger building square footage (49,975 SF), which was refined through the design process.

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. 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 cumulative considerable net increase of any criteria pollutant. *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 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 land 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.*

<u>Conclusion:</u> 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 and Water Quality Technical Memorandum prepared by Sherwood Design Engineers, provided in Attachment D of this memorandum. The Hydrology Memorandum evaluates the potential water quality impacts associated with development of the Project. The findings of the Hydrology Memorandum that apply to the water quality related questions contained in CEQA Guidelines Appendix G are summarized below.

- **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**
  - Point-source pollutants from vehicles and pipes/drains currently sheet flow over the impervious surfaces, with a relatively smaller area on the north end towards Adams Boulevard and the remainder towards la Cienega Boulevard. Along the northern frontage there is a high point tat splits drainage on the Adams Boulevard gutter to both the east and northwest. Along the southern frontage, La Cienega Boulevard gutter

drains in the southerly direction. The frontage along Perry Drive drains towards the Perry Drive valley gutter and eventually towards La Cienega Boulevard. The gutters direct runoff to a catch basin located at South Fairfax Avenue. There is also an existing City of Los Angeles storm drain at Fairfax Avenue that ties into the Culver City storm drain culvert at the intersection of Fairfax Avenue and La Cienega Boulevard. No underground storm drain pipes are proposed and the City does not allow direct tie-ins to the City storm drain system. In general, the Project would maintain the existing drainage conditions. The Site would drain via sheet flow into a below grade infiltration gallery located at the center of the parking lot. The infiltration gallery would overland release via sheet flow into the La Cienega Boulevard gutter which would direct runoff into catch basins located at South Fairfax Avenue. The existing catch basin on the northeast corner of the Site would be removed and the Site would be regraded to direct stormwater to the proposed infiltration gallery. The disconnection would ensure that the entire existing 36- inch City-owned storm drain that runs through the Site would not be collecting any stormwater flows and can be considered abandoned through the Site.

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. Based on the preliminary subsurface investigation by Feffer Geological Consulting and soil types encountered on and around the Project Site, groundwater is estimated to be as shallow as 17 feet below existing grade. The infiltration rate is likely 0.3”/hour to 0.5”/hour, which surpasses the site requirements for stormwater infiltration per the City’s LID Stormwater Infiltration Guidelines.[8] Permeable pavers with 6” gravel section over the infiltration gallery would retain the stormwater quality volume and water would percolate into the soil through voids in the gravel. The gravel section has sufficient storage capacity and 100 percent of the 85th percentile storm event volume would be managed onsite.

As an urban commercial 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.

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

8 LID Stormwater Infiltration Guidelines for Culver City.

that exceed protective water quality criteria and standards.[9] 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 611 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 use permeable pavers with 6" gravel section over the infiltration gallery to retain the stormwater, which would percolate into the soil through voids in the gravel. Because the Project Site is essentially entirely impervious, the Project Site is also 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 including the pollutants to 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 development of the Project. *Impacts would be less than significant.*

<u>Conclusion:</u> 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.

Utilities

The Project would be located on a developed urban site in an area that is served by existing public utilities and services. Southern California Edison (SCE) would provide electricity services and the Southern California Gas Company (SoCalGas) would provide gas services. Water would be provided by Golden State Water Company and the Los Angeles Department of Water and Power (LADWP).

The following summarizes information provided in the Water Utility Technical Memorandum prepared by Sherwood Design Engineers, which is provided as Attachment E. There are water lines ranging in size from 4- to 12-inches in the streets in the Project vicinity. For domestic water, the Project would reuse or upsize if needed, the existing water lateral at the north side of the building that connects to the 8-inch water line in Adams Boulevard. The Project would include the installation of a new 4-inch lateral to the public water main in Adams Boulevard for fire service. This connection would be on the north side of the building to the west of the domestic water lateral. A fire hydrant that would connect to the water main in Adams Boulevard would also be installed. Based on flow tests by the Culver City Fire Department, there is adequate flow pressure.

9 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 June 1, 2023.

In addition, sanitary sewer service to the Project Site from the surrounding streets is provided by the Culver City Public Works Department. A Wastewater Utility Technical Memorandum prepared by Sherwood Design Engineers for the Project (provided in Attachment F of this memorandum) indicates that sewer services are available for the Project. The Project would connect to the 15-inch sewer located within Adams Boulevard. As indicated in the Wastewater Memorandum, there is sufficient capacity within the system to serve the Project.

As it relates to solid waste, solid waste collection services are currently provided to the Project Site by haulers contracted by the City of Culver City. The Project would convert the use of the vacant building from plumbing supply warehouse to office use, increasing the existing floor area on the Project Site by 27,008 SF. 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.

In summary, the Project would not result in significant impacts to water, wastewater or solid waste. Thus, the Project meets this criterion.

Public Services

Fire Protection

Fire protection and emergency medical services for the Project Site are provided by the 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, 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 4-inch lateral to the public water main in Adams Boulevard for fire service. This connection would be on the north side of the building to the west of the domestic water lateral. A fire hydrant that would connect to the water main in Adams Boulevard would also be installed. Based on flow tests by the Culver City Fire Department, there is adequate flow pressure. In addition, sprinklers would be installed in the building.

The Project would be constructed in accordance with the California Building Code, California Fire Code, and the CCMC. In addition, Culver 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 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 would convert the use of the vacant building from a plumbing supply warehouse to office use, increasing the existing floor area on the Project Site by 27,008 SF. The Project Site is located in an urbanized area within the City of Culver City and is well served by CCPD. The nearest CCPD station is located at 4040 Duquesne Avenue, approximately 1.5 miles west of the Project Site. The Project would result in an increase in employees on the Project Site. However, with the renovation of the Site and the proximity to the CCPD station, the Project would have adequate 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. Since this Project qualifies as a Class 32 (Infill Development) Categorical Exemption, this criterion section is not applicable to this exemption. 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.

Under this exception, 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. Related projects within a 1.5-mile radius of the Project Site are identified in **Table 3,** *Related Projects List*.

As noted previously, the Project Site is designated Industrial Park based on the City's General Plan Land Use Element Map and is zoned IG. As described in the CCMC, Chapter 17.230, the IG zoning designation permits industrial, manufacturing and processing uses; some recreation and education uses; retail uses; and service uses (including offices and storage facilities). The Project's proposed office use is consistent with the General Plan and zoning designations for the Project Site.

With regard to transportation, the Project Site is located 0.5 mile north of the Metro E Line La Cienega/Jefferson Station and approximately 0.95 mile east of the Metro E Line Culver City Station and as such would not result in a significant VMT impact. The Project's Transportation Study did not identify significant cumulative traffic impacts with regards to the Project and buildout of future developments.

As it relates to noise, the maximum cumulative noise increase from the Project plus related Project traffic would occur along Adams Boulevard west 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 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 44 related projects within 0.25-mile of the Project Site, one north of the Project Site across Washington Boulevard and the remaining are further away from the Project Site, without direct views of the site. 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 would not contribute to cumulative impacts associated with related projects. As a result, there is no evidence of significant cumulative impacts from successive projects of the same type in the same place, over time.

TABLE 3
RELATED PROJECTS

Project Name and Address	Proposed Use
City of Los Angeles	
Coffee Bean & Tea Leaf 6024 W. Jefferson Boulevard	123,527 sf office, 64,206 sf manufacturing, 2,200 sf coffee shop with drive thru

Project Name and Address	Proposed Use
5950 W. Jefferson Boulevard	64,000 sf office, 2,000 sf retail, 4,000 sf restaurant
5760 Obama Boulevard Mixed-Use 5760 Obama Boulevard	126 apartments, 20,250 sf retail/restaurant
5850 W. Jefferson Boulevard	344,947 sf office
5741 W. Jefferson Boulevard	307,969 sf mini-warehouse, 6,720 sf retail
3401 S. La Cienega Boulevard	260 apartments, 263,000 sf office, 5,000 sf retail
3200 S. La Cienega Boulevard	254 apartments
Jefferson/La Cienega Mixed-Use Project (Cumulus) 3221 S. La Cienega Boulevard	1,218 apartments, 200,000 sf office, 50,000 sf supermarket, 30,000 sf retail, 20,000 restaurant
3430 S. La Brea Avenue	76,150 sf mini-storage expansion
Adams and Mansfield Mixed-Use & Mansfield Hotel 5109 W. Adams Boulevard	69 apartments, 78 hotel rooms, 2,053 sf restaurant, 3,073 sf retail
5181 W. Adams Boulevard	115 apartments, 11,800 sf retail, 3,680 sf restaurant
5213 W. Adams Boulevard	74 apartments, 9,396 sf retail
5775 W. Adams Boulevard	65 apartments, 2,500 sf retail
8787 Venice Boulevard	74 apartments, 52,601 sf office, 16,130 sf retail
Crossings Campus (Apple Office) 8876 W. Venice Boulevard	369,000 sf office
Venice & National Hotel 8900 W. National Boulevard	180 hotel rooms, 16,456 sf retail, 7,330 sf restaurant
9431 W. Venice Boulevard Mixed-Use 9431 W. Venice Boulevard	52 apartments, 2,627 sf restaurant
3301 S. Canfield Avenue	50 apartments
1930 S. La Cienega Boulevard Mixed-Use 1930 S. La Cienega Boulevard	45 apartments, 8,100 sf commercial
1500 S. Hi Point Street	45 apartments
1417 S. Hi Point Street	77 apartments
5935 W. Pico Boulevard	124 apartments, 2,000 sf restaurant, 3,100 sf retail
6055 W. Pico Boulevard	125 apartments, 4,140 sf retail
6075 W. Pico Boulevard	45 apartments, 110 hotel rooms, 2,500 sf retail, 3,800 sf restaurant
6116 W. Pico Boulevard	125 apartments, 6,907 sf retail
6132 W. Pico Boulevard	100 apartments, 14,000 sf retail
City of Culver City	
3817 Watseka Avenue	149,439 sf office
9735 Washington Boulevard	55,477 sf office, 12,249 sf retail, 4,147 sf restaurant
9300 Culver Boulevard	45,000 retail/restaurant, 65,000 sf office, 10,000 sf public plaza
9401 Jefferson Boulevard	257,000 sf office
8631 Hayden Place	245,000 sf creative office
Willows School 8509 Higuera Street	100 students enrollment
8511 Warner Drive	51,520 sf retail/restaurant

Project Name and Address	Proposed Use
8960 Washington Boulevard Mixed-Use 8960 Washington Boulevard	75,184 sf office
Park Century School 3939 Landmark Street	2,441 sf classroom, addition of 50 students
Synapse Office and Retail/Restaurant (ICC site) 8888 Washington Boulevard	56,559 sf office, 5,972 sf retail
Robertson Blvd Mixed-Use 3727 Robertson Boulevard	12 apartment units, 6,800 sf retail/restaurant
Culver Crossings (Apple) 8825 National Boulevard	167,000 sf of office
Lorcan O'Herlihy Architects 3434 Wesley Street	15 apartments, 14,237 sf office/gallery
8740 Washington Boulevard	60,319 sf office
Schaefer II 3516 Schaefer Street	9,338 sf creative office addition
8570 National Boulevard	4,820 sf retail/restaurant, 30,253 sf office
5863 Washington Boulevard	16,900 sf creative office
3814 Lenawee Avenue Assisted Living 3814 Lenawee Avenue	110 assisted living beds, 8 single family residential units

Note: Related projects include developments within 1.5 miles from the Project Site. City of 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: KOA., *Transportation Study for 5880 Adams Boulevard*, March 2024 (see Attachment A).

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.

This exception applies when there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances. 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 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. Based on available facts and reasonable assumptions based on facts, there are no unusual circumstances for the Project that support a reasonable possibility of a significant effect on the environment. Therefore, this exception does not apply to the 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.

This exception applies to 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. Based on a review of the California Scenic Highway Mapping System,[10] the Project Site is not located on or near an officially designated scenic highway. The Project would have no impacts on an officially designated scenic highway. Therefore, this exception does not apply to the Project.

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.

This exception applies to a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code. Government Code Section 65962.5 refers specifically to a list of hazardous waste facilities compiled by the Department of Toxic Substances Control (DTSC). Based on Envirostor (DTSC list), the Project Site is not included on the DTSC's hazardous waste facilities list.[11] Thus, the Project Site has not been included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, this exception does not apply to the 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.

CEQA Guidelines section 15300.2 states that a categorical exemption "shall not be used for a project that may cause a substantial adverse change in the significance of a historical resource." A Historic Resources Assessment (Historic Assessment) was prepared by ESA for the Project and is included in Attachment G.[12]

The Project Site is currently improved with an industrial warehouse building with associated surface parking lot and a small storage building. According to the Los Angeles County Assessor's Office, the building was constructed in 1955. The building has not been identified as potentially significant by any previous evaluations or surveys of the Project Site or the wider Culver City locale. Through research, survey, and subsequent evaluation under the applicable federal, state, and local eligibility criteria, ESA found the building on the Project Site lacks both historical significance and architectural integrity. 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. The CEQA threshold for determining significant impacts requires that a historical resource's significance not be materially impaired by a project. The resource must remain eligible and capable of conveying its historical significance following the construction and operation of the project. There are four 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

10 For State-designated scenic highway: California Department of Transportation, California State Scenic Highway System Map, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed June 2, 2023.

11 https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=culver+city. [DTSC website: EnviroStor Database (ca.gov)]. Accessed June 2, 2023.

12 The Historic Resources Report analyzed a previous iteration of the Project with larger building square footage, which was refined through the design process. The revisions to square footage do not change the conclusions in the Report.

Boulevard, located 528 feet northeast of the Project Site; 5812 Washington Boulevard, located 475.2 feet northeast of the Project Site; 5835 Washington Boulevard, located 690.12 feet north of the Project Site, and 5879 Washington Boulevard, located 475.2 feet northwest of the Project Site. The impacts analysis concluded that the Project does not include the demolition, relocation, rehabilitation, alternation, or conversion of the aforementioned resources. The resources would remain unchanged and in their original locations after implementation of the Project. Additionally, the impacts analysis determined that 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. The proposed Project is similar in massing and height to the existing built environment and would continue the historic industrial/commercial use of the site. 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. For these reasons, the significance and integrity of 5788-90 Washington Boulevard, 5812 Washington Boulevard, 5835 Washington Boulevard, and 5879 Washington Boulevard would not be materially impaired, and they would retain their eligibility as Culver City "Landmark" structures. Therefore, the Project would not result in significant impacts to these buildings.

The Noise and Vibration Technical Report (Attachment B) evaluates noise and vibration impacts to receptors in the vicinity of the Project Site, including the potential for vibration to cause structural damage to historic buildings. As detailed in the Noise and Vibration Technical Report, 5788-90 Washington Boulevard, 5812 Washington Boulevard, 5835 Washington Boulevard, and 5879 Washington Boulevard are all located far enough away from the Project that impacts related to construction vibration would be less than significant and on-site project construction would not result in any building damage to the aforementioned historic resources.

No additional historical architectural resources were identified that would be proximate enough to result in indirect impacts in association with the Project. Therefore, the Project should result in no indirect impacts to historical resources.

With regard to archaeological resources, an Archaeological Assessment Report was prepared by ESA and is included as Attachment H of this memorandum.[13] ESA reviewed the results of cultural resources record searches conducted through the South Central Coastal Information Center (SCCIC) for the Environmental Background Report that was prepared to support the City's General Plan Update. For this Project, ESA reviewed all previously recorded archaeological resources and studies within the Project Site and a 0.50-mile radius from the Site. The record search revealed that 2 cultural resources were previously recorded within the 0.50-mile radius of the Project Site. These resources are prehistoric archaeological sites. The SLF records search through the NAHC was positive for sacred lands.

Although the Project Site is developed, construction of the current uses dating to the 1960s would not likely have involved particularly deep excavation and no basements are known to be located within the Project Site. In cases where later development does disturb native sediments, archaeological materials can become intermixed within historic fill such as in the case with the two prehistoric metates encountered during monitoring in connection with a development project in Downtown Culver City located approximately 1.25 miles from the Project Site in a similar geologic setting and underneath similar mid-century buildings. Based on these results, the archaeological sensitivity assessment concluded that the Project Site has a moderate potential for prehistoric archaeological materials to be encountered as a result of Project-related ground-disturbing activities. There is also a moderate potential to encounter

13 The Archaeological Assessment Report analyzed a previous iteration of the Project with larger building square footage, which was refined through the design process. The revisions to square footage do not change the conclusions in the Report.

historic-period archaeological resources associated with the previous uses as observed in the 1928, 1938, 1948, and 1952 historic aerials. In the unlikely event such resources are encountered during construction, the City's standard condition of approval, which applies to any excavation that occurs up to 10-feet in depth, would ensure that potential impacts to buried archaeological resources are avoided. Therefore, with implementation of the City's standard condition 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 5880 Adams 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 and Water Quality Technical Memorandum

Attachment E – Water Utility Technical Memorandum

Attachment F – Wastewater Utility Technical Memorandum

Attachment G – Historic Resources Assessment

Attachment H – Archaeological Resources Assessment