



technical memorandum

date March 4, 2022
to City of Culver City
from Jay Ziff
Jacqueline De La Rocha
subject Class 32 Categorical Exemption for the 3855 Watseka Avenue Project

Introduction

ESA has prepared this analysis to assist the City of Culver City in their assessment of the potential environmental impacts associated with the 3855 Watseka Avenue Project (Project), pursuant to the California Environmental Quality Act (CEQA). The analysis below, along with supporting technical studies, concludes that the Project (described in more detail below) qualifies under CEQA for a Class 32 (Infill Development) Categorical Exemption, that it would not have a significant effect on the environment, and is exempt from review under CEQA.

Project Description

Project Location and Existing Conditions

The Project Site is an approximately 49,125 square foot (SF) (1.128 acre) property located in downtown Culver City between Washington Boulevard and Venice Boulevard (Project Site). The Project Site is located approximately 5.18 miles from the Pacific Ocean and approximately 7.88 miles from downtown Los Angeles. The northern boundary of the Project Site borders the City of Los Angeles. **Figure 1, Regional and Project Vicinity Location**, illustrates the location of the Project Site from a regional and local perspective.

As shown in **Figure 2, Aerial Photograph with Surrounding Land Uses**, the Project Site is currently improved with two buildings totaling 7,633 SF.¹ The first building is a one-story, 3,942 SF medical office building built in 1996 and located on the northernmost portion of the Project Site. The second building, a two-story, 3,691 SF institutional building, is located adjacent to and south of the first building. The remainder of the Project Site consists of storage areas and a 120-space asphalt-paved surface parking lot with approximately 2,729 SF of landscaping. Eight trees are currently located on-site and four street trees are located within the adjacent public right-of-way along Watseka Avenue. Ingress/egress to the Project Site is available via four driveways from Watseka Avenue and a driveway via the public alley directly adjacent to and north of the Project Site.

¹ Note that the analysis provided in Attachments B and C of this memorandum is conservative, as it is based on a slightly smaller existing building square footage of 7,370 SF.



SOURCE: ESRI, 2021; ESA, 2021

3855 Watsaka Avenue Project

Figure 1
Regional and Project Vicinity Location



SOURCE: ESRI, 2021; ESA, 2021

3855 Watseka Avenue Project

Figure 2
Aerial Photograph with Surrounding Land Uses

Planning and Zoning

The Culver City General Plan designation for the Project Site is Downtown, which allows for medium- and large-scale commercial uses and shared parking. The Downtown designation is intended to support desirable existing and future commercial uses and mixed-use housing opportunities within the Downtown area, and to encourage a pedestrian-friendly environment with a positive nightlife ambiance. The Project Site's zoning designation is Commercial Downtown (CD). The CD zone permits medium- and large-scale commercial uses, emphasizing retail, entertainment, restaurant, and cultural uses. The development standards of the CD zone are intended to provide a pedestrian-friendly environment with high visual quality.

Surrounding Uses and Development

The Project Site is generally surrounded by a mix of hospital, medical office, retail, restaurant, office, and residential uses. Surrounding land uses include the following:

- North – A public alley is located directly adjacent to the Project Site with commercial uses north of the alley fronting Venice Boulevard within the City of Los Angeles.
- South – A two-story multi-family residential building and surface parking are located immediately adjacent to the Project Site.
- East – A three-story public parking structure, a two-story office building, and a two-story multi-family residential building are located to the east of the Project Site on the other side of Watseka Avenue.
- West – The Southern California Hospital at Culver City (SCH-CC) is located to the west of the Project Site. Specifically, a 7-story building which houses the acute rehab unit providing 24-hour medical service for the hospital and associated surface parking is located immediately adjacent to the Project Site along Delmas Terrace. The SCH-CC property extends further west across Delmas Terrace and includes a 6-story building which houses the emergency department, and a single-story building which houses offices for the hospital.

Project Characteristics

The Project is proposing to develop a new, four-story, approximately 145,751 SF office building of up to 56 feet in height, over three levels of subterranean parking.² Level 1 of the office building would include a lobby, which would be accessible from Watseka Avenue and from the visitor parking drop-off area located within the proposed parking structure. Bicycle storage and other end-of-trip facilities for pedestrians, cyclists, and other non-automobile users would be located within the eastern portion of the building, and mechanical equipment rooms, storage and a loading area would be provided within the southern edge of the building. Parking Level 1, located on the first underground level, would include a security room for the building and a parking operations office. Levels 2 through 4 would include office uses and landscaped outdoor patio spaces for use by employees and visitors to the Project Site. The roof level of the office building would include roof-mounted mechanical equipment (e.g., air conditioning, heating, exhaust, and ventilation ducts) and solar photovoltaic (PV) panels.

The Project would include landscaped areas at the ground level along the northern, southern, and eastern boundaries of the Project Site, and along the western boundary which also includes a utility easement. The street-level exterior of the office building would be visually accessible to pedestrians, drivers, and transit riders,

² Note that the analysis provided in Attachments A, B, and C of this memorandum is conservative, as it is based on a slightly larger Project building square footage of 149,518 SF.

emphasizing a pedestrian-oriented design that would help activate Watseka Avenue through trees, landscaping and other amenities along the public right-of-way.

A summary of the Project is provided in **Table 1, Project Square Footage Summary**, and **Figure 3, Conceptual Site Plan**, illustrates the conceptual site plan for the Project.

TABLE 1
PROJECT SQUARE FOOTAGE SUMMARY

Office Building (Levels 1-4 and Parking Level 1)	
Level 1	24,816 SF
Level 2	43,151 SF
Level 3	39,871 SF
Level 4	37,411 SF
Parking Level 1 (security room and parking operations)	501 SF
Total	145,751 SF
Aboveground Open Space (Levels 2-4)	
Level 2	252 SF
Level 3	3,314 SF
Level 4	3,247 SF
Total	6,813 SF
Vehicle Parking (Level 1 – Parking Level 3)	
Level 1	17,124 SF
Parking Level 1	42,847 SF
Parking Level 2	43,348 SF
Parking Level 3	43,348 SF
Total	146,667 SF^a
Total Buildable Area	298,205 SF
Project Site Area	49,002 SF
SF = square feet	
^a 146,667 SF of parking assumes three subterranean parking levels for 551 spaces.	
SOURCE: Gensler, 2022.	

The Project would provide a total of 551 vehicle parking spaces, of which 120 vehicle parking spaces are replacement parking for spaces leased by off-site tenants at the existing surface parking lot that would be demolished with the development of the Project. The 551 vehicle parking spaces provided by the Project would exceed the Culver City Municipal Code (CCMC)-required minimum of 404 vehicle parking spaces.

Vehicle parking spaces would be provided primarily within three subterranean levels, although five (5) Americans with Disabilities Act (ADA)-compliant vehicle parking spaces and one (1) loading space would be located on Level 1. The combined parking area would total approximately 146,667 SF. The Project's subterranean parking would be designed to accommodate vehicles through a combination of standard, tandem, stacker, and ADA-compliant vehicle parking spaces. The subterranean parking levels would be valet managed to facilitate the use of these various types of vehicle parking spaces.

The Project would remove the four existing driveways and provide one new driveway. Specifically, as illustrated further in Figure 3, direct vehicular access to the parking area would be provided via a driveway on Watseka Avenue, which would include one dedicated entry drive aisle and two dedicated exit drive aisles. Further into Level 1, these three lanes continue into a zone for valet drop-off and pickup, which subsequently merges into two drive lanes entering a ramp to the parking levels at the northwest corner of the building.

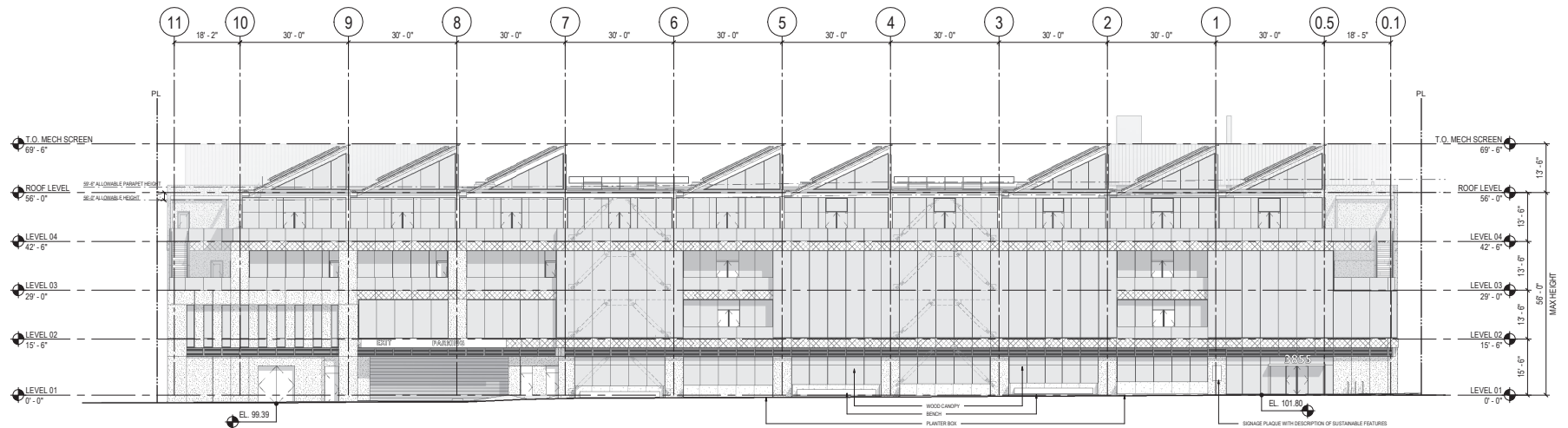
Pursuant to CCMC Section 17.320.045 and the California Building Code, the Project would provide 28 short-term and 28 long-term bicycle parking spaces, for a total of 56 bicycle parking spaces, which would be equal to approximately 10.1 percent of the provided automobile parking spaces. Both short- and long-term parking spaces would be provided within Level 1 near the entrance to the lobby from the visitor parking drop-off area.

The Project is surrounded by setbacks with landscaping provided along each of the Project Site boundaries. The architecture would support a creative workplace that emphasizes health and well-being. The Project, which is located in downtown Culver City, would help transform Watseka Avenue into a more pedestrian-oriented street by replacing existing fencing/walls and surface parking along the public right-of-way with additional street trees, landscaping and open building facades at the ground level that would create visual interest and promote pedestrian activity. The building's architecture would include concrete, stucco, glass, wood timber materials and green screens, with a series of terraces and mechanical projections that present a loft-like appearance at the rooftop level. The Project would include authentic wood framing on Level 4 and wood-framed accents on Level 1. The exterior mechanical projections and generous amounts of exterior glazing would allow for natural ventilation and light.

The office building would be approximately 56 feet in height (with the mechanical screen/projections reaching approximately 69.5 feet in height) and would comply with the maximum allowable height for the Project Site. Roof-mounted mechanical equipment (e.g., air conditioning, heating, exhaust, and ventilation ducts) would be screened from the public view along adjoining public streets and rights-of-way. The rooftop screening would be architecturally compatible with the office building in terms of colors, materials, and architectural style. **Figure 4, Project Elevation**, illustrates the eastern elevation of the proposed building, and **Figure 5, Project Rendering**, provides an illustrative rendering for the Project.

Sustainable Design Elements

The Project would be designed to achieve Leadership in Energy and Environmental Design (LEED) Silver or equivalent green building standards and would incorporate a number of energy saving and sustainable design elements, as well as a green building design, which would promote conservation, energy efficiency, and carbon emission reduction. Energy saving and sustainable design elements include, but are not limited to: designing automobile parking such that 20 percent of the stalls are electric vehicle (EV)-capable, 10 percent have EV-ready charging stations, and 10 percent have full EV charger stations; installation of a 100 kilowatt (kW) PV system estimated to produce approximately 7.99 percent of the Project's base electricity demand, which exceeds the 30 kW system required by the City to provide at least one kW of solar PV per 10,000 SF of new development; installation of water-saving fixtures, including low-flow urinals in public restrooms and water-saving landscaping; incorporation of low-water and drought tolerant plants in the landscape plan; and reliance on 100 percent LED systems for all interior and exterior lighting. The Project has also agreed to be part of Culver City's Clean Power Alliance.



SOURCE: Gensler, 2022

3855 Watseka Avenue Project

Figure 4
Project Elevation

D:\2020\01122.00 - 3855 Watseka Ave Office Project\05 Graphics-GIS-Modeling



SOURCE: Gensler, 2022

3855 Watseka Avenue Project

Figure 5
Project Rendering

The Project would incorporate green building elements and lower emission, locally sourced building materials. The office building would include a sawtooth roof that draws sunlight and natural ventilation deep into the building. The building would use CLT wood framing on the top floor, which allows the building to use less steel and concrete and lower its overall carbon footprint.

The Project also includes a proposed Transportation Demand Management (TDM) Program. The TDM Program includes strategies and action plans that consist of a transportation coordinator, bicycle hub/share, transit subsidies, telecommuting, marking program, carpool/vanpool incentives, and bicycling/walking incentives. The Project's TDM Program would be consistent with the requirements of Culver City's Traffic Code, Chapter 7.05: Motor Vehicle Air Quality Management.

Construction Schedule/Activities

Project construction is anticipated to commence as early as the third quarter of 2022 with full build-out occurring in the fourth quarter of 2024, for a total of approximately 26.5 months of construction. Construction phasing would include demolition, grading and excavation, draining, utilities and trenching, foundations/concrete pour, building construction and exterior finishes, and paving.

Project Design Features

The Project will include the following Project Design Features (PDFs) in order to reduce and avoid any potential environmental impacts during construction of the Project.

PDF TRAF-1: Construction Management Plan. A Construction Management Plan (CMP) will be developed by the Project contractor in consultation with the Project's traffic and/or civil engineer. The CMP will define the scope and scheduling of construction activities as well as the proposed construction site management responsibilities in order to ensure that disturbance of nearby land uses or interruption of pedestrian, vehicle, and alternative transportation modes and public transit are minimized to the extent feasible. The CMP will be subject to review and approval by Culver City's Building Official, City Engineer and/or Planning Manager, as applicable, prior to issuance of any Project demolition, grading or excavation permit. The CMP will also be reviewed and approved by Culver City's fire and police departments.

Prior to the commencement of Project construction, the contractor will meet with the Public Works Inspector and Building Inspector (Inspectors) to discuss the construction schedule. Also, biweekly construction management meetings with City staff and other representatives of surrounding developments will be required if such development are under construction around the same time as the Project, as determined appropriate by City staff, to ensure concurrent construction projects are managed in collaboration with one another. The CMP will assess Project construction impacts and provide effective strategies to limit the use of the public right-of-way (streets and sidewalks) during peak traffic periods and would be subject to adjustment by City staff as deemed necessary and appropriate to preserve the general public safety and welfare.

The CMP will, at a minimum, include the following:

- The name and telephone number of a contact person who can be reached 24 hours a day regarding Project construction, construction traffic complaints or emergency situations.
- An up-to-date list of local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Coordination will include the assessment of any alternative access routes that might be required

through the Project Site, and maps showing access to and within the Project Site and to adjacent properties.

- Construction plans and procedures to address: community and City notification of key construction activities; temporary construction fencing and maintenance of construction areas visible from the public right-of-way; noise and vibration controls; dust management and control; and worker education regarding best practices to reduce any potential disturbances to adjacent and nearby land uses.
- Procedures for the training and certification of flag persons.
- To the extent feasible, identification of the location, times, and estimated duration of any roadway closures; procedures for traffic detours, pedestrian protection, reducing effects on public transit and alternate transportation modes; and plans for the use of protective devices, warning signs, and staging or queuing areas.
- The location of temporary power, portable toilet and trash, and materials storage locations.
- The timing and duration of all street and/or lane closures will be made available to the City in digital format for posting on the City's website and distribution via email alerts on the City's "Gov Delivery" system. The plans will be updated weekly during the duration of Project construction, as determined necessary by the City.

The Project would also comply with Culver City's allowable construction hours pursuant to CCMC Chapter 9.07: Noise Regulations, Section 9.07.035 Construction:

- Monday-Friday: 8:00 A.M. through 8:00 P.M.
- Saturdays: 9:00 A.M. through 7:00 P.M.
- Sundays: 10:00 A.M. through 7:00 P.M.

PDF AIR-1: Construction Equipment. All off-road diesel construction equipment greater than 50 horsepower (hp) that will be used an aggregate of 40 or more hours will be required to meet the United States Environmental Protection Agency (USEPA) Tier 4 final off-road emission standards. This requirement will be included in all applicable bid documents, and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's certified tier specification or model year specification and California Air Resources Board (CARB) or South Coast Air Quality Management District (SCAQMD) operating permit (if applicable) will be available upon request at the time of mobilization of each applicable unit of equipment. This PDF will reduce diesel particulate matter and nitrogen oxides (NO_x) emissions during construction activities.

PDF NOISE-1: Noise Limits. The Project will implement noise reduction strategies to reduce noise levels from construction activities to ensure ambient noise levels do not exceed 65 A-weighted decibels (dBA L_{eq}) (1-hour) measured at the building facade of the nearest adjacent patient room at the hospital and at the building facade of the nearest residential uses, pursuant to PDF NOISE-5, below. Measurements of existing one-hour L_{eq} noise levels at the adjacent sensitive receptor will be conducted prior to construction activities at a time that will provide a representative sample of typical noise conditions. Noise reduction measures consist of the following:

- Noise-generating equipment operated at the Project Site will be equipped with noise control devices, i.e., mufflers, lagging, and/or motor enclosures. All noise-generating equipment will be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

- Impact tools used for Project construction will be hydraulically or electrically powered wherever practicable to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where pneumatic tools are employed, quieter procedures will be used such as an exhaust muffler on the compressed air exhaust and external jackets to minimize noise impacts. Temporary abatement techniques will include the use of temporary and/or movable shielding for both specific and nonspecific operations.
- Buffer distances of noise and ground-borne vibration construction activities whose specific location on the Project Site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) will be implemented to minimize noise impacts.
- Construction and demolition activities will be scheduled to avoid operating more than one piece of motorized equipment simultaneously within 15 feet of the adjacent sensitive receptor's property line in the event that construction noise increases cause ambient noise to exceed the 65 dBA L_{eq} (1-hour) standard.

PDF NOISE-2: Noise Barrier. Temporary noise barriers will be installed along the West Side of the Project boundary to help shield the hospital from noise of construction, with a minimum height of 15 feet and a maximum height of 25 feet (above finished grade) to reduce any increase in ambient noise attributable to construction to no more than the 65 dBA L_{eq} (1- hour) standard. Temporary noise barriers will be made of plywood or use sound blankets rated at a sound transmission class (STC) capable of reducing any increase in ambient noise attributable to construction to no more than the 65 dBA L_{eq} (1-hour) standard. The noise barrier will be monitored as discussed in PDF NOISE-5 and can be removed once the Project is complete with the 1st level (above grade).

PDF NOISE-3: Vibration Limits. The Project will implement vibration reduction strategies to ensure that construction vibration levels do not exceed 0.5 peak particle velocity (PPV) inches per second (in/sec) for structural damage and 72 vibration velocity (VdB) for hospital operating rooms.

The Contractor will employ strategies to reduce vibration from construction activity near the property line, such as using smaller machines or lower-impact construction technologies in these areas, and staging vibrating machinery such as cement mixers and dump trucks further from the property line. Impact pile driving will be avoided where practicable in noise- and vibration-sensitive areas and "quiet" pile driving technology such as auger displacement installation will be used where geological conditions permit their use.

Vibration will be monitored as discussed in PDF NOISE-5. In the event the PPV limit is triggered, work in the vicinity will be temporarily halted and potential adjustments to the construction program will be made to ensure that continuing construction activity would not exceed the vibration thresholds listed above.

If the structural damage threshold is exceeded, the hospital will be inspected for damage. In the event that damage to the hospital occurs due to construction vibration, repairs will be arranged by the Contractor and/or the Applicant's representative in consultation with SCH-CC, and/or the City Building Official, as necessary.

PDF NOISE-4: Construction Relations Officer. The Applicant will designate a Construction Relations Officer to serve as a liaison with hospital management, who will be responsible for responding to any concerns regarding construction noise and vibration. The liaison's telephone number(s) will be prominently displayed at the Project Site. Signs will also be posted at the Project Site that include permitted construction days and hours.

PDF NOISE-5: Monitoring. The Project will provide continuous, automated noise and vibration monitoring during construction. In addition, the Project will provide at least two (2) noise monitors located

on the building façade near patient rooms (window adjacent) and at least two (2) vibration monitors within the SCH-CC at sensitive rooms that are located near the Project Site.

The Contractor will provide a noise and vibration monitoring plan, prepared by a qualified acoustical consultant, prior to the start of Project construction. The plan should include, but not be limited to, monitoring instrument specifications, instrument calibration certificates, list of exact monitoring locations, data collection protocol, alarming and alerting protocol, weekly reporting protocol, and maintenance and service outage protocol.

Noise monitoring will be conducted throughout Project construction. Vibration monitoring will be conducted, at minimum, during all ground-disturbing significant impact construction activities (i.e., demolition, shoring, excavation, and foundation work). Any of the measures can be removed when no longer necessary to achieve the 65 dBA L_{eq} threshold for noise, or 0.5 PPV in/sec for structural damage and 72 VdB for hospital operating rooms.

The monitoring system will produce real-time specific alarms (via text message and/or email to on-site personnel) as warning thresholds are reached. Warning thresholds, as specified in the noise and vibration monitoring plan, will be below the specified noise and vibration limits to allow the Contractor to take the necessary steps to reduce the noise and/or vibration, including but not limited to halting/staggering concurrent activities, utilizing quieter or lower-vibratory techniques, or reducing the speed or intensity of equipment.

A monitoring record that documents all alarms and includes information regarding compliance with these noise and vibration measures will be provided to SCH-CC at weekly intervals.

Necessary Approvals

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

- Site Plan Review for the construction of a new non-residential project greater than 5,000 SF (CCMC Section 17.540.010), including a subsidiary Architectural Review approval (CCMC Sections 15.07.025 A.1; 15.07.030 A.3).
- Administrative Use Permit for the use of valet-managed parking (CCMC Section 17.530.010).
- Administrative Modification of parking development standards to permit the use of compact parking spaces (CCMC Section 17.550.010).
- Demolition Permits to remove the existing on-site structures to allow for construction of the proposed building.
- Construction Permits, including building, grading, excavation, foundation, and associated permits.
- Haul Route Permit, as may be required by Culver City.
- Other approvals as needed.

Assessment of Class 32 In-Fill Development Project Exemption

Exemption Criteria

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

This document demonstrates that the Project, which includes the demolition of the existing buildings on the Project Site as well as the construction of a new building, qualifies for an exemption under CEQA Guidelines Section 15332, In-Fill Development Projects, as a Class 32 project that meets the following conditions:

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

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

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

As discussed above, the Project Site is located in downtown Culver City. The Project Site has a land use designation of Downtown under the City's General Plan and is zoned Commercial Downtown (CD).³ The CD zone permits medium- and large-scale commercial uses, emphasizing retail, entertainment, restaurant, and cultural uses. The development standards of the CD zone are intended to provide a pedestrian-friendly environment and high visual quality. The Project's proposed uses are consistent with the General Plan and zoning designations for the Project Site.

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

As discussed in Table 2, the Project would be consistent with the applicable General Plan Land Use Element policies for the Downtown area of the City of Culver City. Furthermore, as discussed above, the Project would be consistent with the Downtown General Plan land use designation, which allows for medium- and large-scale commercial uses and shared parking, and the Commercial Downtown (CD) zoning designation, which allows for a variety of uses including retail, restaurant, entertainment, and cultural uses. Therefore, the Project would meet this criterion.

³ City of Culver City, City of Culver City General Plan Land Use Element Map, August 2007, <https://www.culvercity.org/Services/Building-Development/General-Plan>. Accessed September 2021.

TABLE 2
CONSISTENCY WITH APPLICABLE GENERAL PLAN LAND USE ELEMENT OBJECTIVES AND POLICIES FOR THE DOWNTOWN SUB-AREA OF CULVER CITY

Objectives and Policies	Consistency Analysis
Objective 22. Downtown	
Policy 22.A. Encourage uses that contribute to a positive nightlife ambiance, such as sidewalk cafes, specialty retail, and newsstands that could support a 18 to 24-hour day patronage.	Consistent. The Project does not propose sidewalk cafes or other retail uses. However, employees and visitors to the Project Site would support 18- to 24-hour day patronage for other businesses in the Downtown area. Additionally, the Project would provide sidewalk-level nighttime lighting on Watseka, improving the pedestrian experience at night.
Policy 22.B. Encourage entertainment opportunities by re-using the Culver Theater and promoting other entertainment options.	Not Applicable. The Project does not involve reuse of the Culver Theater; therefore, this policy is not applicable. However, Project employees and visitors would support the use of entertainment venues in the Downtown area.
Policy 22.C. Reinforce the important of Downtown as the Civic Center by visually unifying the institutional buildings consistent with the urban design character of the Downtown Revitalization Plan.	Not Applicable. The Project does not propose an institutional building; therefore, this policy is not applicable. However, the Project would substantially upgrade the visual quality of the Project Site and the design character of the area.
Policy 22.D. Create a pedestrian district in the Downtown by providing pedestrian amenities along Culver Boulevard, such as continuous street trees, outdoor dining areas, and coordinated streetscape improvements.	Not Applicable. The Project is not located along Culver Boulevard; therefore, this policy is not applicable. However, the Project would support this policy as it incorporates pedestrian-friendly elements, such as landscaped planters with built-in seating, additional street trees, and lighting, that will create an attractive and inviting walkable environment. In addition, the Project would remove four driveways and provide one new driveway, thereby improving visibility and reducing potential conflicts between pedestrians and vehicles.
Policy 22.E. Preserve the small-town character of the Downtown by establishing height and setback limits that reflect a sense of human scale.	Consistent. The proposed building would be approximately 56 feet in height (with the mechanical screen/projections reaching approximately 69.5 feet in height) and would comply with the maximum allowed height for the Project Site. The Project has been designed with minimal setbacks along the majority of Watseka Avenue (the eastern Project Site boundary) in order to support an urban, pedestrian-focused setting, and the street-level exterior of the Project would be visually accessible to pedestrians, drivers, and transit riders, emphasizing a pedestrian-oriented design that would help activate Watseka Avenue through trees, landscaping and other amenities along the public right-of-way. Additionally, a series of terraces on the upper floors of the Watseka Avenue frontage would provide visual interest and a human scale to the proposed building. A two-foot setback is provided along the northern Project Site boundary for the existing public alley. Landscaped setbacks are also provided in the utility easement along the western Project Site boundary and the southern Project Site boundary. The heights and setbacks proposed for this Project would be consistent with what is allowed by the existing zoning on the Project Site.
Policy 22.F. Promote the historic character of Main Street by providing urban design elements that enhance the pedestrian experience of the existing uses.	Not Applicable. The Project is not located on Main Street; therefore, this policy is not applicable.
Policy 22.G. Provide a centrally located Town Park that will reinforce the existing view corridor and provide a space for community gatherings.	Not Applicable. The Project does not involve the development of a centrally located Town Park; therefore, this policy is not applicable.
Policy 22.H. Enforce design guidelines to foster good design and enhance and coordinate the existing mix of architectural styles and designs.	Consistent. The architecture proposed for the Project would support a creative workplace that emphasizes health and well-being. The Project, which is located in downtown Culver City, would help transform Watseka Avenue into a more pedestrian-oriented street by replacing existing fencing/walls and surface parking along the public right-of-way with additional street trees, landscaping and open building facades at the ground level that

Objectives and Policies	Consistency Analysis
Objective 22. Downtown	would create visual interest and promote pedestrian activity. The building's architecture would include concrete, stucco, glass, wood timber materials and green screens, with a series of terraces and mechanical projections that would present a loft-like appearance at the rooftop level and would provide visual interest and a human scale to the proposed building.
Policy 22.I. Encourage art, media, and cultural "street fairs" and farmers' markets within the Downtown area, that could attract new patronage for existing and desirable new businesses.	Not Applicable. The Project does not propose the development of "street fairs" or farmers' markets; therefore, this policy is not applicable.
Policy 22.J. Promote Downtown Culver City's role as the historic commercial and Civic Center of the City by encouraging the preservation of historic buildings.	Consistent. As discussed further below, development of the Project would not impact historical resources in the vicinity of the Project Site.
Policy 22.K. Establish a bikeway that links Downtown to a comprehensive bikeway system which connects the Ballona Creek Bicycle Path to activity centers in the City.	Consistent. The Project does not include the development of a bikeway that links Downtown to a comprehensive bikeway system. No existing or planned bicycle lanes are provided along Watseka Avenue. A such, development of the Project would not obstruct the use of the City bikeway system. However, the Project would support this policy through the provision of 28 short-term and 28 long-term bicycle parking spaces, for a total of 56 bicycle parking spaces. In addition, bicycle storage, showers, and other end-of-trip facilities would also be provided on-site. Furthermore, as part of the Project's TDM Program, the Project would contribute towards provisions of a bike share station off-site in the vicinity of the Project Site.
SOURCE: City of Culver City, General Plan Land Use Element, 2000; ESA, 2021.	

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

The Project Site is located within the City of Culver City limits on an approximately 1.128-acre site within a developed urban neighborhood. The Project Site is surrounded by urban uses as shown in **Figure 2**, above. Therefore, the Project would meet this criterion.

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

The Project Site is located within a highly developed, urbanized area. As described above, the Project Site is currently improved with two buildings, storage areas, and a 120-space asphalt-paved surface parking lot with minimal landscaping. Thus, the Project Site does not include any suitable habitat for sensitive animal or plant species. Furthermore, as discussed above, the area surrounding the Project Site is fully developed with urban uses. Therefore, the Project would meet this criterion.

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

Traffic

The following analysis of potential traffic impacts is based on the Transportation Assessment Study for the 3855 Watseka Avenue Office Project (Transportation Assessment) prepared by Raju Associates, Inc., which is provided in Attachment A of this memorandum. The Transportation Assessment evaluates the potential transportation

impacts associated with the development of the Project. The findings of the Transportation Assessment that apply to the transportation related questions included in Appendix G of the CEQA Guidelines, are summarized below.

- **Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**
 - As evaluated on pages 39 through 49 in Attachment A of this memorandum, the Project is generally considered to be consistent with the Culver City Traffic Code, Chapter 7.05; the policies of the General Plan Circulation Element; the policies and objectives of the General Land Use Element; Neighborhood Traffic Management Program; goals, objectives and policies of the Short-Range Transit Plan; actions of the Bicycle and Pedestrian Action Plan; policies of the Complete Streets Policy; and the Local Roadway Safety Plan. As such, the development of the Project would not conflict with program, plan, ordinance, or policy addressing the circulation system. *Impacts would be less than significant.*
- **Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?**
 - The Project is located in a Transit Priority Corridor Area (TPCA)/High Quality Transit Service Area (HQTSA) and is therefore exempt from the CEQA VMT Analysis, as further discussed on page 51 in Attachment A of this memorandum. The Project, therefore, does not cause a significant impact relative to CEQA Guidelines Section 15064.3, Subsection (b). *No impacts would occur.*
- **Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**
 - As discussed further on pages 52 through 56 in Attachment A of this memorandum, the Project would remove four driveways and provide one new driveway, improving the visibility of the potential vehicle/bicycle, vehicle/pedestrian and vehicle/vehicle intersections. The new driveway would not create sharp curves or a dangerous intersection. The proposed driveway would enhance pedestrian walkability and safety by removing the existing four driveways along Watseka Avenue and replacing one driveway, thereby reducing potential for pedestrian/vehicular conflicts. Therefore, development of the Project would not substantially increase hazards due to a geometric design feature or incompatible uses. *Impacts would be less than significant.*
- **Would the project result in inadequate emergency access?**
 - While it is expected that the majority of construction activities for the Project would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day, including during construction of potential off-site infrastructure upgrades/improvements (i.e., water and sewer lines). As provided above in the Project Description subsection of this memorandum, the Project would implement PDF TRAF-1, Construction Management Plan, which includes designation of a haul route, to ensure that adequate emergency access is maintained during construction. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons and employees. Subject to review and approval of Project Site access and circulation plans by the Culver City Fire Department (CCFD), as necessary, the Project would not result in inadequate emergency access. *Impacts would be less than significant.*

Conclusion: Based on the Transportation Assessment, the Project would have a less than significant transportation impact pursuant to CEQA. For additional details, refer to the Transportation Assessment provided in Attachment A of this memorandum.

Noise

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

- **Would the Project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**
 - As analyzed on pages 31 through 40 in Attachment B of this memorandum, construction of the Project would have the potential to generate an increase in temporary or periodic noise through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. Construction activities are temporary in nature and would be required to comply with Culver City's allowable construction hours of 8:00 A.M. to 8:00 P.M. on weekdays, 9:00 A.M. to 7:00 P.M. on Saturdays, and 10:00 A.M. to 7:00 P.M. on Sundays. The Project would include Project Design Features that would reduce noise and vibration during Project construction. As analyzed further in Attachment B of this memorandum, with the implementation of Project Design Features PDF NOISE-1 through PDF NOISE-2 and PDF NOISE-4 through PDF NOISE-5, which include noise limits during construction, noise barriers, designation of a construction relations officer, and continuous noise monitoring during construction, and through compliance with Culver City's allowable construction hours, and applicable noise reduction strategies in the City's General Plan Noise Element Policy 2.A, noise levels would remain at or below 65 dBA L_{eq} . The addition of haul truck trips to roadways during construction would be less than the current traffic volumes on access roads and result in barely perceptible (less than a 3 dBA) noise level increase and would not increase noise levels by a "clearly noticeable" increase of 5 dBA over the ambient conditions. Off-site haul truck trips would not substantially increase noise levels over the ambient conditions. In addition, construction activities would occur only during daytime hours within the allowable hours specified in the CCMC. Project compliance with the City's noise standards as well as Project-related operational noise levels being below the prevailing ambient noise-based thresholds (ambient noise level + 5 dBA) at off-site sensitive receptors would ensure that operational noise impacts are less than significant. The Project's noise impacts on existing off-site development from on-site operational stationary noise sources and traffic would not exceed the established thresholds of significance, as construction and operation of the Project would not increase ambient noise levels by 5 dBA or more. Based on the above, development of the Project would not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards. *Impacts would be less than significant.*
- **Would the project result in generation of excessive groundborne vibration or groundborne noise levels?**
 - As analyzed on pages 41 through 43 in Attachment B of this memorandum, construction activities would generate vibration from the use of heavy equipment and haul trucks. Consistent with the City's General Plan standards, the Project would incorporate general industry standard best practices to minimize vibration impacts resulting from heavy-duty construction equipment. Vibration velocities from the operation of construction equipment would range from approximately 0.001 to 0.031 inches per second PPV at 50 feet from the source of activity. With the implementation of PDF NOISE-1 and PDF NOISE-3, which establish buffer zones for construction equipment and stage vibration-inducing equipment from property boundaries, off-site sensitive receptors or buildings would be exposed to vibration levels below 0.031 PPV from on-site construction activity. In addition, during operation, groundborne vibration generated by each of the operational activities would generate up to approximately 0.005 inches per second PPV adjacent to the

Project Site. Project construction would not result in vibration levels that would exceed the potential building damage threshold of 0.2 inch-per-second PPV or the potential human perception threshold of 0.04 inch-per-second PPV at the nearest buildings. Project operation would also not result in vibration levels that exceed the human perception threshold of 0.04 inch-per-second PPV at the nearest residential buildings. As such, operation of the Project would not result in vibration levels that would affect nearby sensitive receptors. Therefore, the development of the Project would not generate excessive groundborne vibration or groundborne noise levels. *Impacts would be less than significant.*

- **For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**
 - As described on page 43 in Attachment B of this memorandum, the Project Site is not located within an airport land use plan or within two miles of an airport. The nearest airport is the Santa Monica Municipal Airport, located approximately 3.5 miles southwest of the Project Site. Therefore, the Project would not expose people in the Project vicinity to excessive noise levels from airport use. *No impacts would occur.*

Conclusion: Based on the Noise and Vibration Technical Report, the Project would result in a less than significant noise impact pursuant to CEQA. For additional details, refer to the Noise and Vibration Technical Report provided in Attachment B of this memorandum.

Air Quality

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

- **Would the project conflict with or obstruct implementation of the applicable air quality plan?**
 - As analyzed on pages 46 through 52 in Attachment C of this memorandum, in response to Criterion 1, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for ozone. In addition, in response to Criterion 2, the Project incorporates into its design appropriate control strategies set forth in the 2016 AQMP for achieving its emission reduction goals and would be consistent with the demographic and economic assumptions upon which the plan is based. Furthermore, the Project would be consistent with and would not conflict with the General Plan. Based on the analysis provided in Attachment C of this memorandum, the Project would not conflict with or obstruct implementation of applicable air quality plans. *Impacts would be less than significant.*
- **Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?**
 - Construction of the Project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, emissions of fugitive dust and volatile organic compounds (VOCs) would result from grading and construction activities. However, compliance with PDF AIR-1 would reduce the emissions of criteria pollutants attributable to construction. Furthermore, compliance with the mandatory requirements of SCAQMD Rule 403 (Control of Fugitive Dust), such as watering twice daily and employing track-out prevention measures, and compliance with architectural coating emission factors based on SCAQMD Rule 1113 (Architectural Coatings), would reduce emissions of fugitive dust and

VOCs, respectively. As analyzed further on pages 52 through 56 in Attachment C of this memorandum, construction-related daily emissions would not exceed the SCAQMD significance thresholds and emissions levels would be below the applicable thresholds. As it relates to operational emissions, and as discussed in Attachment C of this memorandum, operational criteria pollutant emissions were calculated for mobile, area, and stationary sources (such as the conservatively-assumed emergency generator) for the Project's anticipated operational year of 2024). Operations would adhere to applicable regulatory standards, including the 2019 Title 24 Green Building Code. Operational emission estimates include compliance with SCAQMD Rule 1113 (Architectural Coatings), which limits the VOC content of architectural coatings. The Project's operational-related daily emissions would not exceed the SCAQMD significance threshold for any criteria pollutants. Based on the above, development of the Project would not result in a cumulatively considerable net increase of any criteria pollutant. *Impacts would be less than significant.*

- **Would the project expose sensitive receptors to substantial pollutant concentrations?**

- As analyzed on pages 56 through 60 in Attachment C of this memorandum, localized construction emissions would not exceed the SCAQMD localized significance thresholds. The Project would comply with applicable regulatory control measures including the California Air Resources Board (CARB) Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five minutes at a location and would exceed the CARB In-Use Off-Road Diesel Vehicle Regulation that requires fleets to retire, replace, or repower of older, dirtier engines with newer emission-controlled models through the implementation of PDF-AIR-1. Compliance with these regulations would minimize emissions of TACs during construction. During operation, localized operational emissions would also not exceed the SCAQMD localized significance thresholds. As discussed in Attachment C of this memorandum, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed office land use within the Project Site. Based on the proposed land use, potential long-term operational impacts associated with the release of TACs would be minimal, regulated, and controlled, and would not be expected to exceed the SCAQMD significance thresholds. Therefore, development of the Project would not expose sensitive receptors to substantial pollution concentrations. *Impacts would be less than significant.*

- **Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

- As analyzed on pages 60 through 61 in Attachment C of this memorandum, during construction, through compliance with applicable SCAQMD rules, no construction activities or materials are expected to create objectionable odors affecting a substantial number of people. In addition, as it relates to operation, the Project would not include any uses identified by the SCAQMD as being associated with substantial odors. As a result, the Project is not expected to discharge contaminants into the air in quantities that would cause a nuisance, injury, or annoyance to the public or property pursuant to SCAQMD Rule 402. As such, development of the Project would not result in other emissions adversely affecting a substantial number of people. *Impacts would be less than significant.*

Conclusion: Based on the Air Quality Technical Report, the Project would result in a less than significant air quality impact. For additional details, refer to the Air Quality Technical Report provided in Attachment C of this memorandum.

Water Quality

The following review of potential water quality impacts is based on and summarized from the Hydrology and Water Quality Technical Memorandum (Water Quality Memorandum) prepared by Kimley-Horn, provided in Attachment D of this memorandum. The Water Quality Memorandum evaluates the potential water quality impacts associated

with the development of the Project. The findings of the Water Quality Memorandum that apply to the water quality related questions included in Appendix G of the CEQA Guidelines are summarized below.

- **Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

- Point-source pollutants are discharged directly from pipes or spills. Raw sewage draining from a pipe directly into a stream is an example of a point-source water pollutant. The Project consists of the development of an office building and a three-story subterranean parking garage. The Project does not propose any uses that would generate point source pollutants. Therefore, water quality impacts due to point sources would be less than significant.

Non-point-source pollutants (NPS) cannot be traced to a specific original source. NPS pollution is caused by rainfall or snowmelt moving over and through surface areas. As the runoff moves, it picks up and carries away natural and human-made pollutants, finally depositing them into lakes, rivers, wetlands, coastal waters, and even underground sources of drinking water. These pollutants can include: excess fertilizers, herbicides and insecticides from agricultural lands and residential areas; oil, grease, and toxic chemicals from urban runoff and energy production; sediment from improperly managed construction sites, crop and forest lands, and eroding stream banks; salt from irrigation practices and acid drainage from abandoned mines; bacteria and nutrients from livestock, pet wastes, and faulty septic systems; and atmospheric deposition and hydro modification.

The Project would be subject to all existing applicable regulatory regulations associated with the protection of water quality. Construction activities would be carried out in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB), as applicable. According to the Geotechnical Investigation and Infiltration Testing report prepared for the Project by Geotechnologies, Inc. (2021), temporary excavations of up to approximately 45 feet below grade are anticipated to construct the three-story subterranean levels. As excavations for the parking structure would extend beyond the historic groundwater, which was encountered at depths between 42.5 feet and 44 feet below the ground surface, dewatering will be required during construction. In addition, during operation, the proposed subterranean parking structure would be designed to resist hydrostatic forces.

As construction of the Project would involve grading, including the export of approximately 90,000 cubic yards of soil, on an approximately 1.128-acre site, the Applicant would be required to submit a Storm Water Pollution Prevention Plan (SWPPP) to the City of Culver City Public Works Department as the Project would disturb more than one acre of soil. Consistent with the SWPPP, the Project would implement best management practices (BMPs) to manage storm water drainage during construction through methods such as retention basins of sufficient size; filtering by use of a barrier system, wattle or other method approved by the enforcing agency prior to being conveyed to a public drainage system; compliance with a lawfully enacted storm water management ordinance in order to avoid discharging pollutants into waterways; or other approved methods. Pursuant to CCMC Section 5.05.035, Requirements For Industrial/Commercial and Construction Activities, the Project would submit a local SWPPP and Wet Weather Erosion Control Plan for construction activities consistent with the NPDES General Construction Permit to the City of Culver City Public Works Department. Therefore, development of the Project would not result in any significant effects related to water quality due to construction activities. As an urban commercial development, operation of the Project would add typical, urban, non-point-source pollutants to stormwater runoff. These pollutants are permitted by the countywide MS4 permit and would not exceed any receiving water limitations. In addition, as detailed in the Water Quality Memorandum prepared for the Project by Kimley-Horn (2021), the Project would comply with County and City Low Impact Development (LID) requirements, which require implementation of a stormwater treatment system that captures the 85th percentile runoff for treatment. The Project proposes to implement a capture and reuse system. In order to

conserve potable water, the irrigation system would make use of captured rainwater contained within a cistern located in the subterranean levels of the parking structure. In addition, while there are currently no existing drainage features or water quality measures on-site, the Project proposes to introduce such features and measures which would improve the current water quality conditions. Therefore, operation of the Project would not violate any water quality standards or waste discharge requirements. *Impacts would be less than significant.*

- **Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

- As required by Section 303(d) of the Clean Water Act, the state and regional water boards assess water quality data for California's waters every two years to determine if they contain pollutants at levels that exceed protective water quality criteria and standards.⁴ The LARWQCB most recently prepared a list of impaired waterbodies in the region as part of the 2016 assessment cycle. This list is referred to as the 303(d) list. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). The nearest water body to the Project Site that has been identified as an impaired water body is Ballona Creek Reach 2, located between National Boulevard and Centinela Avenue, approximately 0.5 miles southeast of the Project Site. Impairment for Ballona Creek Reach 2 include trash, toxic pollutants, bacteria, metals, and sediment.

In terms of polluted runoff, the Project's proposed uses would be typical of office uses and would not introduce substantial sources of polluted water. As described above and in the Water Quality Memorandum, the Project would be required to comply with County and City LID requirements, which require implementation of a stormwater treatment system that captures the 85th percentile runoff volume for treatment. In compliance with this requirement, the Project would implement a capture and reuse system, which would serve to address any potential polluted runoff generated by the Project. As such, the Project would not conflict with or obstruct any water quality control plans for Ballona Creek Reach 2. No other water quality control plans or sustainable groundwater management plans would be affected by development of the Project. *Impacts would be less than significant.*

Conclusion: Based on the Water Quality Memorandum, the Project would result in a less than significant water quality impact. For additional details, refer to the Water Quality Memorandum provided in Attachment D of this memorandum.

Conclusion for Criterion (d)

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

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

Utilities

The Project would be located on an urban infill site currently development with commercial buildings in a highly developed urban area that is well served by existing public utilities and services. The City of Culver City Department of Public Works and Southern California Edison (SCE) would provide electricity, solid waste collection and sewer services (SCE provides service to portions of the City). The City of Culver City Department of Public Works has provided a will serve letter (provided in Attachment E of this memorandum) indicating that sewer services are available for the Project. Golden State Water Company would provide water services to the Project Site as stated in the will serve letter from Golden State Water Company (provided in Attachment E of this

⁴ State Water Resources Control Board, Impaired Water Bodies, https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml. Accessed September 2021.

memorandum). SoCal gas provides natural gas services to the City of Culver City and would serve the Project, if necessary. Thus, the Project meets this criterion.

Public Services

Fire Protection

Fire protection and emergency medical services for the Project Site are provided by the Culver City Fire Department (CCFD), which is supported, as required, 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. As the Project Site is located in an urbanized area within the City of Culver City, it is well served by CCFD. The Project Site is located within Fire District 1, Rescue/EMS District 1, and Fire Management Zone 5. The closest fire station to the Project Site is Fire Station 1 (headquarters), located at 9600 Culver Boulevard, approximately 315 feet south of the Project Site across Culver Boulevard. Fire Station 2 and Fire Station 3 are located less than 3 miles from the Project Site. The proposed office building would comply with fire protection design standards, as necessary, per the California Building Code, California Fire Code, the CCMC, and the CCFD, to ensure adequate fire protection. Culver City's standard conditions of approval generally require that plans for building construction, fire flow requirements, fire protection devices (e.g., sprinklers and alarms), fire hydrants and spacing, and fire access including ingress/egress, turning radii, driveway width, and grading would be prepared for review and approval by the CCFD. With compliance with the California Building Code, California Fire Code, and the CCMC, pursuant to associated reviews and approvals by the CCFD, and its close proximity to Fire Station 1, the Project would have adequate fire protection services.

Police Protection

Police protection for the Project Site is provided by the Culver City Police Department (CCPD). As the Project Site includes uses that are currently served by CCPD and is located in an urbanized area within the City of Culver City, it is well served by CCPD. Furthermore, the nearest CCPD station is located in close proximity at 4040 Duquesne Avenue, approximately 0.12 miles southeast of the Project Site. The Project would include a security room located in Parking Level 1, as well as a 24-hour/seven-day video surveillance security program to ensure the safety of Project employees and visitors. The cameras would be located to capture views around the perimeter of the building, at main pedestrian and vehicular entries, at terrace locations, and at stair/elevator lobbies. Project security features would also include building access/design features to assist in crime prevention efforts and to reduce the demand for police protection services, including the lighting of entryways and public areas. Although the Project would increase the occupancy of the Project Site as compared to existing conditions, the Project's added security measures would reduce the demand for police protection services. In light of the Project's security features, the existing level of police services on the Project Site and in the downtown area, and its close proximity to the CCPD station, the Project would have adequate police protection services.

Conclusion for Criterion (e)

As the Project would result in less than significant impacts with respect to utilities and public services, the Project would meet this criterion.

Exceptions to Categorical Exemption

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

- a. Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.
- b. Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.
- c. Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.
- d. Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.
- e. Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.
- f. Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

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

Criterion Section 15300.2(a): Location

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

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

Criterion Section 15300.2(b): Cumulative Impact

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

Under this exception, exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant. There is no evidence of a potential significant cumulative impact because successive projects of the same type in the same place have not been approved and are not currently proposed. A total of 63 related projects were identified in Attachment A of this memorandum, including 48 within the City of Culver City, 14 within the City of Los Angeles, and 1 in the County of Los Angeles. Of these, the related projects in the immediate vicinity of the Project include, among others: 1) The Brick and the Machine mixed-use project (an office and retail building that recently completed construction located directly adjacent to the southwest corner of the Project Site); 2) the Jazz Bakery project (a performance theater with a

museum and bakery located approximately 415 feet southwest of the Project Site); 3) the 3739 Cardiff Avenue project (a residential development located approximately 575 feet northeast of the Project Site); 4) the 3838 S. Dunn Drive project (a residential development located approximately 690 feet west of the Project Site); 5) the One Culver - 10000 Washington Boulevard project (a mixed-use project involving the reuse of an existing office building located approximately 700 feet southwest of the Project Site); 6) the Parcel B – Culver Steps project (a mixed-use office, retail restaurant project located approximately 830 feet to the east of the Project Site); and 7) and the Sweet Flower project (a cannabis project located approximately 1,015 feet southwest of the Project Site). As each of the 63 related projects would be required to comply with the same or similar thresholds of significance and regulatory compliance measures as the Project, it is anticipated that the related projects would not individually contribute to a cumulatively considerable impact. The Project's Transportation Assessment did not identify significant cumulative traffic impacts associated with the Project and related projects. As it relates to noise, the Brick and the Machine mixed-use project, which is the closest related project to the Project Site, recently completed construction. As such, construction of the Project would not combine with The Brick and Machine project to cumulatively contribute to significant cumulative noise impacts with regards to the Project and buildout of the related projects. Noise from the construction of development projects is typically localized, and the potential for cumulative construction noise impacts depends on the proximity of the related projects and whether construction would occur concurrently with the Project. If, for example, the distance between the Project and a related project is 200 feet or more, the difference from two individual noise sources (one from the Project Site and the other from a related project site) would be 12 dBA, and the effect to the composite noise level would be less than 0.3 dBA. Further, construction-related noise levels from the related projects would be intermittent and temporary, and it is anticipated that, as with the Project, the related projects would comply with the construction hour regulations and other applicable provisions set forth in the CCMC. Since the Project would not increase the ambient noise level in the project vicinity by 5 dBA or more, and given the distance attenuation and shielding by intervening buildings between the Project and the related projects, Project construction would not contribute to cumulative construction noise in the event of concurrent construction with the related projects. Furthermore, under existing, future, or cumulative conditions, no significant off-site vehicular traffic noise impacts would occur. Even if construction traffic from both the Project and related projects would use similar haul routes or access routes, the maximum cumulative noise increase from the Project plus related project traffic would be 0.8 dBA CNEL along Watseka Avenue between Venice Boulevard and Washington Boulevard, as shown on page 38 and Table 12 in Attachment B. As a result, cumulative off-site traffic-related noise impacts would not be cumulatively considerable and cumulative impacts would be less than significant. In addition, the Project would not result in significant cumulative air quality impacts since the Project's incremental contribution to long-term emissions of non-attainment pollutants and ozone precursors, considered together with cumulative projects, would not be cumulatively considerable, as analyzed on pages 54 through 56 in Attachment C of this memorandum. As it relates to water quality impacts with regards to the Project and buildout of the related projects, the Project would improve water quality as it would introduce drainage features and/or water quality measures on a site which currently does not include these features. In addition, related projects would be subject to similar water quality regulatory requirements as the Project. As such, the Project would not result in a significant cumulative water quality impact. As a result, there is no evidence of significant cumulative impacts from successive projects of the same type in the same place, over time. Therefore, this exception does not apply to the Project.

Criterion Section 15300.2(c): Significant Effect

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

This exception applies when there is a reasonable possibility that a project will have a significant effect on the environment due to unusual circumstances. As described above, the Project would consist of approximately 24,816 SF of ground-floor office space, 43,151 SF of office space on the second floor, 39,871 SF on the third floor, and 37,411 SF on the fourth floor. The Project would include 551 vehicle parking spaces. Parking would be provided primarily within the three-level subterranean parking garage, with two loading spaces and six ADA-compliant parking spaces provided on Level 1. The Project is consistent with the General Plan land use designation and zoning designation, consistent with applicable General Plan Land Use Element objectives and policies for the Downtown area of the City of Culver City and is similar in size and scale to other developments in the area and is not unusual for the location. The Project Site is located in a developed urban neighborhood, and the Project would provide commercial uses with convenient access to nearby high-quality public transit options. Based on available facts and reasonable assumptions based on facts, there are no unusual circumstances for the Project that support a reasonable possibility of a significant effect on the environment. Therefore, this exception does not apply to the Project.

Criterion Section 15300.2(d): Scenic Highway

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

This exception applies to a project which may result in damage to scenic resources, including, but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. Based on a review of the California Scenic Highway Mapping System,⁵ the Project Site is not located on or near an officially designated scenic highway. The Project would have no impacts on an officially designated scenic highway. Therefore, this exception does not apply to the Project.

Criterion Section 15300.2(e): Hazardous Waste Sites

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

This exception applies to a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code. Government Code Section 65962.5 refers specifically to a list of hazardous waste facilities compiled by the Department of Toxic Substances Control (DTSC). According to the Phase I Environmental Site Assessment Reports (Phase I ESA) prepared for the Project by Citadel EHS (2020), the Project Site is not included on the DTSC's hazardous waste facilities list. In addition, the Project Site has not been included on the DTSC's hazardous waste facilities list following the date of the Phase I ESA. Thus, the Project Site has not been included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, this exception does not apply to the Project.

⁵ For State-designated scenic highway: California Department of Transportation, California State Scenic Highway System Map, <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983>. Accessed September 2021.

Criterion Section 15300.2(f): Historical Resources

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

CEQA Guidelines Section 15300.2 states that a categorical exemption “shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.” A Historical Resources Technical Report was prepared by Historic Resources Group (April 2021), provided in Attachment F of this memorandum. The Project Site is currently occupied by a one-story medical office building with associated surface parking constructed in 1996 and a two-story institutional building with associated surface parking constructed in 1924. The existing buildings on the Project Site have not been identified as potentially significant by any previous evaluations of the parcels on the Project Site or in the wider area. The parcels comprising the Project Site were re-evaluated for potential historical significance, based on an observation of existing conditions, primary and secondary source research related to the history of the property, a review of the relevant historic contexts, and an analysis under the eligibility criteria for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a Culver City Landmark or Significant Cultural Resource. Based on the analysis provided in the Historical Resources Technical Report, the one-story medical office building, constructed in 1996, is not eligible for designation at the federal, state, or local levels. The two-story institutional building, due to substantial alterations over time, does not retain sufficient integrity to convey historic significance. As a result, the buildings and improvements on the Project Site are not eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or as a Culver City Cultural Resource. As such, the Project Site does not meet the definition of an historical resource as outlined in CEQA Guidelines Section 15064.5(a)(1) or (2), and the Project would not have a direct impact on historical resources.

In addition, indirect impacts were analyzed to determine if the Project would result in a substantial material change to the integrity of historical resources outside of the Project Site such that the resources’ significance would be materially impaired, which is the CEQA threshold for determining significant impacts. The Hull Building, located across Watseka Avenue approximately 110 feet to the southeast of the Project Site, is a Culver City Landmark, and Culver City Historical Society Historic Site #2. The Hull Building is therefore a historical resource as defined by CEQA. The Project does not include the demolition, relocation, rehabilitation, alteration, or conversion of any portion of the Hull Building, which would remain unchanged and in its original location after implementation of the Project. In addition, in regard to the potential for indirect impacts on the Hull Building, the Historical Resources Technical Report found that the Project would not block important street views of the building, and would not affect the integrity of location, design, materials, or workmanship of the Hull Building. Although the Project would add new height and mass in the near vicinity of the Hull Building, all of the aspects of integrity of the Hull Building would be unaffected by the Project, so that the historic integrity of the building would be retained. After construction of the Project, the Hull Building would remain intact, and continue to convey its historic significance. For these reasons, the significance and integrity of the Hull Building would not be materially impaired by the Project, and the Project would not result in significant impacts to the Hull Building. No additional historical resources were identified in the Project Site vicinity that could be directly or indirectly impacted by the Project.

The Noise and Vibration Technical Report included as Attachment B analyzes noise and vibration impacts to receptors in the vicinity of the Project Site, including the potential for vibration to cause structural damage to historic buildings. As discussed on page 41 of the Noise and Vibration Technical Report, vibration from Project construction would be monitored and controlled so that the nearest off-site sensitive receptors, including the Hull Building, would not be exposed to vibration levels that would cause structural damage through the implementation

of PDF NOISE-3 and PDF NOISE-5. Accordingly, structural vibration impacts to historical resources would be less than significant.

Based on the above, the Project would not cause a substantial adverse change in the significance of any historical resource.

Summary/Conclusions

A project qualifies for a Class 32 (Infill Development) Categorical Exemption if it is developed on an infill site and meets the five (5) conditions described in this report. Based on the technical analyses above, and consistent with the attached technical reports, the 3855 Watseka Avenue Project meets the criteria for a Class 32 (Infill Development) Categorical Exemption. Furthermore, none of the exceptions to a Class 32 (Infill Development) Categorical Exemption listed in CEQA Guidelines Section 15300.2 apply to the Project, as supported by the technical analyses provide above. Therefore, based on the analyses and findings presented in this technical memorandum and in the attached technical reports, the Project qualifies for a Class 32 (Infill Development) Categorical Exemption and is exempt from further review under CEQA.

Attachments

Attachment A – Transportation Assessment

Attachment B – Noise and Vibration Technical Report

Attachment C – Air Quality Technical Report

Attachment D – Water Quality Memorandum

Attachment E – Utility Will Serve Letters

Attachment F – Historical Resource Technical Report