



## TECHNICAL MEMORANDUM

**To:** Jose Mendivil, City of Culver City  
**From:** Jessie Fan, Project Manager  
**Date:** June 24, 2022  
**Subject:** Culver Arts and Apartments Project – Class 32 Categorical Exemption

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### 1.0 INTRODUCTION & PURPOSE

Kimley-Horn and Associates, Inc. has been retained to evaluate the Culver Arts and Apartments Project (the “Project”) concerning California Environmental Quality Act (CEQA) compliance. This Technical Memorandum (TM) was prepared to present the findings of the CEQA compliance review, as described below. This TM was also prepared to present the recommendations concerning the appropriate CEQA compliance documentation.

The Project’s CEQA compliance review relied on the following documentation:

- Conceptual Site Plan; see **Appendix A: Conceptual Site Plans**.
- Traffic Outputs; see **Appendix B: Vehicle Miles Traveled (VMT) Outputs**
- Kimley-Horn, *Culver Arts and Apartments Project – Noise and Vibration Analysis*. June 2022; see **Appendix C: Noise and Vibration Analysis**.
- Kimley-Horn, *Culver Arts and Apartments Project – Air Quality Analysis*. June 2022; see **Appendix D: Air Quality Analysis**.
- Utilities Documentation; see **Appendix E: Utilities Documentation**.
- Architectural Resources Group, *9814 Washington Boulevard Historic Designation Letter*. July 2009; see **Appendix F: Historic Designation Letter**.

### 2.0 STATUTORY AUTHORITY & REQUIREMENTS

#### CEQA Guidelines Section 15061 – Review for Exemption

Once it has determined that an activity is a project subject to CEQA, it is then determined whether a project is exempt from CEQA. Pursuant to CEQA Guidelines Section 15061, a project is exempt from CEQA if:

- 1) The project is exempt by statute; see CEQA Guidelines Article 18, commencing with Section 15260.

- 2) The project is exempt pursuant to a Categorical Exemption (see CEQA Guidelines Article 19, commencing with Section 15300) and the application of that CE is not barred by one of the exceptions set forth in CEQA Guidelines Section 15300.2.
- 3) The activity is covered by the commonsense exemption that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.
- 4) The project will be rejected or disapproved by a public agency.
- 5) The project is exempt pursuant to the provisions of Article 12.5 - Exemptions for Agricultural Housing, Affordable Housing, and Residential Infill Projects.

#### **CEQA Guidelines Article 19 - Categorical Exemptions**

CEQA Guidelines Article 19 includes a list of classes of projects, which have been determined not to have a significant effect on the environment and, therefore, are exempt from CEQA. The class of projects that is relevant to the Project is presented below.

CEQA Guidelines Section 15332 – Infill Development. Class 32 consists of projects characterized as in-fill development meeting the conditions described below.

- (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.

CEQA Guidelines Section 15300.2 - Exceptions. The following conditions are exceptions that bar the application of a Categorical Exemption:

- (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.

### 3.0 PROJECT DESCRIPTION

REthink Development (the Applicant) proposes a mixed-use development (Project) on an approximately 0.29-acre site (Project Site) located at 9814 Washington Boulevard within the City of Culver City (City). The Project Site is bound by Washington Boulevard to the north, Duquesne Avenue to the southwest, and Culver Boulevard to the southeast. The Project Site is located on two parcels (Los Angeles County Assessor's Parcel Number [APN] 4207-006-915 and 4207-006-003) and is currently developed. The Project would develop 34 residential apartment units, 6 of which would be affordable units, and up to 4,000 square feet of ground-floor commercial uses. A detailed description of the Project Site characteristics and Project are provided below.

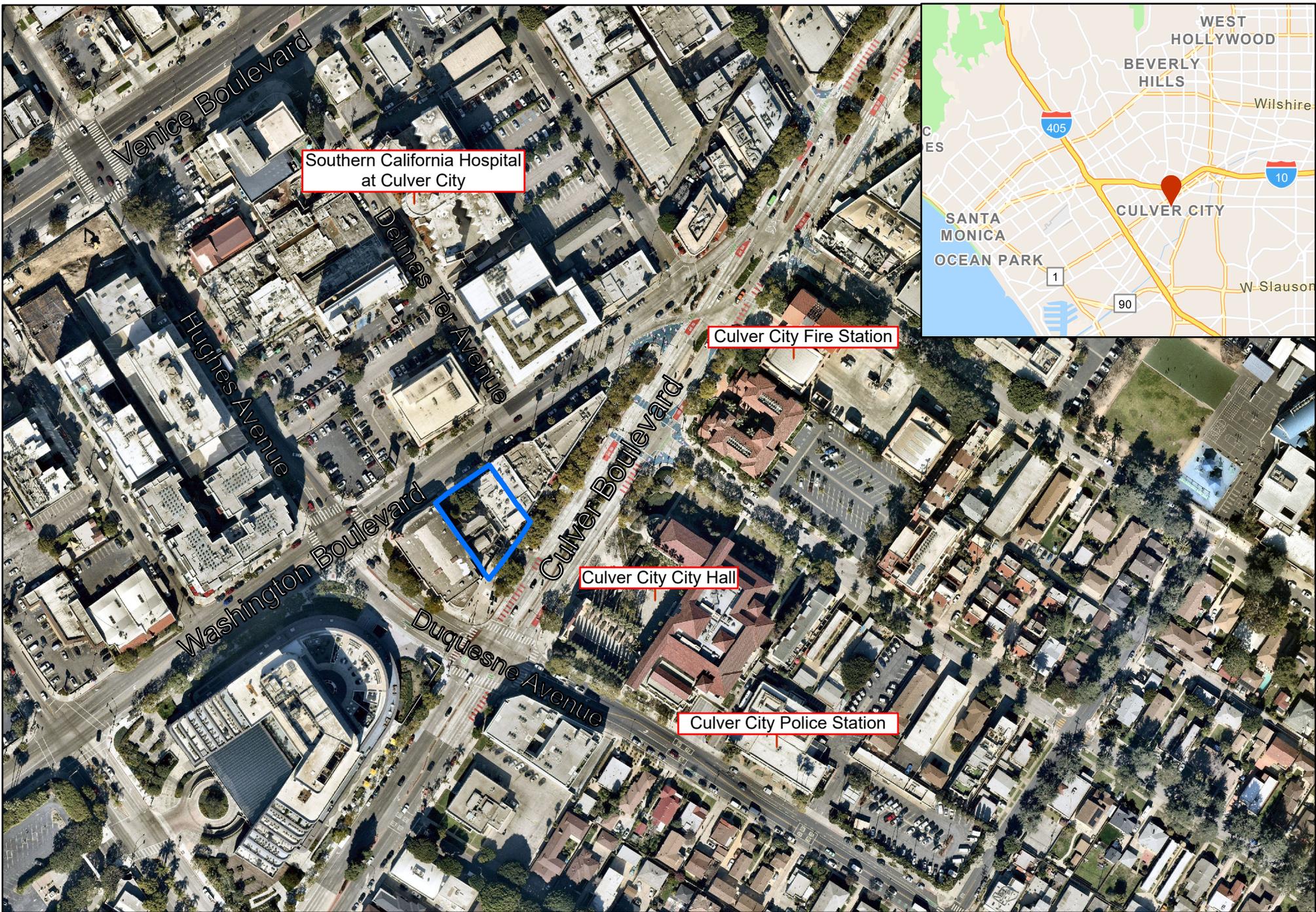
#### Project Location and Surrounding Uses

As shown in **Figure 1: Project Vicinity Map**, the Project Site is located in Downtown Culver City. The Project Site is located in the northern area of the City south of California State Route (SR) 187 (Venice Boulevard). The Project Site currently consists of a 2,240 square-foot vacant single-family home and a 3,769 square-foot commercial restaurant. The Project Site has a General Plan land use designation of Downtown (Commercial)<sup>1</sup> and is zoned Commercial Downtown (CD).<sup>2</sup>

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<sup>1</sup> City of Culver City, General Plan Land Use Element Map, 2007. Available at <https://www.culvercity.org/files/assets/public/documents/information-technology/maps/general-plan-land-use-map.pdf>. Accessed May 24, 2022.

<sup>2</sup> City of Culver City, Zoning Map, 2007. Available at [https://www.culvercity.org/files/assets/public/documents/information-technology/maps/culver\\_city\\_zoning\\_map.pdf](https://www.culvercity.org/files/assets/public/documents/information-technology/maps/culver_city_zoning_map.pdf). Accessed May 24, 2022.



Culver Arts and Apartments Project  
Project Vicinity Map

 Project Site Boundary



0 0.025 0.05 0.1 Miles

There are currently two trees and ornamental landscaping located on the northern portion of the western parcel. There are five street streets planted along Culver Boulevard. The existing frontage of Culver Boulevard includes outdoor dining and is a dedicated bus lane and bike lane. Limited street parking is provided on the existing frontage of Washington Boulevard.

The Project Site is in an urbanized area that is developed with a mix of commercial uses, medical and hospital uses, and municipal buildings. The Project Site is directly bounded by the Kirk Douglas Theatre to the west and commercial restaurants to the east. The surrounding land uses include to the north, Chase Bank, surface parking, and Southern California Hospital at Culver City beyond; Culver City Hall to the south; commercial/restaurant uses to the east; and commercial/office uses to the west. Multi-family residential uses are located at the southern corner of the intersection of Culver Boulevard and Duquesne Avenue.

A Culver CityBus (CCBus) bus stop is located approximately 300 feet northeast and southeast of the Project Site at the intersection of Culver Boulevard and Lafayette Place. A Los Angeles Department of Transportation (LADOT) Commuter Express 437 stop is located approximately 240 feet south of the intersection of Duquesne Avenue and Culver Boulevard. The Los Angeles County Metropolitan Transportation Authority (Metro) E (Expo) Line Culver City Station is located approximately 0.6 miles (3,300 feet) northeast of the Project Site.

### Project Characteristics

The Project Site plans are provided in **Appendix A: Conceptual Site Plans** of this TM. The Project would demolish the single-family home on the western portion of the Project Site and retain the existing commercial space on the eastern portion of the Project Site. The single-family home was constructed in 1921 and has been vacant since 2003, or for approximately 19 years. According to the Historic Designation Letter (see **Appendix F**), the interior of the house is in a state of advanced disrepair with considerable water damage and holes in walls and ceilings, while the exterior of the house has had multiple replacements but is in fair condition. The Project would develop a new four-story building (approximately 47.5 feet high) on the western portion of the Project Site comprised of up to 4,000 square feet of general retail uses on the ground floor and three stories of residential uses above. The new building would include a residential lobby, mail room, bike parking area, restrooms, and trash room on the ground floor. Fork loading trash trucks would use the existing curb cut on Culver Boulevard to pull the bins onto the public sidewalk. The Trash bins would be rolled out of the trash enclosure to the fork loading trash truck.

The Project would develop two stories of residential units on top of the retained one-story commercial building on the eastern portion of the Project Site. The three-story building would be up to 34 feet high. The residential units would be connected across the Project Site. A total of 34 dwelling units would be provided, comprised of 22 studio and 12 one- or two-bedroom units. The Project would result in a total developed floor area of approximately 23,912 square feet. No on-site vehicle parking would be provided. Deliveries for the Project residents and employees would

utilize the white loading space in front of the Kirk Douglas Theatre.

Ornamental landscaping would be provided between the buildings on the ground floor. Additional landscaping would be provided on the second floor. The open deck on the fourth floor would be available to residents to use as a passive recreational gathering space. No events are anticipated to occur in this area.

### **Construction**

Project construction is anticipated to begin as early as 2023, pending Project consideration and approval, and would be completed in 2024. Construction of the Project is estimated to require approximately 15 months. Project construction would include the demolition of the existing residential structure, site preparation to clear vegetation and other materials on-site, grading to prepare the Project Site for the new construction, paving, building construction, and architectural coatings. The existing restaurant on-site would remain operational during construction activities. The restaurant may have temporary business interruption while the utilities are transferred from its current service to the final service for the new building. Demolition activities would require the use of haul trucks. Heavy-duty equipment, vendor supply trucks, and concrete trucks would be used during grading and paving. Architectural coating would occur during the finishing activities. The Project would export approximately 225 cubic yards of soil during the grading/excavation phase, in addition to the 2,240 square feet (equivalent) of building demolition (building walls, etc.), and 55 cubic yards of hardscape (pavement material).

### **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 the entitlements below:

- Site Plan Review;
- Density Bonus;
- Haul Route permit; and
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, construction permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

#### 4.0 FINDINGS CONCERNING CEQA COMPLIANCE

Kimley-Horn has completed the Project’s CEQA compliance review and summarized the findings below.

##### Exemption Justification Under Class 32 – Infill Development

Land Use Consistency. The Project Site has a General Plan land use designation of Downtown (Commercial) and is zoned Commercial Downtown (CD). The CD Zone is addressed in Culver City Municipal Code (CCMC) Title 17, Article 17 – Zoning Code. Pursuant to CCMC Section 17.220.015, the Project’s residential and general retail uses would be allowed on the Project Site. The Downtown (Commercial) designation is appropriate for medium and large-scale commercial uses and shared parking, with specific use restrictions and design standards. It 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 proposes a mixed-use development, which would include residential units and ground floor general retail uses. Therefore, as shown in **Table 1: Project Consistency with Applicable Policies of the Culver City General Plan**, the Project would be consistent with the applicable General Plan designation and all applicable General Plan policies.

<b>Table 1: Project Consistency with Applicable Policies of the Culver City General Plan</b>	
<b><i>Objective/Policy</i></b>	<b><i>Analysis of Project Consistency</i></b>
<b>Policy 2.B.</b> Continue to allow and encourage multiple family housing opportunities in areas designated for such development.	<b>Consistent.</b> The Project would provide 34 residences on a property that would support certain residential uses, including mixed-use. Thus, the Project would provide a mixed-use development in an area that is designated for such development.
<b>Policy 2.E.</b> Develop standards and guidelines for residential unit development in appropriate commercial areas.	<b>Consistent.</b> The Project Site is located in an area surrounded by a mix of uses. The Project would be developed according to the uses, setbacks, height, and open space and landscape requirements. Development of the Project would allow for the ground-floor general retail uses to be consistent with the surrounding uses, but would also allow for the proposed residential units to transition to the residential uses further north and south of the Project Site.
<b>Objective 3.</b> Affordable Housing. Encourage the provision of housing opportunities for all members of the community.	<b>Consistent.</b> The Project would provide 34 residential units, of which 6 would be affordable. In addition, the Project would provide a mix of units, with 22 studio and 12 one- or two-bedroom units. Through the

	provision of affordable units and a range in unit size, the Project would provide housing opportunities for all members of the community.
<b>Objective 5.</b> Economic Diversity. Encourage new business opportunities that expand Culver City’s economic base and serve the needs of the City’s residential and business community.	<b>Consistent.</b> The Project would redevelop the underutilized site with a mix of residential and commercial uses. The Project would demolish the vacant single-family home and develop a mixed-use building in its place. The Project would also retain the existing commercial building and develop residential uses atop the ground floor commercial use. The mix of uses would serve the residential and business community, and would expand the City’s economic base.
<b>Objective 6.</b> Commercial Corridors. Revitalize the physical character and economic well being of the City’s commercial corridors.	<b>Consistent.</b> See Objective 5 above. The Project would redevelop the underutilized site to revitalize the western portion of the Project Site.
<b>Policy 6.A.</b> Encourage revitalization of commercial corridors in the City through new development and renovation of existing structures with incentives which address development standards and the project approval process.	<b>Consistent.</b> See Objective 5 above. The Project would retain the commercial building on the eastern portion of the Project Site and increase density on the Project Site.
<b>Policy 8.A.</b> Support desirable retail establishments in proximity to residential neighborhoods that provide needed goods and services.	<b>Consistent.</b> The Project would develop ground floor general retail uses to support the future residents on the Project Site and the neighborhoods located in the Project Site vicinity.

Location and Size. The Project Site totals approximately 0.29 acres and is located entirely within the City’s limits. Land uses surrounding the Project Site include commercial uses, restaurants, offices, hospital and medical uses, municipal buildings, and multi-family mixed-use buildings. Therefore, the Project would occur entirely within City limits on a Project Site that is no more than five acres substantially surrounded by urban uses.

Biological Resources. The Project Site is completely developed with existing on-site uses and contains ornamental landscaping and non-protected trees. The Project Site is bordered by existing commercial development and well-utilized roadways. There are no regional resources or habitats nearby that could contain sensitive species, and all nearby habitat is disturbed with little-to-no native vegetation. Therefore, the Project would not result in any significant effects relating to

biological resources. The Project Site would have no value as a habitat for endangered, rare, or threatened species.

**Traffic.** The City adopted Transportation Study Criteria and Guidelines in July 2020.<sup>3</sup> As shown in **Table 2: Summary of Project Trip Generation**, the Project would not generate more than 250 or more new daily trips; therefore, a transportation study is not required for the Project.

Land Use <sup>1</sup>	Quantity	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Low-Rise Residential w/ Ground-Floor Commercial	34 DU	117	3	12	15	9	4	13
<b>Project Trips</b>		<b>117</b>	<b>3</b>	<b>12</b>	<b>15</b>	<b>9</b>	<b>4</b>	<b>13</b>
1 The Project utilizes Low-Rise Residential w/ Ground-Floor Commercial (ITE 230), which is a mixed-use multifamily housing building with two or three floors of residential living space and commercial space open to the public on the ground level. Therefore, because the ITE rate generates trips inclusive of the residential and commercial uses.								

The City’s Transportation Study Criteria and Guidelines include screening criteria that may be applied to screen projects from having to conduct vehicle miles traveled (VMT) impact analysis to comply with CEQA, as a less than significant impact would be presumed. As shown in **Table 2** above, the Project would result in less than 250 daily trips. The retail component of the Project would be 4,000 square feet across the Project Site, and would be fewer than 50,000 square feet at every store. Further, as determined in the Culver City VMT Tool (see **Appendix B: Vehicle Miles Traveled (VMT) Outputs**), the Project would be located within a Transit Priority Area (TPA) and at least 15 percent of the on-site residential units would be affordable. Therefore, the Project is assumed to have a less than significant impact on VMT. In conclusion, the Project’s approval would not result in any significant effects relating to traffic pursuant to CEQA Guidelines Section 15332(d).

**Noise.** As concluded in the Project’s Noise and Vibration Analysis (see **Appendix C: Noise and Vibration Analysis**), the Project’s construction and operational noise and vibration levels would not exceed any City or Federal Transit Administration (FTA) standards. The Project would result in less than significant construction and operational noise and vibration impacts. Therefore, the Project’s approval would not result in any significant effects relating to noise and vibration pursuant to CEQA Guidelines Section 15332(d).

**Air Quality.** As concluded in the Project’s Air Quality Analysis (see **Appendix D: Air Quality Analysis**), the Project’s construction and operational emissions would not exceed any South Coast

<sup>3</sup> City of Culver City, Transportation Study Criteria and Guidelines. Available at <https://www.culvercity.org/files/assets/public/documents/public-works/mobility/transportation-study-criteria-and-guidelines.pdf>. Accessed May 26, 2022.

Air Quality Management District (SCAQMD) standards, California Ambient Air Quality Standards (CAAQS), or National Ambient Air Quality Standards (NAAQS). The Project would result in less than significant construction and operational air quality impacts, and no mitigation is required. Therefore, the Project's approval would not result in any significant effects relating to air quality pursuant to CEQA Guidelines Section 15332(d).

Water Quality. The Project would not involve the extraction of groundwater. Historically high groundwater in the Project Site vicinity is estimated to be about 25 feet below the ground surface.<sup>4</sup> Fluctuations in the groundwater level may occur due to variations in rainfall, temperature, and other factors. However, due to the depth of groundwater anticipated on the Project Site, Project construction and operation would not interfere with groundwater. Impacts to groundwater would be less than significant.

The Project's construction-related activities would include ground-disturbing activities, which would displace soils and temporarily increase the potential for soils to be subject to wind and water erosion. Construction-related erosion effects would be addressed through compliance with the National Pollutant Discharge Elimination System (NPDES) Program's Construction General Permit, which would be issued by the Los Angeles Regional Water Quality Control Board (LARWQCB). The Construction General Permit requires development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and monitoring plan, which must include erosion-control and sediment-control best management practices (BMPs) that would meet or exceed measures required by the Construction General Permit to control potential construction-related pollutants. Following compliance with NPDES and City requirements, the Project's construction-related activities would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality.

Stormwater discharge is generated by rainfall that runs off the land and impervious surfaces, and can include pollutants of concern which would affect stormwater quality. The Project is not anticipated to produce any pollutants that would result in a violation of water quality standards or waste discharge requirements. The Project would be required to comply with the applicable requirements of CCMC Chapter 5.05, Stormwater and Urban Runoff Pollution Control, Section 5.05.040, Standard Urban Stormwater Mitigation Plan (SUSMP) Requirements for New Development and Redevelopment Projects. The Project would require a stormwater mitigation plan that complies with the most recent LARWQCB-approved SUSMP. Any pollutants or waste would be discharged according to all appropriate local, State, and federal rules and regulations. Compliance with applicable SUSMP and long-term water quality requirements would be reviewed by the Culver City Department of Public Works during the plan check phase of the Project.

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<sup>4</sup> California Department of Conservation Division of Mines and Geology, Seismic Hazard Zone Report for the Beverly Hills 7.5-Minute Quadrangle, Seismic Hazard Zone Report SHZR-023, 1998, Plate 1.2, Historically Highest Groundwater Contours and Borehole Log Data Locations, Beverly Hills 7 ½ Minute Quadrangle.

Therefore, Project operation would not violate any water quality standards or waste discharge requirements.

In conclusion, the Project’s approval would not result in any significant effects relating to water quality pursuant to CEQA Guidelines Section 15332(d).

Utilities and Public Services. The Project would occur within an urbanized area where utilities and public services are already provided.

(i) *Water Supply and Infrastructure*

The Golden State Water Company (GSWC) currently supplies water to the Project Site. The 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 2020 Urban Water Management Plan (UWMP), approved in June 15, 2021, estimates that the year 2025 water demand is 5,002 acre-feet per year (afy), and the projected year 2045 water demand is approximately 5,370 afy.<sup>5</sup>

During construction activities associated with the future development within the Project Site, there would be a temporary, intermittent demand for water for such activities as soil watering for site preparation, fugitive dust control, concrete preparation, painting, cleanup, and other short-term activities. Construction-related water usage is not expected to have an adverse impact on available water supplies or the existing water distribution system, and impacts would be less than significant.

The Project’s estimated water consumption is presented in **Table 3: Estimated Water Consumption.**

<b>Table 3: Estimated Water Consumption</b>				
<b>Land Use<sup>1</sup></b>	<b>Size</b>	<b>Consumption Rate</b>	<b>Total Water Consumed (gpd)<sup>2</sup></b>	<b>Total Water Consumed (afy)</b>
Residential <sup>3</sup>	34 DU	156 gpd/DU	5,100	5.7
Restaurant	4,000 SF	30 gpd/seat <sup>4</sup>	8,000	9.0
<b>Project Total</b>			<b>13,100</b>	<b>14.7</b>
DU = dwelling units; SF = square feet 1 The estimates do not account for the existing commercial uses on the Project Site that would remain operational upon Project completion. 2 Water consumption estimates are prepared based on 100 percent of the Los Angeles County sewage generation factors for residential and commercial categories. 3 Residential uses assume each unit will be two-bedroom to provide a more conservative estimate of water demand. 4 This assumes each seat is approximately 15 square feet.				

<sup>5</sup> Golden State Water Company, Culver City Service Area 2020 Urban Water Management Plan, Table 5-2, approved June 15, 2021. Available at [https://wuedata.water.ca.gov/public/uwmp\\_attachments/4744519889/GSWC-Culver%20City%202020%20UWMP%20Final.pdf](https://wuedata.water.ca.gov/public/uwmp_attachments/4744519889/GSWC-Culver%20City%202020%20UWMP%20Final.pdf). Accessed June 10, 2022.

As shown in **Table 3**, the Project would result in an estimated net water demand of 13,100 gallons per day (gpd) or 14.7 afy. The Project's estimated water demand constitutes less than 0.3 percent of the GSWC's estimated water demand for 2025. The Project would be required to comply with CCMC Chapter 5.03: Water Conservation and Water Supply Shortage Program and the City's mandatory green building requirements, which would further reduce demand. Therefore, the Project's water consumption would be significantly below the projected supply and demand, and the Project is not expected to measurably reduce the local infrastructure's capacity. Impacts on water supply would be less than significant. Furthermore, the GSWC has confirmed that water service is available and would be provided to the Project (see **Appendix E: Utilities Documentation**).

In addition to supplying water for domestic uses, the 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.

*(ii) Wastewater Treatment Facilities and Infrastructure*

The City's wastewater is sent to Mesmer Pump Station and then treated at the Hyperion Water Reclamation Plan (HWRP), which treats an average daily flow of approximately 275 million gallons per day (mgd), with the capacity to treat up to 450 mgd. Therefore, the HWRP has a remaining treatment capacity of approximately 175 mgd.

During Project construction, a negligible amount of wastewater would be generated by construction workers. However, any such wastewater generation would be temporary, only lasting as long as Project construction activities occur. It is anticipated that portable toilets would be provided by a licensed private vendor that would dispose of the wastewater off-site. Such wastewater generation is therefore anticipated to result in either no or negligible discharges to the City's wastewater treatment conveyance systems or treatment facilities, and would not be discharged through any service connections at or near the Project Site. No such service connections would be established during Project construction to handle wastewater generated by construction workers. Such minimal wastewater flows are not expected to exceed to applicable treatment requirements of the HWRP, and such wastewater would be treated prior to discharge if discharged within the City. The minimal wastewater generation during construction would not require the

construction of new or expansion of existing facilities, and, given their small amount, are not anticipated to exceed the capacity of existing wastewater conveyance and treatment systems.

Based on the estimates provided in **Table 3**, it can be assumed that the Project would also generate approximately 13,100 gpd (approximately 0.013 mgd) of wastewater. The Project's wastewater generation would represent less than one percent of the capacity available at the HWRP. Therefore, Project impacts on wastewater treatment facilities would be less than significant. As the Project would be constructed in an urbanized area with existing uses on the Project Site, the construction of the Project would include all necessary on and off-site sewer pipe improvements and connections to adequately link the Project to the existing City sewer system based on the City's requirements. The necessary improvements would be verified through the permit approval process of obtaining a sewer capacity and connection permit from the City. Construction-related impacts would be temporary and on an intermittent basis. Furthermore, the Culver City Public Works Department has confirmed that sanitary sewer conveyance would be provided to the Project (see **Appendix E**). Impacts to wastewater treatment facilities and infrastructure would be less than significant.

*(iii) Electric Power and Natural Gas*

The Project Site is located in a developed and urbanized area in the City that is served by existing electrical power and natural gas services. Electricity would be provided by Southern California Edison (SCE), and natural gas would be supplied by Southern California Gas (SoCalGas).

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

Project construction would involve installation of new natural gas connections to serve the Project Site. Since the Project Site is located in an area already served by existing natural gas infrastructure, it is anticipated that extensive off-site infrastructure improvements would not be needed to serve the Project Site. Construction impacts associated with the installation of natural gas connections are expected to be limited to shallow grading/trenching activities in order to place the lines below surface. In addition, prior to ground disturbance, project contractors would be required to notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties.

Therefore, impacts to electric power and natural gas would be less than significant.

*(iv) Solid Waste*

Culver City's Public Works Environmental Programs and Operations Division collects municipal solid waste which includes, trash, recycling, organics, and construction and demolition debris from

both the commercial and residential sectors. Both recyclables and organics are hauled to private processing facilities to recycle or compost material. Solid waste is disposed of in either a County or non-County landfill. Culver City operates a transfer station but does not own or operate any landfill, recycling or composting facilities.

Based on the 2019 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total remaining permitted Class III landfill capacity at the County is estimated at 148.40 million tons, with a total estimated daily disposal rate of 34,305 tons per day (tpd).<sup>6</sup> In addition to in-County landfills, out-of-County disposal facilities may also be available to the City. Aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County’s landfills, and based on the 2019 CoIWMP Annual Report, the County anticipates that future Class III disposal needs can be adequately met through 2034 (the Annual Report’s horizon year) through a combination of landfill expansion, waste diversion at the source, out-of-County landfills, and other practices. It should also be noted that with annual reviews of demand and capacity in each subsequent Annual Report, the 15-year planning horizon provides sufficient lead time for the County to address any future shortfalls in landfill capacity.

Project construction would result in generation of construction and demolition (C&D) debris such as metal scrap, lumber, concrete which will be collected and diverted to a C&D debris facility for materials to be recycled and/or discarded. As shown in **Table 4: Estimated Project Waste Generation**, C&D debris for the Project is estimated to be approximately 151.10 tpd or 302,206.25 pounds per day (lb/day). This estimation is a conservative estimate as it assumes no reductions in waste generation would occur due to recycling.

<b>Table 4: Estimated Project Waste Generation</b>				
<b>Land Use<sup>1</sup></b>	<b>Size</b>	<b>Waste Generation Rate</b>	<b>Waste Generated (tpd)</b>	<b>Waste Generated (lbs/day)</b>
<b>Demolition<sup>2</sup></b>				
Single-Family Residence	2,240 SF	0.046 tons/SF	103.04	206,080.00
<b>Construction<sup>3</sup></b>				
Residential	34 DU	4.02 lb/SF	40.02	80,046.24
Restaurant	4,000 SF	4.02 lb/SF	8.04	16,080.00
<i>Total Demolition and Construction Waste</i>			<i>151.10 tpd</i>	<i>302,206.24 lbs/day</i>
<b>Operations<sup>4</sup></b>				
Residential	34 DU	4 lb/DU/day	0.07	136
Restaurant	4,000 SF	0.05 lb/SF/day	0.22	200

<sup>6</sup> County of Los Angeles, Department of Public Works, Countywide Integrated Waste Management Plan 2019 Annual Report, September 2020. Available at <https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=14372&hp=yes&type=PDF>. Accessed June 10, 2022.

<i>Total Operational Waste</i>	<i>0.29 tpd</i>	<i>336 lbs/day</i>
DU = dwelling units; SF = square feet; tpd = tons per day; lbs = pounds 1 The estimates do not account for the existing commercial uses on the Project Site that would remain operational upon Project completion. 2 The demolition waste generation rate of 0.046 tons/SF is based on the CalEEMod User Guide Appendix A, page 13. 3 The construction waste generation rate of 4.02 lb/SF is based on the U.S.EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-2, June 1998. 4 Generation factors provided by the CalRecycle website, refer to Estimated Solid Waste Generation Rates, <a href="https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates">https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates</a> . Accessed June 13, 2022.		

It is anticipated that a large amount of the construction debris would be recycled. Residual wastes such as trash packing materials, and plastics which could require disposal at landfill. Disposal and recycling of the construction debris would be required to comply with all federal, State, and local regulations. Culver City’s standard conditions of approval specifically 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.*

In addition, 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.

As detailed in **Table 4**, based on solid waste generation factors from the California Department of Resources and Recycling and Recovery (CalRecycle), the Project could generate 0.29 tpd or 336 lbs/day. The annual amount of solid waste generated by the Project would represent a minor amount of the estimated 148.40 million tons of remaining disposal capacity for the County’s Class III landfills. As such, the solid waste generated by the Project could be accommodated by the County’s available regional landfills.

CalRecycle is the California State Agency that promotes the importance of reducing waste and oversees California’s waste management and recycling efforts. CalRecycle has issued jurisdiction waste diversion rate targets equivalent to 50 percent of the waste stream as expressing in pounds per person per day. Thus, it is important to note that the estimate of solid waste generated by the Project is conservative, in that the amount of solid waste that would need to be landfilled would likely be less than this forecast based on the City’s implementation of solid waste diversion targets.

(v) *Fire Protection*

Fire protection and emergency medical services for the Project Site are provided by the Culver City Fire Department (CCFD), which is supported, when needed, through mutual aid agreements with fire departments in the City of Los Angeles and Los Angeles County, with further assistance from the cities of Beverly Hills, Santa Monica, and West Hollywood.<sup>7</sup> The Project Site would be served by CCFD Fire Station #1, which is located approximately 0.1 miles northeast of the Project Site along Culver Boulevard. Fire Station #1 serves as the CCFD headquarters, and has an engine company, paramedic resources, and battalion chief command vehicle.<sup>8</sup> At this time, the CCFD has no planned improvements anticipated for Fire Station #1, but CCFD intends to add a third rescue ambulance at Fire Station #2 and to augment employees by 7 additional staff.<sup>9</sup>

During Project construction, 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. Emergency vehicle drivers would utilize different options for avoiding traffic, such as using the sirens to clear a path of travel or driving in the lanes of opposing traffic. Given that the Project Site is located 0.1 miles from Fire Station #1 and given that the CCFD intends to maintain existing staffing at Fire Station #1, the Project would be adequately served by the CCFD. Furthermore, the Project would be built according to applicable fire and building codes and would be fully equipped with a fire suppression sprinkler system as well as a fire alarm system. All building renovations and additions would comply with applicable fire and building codes. As such, any additional demand for fire protection services would be minimized.

(vi) *Police Protection*

Police protection services for the Project Site are provided by the Culver City Police Department (CCPD). The CCPD promotes community safety through deterrence and prevention of crime, apprehension of offenders, and education of the public in self-protective measures to minimize victimization. Additionally, the CCPD collaborates with regional partners and the Los Angeles County Sheriff's Department (LASD), when needed, for large scale police-related emergencies, and along with several other local cities, contracts with the South Bay Regional Public Communications Authority for dispatch services. The CCPD is located at 4040 Duquesne Avenue, which is located approximately 0.1 miles southeast of the Project Site.

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<sup>7</sup> City of Culver City, General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, page 26. Available at [https://static1.squarespace.com/static/5d950bfaae137b5f0cbd75f5/t/5f52a1c3f0c7ef795c8edf66/1599250917520/CCGPU\\_ParksPublicFacilities\\_2020\\_0805\\_WebCovidMemo.pdf](https://static1.squarespace.com/static/5d950bfaae137b5f0cbd75f5/t/5f52a1c3f0c7ef795c8edf66/1599250917520/CCGPU_ParksPublicFacilities_2020_0805_WebCovidMemo.pdf). Accessed June 20, 2022.

<sup>8</sup> City of Culver City, General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, page 23.

<sup>9</sup> City of Culver City, General Plan Update Parks, Public Facilities, and Public Services Existing Conditions Report, July 2020, page 29.

During Project construction, see above discussion regarding emergency vehicle access. The Project would include safety and security features to enhance public safety and reduce the demand for police services. The Project would include 24-hour/seven-day video surveillance security to enhance public safety. The Project would remove the vacant single-family home and enliven the area with active uses. To ensure that police protection considerations are incorporated into Project design, the CCPD would be provided the opportunity to review and comment on the 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 design recommendations to enhance public safety and reduce potential demands upon police protection services. As such, any additional demand for police protection services would be minimized.

(vii) *Conclusion*

The Project would be consistent with the site's intended land uses, as concluded in the *Land Use* Section above. Further, as analyzed above, the demands for utilities and public services associated with the property have been accounted for. The Project Site can be adequately served by all required utilities and public services. Therefore, the Project's approval would not result in any significant effects relating to utilities and public services pursuant to CEQA Guidelines Section 15332(d).

**Exceptions to Categorical Exemptions**

As previously noted, a project is exempt from CEQA pursuant to a Categorical Exemption provided the application of that Categorical Exemption is not barred by one of the exceptions set forth in CEQA Guidelines Section 15300.2. The following demonstrates the Project does not meet any of the exceptions that would bar a Categorical Exemption.

Exception A, Location. The Project would qualify for a Categorical Exemption under Class 32; therefore, because this exception pertains to Classes 3, 4, 5, 6, and 11, it is not applicable to the proposed Project.

Exception B, Cumulative Impact. Other proposed projects within the Project vicinity would be required to demonstrate consistency with the City's General Plan policies and CCMC regulations. There are no successive projects similar to the Project proposed on the Project Site. Additionally, as concluded above, the Project would result in no environmental impact or less than significant impacts. Therefore, no significant cumulative impact would occur.

Exception C, Significant Effect. The proposed Project is not expected to have a significant effect on the environment due to unusual circumstances; see *Exemption Justification* above for biological resources, traffic, noise and vibration, air quality, and water quality.

Exception D, Scenic Highways. There are no State-designated scenic highways in the Project site vicinity.<sup>10</sup> The closest officially designated State scenic highway is the Topanga Canyon State Scenic Highway, a 2.5-mile segment of State Route 27, located approximately 10.8 miles northwest of the Project Site. Moreover, there are no scenic resources present on the Project Site. Therefore, the Project would not damage scenic resources within a State scenic highway.

Exception E, Hazardous Waste Sites. Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the Department of Toxic Substances Control. The Project Site is not included on the Cortese List.<sup>11</sup>

Exception D, Historical Resources. The existing vacant single-family residential building on the western portion of the Project Site was built in 1921. As noted in the Historic Designation Letter (see **Appendix F: Historic Designation Letter**), the residential building is not eligible for individual listing on the National Register of Historic Places or the California Register of Historical Resources as it does not meet any of the four criteria for eligibility. Furthermore, the residential building does not appear to be individually eligible for local designation, and is not historically significant as an individual resource. Therefore, as the residential building is not considered a historic resource for the purposes of CEQA, the Project would not cause a substantial adverse change in the significance of a historical resource.

## 5.0 CONCLUSION

As is evidenced by the discussions presented above, the Project qualifies as being exempt from CEQA under Class 32. Moreover, it has been determined that the Project is not barred from the application of a Categorical Exemption, pursuant to CEQA Guidelines Section 15300.2. Therefore, it has been determined that the Project would not have a significant effect on the environment, and a Categorical Exemption is the appropriate CEQA documentation.

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<sup>10</sup> California Department of Transportation, California State Scenic Highway System Map. Available at <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aa>. Accessed May 24, 2022.

<sup>11</sup> Department of Toxic Substance Control, Hazardous Waste and Substances Site List. Available at <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=9814+washington+boulevard%2C+culver+city>. Accessed May 24, 2022.



## **Appendix A**

Conceptual Site Plans

**SEE ATTACHMENT NO. 4 OF AUGUST 10, 2022  
PLANNING COMMISSION AGENDA REPORT  
TO VIEW CONCEPTUAL PLANS**

**Kimley»»Horn**