ATTACHMENT NO. 8

ANALYSIS SUPPORTING A CATEGORICAL EXEMPTION

9925 Jefferson Boulevard Project

Site Plan Review, P2021-0218-SPR

Project Location: 9925 and 9927 Jefferson Boulevard, Culver City, CA 90232

Project Description: The Project involves the demolition of approximately 26,405 square feet of the existing 41,925 square feet of commercial uses on-site, including the demolition of a 7,091 square foot warehouse building located to the rear of the Project Site, thereby retaining approximately 15,520 square feet of floor area. Upon completion the Project would include an additional 35,658 square feet of commercial space for a total of approximately 51,178 square feet to be utilized as creative office space and an associated 70,739 square foot parking structure providing up to 177 automobile parking spaces and 22 bicycle parking spaces. The proposed creative office space building would have three stories with a height of 43 feet (excluding permitted roof structures) and the parking structure would have four parking levels with a height up to 36 feet (excluding permitted roof structures). In order to permit development of the Project, the City would require approval of the following discretionary and/or ministerial; actions: (1) Site Plan Review; (2) Demolition Permits to demolish Building C and portions of Buildings A and B to allow for construction of the Project; (3) Construction Permits, including building, grading, excavation, foundation, and associated permits; (4) Haul Route permit; (5) Demolition, grading, excavation, and building permits; and (6) Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

PREPARED FOR:
Culver City
Planning Division
PREPARED BY:
EcoTierra Consulting, Inc.
APPLICANT:
HQ Development, LLC

September 2021

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I. INTRODUCTION

1. INTRODUCTION

The subject of this document is the proposed 9925 Jefferson Boulevard Project (the "Project"), which involves the demolition of approximately 26,405 square feet of the existing 41,925 square feet of commercial uses on-site, including the demolition of a 7,091 square foot warehouse building located to the rear of the Project Site, thereby retaining approximately 15,520 square feet of floor area. Upon completion the Project would include an additional 35,658 square feet of commercial space for a total of approximately 51,178 square feet to be utilized as creative office space and an associated 70,739 square foot parking structure providing up to 177 automobile parking spaces and 22 bicycle parking spaces. The Project is discussed in further detail in **Section II, Project Description**. The City of Culver City is the Lead Agency under the California Environmental Quality Act (CEQA).

2. PROJECT INFORMATION

Project Title: 9925 Jefferson Boulevard Project

Project Applicant: HQ Development, LLC

Project Location: 9925 Jefferson Boulevard
Culver City, CA 90232

Lead Agency: City of Culver City
Planning Division
9770 Culver Boulevard
Culver City, CA 90232

3. ORGANIZATION OF THIS DOCUMENT

This document is organized as follows:

Introduction: This section provides introductory information such as the Project title, the Project Applicant, and the designated Lead Agency for the proposed Project.

Project Description: This section provides a detailed description of the proposed Project including the environmental setting, Project characteristics, and environmental clearance requirements.

Categorical Exemption Analysis: This section contains a consistency analysis of the Project with the appropriate Categorical Exemption class and demonstrates that exclusions to a Categorical Exemption are not applicable to this Project.

II. PROJECT DESCRIPTION

1. PROJECT SUMMARY

The Project involves the demolition of approximately 26,405 square feet of the existing 41,925 square feet of commercial uses on-site, including the demolition of a 7,091 square foot warehouse building located to the rear of the Project Site, thereby retaining approximately 15,520 square feet of floor area. Upon completion the Project would include an additional 35,658 square feet of commercial space for a total of approximately 51,178 square feet to be utilized as creative office space and an associated 70,739 square foot parking structure providing up to 177 automobile parking spaces and 22 bicycle parking spaces. The proposed creative office space building would have three stories and a height of 43 feet (excluding permitted rooftop structures) and the parking structure would have four parking levels with a height of up to 36 feet (excluding permitted rooftop structures).

2. ENVIRONMENTAL SETTING

a) Project Location

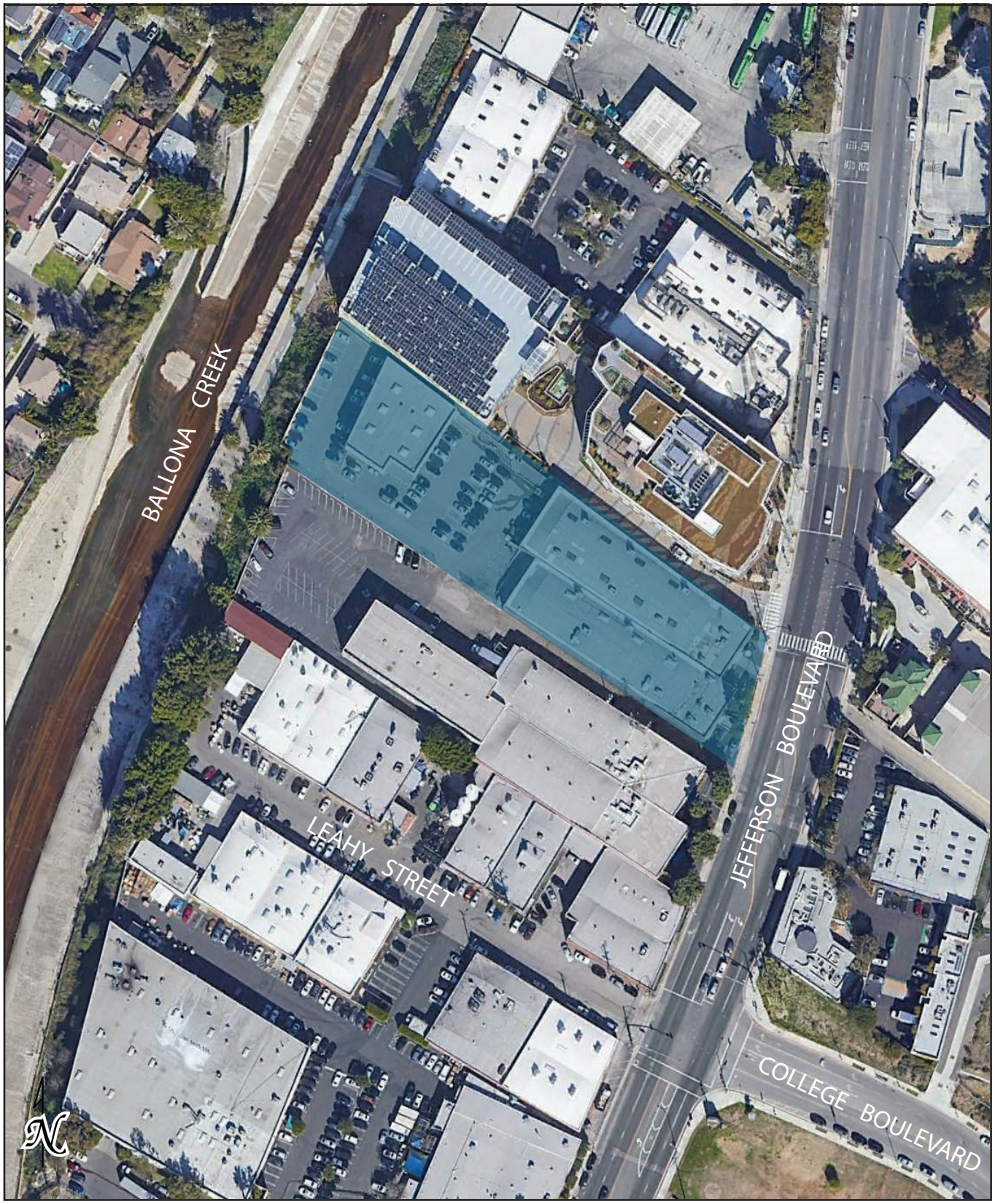
The approximately 2.01-acre, or 87,698 square feet in size, rectangular-shaped site is located along the western side of Jefferson Boulevard at 9925 and 9927 Jefferson Boulevard ("Project Site") in Culver City ("City"). Ballona Creek runs parallel along the western edge of the Project Site (See **Figure II-1, Regional and Project Vicinity Location Map and Figure II-2, Aerial Photograph of the Project Site**). The Project Site is associated with Los Angeles County Assessor's Parcel Number 4207-031-016. An existing 30-foot-wide sewer easement traverses in the north-south direction in the central portion of the Project Site.[1]

[1] *Refer to Figure II-6, Conceptual Site Plan for sewer easement location.*

Project Site

Source: OpenStreetMaps, March 2021.

Figure II-1
Regional and Project Vicinity Location Map



Project Site

Source: Google Earth, March 2021.

Figure II-2
Aerial Photograph of the Project Site

Local access to the Project Site is provided by Jefferson Boulevard, Overland Avenue, and Duquesne Avenue. Regional access to the Project Site is provided by the San Diego Freeway (I-405), located approximately 1.8 miles to the southwest, and the Santa Monica Freeway (I-10), located 2.01 miles to the north.

Public transit access to the area of the Project Site is provided by Culver CityBus. Culver CityBus runs multiple bus lines, including Line 4, along Jefferson Boulevard. There are two Line 4 bus route stops, one westbound and one eastbound, within 250 feet of the Project Site.

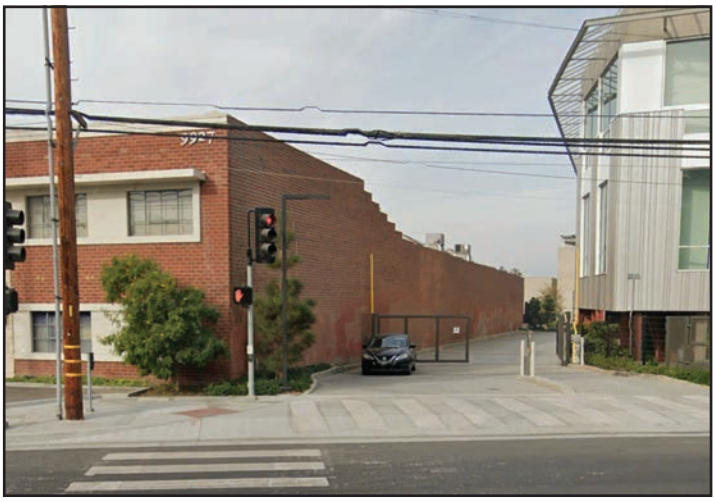
b) Existing Conditions

The Project Site is currently occupied with a two-story 34,834 square foot commercial building fronting Jefferson Boulevard, a one-story 7,091 square foot warehouse building towards the rear, and a 28,235 square foot surface parking area containing 80 parking spaces, plus an additional 5 parking spaces at the front of the commercial building, along Jefferson Blvd. Nearly the entire Project Site is developed and paved with asphalt and concrete. Small planters are located along the front perimeter of the property, which include six ornamental trees. See **Figure II-2, Aerial Photograph of the Project Site**, and **Figure II-3, Views of the Project Site**.

A portion of the Project Site is within a flood control easement associated with adjacent Ballona Creek and is zoned and designated in the Culver City General Plan for Open Space. No development is proposed on this portion of the Project Site. The Culver City General Plan designation for the balance of the Project Site (approximately 1.7 acres) is Light Industrial, which allows a limited variety of light manufacturing and industrial uses, as well as commercial and live-work residential uses. The Light Industrial designation is intended to protect adjacent residential areas while allowing clean, quiet industry and commercial office. No changes to the Project Site's existing General Plan designations are proposed by the Project.

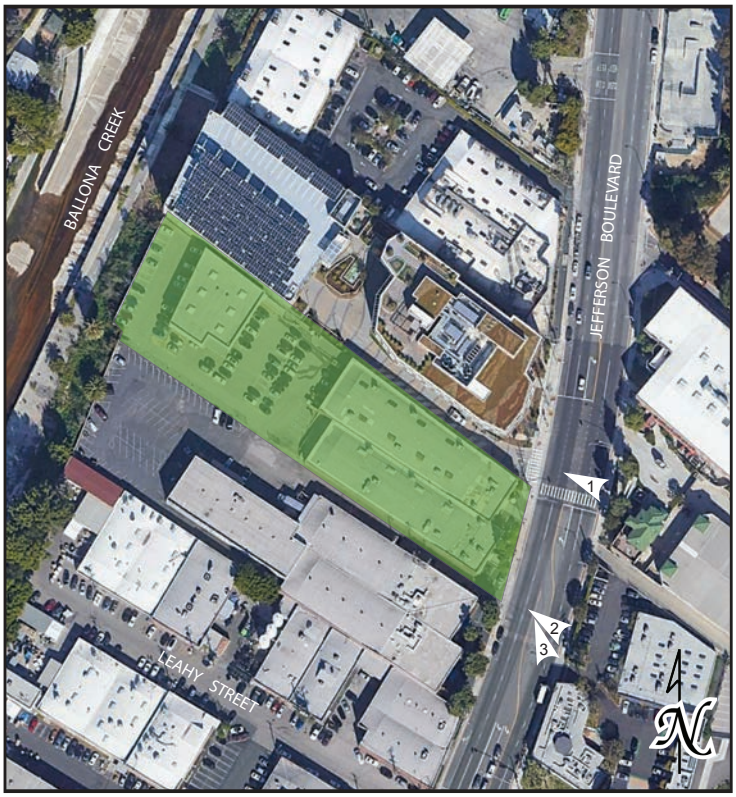
The existing zoning designation of this portion of the Project Site is Industrial General (IG District). As described in the Culver City Municipal Code (CCMC), Chapter 17.230, the IG District permits industrial, manufacturing and processing uses; some recreation and education uses; retail uses; and service uses (including offices and storage facilities). Per Section 17.230.020 of the CCMC, the minimum setbacks required within the IG District are 5 feet along the street facing property line and none along the side or rear property lines. The height limit is 43 feet, with specified exceptions for mechanical equipment and architectural features. (See CCMC, Section 17.300.025.C.). The Project Site is located within Redevelopment Project Area No. 4. The IG Zoning District is consistent with the Light Industrial land use designation of the General Plan. No changes to the Project Site's existing zoning designations are proposed by the Project.

View 1: View looking northwest from Jefferson Boulevard towards the northern edge of the Project Site.



View 2: View looking northwest from Jefferson Boulevard towards the southern edge of the Project Site.

View 3: View looking northwest from Jefferson Boulevard towards the Project Site.



PROJECT SITE

PHOTO LOCATION MAP

Source: GoogleEarth, March 2021.

Figure II-3
Views of the Project Site
Views 1, 2, and 3

c) Surrounding Land Uses

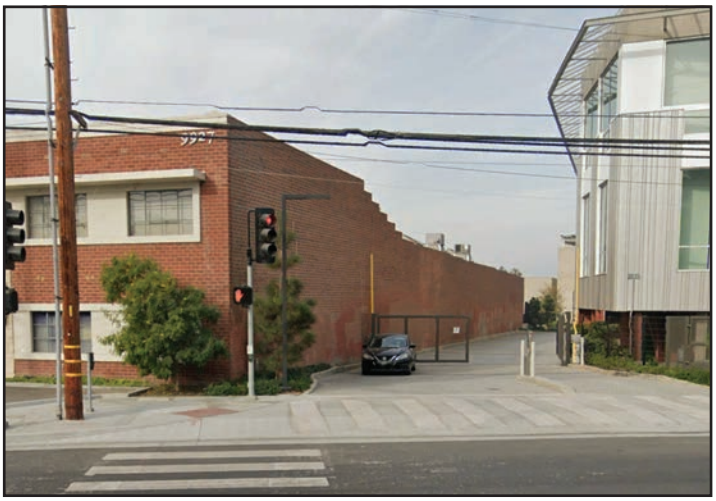
The Project Site is located within an urbanized setting in the City. The surrounding area is characterized by a mix of commercial, office, and light industrial uses, ranging in height from one to three-stories. Land uses immediately surrounding the Project Site include a three-story office use to the north, a two-story commercial use to the south, Ballona Creek to the west, and a two-story office use to the east, across Jefferson Boulevard. Views of the surrounding land uses are shown on **Figures II-4** and **II-5.**

3. PROJECT CHARACTERISTICS

a) Project Overview

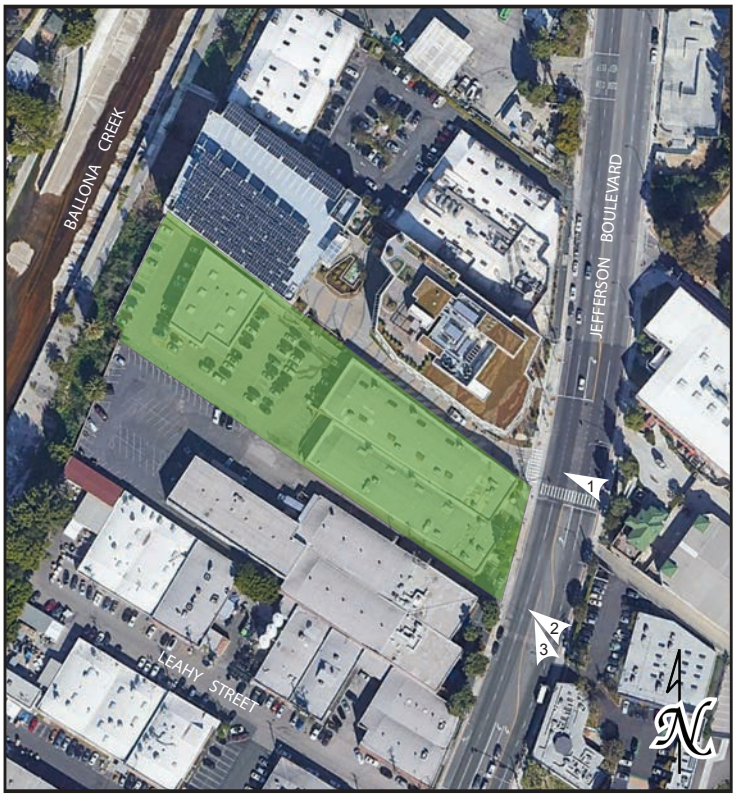
The Project involves the demolition of approximately 26,405 square feet of the existing 41,925 square feet of commercial uses on-site, including the demolition of a 7,091 square foot warehouse building located to the rear of the Project Site, thereby retaining approximately 15,520 square feet of floor area. Upon completion the Project would include an additional 35,658 square feet of commercial space for a total of approximately 51,178 square feet to be utilized as creative office space and an associated 70,739 square foot parking structure providing up to 177 automobile parking spaces and 22 bicycle parking spaces. The proposed creative office space building would have three stories with a height of 43 feet (excluding permitted rooftop structures) and the parking structure would have four parking levels with a height up to 36 feet (excluding permitted rooftop structures). **Table II-1, Project Development Summary**, summarizes the proposed land uses. The Project's floor plans are shown on **Figures II-6** through **II-14.**

View 1: View looking northwest from Jefferson Boulevard towards the northern edge of the Project Site.



View 2: View looking northwest from Jefferson Boulevard towards the southern edge of the Project Site.

View 3: View looking northwest from Jefferson Boulevard towards the Project Site.



PROJECT SITE

PHOTO LOCATION MAP

Source: GoogleEarth, March 2021.

Figure II-3
Views of the Project Site
Views 1, 2, and 3

View 1: View looking southwest from Jefferson Boulevard towards the commercial use adjacent to the Project Site.

View 2: View looking southwest from Jefferson Boulevard towards the office use adjacent to the Project Site.

View 3: View looking north from Jefferson Boulevard towards commercial uses.

PROJECT SITE

PHOTO LOCATION MAP

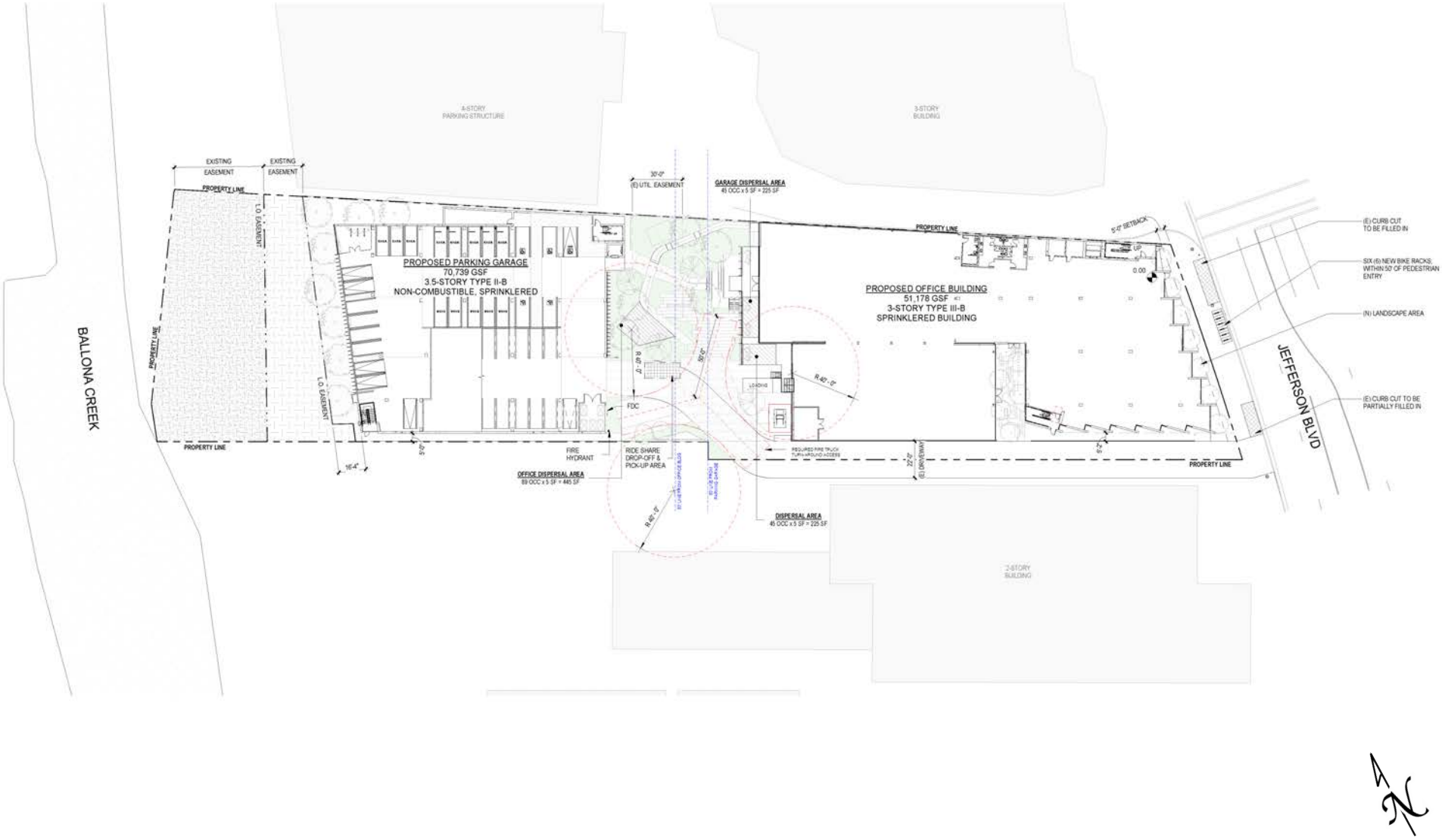
Source: GoogleEarth, March 2021.

Figure II-4
Views of Surrounding Uses
Views 1, 2, and 3

Table II-1
Project Development Summary

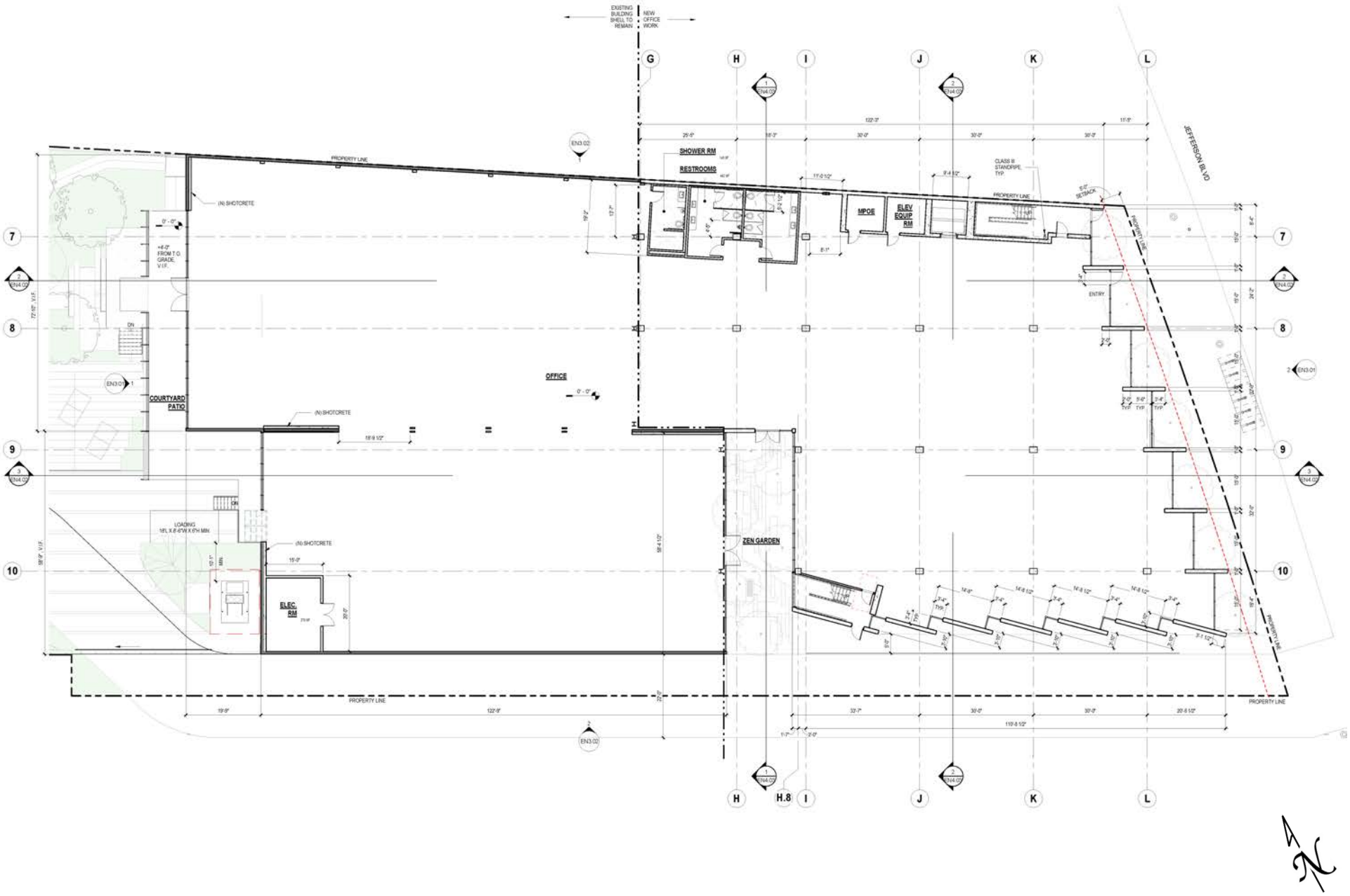
Land Use	Amount
Office Space	
Existing Office Space to Remain (sf) – Level 1	15,520
Total Existing Office Space to Remain	***15,520***
Proposed Office Space (sf)	
Level 1	12,850
Level 2	11,404
Level 3	11,404
Total New Proposed Office Space (sf)	***35,658***
Total Office Space (sf)	**51,178**
Parking	
Parking Structure (sf)	
Parking Level 1	15,611
Parking Level 2	20,613
Parking Level 3	19,849
Parking Level 4	14,666
Total Parking Area (sf)	**70,739**
Parking Spaces	
Parking Level 1	51
Parking Level 2	48
Parking Level 3	60
Parking Level 4	18
Total Automobile Parking Spaces	**177**
Total Bicycle Parking Spaces	**22**
Open Space	
Level 1 (sf)	
Courtyard	8,010
Courtyard Patio	1,063
Zen Garden	1,022
Total Open Space Level 1	***10,095***
Level 2 (sf)	
Terrace	1,330
Total Open Space Level 2	***1,330***
Roof (sf)	
Covered Roof Deck	1,056
Roof Deck	3,392
Total Open Space Roof	***4,448***
Total Common Open Space (sf)	**15,837**

du = dwelling units; sf = square feet
Source: Shubin Donaldson, January 2021.



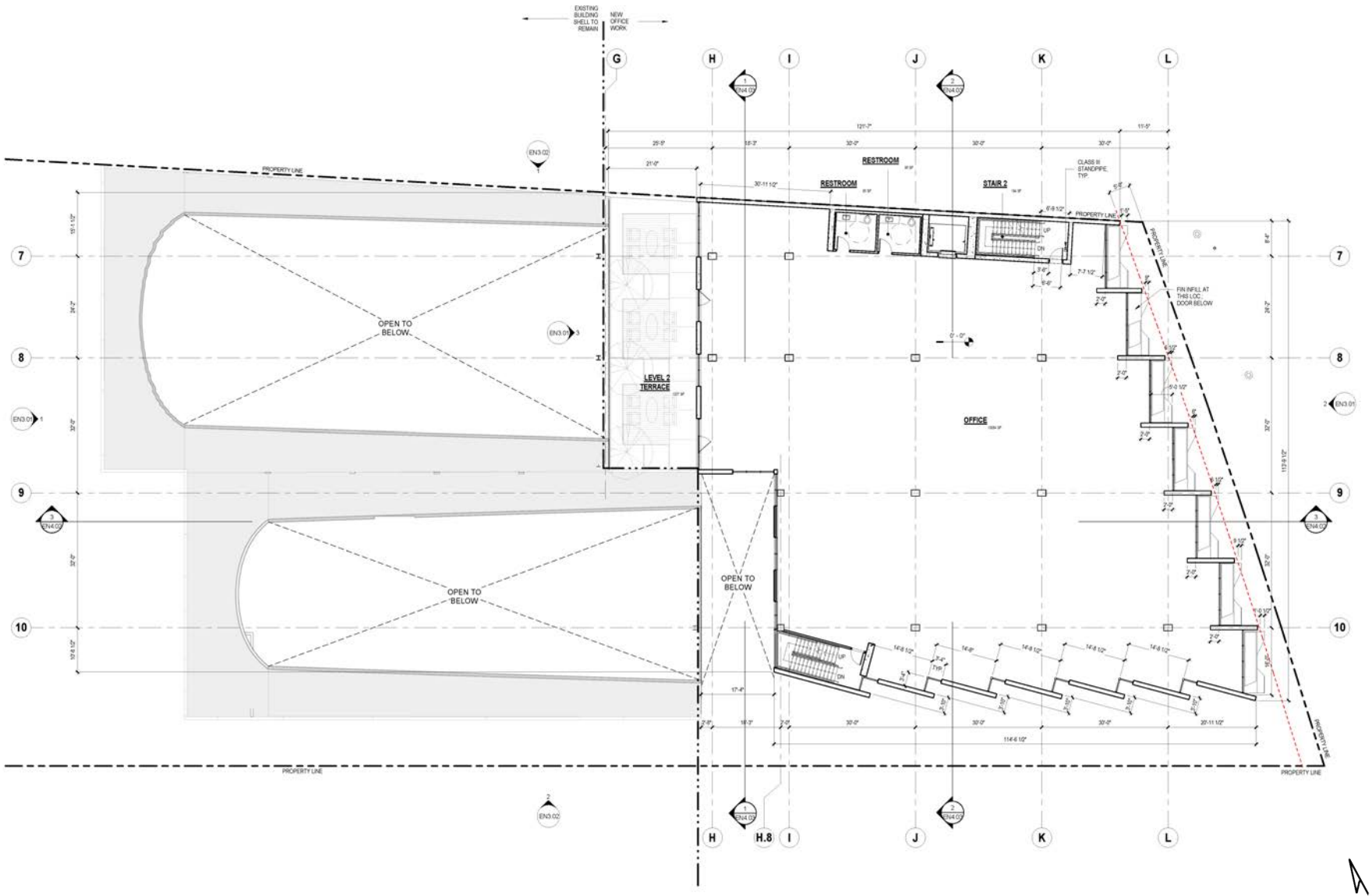
Source: Shubin Donaldson, July 2021.

Figure II-6
Conceptual Site Plan



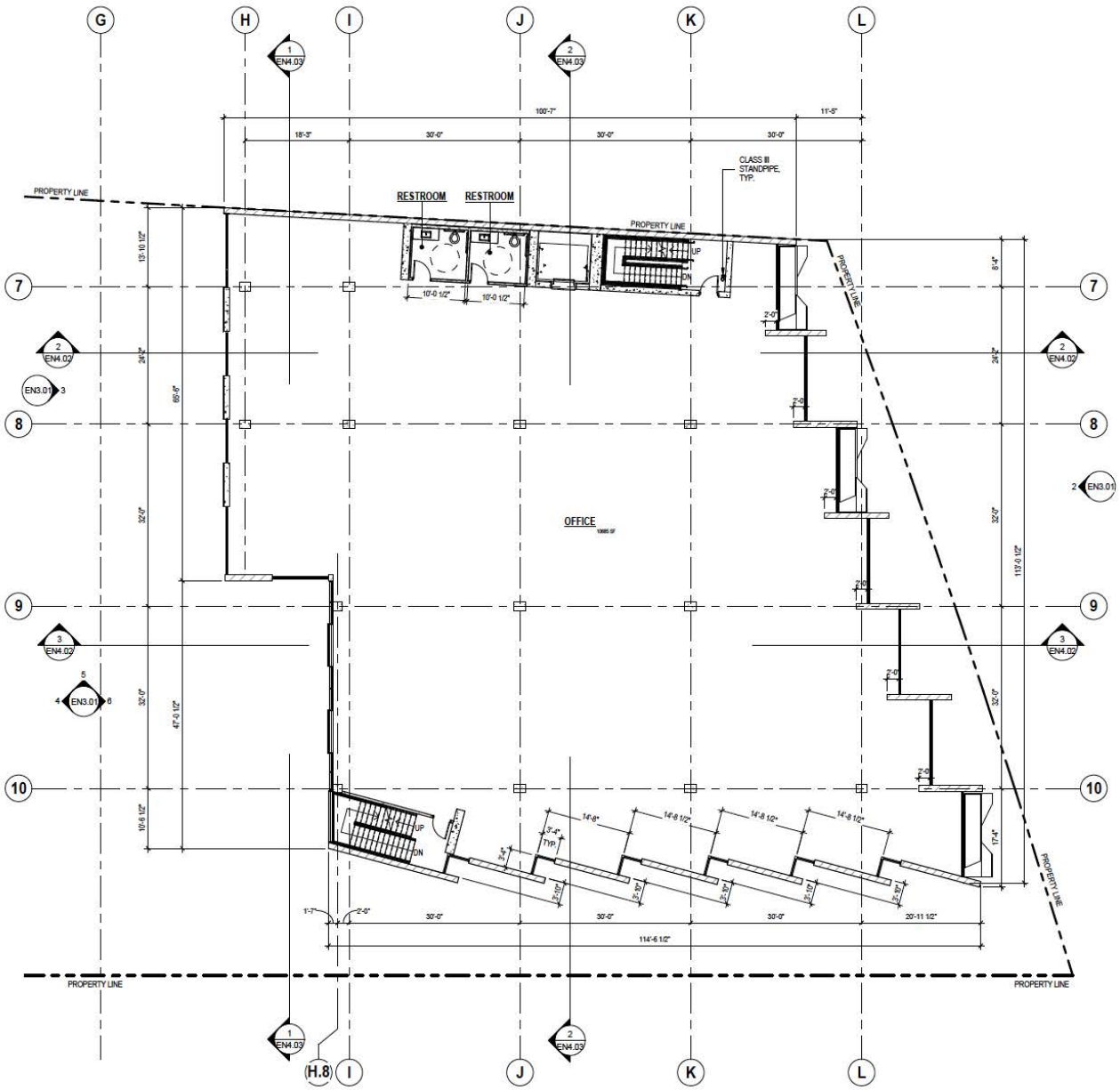
Source: Shubin Donaldson, July 2021.

Figure II-7
Level 1 Office Plan



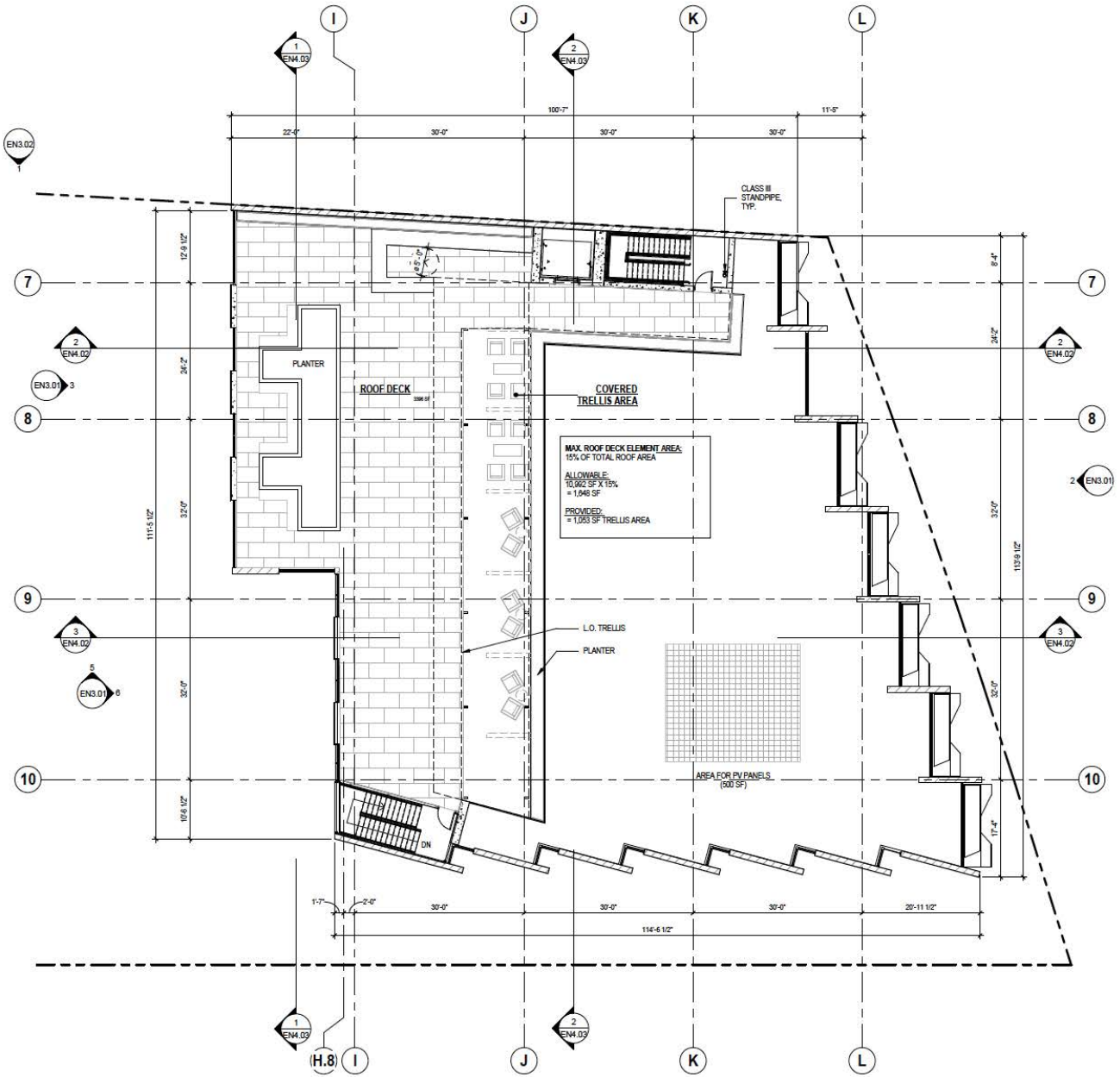
Source: Shubin Donaldson, July 2021.

Figure II-8
Level 2 Office Plan



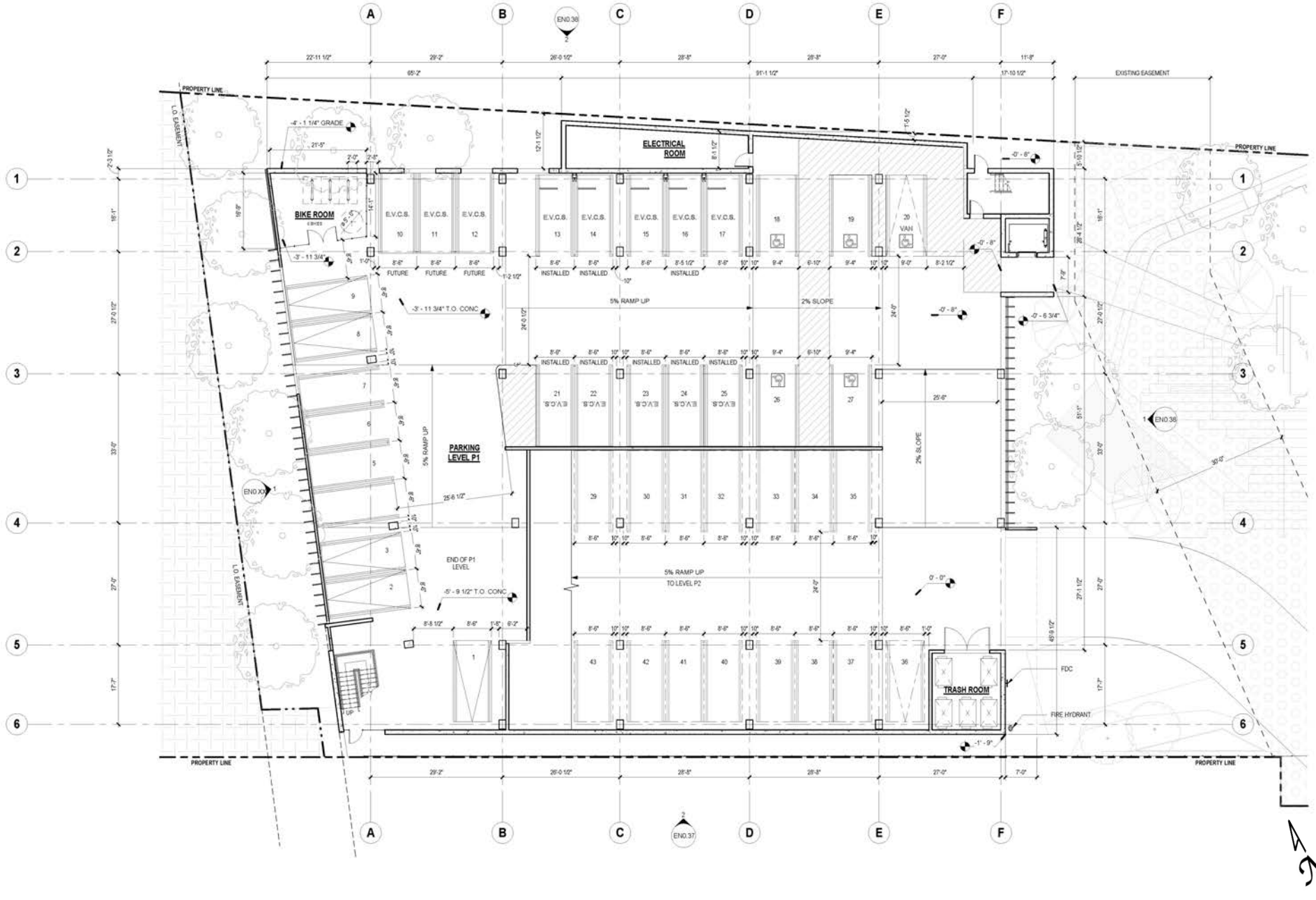
Source: Shubin Donaldson, July 2021.

Figure II-9
Level 3 Office Plan



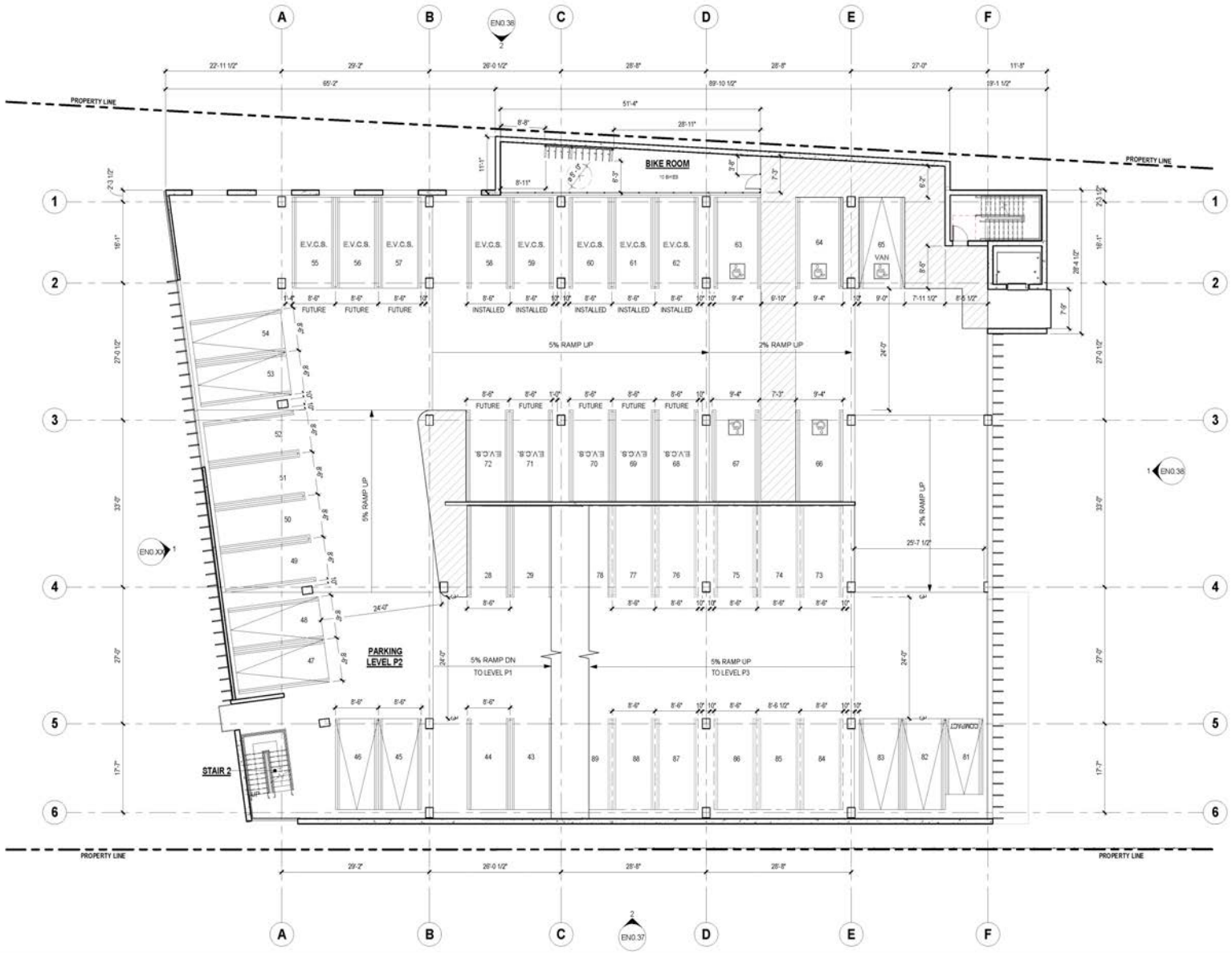
Source: Shubin Donaldson, July 2021.

Figure II-10
Roof Level Office Plan



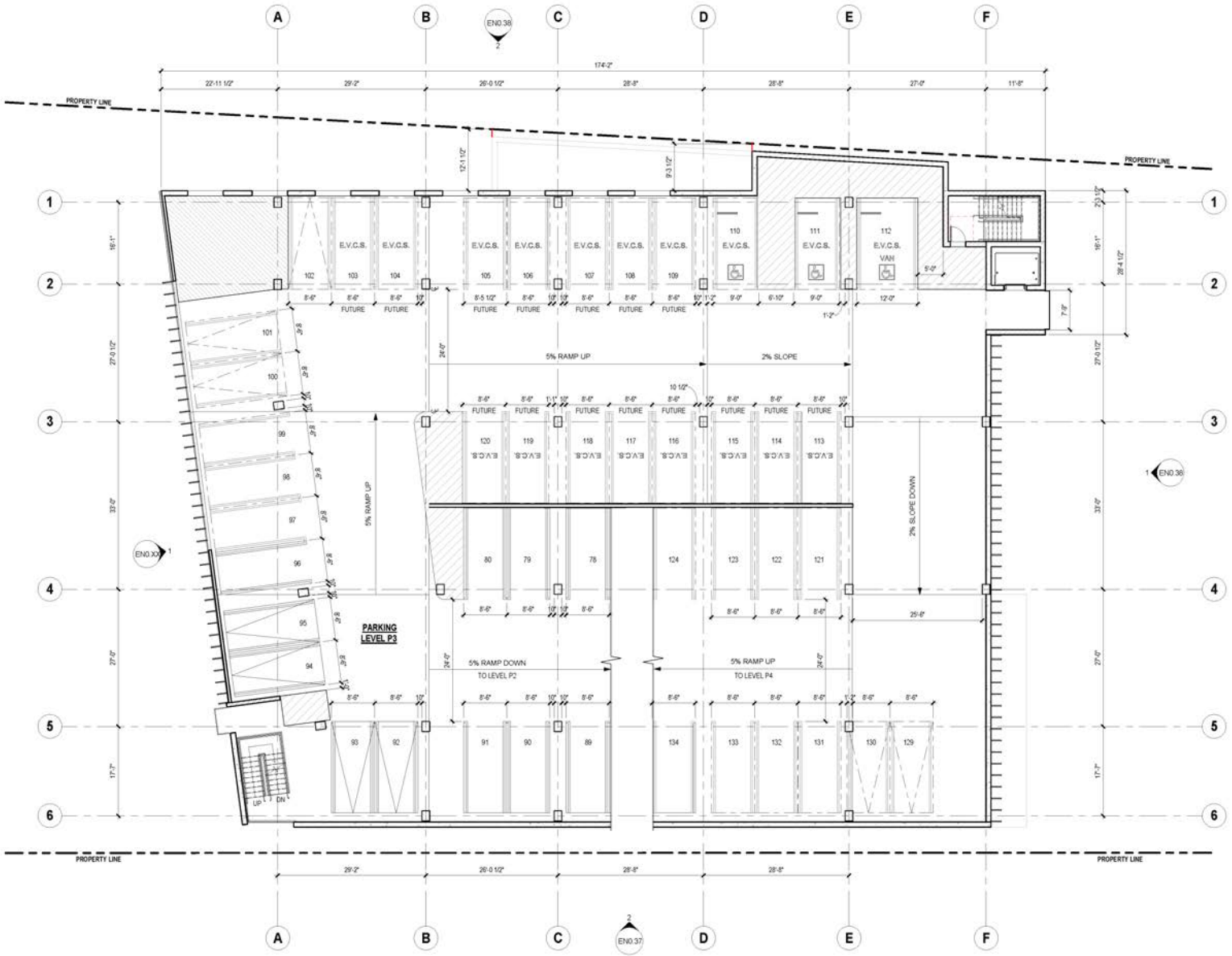
Source: Shubin Donaldson, July 2021.

Figure II-11
Level 1 Parking Plan



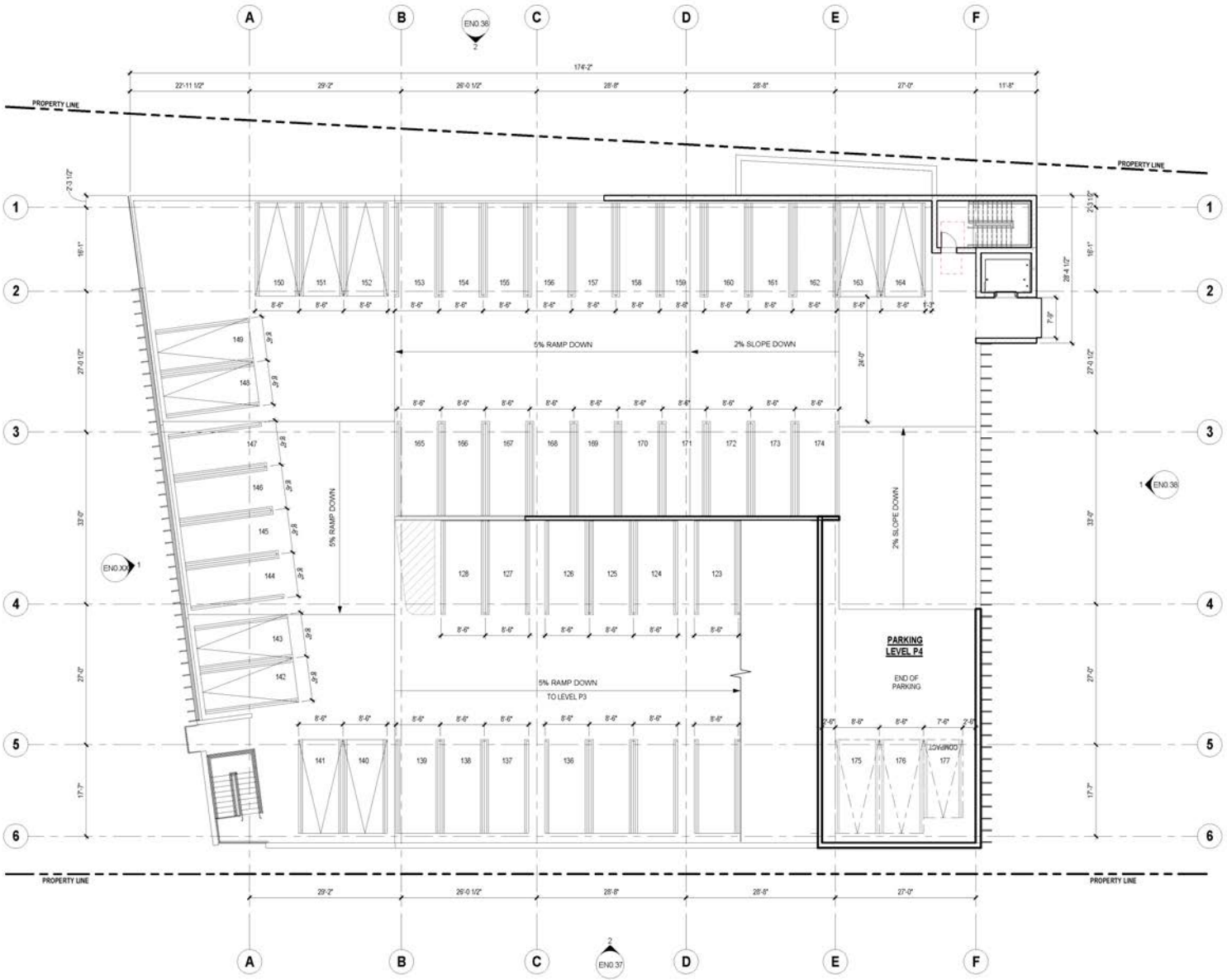
Source: Shubin Donaldson, July 2021.

Figure II-12
Level 2 Parking Plan



Source: Shubin Donaldson, July 2021.

Figure II-13
Level 3 Parking Plan



Source: Shubin Donaldson, July 2021.

Figure II-14
Level 4 Parking Plan

b) Design and Architecture

The proposed office building provides a variety of architectural materials and building planes and façade transparency. The parking structure, which would be located to the rear of the Project Site, has also been designed with a variety of architectural materials and a grid façade to minimize the views of cars. Varying building materials are proposed such as concrete, steel, glazing, metal panels, and other such contemporary materials to provide consistency with recent development that has occurred near the Project Site. The Project's use of different textures, colors, setbacks, materials, and distinctive architectural treatments is designed to create visual interest, avoid repetitive facades, and break up the building's mass.

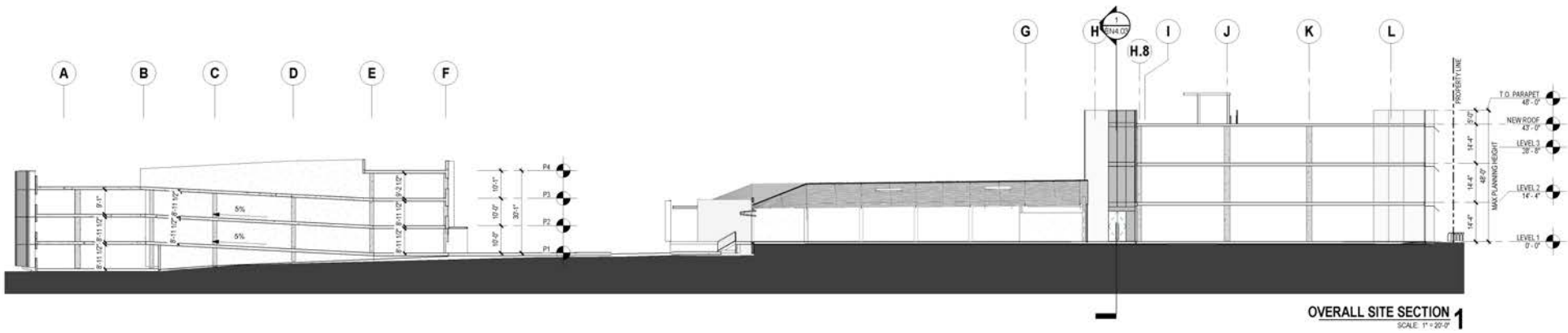
The proposed creative office building would be three stories with a height of 43 feet and would include certain permitted rooftop structures, including a parapet with a height of 5 feet, a stair shaft with a height of 12 feet 6 inches, and an elevator shaft with a height of 14 feet 6 inches. The four-level parking structure would have a height of approximately 36 feet and would include certain permitted rooftop structures, including a stair shaft with a height of 11 feet 10.5 inches and an elevator shaft with a height of 14 feet 4.5 inches. Roof mounted mechanical equipment (e.g., air conditioning, heating, exhaust, and ventilation ducts, etc.) would be screened from public view from adjoining public streets and rights-of-way. The method of screening would be architecturally compatible with other on-site development in terms of colors, materials, and architectural style as approved by the City's Planning Manager.

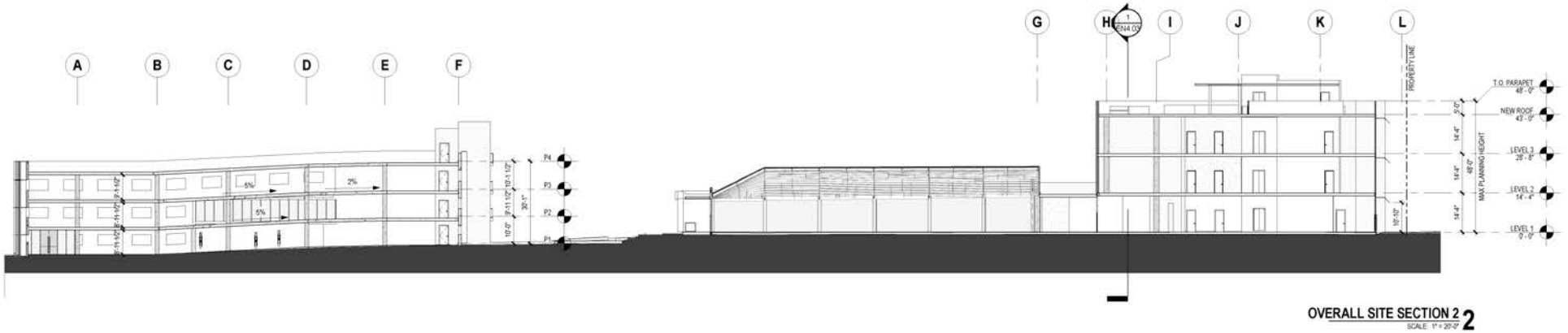
The office building and parking structure would both be designed in a modern architectural style that utilizes a natural palette. The office building would include extensive fenestration and windows, including a second floor roof deck. One of the main features of the Project Site would be a landscaped common area that creates an inviting open space that draws inspirations from the vegetation of the Ballona Creek. The Project would include a central open space common area, with a water feature, a zen garden, and outdoor open seating work areas. See **Figures II-15** through **II-22** for the Project's elevations and conceptual rendering.

Open Space and Landscaping

As shown in **Table II-1**, the Project would provide approximately 15,837 square feet of open space. The Project's open space and amenities would include two ground-floor courtyards, a ground-floor covered courtyard patio, a zen garden, and a second-floor terrace with a covered area and an open deck area with landscaping and seating.

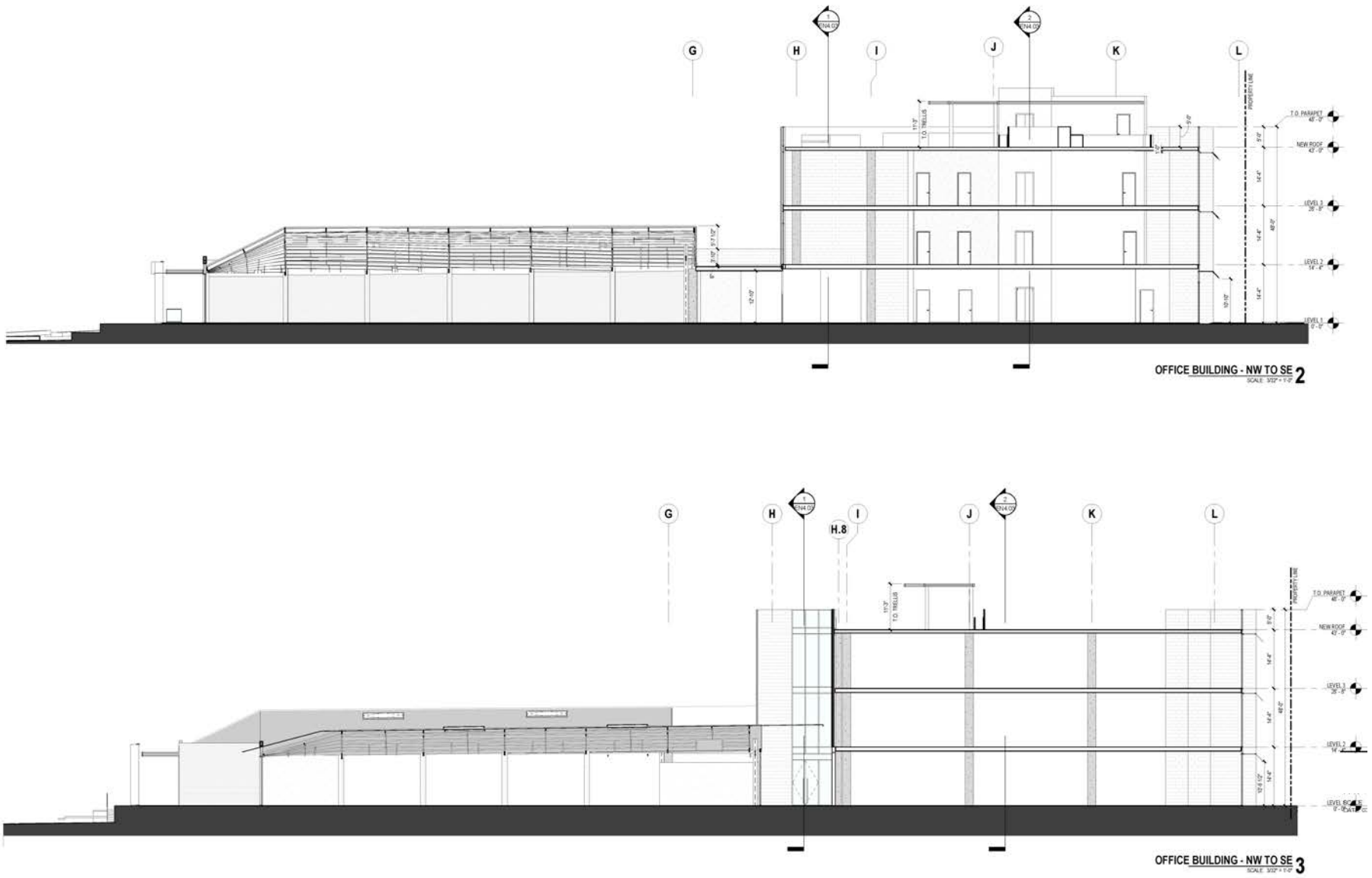
The Project's landscape plan proposes removal of all existing ornamental trees, and would plant at least 32 new trees on the ground level and 3 trees on the upper terrace, including seven street trees on the eastern frontage of the office building, and six trees within a 16 foot wide landscape buffer on the western edge of the Project Site that would screen the parking structure from the residential uses to the west.





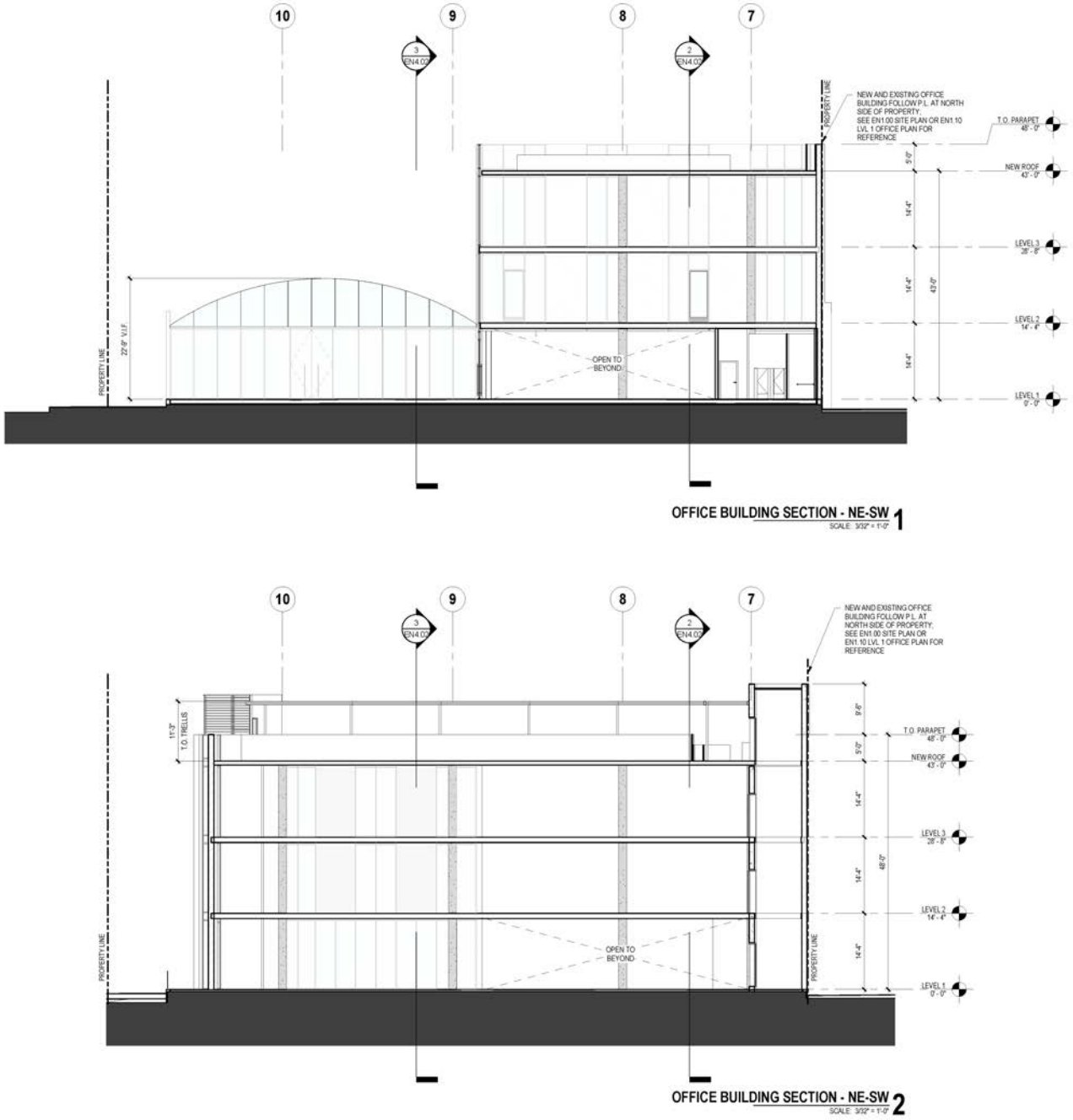
Source: Shubin Donaldson, July 2021.

Figure II-15
Overall Site Section



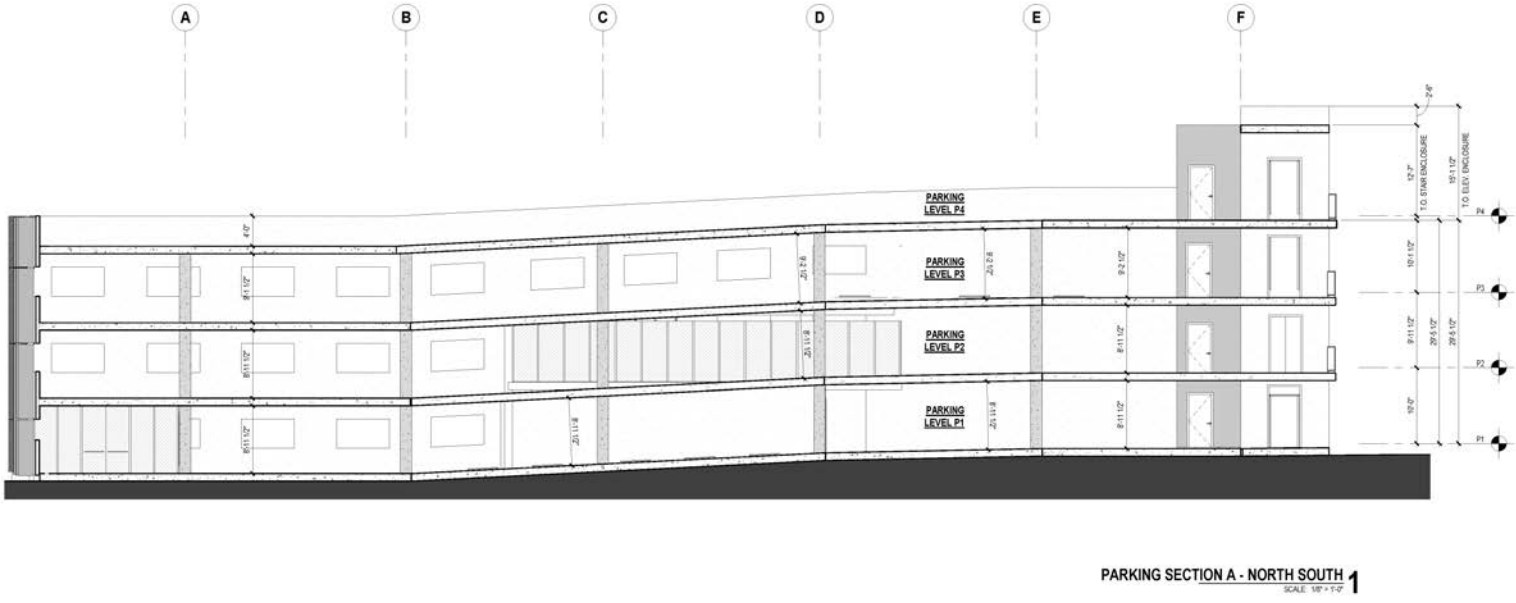
Source: Shubin Donaldson, July 2021.

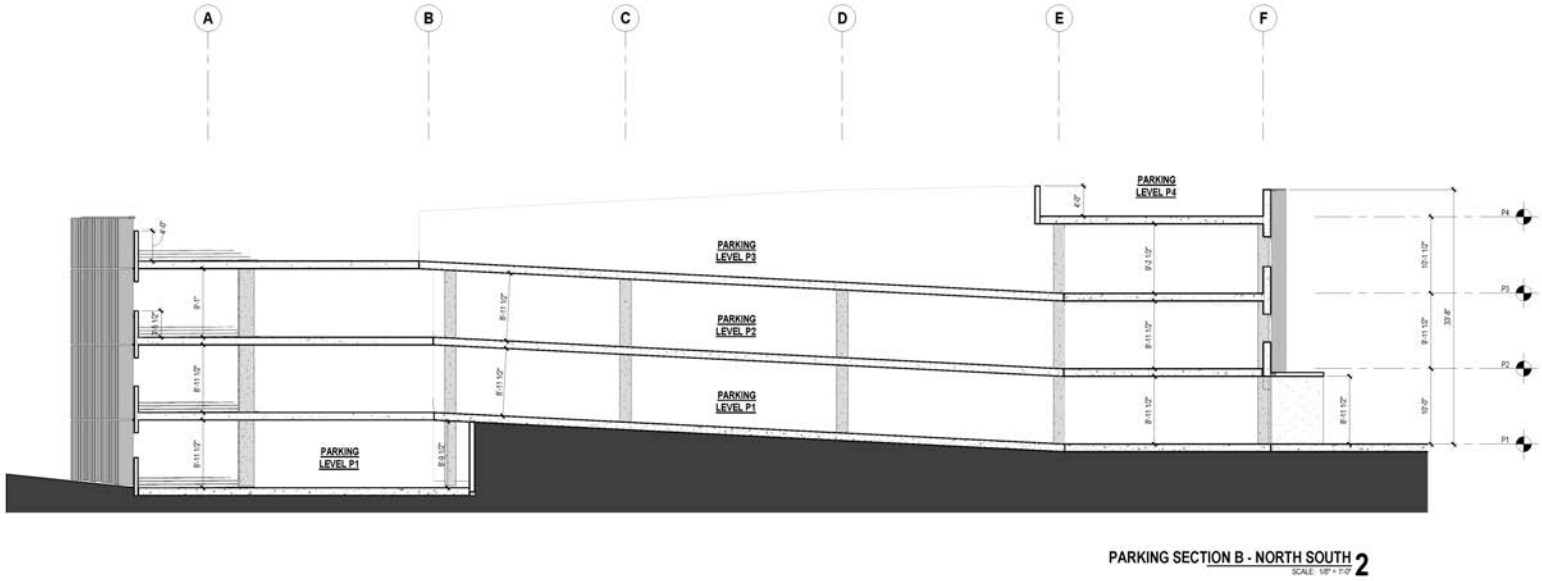
Figure II-16
Office Site Section – Northwest to Southeast



Source: Shubin Donaldson, July 2021.

Figure II-17
Office Site Section – Northeast to Southwest





Source: Shubin Donaldson, July 2021.

Figure II-18
Parking Site Section – North to South

OFFICE BUILDING - JEFFERSON BLVD. 1

OFFICE BUILDING - JEFFERSON BLVD. 2

OFFICE COURTYARD - ZEN GARDEN AREA 3

OFFICE COURTYARD 4

KEY PLAN

Source: Shubin Donaldson, July 2021.

Figure II-19
Office Concept Renderings

LEVEL 2 - TERRACE 1

LEVEL 2 - TERRACE 2

ROOF DECK 3

ROOF DECK 4

KEY PLAN

Source: Shubin Donaldson, July 2021.

Figure II-20
Office Open Space Concept Renderings

OFFICE ENTRY 1

OFFICE ENTRY 2

OFFICE ENTRY 3

WATER FEATURE AT OFFICE ENTRY 4

KEY PLAN

Source: Shubin Donaldson, July 2021.

Figure II-21
Office Courtyard Concept Renderings

PARKING STRUCTURE - DRIVE ENTRY 1

PARKING STRUCTURE - STAIR & ELEV TOWER 2

PARKING STRUCTURE - FACADE FACING BALLONA CREEK 3

PARKING STRUCTURE - FACING BALLONA CREEK 4

KEY PLAN

Source: Shubin Donaldson, July 2021.

Figure II-22
Parking Concept Renderings

c) Access, Circulation, and Parking

Pedestrian Access

Pedestrian access to the office building would be provided from the sidewalk along Jefferson Boulevard, the parking structure access road along the southern edge of the Project Site, and two separate access points at the rear of the office building.

Automobile Access

As shown in **Figure II-6, Conceptual Site Plan,** direct vehicular access to the parking area would be provided by a vehicular access driveway from Jefferson Boulevard. This vehicular access road would run along the southern perimeter of the Project Site directly to the proposed parking structure at the rear of the Project Site. The Project's parking would be designed to accommodate vehicles through a combination of standard, compact, and Americans With Disabilities (ADA)-compliant parking spaces.

The parking structure would offer ample parking for low emission vehicles (i.e., hybrid, alternative fuel and electrical automobiles) as required by the California Green Building Code (CGBC) (Section 5.106.5.3.3, Electric Vehicle (EV) charging space calculation). In total, the Project would provide 102 standard spaces, 2 compact spaces, ten ADA spaces, 3 EV ADA spaces, 15 EV-parking spaces with chargers installed,15 EV-ready, and 30 EV-capable (future) parking spaces, per CCMC Section 17.320.035.O.3. As shown on **Table II-1**, the Project would provide 177 automobile parking spaces, which is over the required 146 parking spaces.[2]

Bicycle Parking

As shown on **Table II-1**, the Project would provide a total of 22 bicycle spaces , which would be seven spaces above the Culver City's Municipal Code ("CCMC") required parking.[3] The Project would provide indoor bicycle parking spaces within the parking structure, 6 on Level 1 and 10 on Level 2, and 6 along the building frontage.

d) Lighting and Signage

New Project signage would be used for building identification, wayfinding, and security markings. Exterior lights would be wall- or ground-mounted and shielded away from adjacent land uses. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn but would be designed to prevent light trespass onto adjacent properties. All signage would be provided consistent with a *Master Sign Program* pursuant to zoning code section 17.330.050.D.2

[2] *Required Office Parking is 1 space per 350 square feet. The Project is required to have 146 automobile parking spaces (51,178 square feet x 1 space/350 square feet = 146.2).*

[3] *Required Bicycle Parking is five percent of the automobile spaces. The Project is required to have nine automobile space (177 automobile spaces x 5 percent = 9).*

e) Sustainability Features

The Project would incorporate green building design, which would promote conservation, energy efficiency, and carbon emission reduction, including compliance with the California Energy Code/Title 24 requirements, and would include, but not be limited to, the following features:

Conservation and Energy Efficiency

- Recycling or salvaging at least 65 percent of non-hazardous construction and demolition debris;
- Energy efficient elevator;
- Low-flow faucets and toilets;
- Stormwater filtration and capture systems;
- Permeable exterior paving surfaces to reduce stormwater runoff;
- Incorporation of low-water and drought tolerant plants in the landscape plan;
- Installation of electric vehicle supply equipment (EVSE) or EV charging stations;
- Installation of a photovoltaic system equivalent to at least one percent of the Project's electricity demand and at least one kilowatt (kW) of solar photovoltaics per 10,000 SF of new development;
- Energy efficient mechanical systems;
- Energy efficient glazing and window frames;
- High reflective roof material;
- On-site recycling collection facilities; and
- Energy efficient lighting.

Carbon Emission Reduction

- Bicycle rooms in Parking levels 1 and 2.

Mobility Features

- Access to multi-modal transit with connecting bike and bus routes. There is direct access to a Class III bus route;
- Bike friendly design with bicycle parking for guests and employees;
- Designated parking for low-emission/zero-emission vehicles; and
- The perimeter of the Project Site area would incorporate the City's approved Streetscape plan which will create an attractive and inviting walkable environment .

f) Site Security

The Project would incorporate a 24-hour/seven-day video surveillance security program to ensure the safety of its employees and visitors. Site security features would include building access/design to assist in crime prevention efforts and to reduce the demand for police protection

services. The Project design would include lighting of entry-ways and public areas for site security purposes.

g) Anticipated Construction Schedule

It is anticipated that Project construction activities would commence as early as the second quarter of 2022 with completion of construction in approximately the third quarter of 2023, with a total of approximately 14 months of construction. Construction would include the removal of approximately 4,800 cubic yards of demolition debris, involving approximately 400 truck loads at 12 CY/load for super tens over approximately 20 days of demolition. Project construction would include the removal of approximately 3,400 cubic yards of dirt, 30 trucks per day (approximately 14 cubic yard bottom dump truck), or 240 total trucks over approximately 8 days of hauling.

A Construction Management Plan (CMP) would be developed by the Applicant in consultation with the Project's traffic engineer as necessary, and approved by the Culver City Engineer prior to issuance of a demolition permit. The CMP would document how the Project's construction management team would implement and conduct construction phases of the Project. The CMP would include: name and telephone number of a contact person regarding traffic complaints or emergency situations; contact information for local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity; procedures for training the flag person(s) used in implementing the plan; the location, times, and estimated duration of any temporary lane closures; managing the approved haul route plan; and construction parking management plan.

The Project would comply with CCMC construction hours of:[4]

- Monday-Friday: 8:00 AM through 8:00 PM
- Saturdays: 9:00 AM through 7:00 PM
- Sundays: 10:00 AM through 7:00 PM

Any work outside of the above hours would require consultation and approval with Culver City departments prior to any works being scheduled and nearby businesses would be given notification of the proposed after hours work prior to the starting said work including details of the work to be performed with an anticipated time required to undertake each activity.

Dirt hauling and construction material deliveries or removal would not be allowed during morning (7:00 AM – 9:00 AM) and afternoon (4:00 PM – 6:00 PM) peak traffic periods. It should be noted that this requirement would have the effect of prolonging overall construction time. However, this would minimize peak hour traffic impacts. Also, every effort would be made to minimize the need for lane closures. Should lane closures be required, businesses and city officials would be notified via the email notification system set up at the commencement of construction. Lane closures, if required, would occur between the hours of 9:00 AM – 3:00 PM to avoid peak traffic periods.

[4] *CCMC Chapter 9.07: Noise Regulations, Section 9.07.035 Construction.*

A series of permits would be required for Project phases including demolition, excavation, subterranean and above-ground construction. These approvals may include contingencies requiring additional design and submittals that must be approved before work can begin. Some anticipated items requiring further approval might include, but not be limited to: Final Construction Traffic Management Plan; Erosion and Sediment Control Plan; and Shoring and Excavation Plan. The Final Construction Traffic Management Plan would include measures to minimize traffic impacts associated with any concurrent construction activities occurring in the Project vicinity.

Before any lane closures and/or other temporary modifications to traffic are implemented, further approvals would be required from Culver City Public Works Traffic Management Division and/or other pertinent city departments. These items may include, but would not limited to: Traffic Control Plan including, but not limited to vehicular, bicycle, and pedestrian traffic routing; Off-site Civil work including lighting, signage, landscape, paving, and striping; and After Hours Application.

4. REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated discretionary and/or ministerial requests required for approval of the Project. This Categorical Exemption analyzes impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project.

- Site Plan Review
- Demolition Permits to demolish Building C and portions of Buildings A and B to allow for construction of the Project
- Construction Permits, including building, grading, excavation, foundation, and associated permits
- Haul Route permit;
- Demolition, grading, excavation, and building permits; and
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

5. ENVIRONMENTAL REVIEW

As demonstrated in the following **Section III, Categorical Exemption Analysis**, this Project has been determined to qualify as a Class 32 In-Fill Development Project and is therefore categorically exempt from CEQA.

III. CATEGORICAL EXEMPTION ANALYSIS

1. EXEMPTION

The Project qualifies for a Class 32 – In-Fill Development Project Categorical Exemption under the California Environmental Quality Act (CEQA) (Public Resources Code, Sections 21000-21189.57) as set forth in Section 15332 of the *State CEQA Guidelines* (California Code of Regulations, Title 14, Chapter 3, Sections 15000-15387).

2. EXEMPTION RATIONALE

Article 19, Categorical Exemptions, of the *State CEQA Guidelines* (Sections 15300 – 15333) lists classes of projects which have been determined not to have a significant effect on the environment and which are exempt from the provisions of CEQA as required by Section 21084 of the Public Resources Code. This section provides an analysis demonstrating that the Project meets the conditions for a Class 32 Categorical Exemption and that none of the possible exceptions to a Categorical Exemption listed in Section 15300.2 of the *State CEQA Guidelines* is applicable to this Project. The specific language of each condition of the Class 32 Categorical Exemption and each possible exception is shown in italics below under their respective headings, which are followed by the Project analysis for each condition and exception.

a) Conditions of the Class 32 Categorical Exemption

[State CEQA Guidelines Section] 15332. In-Fill Development Projects

Class 32 consists of projects characterized as in-fill development meeting the conditions described in this section.

- *(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.*

(1) Project Analysis

Condition (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.

(a) Culver City General Plan

The *Culver City General Plan* (General Plan) guides land use throughout the City. The General Plan sets forth objectives, policies, and programs to guide day-to-day land use policies and to meet the existing and future needs and desires of the community, while integrating a range of State-mandated elements including Land Use, Circulation, Housing, Open Space, Noise, Conservation, Seismic, Public Safety, and Recreation. The Land Use Element of the General Plan consists of eight community sub-areas that guide land use at a neighborhood level. The Project Site is located within the Southeastern sub-area, Jefferson neighborhood. Jefferson Boulevard developments are heavily landscaped and non-residential uses along Jefferson Boulevard include industrial and commercial businesses and the City maintenance and CityBus yards.[5]

The General Plan designates the Project Site for Light Industrial land uses, which allows a limited variety of light manufacturing and industrial uses, including commercial and live-work uses. The Light Industrial designation is intended to protect adjacent residential uses, while allowing clean, quiet industry and commercial office uses. The Light Industrial designation provides for the development of industrial and commercial uses and corresponds with the Light Industrial (IL) zone. The permitted density is determined site-by-site based on adjacent uses and required setbacks.[6]

Table III-1, Project Consistency with the General Plan presents an analysis between the applicable objectives and policies in the General Plan. As shown, the Project would be consistent with the applicable goals and policies.

Table III-1
Project Consistency with the General Plan

Objective/Policy[a]	Project Consistency
Land Use Element	
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. Varying building materials are proposed such as concrete, steel, glazing, metal panels, and other such contemporary materials to provide consistency with recent development that has occurred near the Project Site. The use of quality materials in combination with a clear architectural design would enhance the overall area.
Policy 10.F: Continue to require the undergrounding of utilities in all new developments and during replacement of	**Consistent:** If new Project-related utility equipment is needed, the Project would place such equipment underground.

[5] *Culver City General Plan, Land Use Element, Amended February 28, 2020, page LU-58.*
[6] *Culver City General Plan, Land Use Element, Amended February 28, 2020, page LU-24.*

Table III-1
Project Consistency with the General Plan

Objective/Policy[a]	Project Consistency
existing service whether alone or as a part of a remodeling project, wherever feasible.	
Objective 27: Protect and enhance open space, residential and business uses within the Southeastern Sub-Area.	**Consistent:** The Project would provide approximately 19,047 square feet of open space, which would include two ground-floor courtyards, a ground-floor covered courtyard patio, a dog run, a zen garden, and a second-floor terrace with a covered area and an open deck area with landscaping and seating, thereby enhancing the office use with usable on-site open space.
Policy 27.C: Improve the Southeastern Sub-Area's aesthetic image and identity as part of Culver City by assigning high priority to streetscape improvements and City signage along east Jefferson Boulevard and along La Cienega Boulevard south of Wrightcrest Drive.	**Consistent:** The Project would enhance pedestrian access along Jefferson Boulevard with new and additional landscape features including at least seven street trees, subject to City approval.
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 enhance pedestrian access along Jefferson Boulevard with new and additional landscape features including at least seven street trees, subject to City approval.
Policy 4.E: Ensure actual and perceived safety of pedestrian areas through crime prevention measures.	**Consistent.** The Project would incorporate a 24-hour/seven-day video surveillance security program to ensure the safety of its employees and visitors. Site security features would include building access/design to assist in crime prevention efforts and to reduce the demand for police protection services. The Project design would include lighting of entry-ways and public areas for site security purposes.
Policy 4.I: Encourage business signage which is easily readable and visually attractive for pedestrians.	**Consistent.** New Project signage would be used for building identification, wayfinding, and security markings. All signage would be provided consistent with a Master Sign Program pursuant to zoning code section 17.330.050.D.2.
Policy 6.B: Reduce pressure on on-street parking through provision of private and public off-street parking facilities.	**Consistent.** The Project would provide 177 automobile parking spaces in a four-story parking structure. In total, the Project would provide 124 standard spaces, four compact spaces, ten ADA spaces, 15 EVparking spaces with charges installed, and 30 EV-ready or capable (future) parking spaces, per CCMC Section 17.320.035.O.3.
Open Space Element	
Policy 5.I: Underground utility lines as part of new developments, and as part of ongoing maintenance and upgrades to existing services whenever feasible.	**Consistent:** If new Project-related utility equipment is needed, the Project would place such equipment underground.
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 be comprised of approximately 51,178 square feet to be utilized as creative office space and an associated parking structure. The Project would be compatible with the uses as they are characterized by a mix of commercial, office, and light industrial uses. Land uses immediately surrounding the Project Site include a three-story office

Table III-1
Project Consistency with the General Plan

Objective/Policy[a]	Project Consistency
	use to the north, a two-story commercial use to the south, Ballona Creek to the west, and a two-story office use to the east, across Jefferson Boulevard. Residential uses to the west of the Project Site are separated from the site by Ballona Creek and a 76-foot setback, including a 16-foot landscape buffer, between Ballona Creek and the Project'
Public Safety Element	
Policy 9: Require all new development and selected existing development to comply with established fire and geologic safety standards.	**Consistent**. Project buildings would be designed and constructed to resist the effects of seismic ground motions and be subject to compliance with fire protection design standards as provided in the Culver City Building Code and the 2019 California Building Code.

[a] *Culver City General Plan, Land Use Element, Amended February 28, 2020.*
Source (table): EcoTierra Consulting, 2021.

(b) Culver City Zoning Code

All on-site development activity is subject to *Title 17* (Zoning) of the Code. The Zoning Code includes development standards for the various districts in the City. The Zoning Code establishes the underlying zoning for the Project Site, which is Industrial General (IG). Per the Zoning Code, the IG Zoning District identifies areas appropriate for a wide variety of industrial uses, including outdoor activities. No heavy industry uses are allowed.[7]

Land uses allowed in the IG Zoning District include a variety of industry, manufacturing, and processing type uses, recreation, education, and public assembly type uses, retail trade type uses, service type uses, and transportation/communications type uses. An office use and associated parking is a permitted use within the IG Zoning District. The Project is consistent with the development standards of the IG Zoning District as explained below in **Table III-2, Zoning Consistency**.

[7] *Code Section 17.230.010.*

Table III-2
Zoning Consistency

	IG Development Standards[a]	Office Building	Parking Structure
Minimum Lot Area	*determined through subdivision review process*		
Maximum Height	43 feet	43 feet	36 feet
Maximum Height for Elevator Shafts	19'6" above height of building	57'6"	50'4.5"
Maximum Height for Other Permitted Rooftop Structures	13'6" above height of building	55'6"	47'10.5"
Setbacks			
Street Facing (Jefferson)	5 feet	5 feet	
Side (east)	0 feet	0 feet	
Side (west)	0 feet	0 feet	
Rear	0 feet	Approx. 90 feet	
Parking	146	177	

[a] *Code Section 17.230.010.*

(c) Culver City Mandatory Green Building Program

The *Culver City Mandatory Green Building Program* is based on the *California Green Building Standards Code* (commonly known as CALGreen), which was developed and mandated by the State to attain consistency among the various jurisdictions within the State with the specific goals to reduce a building's energy and water use, reduce waste, and reduce the carbon footprint. The following types of projects are subject to the *Culver City Mandatory Green Building Program*:

- Major Renovations up to 10,000 square feet;
- Major Renovations from 10,000 to 50,000 square feet;
- New Construction up to 10,000 square feet;
- New Construction from 10,000 to 50,000 square feet;
- Major Renovations over 50,000 square feet ;and
- New Construction over 50,000 square feet.[8]

The Project would incorporate green building design, which would promote conservation, energy efficiency, and carbon emission reduction, including compliance with the California Energy Code/Title 24 requirements, and would include, but not be limited to, the following features:

Conservation and Energy Efficiency

- Recycling or salvaging at least 65 percent of non-hazardous construction and demolition debris;
- Energy efficient elevator;
- Low-flow faucets and toilets;
- Stormwater filtration and capture systems;
- Permeable exterior paving surfaces to reduce stormwater runoff;

[8] *Culver City Building Safety Division, Culver City Green Requirements Application Chart, https://www.culvercity.org/files/assets/public/documents/city-manager/culvercity2010calgreenguid.pdf, accessed July 2021.*

- Incorporation of low-water and drought tolerant plants in the landscape plan;
- Installation of electric vehicle supply equipment (EVSE) or EV charging stations;
- Installation of a photovoltaic system equivalent to at least one percent of the Project's electricity demand and at least one kilowatt (kW) of solar photovoltaics per 10,000 SF of new development;
- Energy efficient mechanical systems;
- Energy efficient glazing and window frames;
- High reflective roof material;
- On-site recycling collection facilities; and
- Energy efficient lighting.

Carbon Emission Reduction

- Bicycle rooms in Parking levels 1 and 2.

Mobility Features

- Access to multi-modal transit with connecting bike and bus routes. There is direct access to a Class III bus route;
- Bike friendly design with bicycle parking for guests and employees;
- Designated parking for low-emission/zero-emission vehicles; and
- The perimeter of the Project Site area would incorporate the City's approved Streetscape plan which will create an attractive and inviting walkable environment.

(d) Summary

As discussed above, the Project would be consistent with its general plan designation and all applicable general plan policies, as well as, with its zoning designation and regulations. ***As such, the Project meets condition (a) of the Class 32 exemption.***

Condition (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 entirely within the Culver City limits on a site that is approximately 87,698 square feet (2.01-acre) in size. **Figures II-1** through **II-5** in **Section I, Project Description** show views of the Project Site and its regional vicinity; as shown therein, the Project Site is located in an urbanized setting characterized by a mix of commercial, office, and light industrial uses. ***As such, the Project meets condition (b) of the Class 32 exemption.***

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

The Project Site is currently occupied with a two-story commercial building fronting Jefferson Boulevard, a one-story warehouse building towards the rear, and a surface parking area. Nearly the entire Project Site is developed and paved with asphalt and concrete. Ballona Creek runs parallel along the western edge of the Project Site. As the Project Site has been completely developed, including hardscaping, within a heavily urbanized area of the City, the Project Site

does not contain any habitat capable of sustaining any species identified as endangered, rare, or threatened. No such species or habitats are known to occur at the Project Site per local or regional plans by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Moreover, the Project Site and immediately surrounding area are not within or near a designated Significant Ecological Area.[9] Therefore, the Project Site has no value as habitat for endangered, rare, or threatened species. ***As such, the Project meets condition (c) of the Class 32 exemption.***

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

The following provides a Project-specific analysis of potential impacts to traffic, noise, air quality, greenhouse gases, and water quality.

(a) Project-Specific Transportation Impacts

The following transportation impact analysis summarizes the information provided in the *Transportation Generation Assessment for 9925 Jefferson Project,* prepared by Fehr & Peers, April 2021 (Transportation Assessment) and the *Average Daily Traffic Volumes Development for 9925 Jefferson Project*, prepared by Fehr & Peers, May 2021 (Traffic Assessment).[10] The Transportation and Traffic Assessments are both available as **Appendix A** to this document.

(i) Project Trip Generation Assessment

Trip generation estimates for the Project were determined using trip generation rates from *Trip Generation, 10th Edition*. ITE trip generation rates for General Office (ITE Code 710) were used to estimate trips for both the Project and part of the existing use (front building), while the ITE trip generation rates for Warehouse (ITE Code 150) were used to estimate trips for the remaining part of the existing use (back building).[11]

Project Trip Generation

Table III-3, Trip Generation Estimate, presents the estimated trip generation for the Project. An existing use credit was taken for the existing office and warehouse spaces, which would be replaced with the Project. As presented in **Table III-3, Trip Generation Estimate**, the Project is estimated to generate approximately 161 daily net external trips, including 15 trips (13 inbound/2 outbound) during the AM peak hour and 17 trips (3 inbound/14 outbound) during the PM peak hour.

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[9] *Los Angeles County Department of Regional Planning, Planning & Zoning Information, GIS-NET online database, https://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public, accessed July 2021.*

[10] *The Traffic Assessment analyzes average daily traffic estimates for Existing (2021) Baseline, Future (2023) Base, and Future (2023) Base plus Project scenarios. Refer to **Exception B**, in this document, for specific details.*

[11] *Institute of Transportation Engineers, Trip Generation Manual, 10th Edition, Washington, D.C., 2017.*

Table III-3
Trip Generation Estimate

Land Use	Size	Daily	AM Peak Hour			PM Peak Hour		
Project								
Office	51,178 sf	554	65	10	75	10	50	60
Existing Use								
Office	34,834 sf	(381)	(51)	(8)	(59)	(7)	(35)	(42)
Warehouse	7,091 sf	(12)	(1)	(0)	(1)	(0)	(1)	(1)
Net New Trips		**161**	**13**	**2**	**15**	**3**	**14**	**17**

Note: Trip generation estimates based on rates for General Office Building (710) and Warehouse (150) in ITE's Trip Generation, 10th Edition, 2017.
*Traffic Assessment is available in **Appendix A** to this document.*

The *Culver City Transportation Criteria and Guidelines*[12] establishes criteria to determine whether a transportation study is required. The guidelines state that the City shall require a transportation study if a project is estimated to add 250 or more new daily trips. Because the Project would generate less than 250 net new daily trips, a transportation study is not required per the *Culver City Transportation Criteria and Guidelines*.

Geometric Design Review

Given the classification of the roadways along the Project Site's frontage, existing physical condition of the Project Site, and planned pedestrian enhancements, no safety concerns related to geometric design are noted. Additionally, the number of curb cuts along the Project Site's Jefferson Boulevard frontage would remain unchanged. Therefore, it can be determined that the Project would not substantially increase hazards due to a geometric design feature or incompatible use.

(ii) Transportation Impact Summary

As indicated above and in the Trip Generation Assessment, the Project would result in less than significant impacts to traffic.

(b) Project-Specific Noise Impacts

The following noise impact analysis summarizes the information provided in the *9925 Jefferson Boulevard Development – Cat32 Exemption Noise Impact Assessment – Culver City, CA,* prepared by MD Acoustics, July 2021 (Noise Assessment). The Noise Assessment is available as **Appendix B** to this document.

This analysis calculates the short-term noise levels during the various phases of construction, provides the necessary noise control measures to remain in compliance with the City's noise ordinance and *General Plan Noise Element*, and provides the long-term noise levels after the Project is constructed and occupied.

[12] *Culver City Transportation Study Criteria and Guidelines, July 2020.*

(i) Local Acoustical Requirements

Culver City outlines noise regulations and standards within the CCMC. Excerpts of the CCMC as it relates to this Project are provided below:

SEC.9.07.035. CONSTRUCTION

(A) All construction activity shall be prohibited, except between the hours of:

8:00 a.m. and 8:00 p.m. Mondays through Fridays

9:00 a.m. and 7:00 p.m. Saturdays

10:00 a.m. and 7:00 p.m. Sundays

(B) It is prohibited for any person to operate a device, which amplifies music or sound, at a construction site in a manner that results in noise levels that are audible beyond the construction site property line.

(C) Construction activity of a specific nature (such as the pouring of concrete), with a limited duration, in non- residential zoning districts (as set forth in Article 2 of Title 17, Zoning, of this Code), on construction sites one (1) acre or greater in size, during the times prohibited by Subsection A. of this Section may be authorized, provided such exception has been determined to be in the public interest and one (1) of the following permits has been issued:

1. A land use permit, processed in accordance with the provisions of Article 5 of Title 17, Zoning, of this Code. The request for extended construction hours shall accompany the land use permit application and include detailed facts showing that the public interest will be served by allowing the extended construction hours. The request shall be considered in conjunction with the project as a whole and shall be subject to conditions of approval as determined to be necessary by the decision making authority.

2. A Temporary Use Permit approved by the City Council, processed in accordance with the provisions of Chapter 17.520. At least fifteen (15) days prior to the anticipated date of decision on the Temporary Use Permit application, notice of the Temporary Use Permit application shall be mailed to all property owners and occupants within a one thousand (1,000) foot radius of the construction site. Applications for a Temporary Use Permit shall set forth detailed facts showing that the public interest will be served by the issuance of such permit.

(D) In the case of an emergency, the Building Official may issue a permit for construction activity for periods during which construction activity is prohibited by Subsection A. of this Section. Such permit shall be issued for only the period of the emergency.

(E) The City Council shall retain the right to impose more restrictive hours of construction upon any project by adding appropriate conditions to the approval of any Use Permits that are required for the project.

(F) Home repairs and routine maintenance of personal property such as automobiles or boats are not considered construction.

(G) All minor exterior home improvement construction activities such as, but not limited to roof replacement, and patio construction shall be subject to the provisions of this Chapter.

(ii) Study Method and Procedure

(a) Ambient Noise Measurement

Three short-term measurements were performed on May 25, 2021 between 1 PM and 3 PM and extrapolated out to 24 hours (refer to **Appendix B**). The measurements were performed near the Project Site along Jefferson Boulevard and represent the existing noise level conditions near the Project Site's eastern property line. The lowest and highest ambient level at the eastern property line was 70.3 dBA Leq(h) and 75.6 dBA Leq(h), respectively, between the hours of 7AM to 10PM. The estimated average community noise equivalent level (CNEL) was 75.9 dBA. The main sources of noise propagate from Jefferson Boulevard.[13]

(b) Federal Highway Administration Traffic Model

The traffic noise analysis utilizes the Federal Highway Administration (FHWA) Traffic Noise Model, together with several key construction parameters. Key input speed, site conditions, average daily traffic (ADT), and vehicle mix data. **Table III-4, Roadway Parameters and Vehicle Distribution**, outlines the roadway assumptions.[14] The modeling does not take into account any existing barriers, structures, and/or topographical features that may further reduce noise levels.

Table III-4
Roadway Parameters and Vehicle Distribution

Roadway	Segment	Existing ADT[1]	Existing Plus Project ADT	Speed (MPH)	Site Conditions
Jefferson Blvd	Overland Ave to Duquesne Ave	38,152	38,282	40	Hard
Major Arterial Vehicle Distribution (Truck Mix)[2]					
Motor-Vehicle Type		**Daytime % (7AM to 7PM)**	**Evening % 7PM to 10PM**	**Night % (10PM to 7AM)**	**Total % of Traffic Flow**
Automobiles		75.5	14.0	10.5	97.42
Medium Trucks		48.9	2.2	48.9	1.84
Heavy Trucks		47.3	5.5	47.3	0.74

[1] *From Fehr and Peers May 28, 2021 traffic report, available in **Appendix A**.*
[2] *Typical southern California vehicle distribution.*

[13] *Field sheets are provided in Appendix B of **Appendix B** of this document.*
[14] *Traffic noise input and output calculations are provided in Appendix C of **Appendix B** of this document.*

(c) FHWA Construction Model

The construction noise analysis utilizes the FHWA Noise and Vibration During Construction model/methodology, together with several key construction parameters. Key inputs include distance to the sensitive receiver, equipment usage, percentage usage factor, and baseline parameters for the Project Site. The Project was analyzed based on the different construction phases. The FTA has compiled data regarding the noise generated characteristics of typical construction activities and is presented in **Table III-5, Typical Construction Equipment Noise Levels**.

Table III-5
Typical Construction Equipment Noise Levels[1]

Type	Typical Noise Level at 50 Feet ($L_{max, dBA}$)
Saw	90
Dozer	85
Grader	85
Loader	80
Backhoe	80
Crane	85
Air Compressor	80

[1] *Referenced Noise Levels from FHWA Construction Noise Handbook.*

Construction noise is expected to be loudest during the demo and paving phases of construction.[15] Construction assumptions follow the air quality assumptions and utilize the same equipment as outlined within the air quality analysis, detailed below in **Section C, Project-Specific Air Quality Emission Impacts**, of this document. The construction noise was modeled as outlined in **Table III-6, Construction Phasing and Timeline**.

Table III-6
Construction Phasing and Timeline

Type	Start Date	End Date	Days
Demolition	6/1/2022	6/29/2022	21
Site Preparation	6/30/2022	7/4/2022	3
Grading	7/2/2022	7/11/2022	6
Building Construction	7/12/2022	6/23/2023	249
Paving	6/24/2023	7/12/2023	13
Architectural Coating	7/13/2023	7/31/2023	13

[1] *Referenced Noise Levels from FHWA Construction Noise Handbook.*

(iii) Traffic Noise Level Projections

Traffic noise along Jefferson Boulevard would be the main source of noise impacting the Project Site and the surrounding area and would have the potential largest change in noise level as a result of the Project once construction is completed.

[15] *The construction noise calculation output worksheet is located in Appendix D of **Appendix B** this document.*

A worst-case project generated traffic noise level was modeled utilizing the FHWA Traffic Noise Prediction Model - FHWA-RD-77-108. Traffic noise levels were calculated 50 feet from the centerline of the analyzed roadway. The modeling does not take into account any existing barriers, structures, and/or topographical features that may further reduce noise levels. Therefore, the levels are shown for comparative purposes only to show the difference with and without project conditions. In addition, the noise contours for 60, 65, and 70 dBA CNEL were calculated. The potential off-site noise impacts caused by an increase of traffic from operation of the Project on the nearby roadway was calculated for the following scenarios:

Existing Year (without Project): This scenario refers to existing year traffic noise conditions.

Existing Year (Plus Project): This scenario refers to existing year + project traffic noise conditions.

Table III-7, Projected Exterior Noise Levels, compares the without and with project scenario and shows the change in traffic noise levels as a result of the Project. It takes a change of 3 dBA or more to hear an audible difference. Jefferson Boulevard is anticipated to experience a net worst-case increase of 161 trips per day due to the Project. As demonstrated in **Table III-7, Projected Exterior Noise Levels,** the Project is not anticipated to change the existing noise level and therefore there is no impact.

Table III-7
Projected Exterior Noise Levels

Roadway	Segment	CNEL at 50 Ft (dBA)	Distance to Contour (Ft)			
			70 dBA CNEL	65 dBA CNEL	60 dBA CNEL	55 dBA CNEL
Existing Without Project Exterior Noise Levels						
Jefferson Blvd	Overland Ave to Duquesne Ave	75.1	162	512	1,620	5,123
Existing With Project Exterior Noise Levels						
Jefferson Blvd	Overland Ave to Duquesne Ave	75.1	163	514	1,625	5,140

Roadway[1]	Segment	CNEL at 50 Feet dBA[2]			
		Existing Without Project	Existing With Project	Change in Noise Level	Potential Significant Impact
Change in Existing Noise Levels as a Result of Project	Overland Ave to Duquesne Ave	75.1	75.1	0.0	No

[1] *Exterior noise levels calculated at 5 feet above ground level.*
[2] *Noise levels calculated from centerline of subject roadway.*

(iv) Project Operational Noise Level Projections

All HVAC equipment will be shielded by parapet walls and will not be audible at the surrounding sites. Project operational noise on the rooftop deck will include small groups of people working or talking and will neither exceed the ambient noise level nor be audible at the surrounding sites.

(v) Construction Noise Level Projections

The degree of construction noise may vary for different areas of the Project Site and may also vary depending on the construction activities. Noise levels associated with the construction would vary with the different phases of construction.

The projected construction noise levels at the uses to the north, south, east and west are presented in **Table III-8, Projected Construction Noise Levels (dBA, Leq)**. Noise levels are projected from the center of the Project Site.

Table III-8
Projected Construction Noise Levels (dBA, Leq)[1]

Location	Phase	Construction Noise Level (dBA, Leq)
North Commercial	Demo	81
	Site Prep	74
	Grade	79
	Build	81
	Paving	70
	Finish	72
East Property Line	Demo	72
	Site Prep	66
	Grade	70
	Build	71
	Paving	72
	Finish	62
South Commercial	Demo	81
	Site Prep	74
	Grade	79
	Build	79
	Paving	81
	Finish	70
West Residence	Demo	68
	Site Prep	61
	Grade	66
	Build	66
	Paving	68
	Finish	57

[1] *Construction noise projected from property line to nearest sensitive use (structure).*
Note: Barrier insertion loss calculations are provided in Appendix C of ***Appendix B.***

Culver City does not have a not-to-exceed standard for construction noise; therefore, the Project would comply as long as the construction activities take place during the allowable times, as specified in Section A of Section 9.07.035 the CCMC.

The project would implement the following construction noise measure which would be incorporated as a condition of approval in compliance with the City's Noise Ordinance:

1. Construction and demolition shall be restricted to between the hours of 8:00 a.m. and 8:00 p.m. Mondays through Fridays, between 9:00 a.m. and 7:00 p.m. Saturdays, and between 10:00 a.m. and 7:00 p.m. Sundays.

(vi) Conclusions

The Project would be compliant with the City's noise ordinance during construction. In addition, the Project would not generate a noise impact during operation.

(vii) Noise Impact Summary

The Project would not result in any significant noise impacts during the construction and operations phases.

(c) Project-Specific Air Quality, GHG , and Energy Impacts

The following impact analysis summarizes and incorporates by reference the information provided in the *9925 Jefferson Boulevard Creative Office Development – Cat32 Exemption - Focused Air Quality, Greenhouse Gas, and Energy Impact Evaluation, City of Culver City, CA,* prepared by MD Acoustics, July 2021 (Air Quality, Greenhouse Gas, and Energy Assessment). The Air Quality, Greenhouse Gas, and Energy Assessment is available as **Appendix C** to this document.

The Project has been evaluated to determine the air quality, greenhouse gas and energy construction and operational emissions generated by the Project and to compare the project emissions to South Coast Air Quality Management District's (SCAQMD) thresholds of significance as it relates to residential and commercial uses and consistency to the City's General Plan. The significance of these potential impacts is described below.

(i) Standards of Significance

For the air quality analysis, the Project emissions were compared to both regional and localized SCAQMD's thresholds of significance for construction and operational emissions.[16,17] The Project greenhouse gas emissions were compared to the SCAQMD's 3,000 MTCO2e draft threshold for all land uses.[18]

[16] *South Coast Air Quality Management District, Significance Thresholds, https://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf, accessed July 2021.*

[17] *South Coast Air Quality Management District, Localized Significance Thresholds, https://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds, accessed July 2021.*

[18] *South Coast Air Quality Management District, Greenhouse Gases, https://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds, accessed July 2021.*

(ii) Air Quality Analysis

(a) Regional Construction Emissions

The construction emissions for the project would not exceed the SCAQMD's daily emission thresholds at the regional level as indicated in **Table II-9, Regional Significance-Construction Emissions**, and therefore the impact would be considered less than significant.

Table III-9
Regional Significance - Construction Emissions (lbs/day)

Activity		Pollutant Emissions (pounds/day)					
		VOC	**NOx**	**CO**	**SO_2**	**PM10**	**PM2.5**
Demolition	On-Site[a]	1.69	16.62	13.96	0.02	1.32	0.86
	Off-Site[b]	0.13	3.37	1.26	0.01	0.50	0.15
	Subtotal	*1.82*	*19.99*	*15.22*	*0.04*	*1.82*	*1.01*
Site Preparation	On-Site[a]	0.16	1.68	2.24	0.00	0.19	0.09
	Off-Site[b]	0.01	0.01	0.12	0.00	0.03	0.01
	Subtotal	*0.18*	*1.68*	*2.36*	*0.00*	*0.22*	*0.10*
Grading	On-Site[a]	1.54	16.98	9.22	0.02	3.53	2.02
	Off-Site[b]	0.04	12.41	3.18	0.05	1.44	0.46
	Subtotal	*1.58*	*29.39*	*12.40*	*0.07*	*4.97*	*2.48*
Building Construction	On-Site[a]	1.65	12.50	12.73	0.02	0.59	0.57
	Off-Site[b]	0.27	1.44	2.75	0.01	0.84	0.24
	Subtotal	*1.92*	*13.94*	*15.47*	*0.03*	*1.42*	*0.81*
Paving	On-Site[a]	0.64	6.24	8.80	0.01	0.32	0.28
	Off-Site[b]	0.04	0.03	0.47	0.00	0.15	0.04
	Subtotal	*0.69*	*6.27*	*9.27*	*0.01*	*0.45*	*0.32*
Architectural Coating	On-Site[a]	*28.06*	*1.30*	*1.81*	*0.00*	*0.07*	*0.07*
	Off-Site[b]	*0.04*	*0.03*	*0.43*	*0.00*	*0.13*	*0.04*
	Subtotal	*28.11*	*1.33*	*2.25*	*0.00*	*0.21*	*0.11*
Total for overlapping phases[c]		***28.79***	***7.60***	***11.52***	***0.02***	***0.66***	***0.43***
SCAQMD Thresholds		75	100	550	150	150	55
Exceeds Threshold?		**No**	**No**	**No**	**No**	**No**	**No**

[a] *On-site emissions from equipment operated on-site that is not operated on public roads.*
[b] *Off-site emissions from equipment operated on public roads.*
[c] *Architectural coatings and paving phases may overlap.*
*Source: CalEEMod Version 2020.4.0. Output, available in **Appendix C**.*

(b) Localized Construction Emissions

Utilizing the construction equipment list and associated acreages per 8-hour day provided in the SCAQMD "Fact Sheet for Applying CalEEMod to Localized Significance Thresholds",[19] the

[19] *South Coast Air Quality Management District, Localized Significance Thresholds, https://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds, accessed July 2021.*

maximum number of acres disturbed in a day would be 2.0 acres during both demolition and grading (as shown in **Table II-10, Maximum Number of Acres Disturbed Per Day**, below); therefore, the Project emissions have been compared to the 2-acre per day localized significance threshold. Detailed construction equipment lists, construction scheduling, and emission calculations are available in the CalEEMod Output provided in **Appendix C** of this document.

Table III-10
Maximum Number of Acres Disturbed Per Day[a]

Activity	Equipment	Number	Acres/8hr-day	Total Acres
Demolition	Rubber Tired Dozers	1	0.5	0.5
	Tractors/Loaders/Backhoes	3	0.5	1.5
			Total Per Phase:	**2.0**
Site Preparation	Tractors/Loaders/Backhoes	1	0.5	0.5
			Total Per Phase	**0.5**
Grading	Graders	1	0.5	0.5
	Rubber Tired Dozers	1	0.5	0.5
	Tractors/Loaders/Backhoes	2	0.5	1.0
			Total Per Phase:	**2.0**

[a] *CalEEMod output and South Coast AQMD, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf?sfvrsn=2.*

None of the analyzed criteria pollutants would exceed the localized significance threshold for emissions at the nearest sensitive receptors as shown in **Table III-11, Localized Significance – Construction Emissions**. Therefore, the impact would be less than significant from construction.

Table III-11
Local Significance - Construction Emissions

Activity	On-Site Pollutant Emissions (pounds/day)[a]			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Demolition	16.21	13.96	1.32	0.86
Site Preparation	1.68	2.24	0.19	0.09
Grading	16.98	9.22	3.53	2.02
Building Construction	12.50	12.73	0.59	0.57
Paving	6.24	8.80	0.31	0.28
Architectural Coating	1.30	1.81	0.07	0.07
Total for Overlapping Construction Phases	20.04	23.34	0.97	0.92
SCAQMD Thresholds[b]	**143**	**827**	**19**	**5**
Exceeds Threshold?	**No**	**No**	**No**	**No**

[a] *Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for two-acres per day (see Table 2) in Northwest Coastal LA County Source Receptor Area (SRA 2). Output, available in **Appendix C.***

[b] *The nearest sensitive receptors are the single-family residential uses located across Ballona Creek approximately 175 feet (~53 meters) to the west of the project site; therefore, the 50-meter threshold was utilized.*

(c) Regional Operational Emissions

The operating emissions were based on year 2023, which is the anticipated opening year for the Project. The CalEEMod default project trips were adjusted based on the trip generation provided in the Transportation Assessment prepared for the Project, found in **Appendix A** of this document.

The summer and winter emissions created by the Project's long-term operations were calculated and the highest emissions from either summer or winter are summarized in **Table III-12, Regional Significance – Operational Emissions**. The data in **Table III-12, Regional Significance – Operational Emissions,** shows that the operational emissions for the Project, even without reduction from removal of existing uses, would not exceed the SCAQMD's regional significance thresholds.

Table III-12
Regional Significance – Operational Emissions

Operational Activities	Pollutant Emissions (pounds/day)					
	VOC	**NOx**	**CO**	**So_2**	**PM_{10}**	**$PM_{2.5}$**
Area Sources[a]	1.19	0.00	0.02	0.00	0.00	0.00
Energy Usage[b]	0.02	0.14	0.12	0.00	0.01	0.01
Mobile Sources[c]	1.67	1.85	17.00	0.04	3.78	1.02
Subtotal Emissions	**2.88**	**1.99**	**17.15**	**0.04**	**3.79**	**1.04**
Reduction from existing office and industrial uses to be removed[d]	-2.19	-1.61	-12.93	-0.03	-2.72	-0.75
Total Emissions	**0.69**	**0.38**	**4.22**	**0.01**	**1.07**	**0.29**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

[a] Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.
[b] Energy usage consists of emissions from generation of on-site natural gas usage.
[c] Mobile sources consist of emissions from vehicles and road dust.
[d] Emissions from removal of the 41,925 square feet of existing uses, including 7,091 square feet of industrial uses and 34,834 square feet of office uses.
*Source: CalEEMod Version 2020.4.0, available in **Appendix C**.*

(d) Localized Operational Emissions

Project-related air emissions from on-site sources such as architectural coatings, landscaping equipment, on-site usage of natural gas appliances as well as the operation of vehicles on-site may have the potential to exceed the State and Federal air quality standards in the Project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin.

According to SCAQMD localized significance threshold methodology, localized significance threshold's would apply to the operational phase of a project, if the project includes stationary sources, or attracts mobile sources (such as heavy-duty trucks) that may spend long periods queuing and idling at the site; such as industrial warehouse/transfer facilities. The Project includes office uses and does not include such uses. Therefore, due to the lack of stationary source emissions, no long-term localized significance threshold analysis is warranted.

(iii) Greenhouse Gas Analysis

(a) GHG Emissions Allocated to the Project

Table III-13, Opening Year Project-Related Greenhouse Gas Emissions, outlines the construction and operational greenhouse gas emissions allocated to the Project in accordance with SCAQMD methodology. The Project's emissions without reduction from removal of existing uses are 910.43 MTCO2e per year (with reduction from removal of existing uses Project

emissions are reduced to 297.31 MTCO2e per year). Therefore, even without reduction from removal of existing uses, the Project's emissions do not exceed the SCAQMD's draft screening threshold of 3,000 MTCO2e for all land uses and the impact is less than significant.

Table III-13
Opening Year Project-Related Greenhouse Gas Emissions

Operational Activities	Greenhouse Gas Emissions (Metric Tons/Year)					
	BIO-CO_2	**NonBIO-CO_2**	**CO_2**	**CH_4**	**N_2O**	**CO_2e**
Area Sources[a]	0.00	0.01	0.01	0.00	0.00	0.01
Energy Usage[b]	0.00	209.86	209.86	0.02	0.00	210.96
Mobile Sources[c]	0.00	607.97	607.97	0.04	0.03	616.95
Solid Waste[d]	9.66	0.00	9.66	0.57	0.00	23.94
Water[e]	2.89	31.99	34.88	0.30	0.01	44.54
Construction[f]	0.00	13.85	13.85	0.00	0.00	14.04
Subtotal Emissions	**12.55**	**863.67**	**876.22**	**0.93**	**0.04**	**910.43**
Reduction from existing office and industrial uses to be removed[f]						*-613.11*
Total Emissions						**297.31**
SCAQMD Draft Screening Threshold						**3,000**
Threshold Exceeded?						**NO**

[a] Area sources consist of GHG emissions from consumer products, architectural coatings, and landscape equipment
[b] Energy usage consists of GHG emissions from electricity and natural gas usage.
[c] Mobile sources consist of GHG emissions from vehicles.
[d] Solid waste includes the CO2 and CH4 emissions created from the solid waste placed in landfills.
[e] Water includes GHG emissions from electricity used for transport of water and processing of wastewater.
[f] Construction GHG emissions based on a 30-year amortization rate. Emissions from removal of the 41,925 square feet of existing uses, including 7,091 square feet of industrial uses and 34,834 square feet of office uses.
*Source: CalEEMod Version 2020.4.0, available in **Appendix C**.*

(b) Consistency with Applicable Plans

The Project would be subject to the policies and ordinances pertaining to air quality and climate change in the City's General Plan. Although the Project would generate greenhouse gas emissions, either directly or indirectly, these emissions are short-term and not considered to have a significant impact on the environment. Furthermore, Project emissions have demonstrated that they would be below significance thresholds as outlined by SCAQMD.

The significance of the Project's greenhouse gas emissions is also evaluated based on whether they would be generated in connection with a design that is consistent with relevant City goals and actions designed to encourage development that results in the efficient use of public and private resources. The Project would be designed to include building features that would include, but are not limited to, such items as energy-efficient elevator, low-flow faucets and toilets, stormwater filtration and capture systems, permeable exterior paving surfaces, low-water and drought tolerant landscaping, electric vehicle supply equipment or electric vehicle charging stations, installation of a photovoltaic system equivalent to at least one percent of the project's electricity demand and at least one kilowatt of solar photovoltaics per 10,000 square feet of new development (as required by the City), energy efficient mechanical systems, energy efficient glazing and window frames, high reflective roof material, on-site recycling collection facilities, energy efficient lighting, and bicycle rooms in parking levels 1 and 2. Moreover, the Project would locate development in a developed area that is served by transit, consistent with regional planning

policies. Therefore, as the Project's greenhouse gas emissions would be generated in connection with a development located and designed to be consistent with the applicable City goals and actions for greenhouse emission reductions, the impact would result be less than significant impacts.

(iv) Energy Analysis

(a) Construction Energy Demand

Construction Equipment Electricity Usage Estimates

Electrical service would be provided by Southern California Edison (SCE). Based on the 2017 National Construction Estimator,[20] the typical power cost per 1,000 square feet of building construction per month is estimated to be $2.32. The Project plans to develop the Site with 35,658 square feet of new office buildings over the course of approximately fourteen months. Therefore, as detailed in **Appendix C**, of this document, based on the total power cost of the on-site electricity usage during the construction the Project is estimated to be approximately $1,158.17. The total electricity usage from Project construction related activities is estimated to be approximately 13,467 kWh.[21]

Construction Equipment Fuel Estimates

Using the CalEEMod data input, the Project's construction phase would consume electricity and fossil fuels as a single energy demand, that is, once construction is completed their use would cease. California Air Resource Board's (CARB) 2017 Emissions Factors Tables show that on average aggregate fuel consumption (gasoline and diesel fuel) would be approximately 18.5 hp-hr-gal.[22] As detailed in **Appendix C**, of this document, Project construction activities would consume an estimated 28,341 gallons of diesel fuel.

Construction Worker Fuel Estimates

It is assumed that all construction worker trips are from light duty autos (LDA) along area roadways. Vehicle fuel efficiencies for construction workers were estimated in the air quality and greenhouse gas analysis using information generated using CARB's EMFAC model (refer to **Appendix C** for details). As detailed in **Appendix C**, of this document, it is estimated 7,294 gallons of fuel would be consumed for construction worker trips.

Construction Vendor/Hauling Fuel Estimates

As detailed in **Appendix C**, of this document, with respect to estimated VMT, the vendor and hauling trips would generate an estimated 261,953 VMT. For the architectural coatings it is

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[20] *Pray, Richard. 2017 National Construction Estimator. Carlsbad : Craftsman Book Company, 2017.*

[21] *LADWP's Small Commercial & Multi-Family Service (A-1) is approximately $0.06 per kWh of electricity Southern California Edison (SCE). Rates & Pricing Choices: General Service/Industrial Rates. https://library.sce.com/content/dam/sce-doclib/public/regulatory/historical/electric/2020/schedules/general-service-&-industrial-rates/ELECTRIC_SCHEDULES_GS-1_2020.pdf, accessed July 2021.*

[22] *Aggregate fuel consumption rate for all equipment was estimated at 18.5 hp-hr/day (from CARB's 2017 Emissions Factors Tables and fuel consumption rate factors as shown in Table D-21 of the Moyer Guidelines, https://www.arb.ca.gov/msprog/moyer/guidelines/2017gl/2017_gl_appendix_d.pdf), accessed July 2021.*

assumed that the contractors would be responsible for bringing coatings and equipment with them in their light duty vehicles.[23] An estimated 37,151 gallons of fuel would be consumed for vendor and hauling trips.

Construction Energy Efficiency/Conservation Measures

Construction equipment used over the approximately fourteen-month construction phase would conform to CARB regulations and California emissions standards and is evidence of related fuel efficiencies. In addition, the CARB Airborne Toxic Control Measure limits idling times of construction vehicles to no more than five minutes, thereby minimizing unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Furthermore, the Project has been designed in compliance with California's Energy Efficiency Standards and 2019 CALGreen Standards.

Construction of the Project would consume typical levels of energy resources associated with urban development. There are no unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the Project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel.

(b) Operational Energy Demand

Transportation Fuel Consumption

The largest source of operational energy use would be vehicle operation of customers. The Project Site is located in an urbanized area in close proximity to transit stops. Using the CalEEMod output, it is assumed that an average trip for autos were assumed to be 16.6 miles, light trucks were assumed to travel an average of 6.9 miles, and 3 to 4-axle trucks were assumed to travel an average of 8.4 miles.[24] To show a worst-case analysis, as the Project is an office project, it was assumed that vehicles would operate 365 days per year. As detailed in **Appendix C**, of this document, an estimated 26,358 gallons of fuel would be consumed per year for the operation of the Project. The Project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips, nor associated excess and wasteful vehicle energy consumption. Therefore, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Facility Energy Demands (Electricity and Natural Gas)

As detailed in **Appendix C**, of this document, the estimated electricity demand for the Project is approximately 527,645 kWh per year and 162,408 kWh per year once reduction from existing uses are taken. In 2019, the non-residential sector of the County of Los Angeles consumed

[23] *Vendors delivering construction material or hauling debris from the site during grading would use medium to heavy duty vehicles with an average fuel consumption of 9.22 mpg for medium heavy-duty trucks and 6.74 mpg for heavy heavy-duty trucks (refer to **Appendix C** for details).*

[24] *CalEEMod default distance for H-W (home-work) or C-W (commercial-work) is 16.6 miles; 6.9 miles for H-S (home-shop) or C-C (commercial-customer); and 8.4 miles for H-O (home-other) or C-O (commercial-other)*

approximately 46,556 million kWh of electricity.[25] In addition, the estimated natural gas consumption for the Project is approximately 1,024,545 kBTU per year and 561,962 kBTU per year once reduction from existing uses are taken. In 2019, the non-residential sector of the County of Los Angeles consumed approximately 1,813 million therms of gas.[26] Therefore, the increase in both electricity and natural gas demand from the Project is insignificant compared to the County's 2019 demand.

Renewable Energy and Energy Efficiency Plan Consistency

Regarding federal transportation regulations, the Project Site is located in an already developed area. Access to/from the Project Site is from existing roads. These roads are already in place so the Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be proposed pursuant to the Intermodal Surface Transportation Efficiency Act (ISTEA) because SCAG is not planning for intermodal facilities in the Project area.

Regarding the State's Energy Plan and compliance with Title 24 CCR energy efficiency standards, the Applicant is required to comply with the California Green Building Standard Code requirements for energy efficient buildings and appliances as well as utility energy efficiency programs implemented by the SCE and Southern California Gas Company (SoCal Gas).

Regarding the State's Renewable Energy Portfolio Standards, the Project would be required to meet or exceed the energy standards established in the California Green Building Standards Code, Title 24, Part 11 (CALGreen). CalGreen Standards require that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials.

(v) Toxic Air Contaminants

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, the elderly, individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather to exercise are defined as "sensitive receptors"; they are also known to be locations where an individual can remain for 24 hours. The closest existing sensitive receptors (to the Site area) are the single-family residential uses located across Ballona Creek approximately 175 feet (~53 meters) to the west of the Project Site.

(a) Construction

With respect to toxic air contaminants (TAC), the greatest potential for TAC emissions resulting from construction of the Project would involve diesel particulate emissions associated with trucks and heavy equipment. Based on SCAQMD guidance, health effects from TACs are usually described in terms of individual cancer risk, which is the likelihood that a person exposed to TACs

[25] *California Energy Commission, Electricity Consumption by County. https://ecdms.energy.ca.gov/elecbycounty.aspx, accessed July 2021.*

[26] *California Energy Commission, Gas Consumption by County. http://ecdms.energy.ca.gov/gasbycounty.aspx, accessed July 2021.*

over a 70-year lifetime will contract cancer. Project construction activity would not result in long-term substantial sources of TAC emissions (i.e., 30 or 70 years) and would not generate ongoing construction TAC emissions. Given the temporary and short-term construction schedule (approximately 13 months), the Project would not result in a long-term (i.e., lifetime or 30-year) exposure as a result of Project construction. Furthermore, as shown above, construction-based particulate matter (PM) emissions (including diesel exhaust emissions) do not exceed any local or regional thresholds.

In addition, the construction activities associated with the Project would be similar to other development projects in the City, and would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and Federal level that would protect sensitive receptors from substantial concentrations of these emissions. The Project would be consistent with applicable AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. The Project would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five (5) minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction. The Project would also comply with the requirements of SCAQMD Rule 1403 if asbestos is found during the demolition activities.

(b) Operation

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with Project CO levels to the State and federal CO standards which were presented above.

To determine if the Project could cause emission levels in excess of the CO standards discussed above, a sensitivity analysis is typically conducted to determine the potential for CO “hot spots” at a number of intersections in the general Project vicinity. Because of reduced speeds and vehicle queuing, “hot spots” potentially can occur at high traffic volume intersections with a Level of Service E or worse.

Per the Trip Generation Assessment analysis, the Project would generate less than 250 daily vehicle trips. The 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan) showed that an intersection which has a daily traffic volume of approximately 100,000 vehicles per day would not violate the CO standard. The highest roadway traffic volume of 20,692 average traffic volume traveling eastbound occurs along the segment of Jefferson Boulevard for the Future (2023) Base Plus Project Scenario. Therefore, as the addition of Project-related traffic volumes to existing traffic volumes would fall far short of 100,000 vehicles necessary to create a CO “hot spot,” no CO hot spot modeling was performed. No significant long term air quality impact is anticipated to local air quality with the ongoing use of the Project.

As discussed above, the Project would not exceed any of thresholds of significance recommended by the SCAQMD; therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

(vi) Odors

Odors are typically associated with the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. According to the SCAQMD *CEQA Air Quality Handbook*, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The Project involves the construction and operation of an office building, which is a use not typically associated with odor complaints.

Potential sources that may emit odors during construction activities include the application of materials such as asphalt pavement. The objectionable odors that may be produced during the construction process are short-term in nature and the odor emissions are expected to cease upon the drying or hardening of the odor producing materials. Due to the short-term nature and limited amounts of odor producing materials being utilized, no significant impact related to odors would occur during construction of the Project. Diesel exhaust and VOCs would be emitted during construction of the Project, which are objectionable to some; however, emissions would disperse rapidly from the Project Site and therefore should not reach an objectionable level at the nearest sensitive receptors. As the Project involves no operational elements related to industrial projects, no long-term operational objectionable odors are anticipated. Therefore, potential impacts associated with objectionable odors would be less than significant and no mitigation is required.

(vii) Air Quality, Greenhouse Gas, and Energy Impact Summary

Project emissions are anticipated to be below SCAQMD's thresholds of significance with no mitigation. Furthermore, neither construction nor operation of the Project would result in wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources. The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency; therefore, impacts would be less than significant.

(d) Project-Specific Water Quality Impacts

(i) Groundwater

The Project does not involve the extraction of groundwater and it would not result in a reduction in aquifer volume or lower the local groundwater table. The historically highest groundwater level is greater than 45 feet below grade.[27] Fluctuations in the level of groundwater may occur due to variations in rainfall, temperature, and other factors. However, due to the depth of the groundwater anticipated on the Project Site, the operation of the Project would not interfere with any groundwater recharge activities within the area.[28] The Project Site's existing condition is a developed property and the degree to which any surface water infiltration and groundwater recharge occurs on-site is negligible. Moreover, the Project would redevelop the entire site.

[27] *Geotechnical Investigation for the Proposed Office Addition and Parking Structure 9925 Jefferson Boulevard, Culver City, California, prepared by Geocon West, Inc., October 2020. Refer to* ***Appendix D****.*

[28] *Geotechnical Investigation for the Proposed Office Addition and Parking Structure 9925 Jefferson Boulevard, Culver City, California, prepared by Geocon West, Inc., October 2020. Refer to* ***Appendix D****.*

Therefore, impacts to groundwater would be less than significant. Therefore, as the Project Site would not result in any significant effects related to groundwater water quality, the Project meets this condition for water quality.

(ii) Surface Water

A project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the *California Water Code* (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this issue, a significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

(a) Construction

During construction, the Project Site would contain a variety of construction materials such as adhesives, cleaning agents, landscaping, plumbing, painting, heat/cooling, masonry materials, floor and wall coverings, and demolition debris. Spills of construction materials can be a source of stormwater pollution and/or soil contamination. All hazardous materials are to be stored, labeled and used in accordance with the U.S. Occupational Safety and Health Administration regulations. These regulations for routine handling and storing of hazardous materials effectively control the potential stormwater pollution caused by these materials.

Earth moving activities would involve preparation of the Project Site for Project construction. Soil erosion is the process by which soil particles are removed from the land surface, by wind, water and/or gravity. Soil particles removed by stormwater runoff can have negative impacts on downstream conditions through increased sedimentation as well as spread of contaminants found in the exposed soil of the Project Site. Grading activities can greatly increase erosion processes. Two general strategies are typically required to prevent construction silt from entering drainage courses. First, the amount of exposed soil is typically limited and erosion control procedures are implemented for those areas that must be exposed. Common methods for controlling fugitive dust emissions, such as covering truck loads and street sweeping, are also effective in controlling stormwater quality. Second, the construction area would be secured to control off-site migration of pollutants. Erosion control devices, including temporary diversion dikes/berms, drainage swales, and siltation basins, are typically required around construction areas to ensure that sediment is trapped and properly removed.

The Project's proposed construction activities would be required to comply with the State's General Construction National Pollutant Discharge Elimination System (NPDES) Permit and the development of a construction Storm Water Pollution Prevention Plan (SWPPP) because the Project Site is greater than one acre in size. The Project SWPPP would identify potential pollutant

sources that may affect the quality of discharge associated with construction activity, identify non-storm water discharges, and provide design features to effectively prohibit the entry of pollutants into the public storm drain system during construction.

When properly designed and implemented, BMPs would ensure that construction of the Project would not result in degradation of surface water quality through increased sedimentation or spread of soil contaminants. Accordingly, required compliance with the Culver City grading permit regulations and implementation of BMPs would ensure that Project construction would not create a significant impact by degrading surface water quality, or by causing a violation of applicable water quality standards. Therefore, as the Project Site would not result in any significant effects related to construction surface water quality, the Project meets this condition for water quality.

(b) Operation

Operation of the Project would introduce sources of potential water pollution that are typical of office developments. Anticipated and potential pollutants generated by the Project are sediment, nutrients, pesticides for landscaping, metals, pathogens, oil and grease and cleaning solvents. The Project's proposed office land use does not represent the type of use that would otherwise degrade water quality (e.g., an industrial land use that could adversely affect water quality).

Furthermore, operation of the Project would not result in discharges that would cause regulatory standards to be violated. Project Site BMPs have been designed to prevent storm water pollution that include minimalization of impervious areas, preserve existing drainage patterns, and native and/or tolerant landscaping.

The Project Site, which is relatively level, is currently covered completely in impervious area and surface water drainage at the Site appears towards the west to Ballona Creek.[29] With the development of the Project landscaping would be provided throughout the site within the two ground-floor courtyards, the dog run, and in the zen garden, thereby minimizing the impervious area. Runoff from the site would continue to flow similar to existing conditions. Finally, native and /or tolerant landscaping would be incorporated into the site design. Therefore, the Project would mitigate surface runoff conditions and would reduce runoff onto adjacent properties while matching historic drainage patterns by carrying existing flows and increasing the amount of pervious land.

Overall, the Project would comply with all applicable State, regional, and local regulations, policies, and requirements with regard to surface water quality and implement BMPs for the control and retention of stormwater and eroded sediments. Based on the above, the Project would result in less than significant impacts to surface water quality during operation. Therefore, as the Project Site would not result in any significant effects related to operation surface water quality; therefore, the Project meets this condition for water quality.

[29] *Geotechnical Investigation for the Proposed Office Addition and Parking Structure 9925 Jefferson Boulevard, Culver City, California, prepared by Geocon West, Inc., October 2020. Refer to* ***Appendix D****.*

(iii) Water Quality Impact Summary

Neither construction nor operation of the Project would result in exceedance of Federal, state, regional or local water standards. Therefore, impacts would be less than significant.

As discussed in the preceding sections, approval of the Project would not result in any significant effects relating to traffic, noise, air quality, greenhouse gases, or water quality. ***As such, the Project meets condition (d) of the Class 32 exemption.***

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

The following provides a Project-specific analysis of the impacts to utilities and public services that would serve the Project.

(a) Impacts to Project-Serving Utilities

(i) Water Supply and Infrastructure

The Golden State Water Company (GSWC) currently supplies water to the Project Site. GSWC is responsible for ensuring that water demand within the City is met and that State and federal water quality standards are achieved. The GSWC ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 2,800 miles of pipes.[30] GSWC primarily uses water purchased from the West Basin Municipal Water District (WBMWD) to serve the Culver City Service Area. The *GSWC Draft 2020 Urban Water Management Plan* (UWMP) provides water demand and water supply projections in five-year increments from 2025 through 2045, which are based on regional demographic data provided by Southern California Association of Governments (SCAG). Year 2025 water demand is 5,002 acre-feet per year (af/y) while projected year 2045 water demand is 5,370 afy.[31]

The Project's estimated water consumption is presented on **Table III-14, Estimated Average Daily Water Consumption**. As shown, the Project would consume a net total of approximately 10,236 gallons per day (gpd) (approximately 0.010 mgd), or approximately 3.47 af/y. The Project would be within the growth projections of the *Draft 2020 UWMP* and it is, therefore, anticipated that GSWC would be able to meet the Project's water demand. Therefore, with respect to water infrastructure, impacts would be less than significant.

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[30] *Golden State Water Company, https://www.gswater.com/, accessed July 2021.*

[31] *Golden State Water Company, Culver City Service Area 2020 Urban Water Management Plan, Public Draft June 2021, https://www.gswater.com/sites/main/files/file-attachments/culver_city_2020_uwmp_0.pdf?1624993834, accessed July 2021.*

Table III-14
Estimated Average Daily Water Consumption

Land Use	Size	Consumption Rate[a]	Total Water Consumed (gpd)	Total Water Consumed (AF/Y)
Existing Uses				
Office	34,834 sf	200 gpd/1,000 sf	6,967	7.67
Warehouse	7,091 sf	25 gpd/1,000 sf	177	0.18
		Total Existing Water Demand	*7,144*	*7.85*
Proposed Uses				
Office	51,178 sf	200 gpd/1,000 sf	10,236	11.32
		Total Proposed Water Demand	*10,236*	*11.32*
		Net Project Water Total	**3,092**	**3.47**

Notes: sf = square feet; gpd = gallons per day; AF/Y = acre-feet per year. Estimated gallons per day have been rounded.

[a] *Water consumption estimates are prepared based on 100 percent of the Los Angeles County sewage generation factors.*

Source (table): EcoTierra Consulting, 2021.

In addition to supplying water for domestic uses, GSWC also supplies water for fire protection services, in accordance with the Fire Code. If water main or infrastructure upgrades are required to serve the Project, the Fire Code requires the Project Applicant to pay for such upgrades, which would be constructed by either the Project Applicant or GSWC. To the extent such upgrades result in a temporary disruption in service, proper notification to GSWC customers would take place, as is standard practice. In the event that water main and other infrastructure upgrades are required, it would not be expected to create a significant impact to the physical environment because: (1) any disruption of service would be of a short-term nature, (2) replacement of the water mains would be within public rights-of-way, and (3) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity. Therefore, potential impacts resulting from water infrastructure improvements, if any are to be required, would be less than significant.

Furthermore, the Project would comply with the City's mandatory water conservation measures that, relative to the City's increase in population, have reduced the rate of water demand in recent years. GSWC's growth projections are based on conservation measures, as well as the WBMWD's expected water sources. Compliance with water conservation measures, including Title 20 and 24 of the California Administrative Code would serve to reduce the projected water demand. Title 24 of the California Administrative Code contains the California Building Standards, including the California Plumbing Code (Part 5), which promotes water conservation. Title 20 of the California Administrative Code addresses Public Utilities and Energy and includes appliance efficiency standards that promote conservation. Various sections of the Health and Safety Code also regulate water use.

Water demand would be further reduced through adherence to the City's existing regulatory compliance measures including the following:

- No landscape watering between the hours of 8:00 a.m. and 7:00 p.m.
- Irrigating outdoors during and within 48 hours following measurable rainfall is prohibited.
- Excessive water runoff is prohibited
- Washing down hard or paved surfaces with potable water is prohibited (except using low-water use methods for safety and sanitary purposes)
- Water line leaks must be fixed within 48 hours of their discovery.
- Installation of single pass cooling systems or non-re-circulating commercial laundry systems is prohibited.[32]

Overall, the Project's water demand is expected to comprise a small percentage of WBMWD's existing water supplies. Moreover, as discussed below, the Project's anticipated water demand is consistent with demand projected under *Draft 2020 UWMP* for multiple dry-year and wet-year scenarios. Therefore, the impact would be less than significant.

(ii) Wastewater Treatment Facilities and Existing Infrastructure

The City of Los Angeles, Los Angeles Sanitation and Environment (LASAN) provides sewer service to the Project area. An existing 30-foot-wide sewer easement traverses in the north-south direction on the western end of the Project Site. The sewer located within the easement consists of a 93-inch, semi-elliptical pipe located approximately 27 to 30 feet below existing grade.[33] The Project Site has existing sewer connections into the 93-inch North Outfall sewer pipeline, where it is conveyed southward into the LASAN Relief Station, located 0.4 mile south.[34] Sewage from the Project Site is ultimately conveyed via existing sewer infrastructure to the Hyperion Treatment Plant (HTP), which has the capacity to treat approximately 450 mgd of wastewater to full secondary treatment level and currently treats 260 mgd. The remaining capacity at the HTP is approximately 190 million gpd or approximately 42 percent of its total capacity.[35]

Estimated Project wastewater generation is presented below in **Table III-15, Estimated Average Daily Wastewater Generation**. As shown, the Project would generate approximately 3,092 net gpd (0.003 mgd) of wastewater. Therefore, the HTP would have adequate capacity to serve the Project. As such, with respect to the capacities of wastewater treatment facilities, impacts would be less than significant.

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[32] *Culver City Public Works Department, Culver City Water Conservation Plan for Fiscal Year 2015/2016, September 2015, https://www.culvercity.org/files/assets/public/documents/public-works/stormwater/culvercitywaterconservatio.pdf, accessed July 2021.*

[33] *Geotechnical Investigation for the Proposed Office Addition and Parking Structure 9925 Jefferson Boulevard, Culver City, California, prepared by Geocon West, Inc., October 2020. Refer to* ***Appendix D****.*

[34] *Culver City, Sewer Infrastructure Management System, https://gisproxy.culvercity.org/Html5Viewer/index.html?viewer=Sims.sims, accessed July 2021.*

[35] *City of Los Angeles, One Water LA 2040 Plan, Volume 2, Wastewater Facilities Plan, page 59.*

Table III-15
Estimated Average Daily Wastewater Generation

Land Use	Size	Generation Rate[a]	Total Wastewater Generation (gpd)
Existing Uses			
Office	34,834 sf	200 gpd/1,000 sf	6,967
Warehouse	7,091 sf	25 gpd/1,000 sf	177
Total Existing Wastewater Generation			*7,144*
Proposed Uses			
Office	51,178 sf	200 gpd/1,000 sf	10,236
Total Proposed Wastewater Generation			*10,236*
Net Project Wastewater Total			**3,092**

Notes: sf = square feet; gpd = gallons per day; AF/Y = acre-feet per year. Estimated gallons per day have been rounded.
[a] *Generation estimates are prepared based on the Los Angeles County sewage generation factors.*
Source (table): EcoTierra Consulting, 2021.

Based on the estimated net wastewater generation of approximately 3,092 gpd (0.003 mgd), and given the infill location of the Project Site surrounded by commercial and warehouse uses that are well-served by existing utility infrastructure, it is reasonably anticipated that the existing sewer lines have sufficient capacity to accommodate the additional flow. Nonetheless, as part of the building permit process, the City will require detailed gauging and evaluation of the Project's wastewater connection point at the time of connection to the system. If deficiencies are identified at that time, the Project Applicant would be required, at its own cost, to build secondary sewer lines to a connection point in the sewer system with sufficient capacity, in accordance with standard City procedures. The installation of any such secondary lines, if needed, would require minimal trenching and pipeline installation in accordance with all City permitting requirements, which would be a temporary action and would not result in any adverse environmental impacts. Therefore, impacts would be less than significant.

(iii) Solid Waste Disposal

The Culver City Public Works Environmental Programs and Operations Division provides waste collection services, which includes, trash, recycling, organics, and construction and demolition debris from both the commercial and residential sectors. As is typical for most solid waste haulers in the greater Los Angeles area, the hauler would be anticipated to separate and recycle all reusable material collected from the Project Site at a local materials recovery facility. The remaining solid waste would be disposed of at a variety of landfills, depending on with whom the hauler has contracts.

(a) Construction

Implementation of the Project would generate construction and demolition waste. Typical construction and demolition debris includes concrete, asphalt, wood, drywall, metals, and other

miscellaneous and composite materials. Construction debris would consist primarily of debris from the demolition of the approximately 26,405 square feet of the existing 41,925 square feet of commercial uses on-site, including the demolition of a 7,091 square foot warehouse, and the 6,858 square feet of a 6,858 square foot surface parking area that would be disposed of as inert waste.

Construction activities generate a variety of scraps and wastes, with the majority of recyclables being wood waste, drywall, metal, paper, and cardboard. The construction of the Project is estimated to generate a total of approximately 103 tons of solid waste,[36] and approximately 1,716 tons of demolition debris.[37]

This forecasted solid waste generation is a conservative estimate as it assumes no reductions in solid waste generation would occur due to recycling. In order to help meet the landfill diversion goals, the City standard conditions of approval require the following:

- Reasonable efforts shall be used to reuse and recycle construction and demolition debris, to use environmentally friendly materials, and to provide energy efficient buildings, equipment and systems. A Demolition Debris Recycling Plan that indicates where select demolition debris is to be sent shall be provided to the Building Official prior to the issuance of a demolition permit. The Plan shall list the material to be recycled and the name, address, and phone number of the facility or organization accepting the materials.

Furthermore, the Project would comply with CCMC Title 5: Public Works, Chapter 5.01: Solid Waste Management. According to the CCMC, the Project Applicant would submit a construction and demolition recycling and waste assessment plan prior to issuance of the permit. Monthly reports would be submitted throughout the construction of the Project. Further, summary reports with documentation would be submitted prior to final inspection.[38]

Moreover, there are 148.40 million tons of remaining capacity available in Los Angeles County for the disposal of inert waste.[39] Thus, Project-generated construction and demolition waste would represent a very small percentage of the waste disposal capacity in the region, and, as noted, the aggregate amount estimated above would not all be landfilled since the Project would comply with City's recycling requirements. Therefore, solid waste impacts from construction and demolition waste activities would be less than significant.

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[36] *A construction waste generation rate of 4.02 pounds per square foot was used. 51,178 square feet of construction multiplied by 4.02 pounds is 205,735.6 pounds (102.87 tons). Source: U.S. EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-2, June 1998.*

[37] *A building demolition waste generation rate of 0.046 tons per square foot was used. 33,496 square feet of demolition multiplied by 0.046 tons is 1,540.8 tons. Source: CalEEMod User Guide Appendix A, page 13: 1 sf of building space represents 0.046 ton of waste material. A surface parking demolition waste generation rate of 6,858 square feet of surface area @ 1 foot deep slab = 6,858 cubic feet of demolition volume, or 254 cubic yards was used. The asphalt conversion factor is 1 cubic yard of asphalt/paving = 1,380 pounds of waste. Therefore, the parking area would generate approximately 350,520 pounds, or 175.3 tons of demolition debris. Source: California Department of Resources Recycling and Recovery. Total demolition debris is 1,716 (1,540.8 + 175.3 = 1,716.1).*

[38] *CCMC Chapter 5.01. https://codelibrary.amlegal.com/codes/culvercity/latest/culvercity_ca/0-0-0-35527#JD_CHAPTER5.01, accessed July 2021.*

[39] *County of Los Angeles Department of Public Works, Countywide Integrated Management Plan 2019 Annual Report, September 2020, page 32.*

(b) Operation

The Project's estimated operational solid waste generation is presented in **Table III-16, Estimated Project Operational Solid Waste**.

Table III-16
Estimated Average Daily Solid Waste Generation

Land Use	Size	Generation Rate[a]	Total Solid Waste Generated (lbs/day)
Existing Uses			
Office	34,834 sf	6 lbs/1,000 sf	209
Warehouse	7,091 sf	6 lbs/1,000 sf	43
Total Existing Solid Waste Generation			*252*
Proposed Uses			
Office	51,178 sf	6 lbs/1,000 sf	307
Total Proposed Solid Waste Generation			*307*
Net Project Solid Waste Total			**55**

Notes: sf = square feet; gpd = gallons per day; AF/Y = acre-feet per year. Estimated gallons per day have been rounded.
[a] *Generation factors provided by the CalRecycle website, refer to Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates. accessed July 2021.*
Source (table): EcoTierra Consulting, 2021.

AB 374 mandates a 75 percent landfill diversion rate by 2020.[40] At the State-mandated minimum diversion rate of 75 percent, approximately 41 pounds would be recycled and the remaining 14 pounds (0.007 tons) would be landfilled. Therefore, there is adequate landfill capacity for the Project's operational impact. Furthermore, AB 341 requires office developments to provide for recycling services on site. Therefore, solid waste impacts from operation of the Project would be less than significant.

(iv) Natural Gas Existing Infrastructure

SoCal Gas provides natural gas service to the City, including the Project Site. The *2020 California Gas Report* presents a comprehensive outlook for natural gas requirements and supplies for California through 2035. SoCal Gas expects its active meter growth to increase by an annual average of 0.58 percent from the period 2019 through 2035; however, SoCal Gas expects natural gas demand in its service area will decline at an annual rate of 1.0 percent during this same period. Specifically, the commercial load in Southern California is expected to decline by 1.7 percent annually from 82.8 billion cubic feet in 2019 to 62.5 billion cubic feet in 2035. The

[40] *California Department of Resources and Recycling, California's 75 Percent Initiative, https://www.calrecycle.ca.gov/75percent, accessed July 2021.*

decrease in gas demand results mainly from the CPUC authorized energy efficiency program savings in this market and Title 24 codes building standards.[41]

As detailed in **Appendix C**, of this document, the estimated net natural gas consumption for the Project is approximately 561,962 kBTU per year or 550,943 cubic feet per year. The Project's natural gas consumption would represent an extremely small percentage of SoCal Gas' total usage supplied to commercial buildings. Also, as the Project would be infill redevelopment, there is already a natural gas connection point; expansion for distribution infrastructure would not be required and capacity-enhancing alterations to existing facilities would be highly unlikely. SoCal Gas is satisfactorily meeting its obligations to its current customers and projects to meet obligations of its future customers. As such, SoCal Gas' existing infrastructure and storage supplies are well-prepared for the long-term forecasts. However, in the event SoCal Gas cannot provide service from the existing infrastructure, a system analysis would be conducted by SoCal Gas to determine the best method to provide service and appropriate actions such as pressure betterments may be initiated to resolve the issue. Thus, any corrective action, albeit unlikely, would be minimal and temporary, and would not result in any adverse environmental impacts. Therefore, impacts would be less than significant.

(v) Electrical Power Existing Infrastructure

Southern California Edison (SCE) provides electrical service to the City, including the Project Site. On September 1, 2020, SCE adopted the 2020 Power Integrated Resource Plan (IRP), which provides a 20-year roadmap to guide SCE in meeting future energy needs by forecasting demand for energy and determine how that demand will be met by executing new projects and replacement projects and programs. SCE currently obtains 35 percent of its energy from renewable resources.[42]

SCE generates power from a variety of different sources that include renewable energy, hydroelectric, natural gas, nuclear energy, and other fuels. SCE utilizes renewable energy sources and is committed to meeting the requirement of the RPS Enforcement Program to use at least 33 percent of the State's energy from renewables by 2020.[43]

The Project Site is currently served by SCE for electrical power. As detailed in **Appendix C**, of this document, the estimated net electricity consumption for the Project is approximately 162,408 kWh per year. SCE routinely plans capacity additions and changes at existing and new facilities

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[41] *California Gas and Electric Utilities, 2020 California Gas Report, https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf?__cf_chl_jschl_tk__=446107637e8985ffc1fbd91d1f0c7fd1ba46d3ae-1626202318-0-ARerFLUjLmRPOjsNW_YNlfPJoTrP9o20dzyaTTDvwoSMjg0s00qDGkJY43F-ZzrumoB7njhk5P7kLUHtKb8LgL77mKkDMRI5WxtgvCOUkGnUPb90VvRtBf5x0Iw645B0FgPNfnHcZO1cpYWXyzY8jIecdPJiRW0srkRJHCKzgFFwri37EBkov0I8S9OVJ8pmaXyR4CyKdrONk5CaZf-DfnT47C_0bIpBXsX8nxbpDHiRYnEYC0qvK6mGdrM17j1rhGaXPNhwnmi-4a9dyXW_tmX53fsReWGwd4M3QavcOZY4nOJQ3-az93rHUDaYhbdnAZGL5YUJKmCRr9N7oy47XNQ07DnR-jRYdueRLeUbbZ4U2_pIoIRKPKSeVT7zGYhjOM3vz392CVPGPbtSuXBZQh4_035arroQmxoYKt6jyMOVL8W-ujhUOOzK_xuhoOxu0BHLmFLqArKR3vPT9DWZpLVMcMkP0ZneSv-rlczCfRthkzGKKnGWRR15mWDCCDtbWWkNb08sN03RjcXALhVKaX0, accessed July 2021.*

[42] *2019 Power Content Label, SCE, https://www.sce.com/sites/default/files/inline-files/SCE_2019PowerContentLabel.pdf, accessed July 2021.*

[43] *California Environmental Protection Agency, Air Resources Board, Renewable Portfolio Standard.*

as needed to supply area load. The Project's electrical consumption would be part of the total load growth forecast for SCE and has been accounted for in the planned growth of the SCE's power system. Furthermore, as the Project would be infill redevelopment, there is already an electrical power connection point, and expansion for distribution infrastructure would not be required, nor would capacity-enhancing alterations to existing facilities be required from Project implementation. Therefore, impacts would be less than significant.

(b) Impacts to Project-Serving Public Services

(i) Fire Protection

The Culver City Fire Department (CCFD) provides fire protection and emergency medical services for the Project Site and operates three fire stations, comprised of three engine companies, and employs approximately 72 personal.[44] The City is divided into three fire districts, two rescue/emergency medical services (EMS) districts, and 15 fire management zones. The fire districts and EMS districts are evenly distributed by population served and centerline miles (i.e., total length of all the roads in the City, excluding the size and number of lanes on each road). The fire management zones are defined by occupancies within a given geographical area that share common risk. The CCFD is supported by the fire departments of the Cities of Los Angeles, Santa Monica, and Beverly Hills, and by the Los Angeles County Fire Department, through mutual aid agreements.[45]

The Project Site is located in Fire Management Zone 14[46] and would be served primarily by Fire Station No. 1, located at 9600 Culver Boulevard, approximately 0.9-roadway-mile to the northwest from the Project Site. Fire Station No. 1 includes an engine company and paramedic rescue ambulance, and as such, is within the maximum response distance of a station with an engine company and a truck company.[47] Furthermore, Fire Station No. 2, located at 11252 Washington Boulevard, approximately 2.8-roadway-miles to the west from the Project Site, would also aid as needed. Fire Station No. 24 includes an engine company and an ambulance.[48]

The Project Site is not located in an area of moderate or very high fire hazard. The nearest state responsibility area is located approximately 10 miles northwest of the Project in the City of Malibu and the nearest very high fire hazard severity zone is located in an unincorporated area of Los Angeles County known as Baldwin Hills, approximately two miles east of the Project Site. In addition, the Project Site is surrounded by urban development and is not adjacent to any wildlands. Therefore, no fuel modification for fire fuel management would be required.

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[44] *Culver City Fire Department, About Us, Apparatus, https://www.culvercityfd.org/About-the-Department/Apparatus, accessed July 2021.*

[45] *2019 Standards of Cover & Risk Community Risk Assessment, https://www.culvercityfd.org/files/sharedassets/fire/crasoc_website_20190618.pdf, accessed July 2021.*

[46] *2019 Standards of Cover & Risk Community Risk Assessment, https://www.culvercityfd.org/files/sharedassets/fire/crasoc_website_20190618.pdf, accessed July 2021.*

[47] *Culver City Fire Department, About Us, Apparatus, https://www.culvercityfd.org/About-the-Department/Apparatus, accessed July 2021.*

[48] *Culver City Fire Department, About Us, Apparatus, https://www.culvercityfd.org/About-the-Department/Apparatus, accessed July 2021.*

(a) Construction

The Project would be subject to compliance with fire protection design standards, as necessary, per the 2019 California Building Code, 2019 California Fire Code, the CCMC, and the CCFD, to ensure adequate fire protection. The Project would implement City Building and Fire Code requirements regarding Project components including, but not limited to, structural design, building materials, site access, clearance, hydrants, fire flow, storage and management of hazardous materials, alarm and communications systems, and building sprinkler systems. Compliance with these requirements would be demonstrated as part of a plot plan that would be submitted to CCFD for review and approval prior to issuance of a building permit in accordance with City regulations. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of CCFD's safety plan review and CCFD's safety inspection for new construction projects, prior to the issuance of a building permit.

An important component of ensuring fire protection services is the availability of adequate firefighting water flow. Fire flow requirements are closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of firehazards. The nearest fire hydrant is located approximately 103 feet north of the Project Site and is located on the right-of-way of on Jefferson Boulevard. An additional fire hydrant is located approximately 178 feet to the east of the Project Site and is located across Jefferson Boulevard.[49] Moreover, the Project would include automatic fire sprinkler systems as required by the Fire Code. GSWC would confirm the adequacy of existing water pressure and availability in the Project area with respect to required fire flow prior to issuance of building permits. As part of the normal building permit process, the Project would be required to upgrade water service laterals, meters, and related devices, as applicable, in order to provide required fire flow. Moreover, if needed, the Project would implement such improvements either on-site or off-site within the right-of-way, and as such, the construction activities would be temporary and not result in disruption of service to neighboring properties.

Emergency vehicle access to the Project Site would continue to be provided from local roadways. All improvements proposed would comply with the Fire Code, including any additional access requirements of CCFD. Additionally, a Construction Traffic Management Plan for the Project would be prepared in order to minimize disruptions to through traffic flow, maintain emergency vehicle access to the Project Site and neighboring land uses, and schedule worker and construction equipment delivery to avoid peak traffic hours.

Therefore, potential impacts to fire protection services during the construction of the Project would be less than significant.

(b) Operation

Operational activities associated with the Project would incrementally increase demand for fire protection and emergency medical services. The Project would result in an indirect population

[49] *City of Los Angeles Geo Hub, fire hydrant locations, https://www.arcgis.com/apps/webappviewer/index.html?id=ba0b630c929d4302b58eb2f65c2c6536, accessed July 2021.*

increase within the City by permitting an additional 35,658 square feet of commercial space for a total of approximately 51,178 square feet of creative office space, which would increase the daytime population in the Project area given the new employees. Compliance with applicable regulatory requirements, discussed above, that are enforced through the City's building permitting process would ensure that adequate fire prevention features would be provided that would reduce the demand on CCFD facilities and equipment.

Project operation would increase traffic in the area, which could affect CCFD emergency response times. However, the Project Site is located in an area that is well served by the surrounding roadway network, and multiple alternative routes exist for emergency vehicle access to the Project Site. Furthermore, pursuant to CVC Section 21806, emergency response is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternate routes, and multiple station response such that adequate CCFD emergency response would be maintained with implementation of the Project.

Therefore, potential impacts to fire protection services during the operation of the Project would be less than significant.

(ii) Police Protection

The Project Site is served by the Culver City Police Department (CCPD) and is located in Car District 4.[50] The CCPD station is located at 4040 Duquesne Avenue, approximately 0.7 roadway-mile northeast of the Project Site. The CCPD serves a resident population of approximately 40,000 persons and a daytime population of over 300,000 persons.[51] The CCPD consists of 153 full time employees, which includes 113 sworn officers, 14 reserve officers, 40 professional staff and 19 volunteers in patrol.[52]

(a) Construction

Construction sites, if not properly managed, have the potential to attract criminal activity (such as trespassing, theft, and vandalism) and can become a distraction for local law enforcement from more pressing matters that require their attention. However, as required by Culver City's standard conditions of approval, the Project would employ construction safety features including erecting temporary fencing along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to deter trespassing, vandalism, short-cut attractions, potential criminal activity, and other nuisances. These safety features would subject to review approval by Culver City's Engineer and Planning Manager.

As discussed above, temporary lane closures may be required, however, these closures would be temporary in nature and in the event of partial lane closures, both directions of travel on area roadways and access to the Project Site would be maintained. All temporary lane closures would

[50] *Culver City Police, Culver City CCPD Districts Map, https://www.culvercitypd.org/files/assets/police/images/maps/police-car-districts.jpeg?w=1561&h=1011, accessed July 2021.*

[51] *Culver City Police, About CCPD, https://www.culvercitypd.org/Office-of-the-Chief-of-Police/About-CCPD, accessed July 2021.*

[52] *Culver City Police, About CCPD, https://www.culvercitypd.org/Office-of-the-Chief-of-Police/About-CCPD, accessed July 2021.*

be coordinated to not occur during peak periods of traffic congestion. Emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Further, as discussed above, a Final Construction Traffic Management Plan for the Project would be prepared in order to minimize disruptions to traffic flow, maintain emergency vehicle access to the Project Site and neighboring land uses, and schedule worker and construction equipment delivery to avoid peak traffic hours.

Therefore, potential impacts to police protection services during the construction of the Project would be less than significant.

(b) Operation

Operational activities associated with the Project would incrementally increase demand for police protection services. The Project would result in an indirect population increase within the City by permitting an additional 35,658 square feet of commercial space for a total of approximately 51,178 square feet of creative office space, which would increase the daytime population in the Project area given the new employees. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons could be anticipated to increase as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. As discussed in **Section II. Project Description**, the Project would include comprehensive safety and security features to enhance public safety and reduce the demand for police services, including a 24-hour/seven-day video surveillance security program and adequate and strategically positioned lighting to enhance public safety. Visually obstructed and infrequently accessed “dead zones” would be limited, and, where possible, security controlled to limit public access. The building and layout design of the Project would also include nighttime security lighting and secure parking facilities. These preventative and proactive security measures would decrease the amount of service calls that CCPD would otherwise receive. In light of these features, it is anticipated that any increase in demands upon police protection services would be relatively low, and not necessitate the construction of a new police station, the construction of which could potentially cause environmental impacts.

Patrol routes in the area currently include the Project Site and would continue to do so in a similar manner as under existing conditions. To ensure that police protection considerations are incorporated into the Project design, prior to the issuance of a building permit for the Project, the CCPD would be provided the opportunity to review and comment upon improvement plans in order to facilitate opportunities for improved emergency access and response; ensure the consideration of design strategies that facilitate public safety and police surveillance; and other specific design recommendations to enhance public safety and reduce potential demands upon police protection services.

Therefore, potential impacts to police protection services during the operation of the Project would be less than significant.

(iii) Schools

The Project is in an area that is currently served by the Culver City Unified School District (CCUSD) schools. The Project would construct an additional 35,658 square feet of commercial space for a total of approximately 51,178 square feet of creative office space.

The Project Site is currently served by the following CCUSD schools:[53]

- Linwood E. Howe Elementary School located at 4100 Irving Place, approximately 1.0 roadway-mile north;
- Culver City Middle School, located at 4601 Elenda Street, approximately 1.4 roadway-mile southwest; and
- Culver City High School, located at 4401 Elenda Street, approximately 1.4 roadway-mile southwest.

It should be noted that State-mandated open enrollment policy enables students anywhere in CCUSD to apply to any regular, grade-appropriate CCUSD elementary school with designated "open enrollment" seats. The number of open enrollment seats is determined annually. Each individual school is assessed based on the principal's knowledge of new housing and other demographic trends in the attendance area. Open enrollment seats are granted through an application process that is completed before the school year begins. Students living in a particular school's attendance area are not displaced by a student requesting an open enrollment transfer to that school.

The Project would result in an indirect population increase within the City by permitting an additional 35,658 square feet of commercial space for a total of approximately 51,178 square feet of creative office space, which would increase the daytime population in the Project area given the new employees. The employees of the Project are not anticipated to generate significant numbers of new students that would be introduced to project area schools.

To reduce any potential population growth impacts on public schools, the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district for the purpose of funding the construction or reconstruction of facilities (pursuant to California Education Code Section 17620(a)(1)). The Developer Fee Justification Study for CCUSD was prepared to support the school district's levy of the fees authorized by Section 17620 of the California Education Code.[54] The Project would be required to pay the appropriate fees, based on the square footage, to CCUSD.

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to address a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits, and subdivisions. SB 50 is deemed to fully address school facilities impacts, notwithstanding any contrary provisions in CEQA or other State or local law. Therefore, as

[53] *Culver City Unified School District website, School Locator, https://www.ccusd.org/apps/pages/index.jsp?uREC_ID=120892&type=d&pREC_ID=237953, accessed July 2021.*

[54] *Culver City Unified School District, Developer Fee Justification Study, March 2020, https://4.files.edl.io/4db8/03/17/20/192657-7c8c44c2-15f7-4980-b79e-a87920d26d89.pdf, accessed July 2021.*

payment of appropriate school fees to CCUSD is required by law and considered to fully address impacts, impacts would be less than significant.

(iv) Parks and Recreation

The Culver City Parks, Recreation and Community Services (PRCS) division manages all municipal recreation and park facilities within the City. The following parks and recreational facilities are available to serve the Project Site:[55]

- Culver City Park, including Boneyard Dog Park, located at 9910 Jefferson Boulevard, approximately 0.5 roadway-mile northeast;
- Blair Hills Park, located at 5950 Wrightcrest Drive, approximately 1.9 roadway-mile east;
- Carlson Park, located at Braddock Drive at Motor Avenue, approximately 1.6 roadway-mile west; and
- Veterans Memorial Park, located at 4117 Overland Avenue, approximately 1.7 roadway-mile west.

Furthermore, the 401-acre Kenneth Hahn State Recreation Area is approximately 2.0 roadway-miles east of the Project Site, located at 4100 S. La Cienega Boulevard.

The Project would result in an indirect population increase within the City by permitting an additional 35,658 square feet of commercial space for a total of approximately 51,178 square feet of creative office space, which would increase the daytime population in the Project area given the new employees. Therefore, the Project would not generate a new direct residential population as no new residential uses are proposed. Despite the incremental indirect population increase, the majority of employees are not expected to use local parks given limited lunch time hours, and to the extent they do use local parks it would likely be for passive recreation (walking or eating lunch) on weekdays when use of these parks is not considered at peak (i.e., peak usage of parks often occurs on weekends when the office uses are not in operation). Although there is the possibility that employees would utilize local parks and recreational facilities, the demand is also expected to be negligible since employees would have access to 19,047 square feet of open space on-site. The Project's open space and amenities would include two ground-floor courtyards, a ground-floor covered courtyard patio, a dog run, a zen garden, and a second-floor terrace with a covered area and an open deck area with landscaping and seating. As such, the Project is not anticipated to result in substantial adverse physical impacts to parks that would alter existing park facilities or result in the need for new facilities, construction of which could cause significant environmental impacts. Therefore, impacts to parks would be less than significant.

(v) Libraries

The Los Angeles County Public Library (LACPL) provides library services to the City. The Project Site is served by the LACPL Culver City Julian Dixon Branch Library, which is located at 4975 Overland Avenue, approximately 1.0 roadway-mile south of the Project Site. Similar to park services, the addition of new daytime employees would not substantially impact the provision of library services. It is expected that the majority of employees would utilize library facilities near

[55] *Culver City Parks, https://www.culvercity.org/Parks?transfer=d862ca40-66a0-4e21-8c6c-12bc1cf7ef98, accessed July 2021.*

their place of residence. Essentially, the provision of library services is the responsibility of local government, which is typically financed through the City general funds. Regardless, the library's existing service level would be maintained without an additional library or alterations to the existing libraries. Therefore, impacts to library facilities would be less than significant.

(c) Summary

As demonstrated above, the Project can be adequately served by all required utilities and public services. ***As such, the Project meets condition (e) of the Class 32 exemption.***

(2) Conclusion of Class 32 Categorical Exemption Conditions Consistency

The Project meets all five conditions enumerated for a Class 32 Categorical Exemption under CEQA Guidelines Section 15332.

b) Exceptions to a Categorical Exemption

[State CEQA Guidelines Section] 15300.2. Exceptions

(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 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.

(3) Project Analysis

Exception (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 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 does not apply to the Project as the Project is seeking Class 32 Categorical Exemption. Nonetheless, the Project would not impact an environmental resource of hazardous or critical concern (see also the discussion for Exception [e]), below). As discussed under Condition (C), above, the Project Site does not contain any habitat capable of sustaining any species identified as endangered, rare, or threatened. Therefore, the exception is not applicable to the Project.

Exception (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.

Cumulative impacts are two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (State CEQA Guidelines Section 15355). Cumulative impacts may be analyzed by considering a list of past, present, and probable future projects producing related or cumulative impacts (State CEQA Guidelines Section 15130[b][1][A]). An overview of each impact discussion is provided below, and as shown, the Project would not result in any Project-specific significant impacts, and would not have any impacts that are individually limited but cumulatively considerable.

(a) Local Land Use Plans and Zoning

Development of related projects is reasonably anticipated to occur in accordance with adopted plans and regulations. It is also reasonably anticipated that most of related projects would be compatible with the zoning and land use designations of each related project site and its existing surrounding uses. In addition, it is reasonable to assume that related projects under consideration in the surrounding area would implement and support local and regional planning goals and policies. Therefore, cumulative land use impacts would be less than significant.

(b) Endangered, Rare, or Threatened Species

The Project Site is located in an urbanized area. However, it is unknown whether or not any of the properties on which related projects may be located contain biological resources, such as sensitive species that may be listed at the federal or State level as endangered, rare, or threatened. Nonetheless, as the Project would not result in a potentially significant impact to listed species or habitat, there is no potential for the Project to contribute to a cumulative impact.

(c) Transportation

With respect to construction traffic, it is unknown whether or not any related projects would have overlapping construction schedules with the Project. However, similar to the Project, and pursuant to existing City regulations and policies, related projects would be required to submit formal construction staging and traffic control plans for review and approval by the City prior to the issuance of construction permits. These plans, identified as a Work Area Traffic Control Plan herein, would identify all traffic control measures, signs, delineators, and work instructions through the duration of construction activities. It is reasonably anticipated that related projects would comply with this requirement, similar to the Project, and as such, cumulative construction traffic impacts would be less than significant.

With respect to cumulative operational traffic impacts, analyses should consider both short-term and long-term project effects. Short-term effects are evaluated in the project-level transportation analysis summarized above. As the Project would generate a total of 161 net daily trips, which is less than the VMT Screening Criteria threshold of 250 net daily vehicle trips, a Transportation Assessment was not required, and the Project would not result in any significant VMT transportation impacts. Long-term, or cumulative, effects are determined through a consistency check with the 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas (GHG) reduction targets. As such, projects that are consistent with this plan, such as the Project, in terms of development, location, density, and intensity, are part of the regional solution for meeting air pollution and GHG goals. Projects that are deemed to be consistent would have a less than significant cumulative impact on transportation. Furthermore, the Project is not expected to result in significant impacts to the surrounding transportation system. Therefore, the Project is not anticipated to make a cumulatively considerable contribution to operational traffic impacts. As such, cumulative operational transportation impacts would be less than significant.

(d) Noise

Development of the Project in combination with related projects in the vicinity of the Project Site could result in an increase in construction noise in an already urbanized area of the City. With respect to construction impacts, it is unknown whether any potential nearby projects would have overlapping construction schedules with the Project. However, as with the Project, any nearby project that could be built simultaneously with the Project would be required to meet the same CCMC requirements regarding construction noise levels. Specifically, construction of all projects would be subject to CCMC Section 9.07.035, which limits the hours of allowable construction activities, avoidance of operating several pieces of equipment simultaneously, and utilizing state-of-the-art noise shielding and muffling devices. To comply with these standards, nearby development projects, much like the Project, would implement best practices and/or project design features to reduce construction noise levels. Accordingly, while concurrent construction of nearby projects in the vicinity of the Project Site could potentially contribute to cumulative increases in ambient noise levels, because the Project would not result in any significant construction noise increases, it would not result in a cumulatively considerable contribution to any such increase. Therefore, potential construction-related noise impacts would not be significant.

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to the Project and related projects within the study area. As the Project would generate a total of 161 net daily trips, which is less than the VMT Screening Criteria threshold of 250 net daily vehicle trips, a Transportation Assessment was not required. As shown in **Appendix B**, daily maximum traffic volumes on Jefferson Boulevard are projected to increase from 20,293 average daily traffic (ADT) (existing) to 20,692 ADT (with future growth, including the Project). This level of traffic increase would not be sufficient to cause an audible increase in traffic noise levels. Therefore, the Project is not anticipated to make a cumulatively considerable contribution to a cumulative noise impact associated with traffic noise sources.

In addition to cumulative mobile source noise levels, operation of the Project in combination with other projects that could potentially be developed nearby could result in an increase in operational noise in this urbanized area of the City. However, as described above, long-term noise impacts from Project operations would be negligible, as building operations and human activities inside and outside the Project would generate minimal noise impacts. Moreover, as with the Project, other developments in the vicinity of the Project would be required to comply with the City's extensive regulatory requirements that limit operational noise sources to minimal levels. Accordingly, as the Project would not produce any significant operational noise impacts, it would not result in a cumulatively considerable contribution to any significant operational noise impacts. As such, cumulative on-site operational noise impacts would be less than significant.

(e) Air Quality

SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable. Individual projects that generate emissions not in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions. As described above, the Project does not generate any regional or localized emissions that exceed SCAQMD's thresholds; therefore, the Project would not contribute a cumulatively considerable increase in emissions for the pollutants which the Basin is in nonattainment, and cumulative air quality impacts would be less than significant.

(f) Greenhouse Gases

Although the Project is expected to emit GHGs, the emission of GHGs by a single project into the atmosphere is not necessarily an adverse environmental effect. As discussed in CEQA case law,[56] the global scope of climate change and the fact that carbon dioxide and other GHGs, once released into the atmosphere, are not contained in the local area of their emission means that the impacts to be evaluated are also global rather than local. For many air pollutants, the significance

[56] *Supreme Court of California, Center for Biological Diversity et al. v. California Department of Fish and Wildlife (2015), S217763, 11-13.*

of their environmental impact may depend greatly on where they are emitted; for GHGs, it does not.

For individual developments, like the Project, this fact gives rise to an argument that a certain amount of GHG emissions is as inevitable as population growth. Under this view, a significance criterion framed in terms of efficiency is superior to a simple numerical threshold because CEQA is not intended as a population control measure. Meeting statewide reduction goals does not preclude all new development. Rather, the Scoping Plan, the State's roadmap for meeting AB 32's target, assumes continued growth and depends on increased efficiency and conservation in land use and transportation from all Californians. To the extent a project incorporates efficiency and conservation measures sufficient to contribute its portion of the overall GHG reductions necessary, one can reasonably argue that the Project's impact is not cumulatively considerable, because it is helping to solve the cumulative problem of GHG emissions as envisioned by California law.

As discussed above, the Project would reduce GHGs in a manner consistent with applicable regulatory plans and policies to reduce GHG emissions, including: AB 32 Scoping Plan, SCAG's 2020-2045 RTP/SCS, and the 2019 CalGreen Standards.

Similar to the Project, all future projects in the State would be reviewed for consistency with applicable State, regional and local plans, policies, or regulations for the reduction of GHGs. Therefore, based on the discussion above, and consistent with *State CEQA Guidelines* Section 15064(h)(3), the Project's generation of GHG emissions would not be cumulatively considerable because the Project would not conflict with an applicable plan, policy, or regulation for the purposes of reducing the emissions of GHGs. Therefore, the Project's contribution to cumulative impacts to GHGs would not be cumulatively considerable, and cumulative impacts would be less than significant.

(g) Water Quality

With respect to construction impacts, it is unknown whether or not any related projects would have overlapping construction schedules with the Project. However, similar to the Project, related projects would be required to comply with the City Building Code, NPDES requirements, etc. Assuming compliance with these regulatory requirements, similar to the Project, the cumulative water quality impact during construction would be less than significant.

With respect to operational impacts, development of the Project in combination with related projects would result in the further infilling in an already developed area. The Project Site and the surrounding area are served by the existing City storm drain system. Runoff from the Project Site and the adjacent land uses is typically directed into the adjacent streets, where it flows to the drainage system. It is likely that most, if not all, related projects would also drain to the surrounding street system or otherwise retain stormwater on-site as all projects would comply with existing stormwater/LID requirements, which would ensure impacts are less than significant.

The runoff associated with related projects would either be directed in non-erosive drainage devices to landscaped areas or directed to an existing storm drain system and would not encounter exposed soils. Related projects would include a drainage system with pipes that would

adequately convey surface water runoff into the existing storm drain or the on-site cisterns. Additionally, related projects would be required to implement BMPs and to conform to the existing NPDES water quality program. Therefore, cumulative hydrology and water quality impacts during operation would be less than significant.

(h) Utilities

(i) Water

Implementation of the Project in combination with related projects within the service area of GSWC would generate demand for additional water supplies. In terms of the City's overall water supply condition, the water demand for any project that is consistent with the City's General Plan and long-range SCAG growth projections has been accounted for in the *Draft 2020 UWMP*. The *Draft 2020 UWMP* anticipates that the future water supplies would be sufficient to meeting existing and planned growth in the City to the year 2045 (the planning horizon required of 2020 UWMPs) under wet and dry year scenarios. The Project would be consistent with the site's General Plan land use designation as well as SCAG growth projections, and therefore, has been accounted for in the *Draft 2020 UWMP* and its water demand would not be cumulatively considerable. Related projects as well as other development in the GSWC service area will be required to comply with current Green Building Code requirements to conserve water, and in addition, larger projects with over 500 residential units would have to prepare a Water Supply Assessment (pursuant to SB 610) to be reviewed and certified by GSWC to demonstrate adequate water supply. Therefore, because the *Draft 2020 UWMP* forecasts adequate water supplies to meet all projected water demands in the City through the year 2045, cumulative impacts with respect to water supply are not anticipated from the development of the Project and related projects.

Development of the Project and future new development in the vicinity of the Project Site would cumulatively increase demands on the existing water infrastructure system. Similar to the Project, related projects would be subject to Culver City Public Works review to assure the existing public infrastructure would be adequate to meet the domestic and fire water demands of each project and individual projects would be subject to GSWC and City requirements regarding infrastructure improvements needed to meet respective water demands, flow and pressure requirements. Furthermore, GSWC through the five year updates of the UWMP, Culver City Department of Public Works, and the CCFD project specific checks would conduct on-going evaluations of its infrastructure. Therefore, the cumulative impact would be less than significant.

(ii) Wastewater

Implementation of the Project in combination with related projects within the service area of the HTP would generate additional wastewater that would be treated at HTP. Currently, the HTP has an average daily flow of 260 mgd; however, the HTP has capacity to treat a maximum daily flow of 450 mgd. This equals a typical remaining capacity of 190 mgd of wastewater able to be treated at the HTP. Therefore, the HTP would have adequate capacity to serve the additional wastewater demanded by the Project (0.003 mgd) and, as such, the Project's demand would not be cumulatively considerable.

The applicants of related projects will be required to verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines receiving additional sewer flows from the Project and other cumulative development projects. If it is determined that the sewer system in the local area has insufficient capacity to serve a particular development, the developer of that project would be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate that project's increased flows. Each project would be evaluated on a case-by-case basis and would be required to consult with Public Works (for projects within the City) and comply with all applicable City and State water conservation programs and sewer allocation ordinances. Therefore, the cumulative impact would be less than significant.

(iii) Solid Waste

Implementation of the Project in combination with related projects within the Southern California region, serviced by area landfills, will increase regional demands on landfill capacities. Construction of the Project and related projects generate construction and demolition waste, resulting in a cumulative increase in the demand for inert (unclassified) landfill capacity. The Project and all other future cumulative development would be required to implement a construction waste management plan to achieve a minimum 75 percent diversion from landfills. Moreover, there are 148.40 million tons of remaining capacity available in Los Angeles County for the disposal of inert waste, and, as such, the Project's demand would not be cumulatively considerable. Therefore, cumulative impacts from demolition and construction waste would be less than significant.

Operation of the Project in conjunction with related projects would generate municipal solid waste and result in a cumulative increase in the demand for waste disposal capacity at Class III landfills. The *County Integrated Waste Management Plan Annual Report* evaluates countywide demand for landfill capacity. Each Annual Report assesses future landfill disposal needs over a 10-year planning horizon. As such, the 2019 Annual Report projects waste generation and available landfill capacity through 2029. Based on the 2019 Annual Report, Los Angeles County has the projected disposal capacity through 2029.[57] The Project's increase in operational solid waste generation, in conjunction with related projects, would represent an insignificant portion of the estimated approximately 31.1 million tons that is anticipated to be generated in 2022 (Project build-out year).[58] The County will continually address landfill capacity through the preparation of Annual Reports. The preparation of each Annual Report provides sufficient lead time (10 years) to address potential future shortfalls in landfill capacity. Moreover, a State-mandated 75 percent landfill diversion rate is required by 2020, which would reduce the amount of solid waste landfilled for related projects. Therefore, cumulative impacts from operational solid waste would be less than significant.

[57] *Los Angeles Countywide Integrated Waste Management Plan, 2019 Annual Report, https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF, accessed July 2021.*

[58] *Los Angeles Countywide Integrated Waste Management Plan, 2019 Annual Report, https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF, accessed July 2021.*

(iv) Natural Gas

Implementation of the Project, in conjunction with related projects, would increase demands for natural gas. Energy consumption by new buildings in California is regulated by the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations. The efficiency standards apply to new construction of both residential and non-residential buildings and regulate insulation, glazing, lighting, shading, and water- and space-heating systems. Building efficiency standards are enforced through the local building permit process. The City has adopted green building standards consistent with Title 24 as the Culver City Mandatory Green Building Requirements. Similar to the Project, related projects and future development must also abide by the same statues, regulations, and programs that mandate or encourage energy conservation. SoCalGas is also required to plan for necessary upgrades and expansion to its systems to ensure that adequate service will be provided for other projects. Specifically, SoCalGas regularly updates its infrastructure reports as required by law. Development projects within its service area would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. Therefore, cumulative impacts are less than significant.

(v) Electrical Power

Implementation of the Project, in conjunction with related projects, would increase demands for electrical power. As discussed above, SCE utilizes renewable energy sources and is committed to meeting the requirement of the RPS Enforcement Program to use at least 33 percent of the State's energy from renewables by 2020. All new development in California is required to be designed and constructed in conformance with State Building Energy Efficiency Standards outlined in Title 24. It is possible that implementation of related projects could require the removal of older structures that were not designed and constructed to conform with the more recent and stringent energy efficiency standards. Thus, it is possible that with implementation of related projects that the resulting demand for electricity supply could be the same or less than the existing condition. The estimated power requirement for related projects would be part of the total load growth forecast for SCE and would be accounted for in the planned growth of power system. SCE undertakes expansion or modification of electrical service infrastructure and distribution systems to serve future growth in the City as required in the normal process of providing electrical service. Any potential cumulative impacts related to electric power service would be addressed through this process. Electrical service to related projects would be provided in accordance with the SCE Power Rules and Regulations. Therefore, cumulative impacts related to electricity supply and infrastructure would be less than significant.

(i) Public Services

(i) Fire Protection

Development of the Project in combination with related projects would cumulatively increase the demand for fire protection services. Over time, CCFD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, CCFD's resource needs would be

identified and monies allocated according to the priorities at the time. Any new or expanded fire station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and cumulative growth would contribute.

Moreover, all of the cumulative development would be reviewed by CCFD in order to ensure adequate fire flow capabilities and adequate emergency access. Compliance with CCFD, City Building Code, and Fire Code requirements related to fire safety, access, and fire flow would ensure that cumulative impacts to fire protection would be less than significant.

(ii) Police Protection

It is anticipated that the Project in combination with related projects would increase the demand for police protection services. This cumulative increase in demand for police protection services would increase demand for additional CCPD staffing, equipment, and facilities over time. Similar to the Project, other projects served by CCPD would implement safety and security features according to CCPD recommendations. CCPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, CCPD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded police station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and cumulative growth would contribute. Therefore, the cumulative impact on police protection services would be less than significant.

(iii) Schools

As discussed above, payment of developer impact fees in accordance with SB 50 and pursuant to Section 65995 of the California Government Code would ensure that the impacts of the Project on school facilities would be less than significant. Similar to the Project, related projects would be required to pay school fees to the appropriate school district wherein their site is located. The payment of school fees would fully address any potential impacts to school facilities. Therefore, cumulative impacts would be less than significant.

(iv) Parks and Recreation

As discussed above, the Project would result in a less than significant impact on parks and recreational facilities. Projects that meet the established criteria would be required to pay Parks and Recreation Fees to the City for the construction of residential dwelling units. The payment of fees would address potential impacts to park and recreational facilities. Therefore, the cumulative impact would be less than significant.

(v) Libraries

Related projects within the City and with a residential component could generate additional residents who could increase the demand upon library services. Essentially, the provision of library services is the responsibility of local government, which is typically financed through the City general funds. Regardless, the library's existing service level would be maintained without

an additional library or alterations to the existing libraries. Therefore, combined with the LAPL standards for new development and the fees to help to pay for any improvements that the LAPL may do in the future impacts to library facilities would be less than significant.

Therefore, the cumulative impact would be less than significant.

(j) Historical Resources

See the analysis under Exception (f), below, for Project-specific impacts to historic resources.

The Project would not result in a significant impact to historical resources. It is unknown whether or not any of the properties on which related projects may be located contain historical resources. Any related project sites that contain historical resources would be required to comply with existing regulations and/or safeguard measures as appropriate for that project, including required compliance with CEQA's provisions regarding historical resources. As the Project would not result in a significant impact to historical resources, there is no potential for the Project to contribute to a cumulative impact, and thus, the cumulative impact would be less than significant.

(k) Summary

As no cumulatively significant impacts would result from the Project, the exception is not applicable to the Project.

Exception (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.

There are no unusual circumstances with the Project Site or the proposed Project that would create a reasonable possibility of significant effects to the environment. The Project Site is located within a highly urbanized setting, and the site would be redeveloped from commercial and warehouse uses to an office building with associated parking, which is a typical urban land use appropriate for the area. Moreover, the Lead Agency has not determined an unusual circumstance is applicable to the Project. Moreover, as analyzed in Exception (b), above, the Project would not result in any Project-specific or cumulative traffic, noise, air quality, greenhouse gas, or water quality impacts. The proposed land uses are consistent and compatible with the Project Site's urban setting and are typical for an infill development located near transit and on a major City thoroughfare. Therefore, as there are no unusual circumstances regarding the proposed Project or Project Site, the exception is not applicable to the Project.

Exception (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.

There are no State-designated scenic highways or highways eligible for scenic designation in the Project Site vicinity.[59] There are also no locally-designated scenic highways in the Project Site vicinity.[60] Therefore, as the Project Site is not located along a State- or City-designated scenic highway, the exception is not applicable to the Project.

Exception (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.

Environmental Site Assessment

California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities where there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

A Phase I Environmental Site Assessment (ESA) was performed by L. Joseph Associates, LLC, in August 2019 (this report is available in **Appendix E**). The ESA was performed in conformance with the scope and limitations of ASTM Standard Practice 1527-13. The purpose of the investigation was to identify the presence of any recognized environmental conditions (RECs), including controlled recognized environmental conditions (CRECs) and historical recognized environmental conditions (HRECs), in connection with the Project Site. RECs are defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release.

The Project Site was developed with the existing office building in the eastern portion of the property in approximately 1960, prior to which it was undeveloped with the exception of limited agricultural uses. The cinder block warehouse building in the western portion of the Project Site was constructed in approximately 1984. Occupants of the buildings since the 1980s included Regal Rents (party rental company) and office tenants. The Project Site was reportedly occupied by companies that conducted circuit board fabrication, silk screening, and metal plating in the 1960s.

A search of current Federal, State, and Local regulatory agency databases was conducted by Environmental Data Resources, Inc (EDR). The governmental database report is provided in Appendix F of **Appendix D**, of this document. The Project Site was listed in the following databases:

- Environmental Interest/Information System (FINDS/ECHO)
- Los Angeles County Hazardous Materials System (Los Angeles Co HMS)

[59] *CalTrans website, Scenic Highways, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways, accessed July 2021.*

[60] *County of Los Angeles Bicycle Master Plan Draft PEIR, Section 3.1. Aesthetics/Visual Resources, 1996, Figure 3.1-1.*

- RCRA Non Generator/No Longer Regulated (RCRA NonGen/NLR)
- Hazardous Waste Tracking System (HAZNET)
- Spills, Leaks, Investigations, and Cleanups (SLIC)
- California Environmental Reporting System (CERS)

The FINDS/ECHO, Los Angeles Co HMS, RCRA NonGen/NLR, HAZNET, and CERS database listings are in reference to the storage/use of hazardous materials or regulated substances at the Project Site and off-site disposal records for regulated wastes generated at the Project Site. Evidence of RECs was not encountered in association with these database listings.

The SLIC listing is in reference to a closed unauthorized release case with the Los Angeles Regional Water Quality Control Board (LARWQCB) related to the assessment of adverse impacts to the Project Site by occupants in the 1960s that conducted circuit board manufacturing, silk screening, and metal plating at the property. The LARWQCB concluded that residual impacted soil and groundwater beneath the Project Site did not pose a threat to public health or the environment, and the unauthorized case was closed in 2000 with no further action required.

None of the above referenced database listings represent a REC warranting further investigation. The closed SLIC case represents a HREC that does not warrant further investigation. In the event that future subsurface construction work disturbs residual impacted soil or groundwater beneath the property, these materials should be managed as regulated wastes in accordance with all regulatory requirements.

Based on the review of the EDR report information, there are no adjacent or up-gradient known or suspect petroleum hydrocarbon impacted soil or groundwater plumes located within 30 feet of the Project Site and there are no adjacent or up-gradient known or suspect contaminated soil or groundwater plumes located within 100 feet of the Project Site.

No evidence was encountered that the subsurface soil, groundwater, and/or soil vapor beneath the Project Site has been adversely impacted in association with releases and adjacent or nearby properties, and no visual evidence of surface contamination threatening the Project Site was observed on adjacent and nearby properties.

Methane

Based on a review of the California Geologic Energy Management Division (CalGEM) Well Finder Website, the Project Site is located within the limits of the Inglewood Oil Field. The closest well to the Project Site is Sentinel Peak Resources California LLC No 7-A, an active oil and gas well, located approximately 570 feet east-southeast of the Site. In addition, a several plugged oil and gas wells are located at or in close proximity to the Project Site.[61] Considering that the Project Site is located within the boundaries of the Inglewood oilfield, there may be a potential for methane. Due to the Project Site's location in a Methane Zone, the Project Applicant is required by the City through regulatory compliance to conduct a methane assessment prior to the

[61] *Geotechnical Investigation for the Proposed Office Addition and Parking Structure 9925 Jefferson Boulevard, Culver City, California, prepared by Geocon West, Inc., October 2020. Refer to* ***Appendix D****.*

redevelopment of the Project Site. Therefore, potentially hazardous impacts associated with methane would be less than significant.

In conclusion, construction and operation of the Project would not pose an environmental hazard to surrounding sensitive uses or the environment in regard to siting the Project on a known hazardous waste site or any other type of site appearing on a list compiled pursuant to Section 65962.5 of the Government Code. Therefore, the exception is not applicable to the Project.

Exception (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.

Section 15064.5 of the *State CEQA Guidelines* defines a historical resource as:

1. a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources;

2. a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or

3. an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record.

A significant adverse effect would occur if a project were to adversely affect an historical resource meeting one of the above definitions. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

According to the Phase I ESA (**Appendix D**), the Project Site was developed with the existing office buildings in the eastern portion of the property in approximately 1960, prior to which it was undeveloped with the exception of limited agricultural uses. The cinder block warehouse building in the western portion of the property was constructed in approximately 1984. Occupants of the Project Site since the 1980s included Regal Rents (party rental company) and office tenants. The Project Site was reportedly occupied by companies that conducted circuit board fabrication, silk screening, and metal plating in the 1960s.

The California Points of Historical Interest, the California Historical Landmarks, the California Register of Historic Resources (CRHR), the National Register of Historic Places (NRHP), and the California Inventory of Historic Resources listings were reviewed to determine if there were any resources listed or determined to be eligible for CRHR, NRHP, or local listing within the Project area. The Project Site and Project area were not located in any of these searches.

Additionally, based on the proposed activity, which would be the demolition of existing uses upon previously disturbed soils, the area has a low-likelihood for buried cultural resources. In the unlikely case the Applicant discovers human remains during ground disturbing activities,

California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Los Angeles County Coroner has made the necessary findings as to origin. Further pursuant to California Public Health & Safety Code, Section 5097-98(b) remains shall be left in place and free of disturbance until a final decision as the treatment and disposition has been made. If the Los Angeles County Coroner determines the remains to be Native American, the Project Applicant must contact the Native American Heritage Commission within 24 hours. The Native American Heritage Commission must then immediately identify the "most likely descendants(s)" for purposes of receiving notification of discovery. The most likely descendant(s) shall then make recommendations within 48 hours and engage in consultation concerning the treatment of the remains as provided in California Public Resources Code, Section 5097.98.

Because the current buildings on the Project Site are not historical resources, the Project would have no direct impact on historical resources. Furthermore, the Project would result in no indirect impacts to historical resources in the vicinity of the Project Site as the historic setting in the area around the Project Site is already eroded by existing development. Therefore, implementation of the Project would not result in a substantial adverse change to a historic resource. This exception is not applicable to the Project.

(4) Conclusion

None of the six exceptions to a Categorical Exemption is applicable to this Project. As the Project meets all five conditions enumerated for a Class 32 Categorical Exemption under CEQA and no exceptions are applicable, the Project therefore qualifies for a Categorical Exemption under CEQA. No further analysis is required.