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memorandum

date October 16, 2018

to Sol Blumenfeld
Director of Community Development,
City of Culver City

cc Jim Suhr
Suhr and Associates

from Jay Ziff
ESA

subject Analysis of Minor Modification (e.g., Additional Hour of Permitted Construction-Related Dirt Hauling and Deliveries) to Culver Studios Innovation Plan - CPA No. 7

A. Purpose of This Technical Memorandum

The Project Applicant, Culver Studios, LLC, (the “Applicant”), has submitted a request to the City of Culver City (City) for a Minor Modification to the Culver Studios Innovation Plan – Comprehensive Plan Amendment No. 7 (CPA No. 7 which was approved by the City on January 8, 2018. The approval included: (1) certification of the associated EIR (SCH No. 2016111044, the “Certified EIR”); (2) approval of amendment to the existing Comprehensive Plan (CPA No. 6); (3) issuance of a Certificate of Appropriateness under the City’s Historic Preservation Ordinance; (4) approval of a Conveyance Agreement for discharge of public sewer waste through the Studio conveyance system; and (5) approval of a Development Agreement.

1. Proposed Minor Modification

The proposed minor modification involves extending the permitted hours of construction-related dirt hauling and deliveries by one additional hour during the morning peak traffic period from 8:00 AM to 9:00 AM on weekdays), compared to Condition #76 of the Conditions of Approval (COA) for the Project, where dirt hauling and construction materials deliveries or removal are prohibited from 7:00 AM to 9:00 AM. The Applicant is requesting the modification to expedite construction hauling and reduce the number of days of adverse traffic effect caused by haul and delivery truck traffic on adjacent streets and

intersections. Per information provided by Culver Studios, the additional hour of hauling and deliveries during the morning peak hour would reduce the overall earthwork activity by up to 12 days. This estimated time savings is somewhat conservative because it is based on a reduced earthwork quantity required per the most recent version of the Project. The changes associated with this proposed modification only apply to Condition #76 of the COA and the construction hauling characteristics of the Project; they would not affect other aspects of the Project as approved by the City and addressed in the Certified EIR.

2. Assessment of California Environmental Quality Act (CEQA) Implications

This technical memorandum has been prepared to document the change in dirt hauling and delivery hours pursuant to the proposed minor modification described above, and determine whether further CEQA analysis beyond that included in the Certified EIR is required.

Section 15162(a) of the CEQA Guidelines states:

“When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- 1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
- 2. Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
- 3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:*
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration,*
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR,*
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative, or*
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.”*

As demonstrated in the analysis below, no new or substantially more severe significant impacts would result with the modification, thus no subsequent EIR or other further CEQA documentation is required.

B. Environmental Analysis

In addition to construction traffic (which is addressed in a separate technical memorandum), the environmental topics evaluated in the Certified EIR that could potentially be affected by the proposed change in construction haul trip hours are focused on construction traffic-related air quality and noise. An analysis of the effects of these changes on these environmental topics is provided below.

1. Noise

a. Approved Project

Delivery and haul truck trips would occur throughout the construction period. Trucks traveling to and from the Project Site would be required to travel along the haul route approved by the City of Culver City for the Project. An estimated maximum of approximately 209 haul truck trips would occur per day. Haul truck traffic would take the most direct route to the appropriate freeway ramp. Haul trucks would enter and exit the Project Site from the Ince Boulevard gates along the eastern part of the property. The trucks would continue onto Washington Boulevard to Robertson Boulevard and then onto the Interstate 10 Freeway.

The Approved Project's truck trips would generate noise levels of approximately 64.2 dBA, L_{eq} at 25 feet distance from the center line of roadways along the construction haul route. As shown in Table 4.9-2 in the Certified EIR, the existing noise levels along the haul route are 64.6 dBA, L_{eq} along Ince Street and 68.9 dBA, along Washington Boulevard. Construction traffic noise levels generated by truck trips would increase traffic noise levels along Ince Street by 2.8 dBA and along Washington Boulevard by 1.3 dBA. As discussed above in Section 4.9.2 of the Certified EIR, a 3 dBA change in ambient noise levels is considered to be a barely perceivable difference. Therefore, the noise levels generated by truck trips would not substantially increase the existing noise levels in the surrounding environment. Construction truck trips would be required to comply with the City's allowable hours as described above and would be temporary in nature. Therefore, construction activities would comply with the City's noise standard and impacts would be less than significant.

b. Proposed Minor Modification

With the minor modification, the estimated maximum haul truck trips per day would increase from approximately 209 to 219 haul truck trips per day. This would represent an approximately 4.6 percent increase in the construction-related truck trips under the Approved Project. As such, this would result in a negligible increase in the noise levels identified for the Approved Project in the Certified of a 2.8 dBA increase along Ince Boulevard and a 1.3 dBA increase along Washington Boulevard. In particular, like the Approved Project, it would not result in traffic noise levels that exceed the City's threshold of a 5 dBA CNEL increase. In addition, the additional construction truck trips would occur within the City's allowable hours and would be temporary in nature. Therefore, construction traffic noise under the proposed minor modification would be less than significant and similar to the Approved Project.

2. Air Quality

a. Regional Construction Emissions

(1) Approved Project

In the Certified EIR, the Maximum daily construction emissions were estimated for each construction phase of the Approved Project. Some individual construction phases potentially overlap and the

maximum daily emissions take into account potential for overlapped emissions. The maximum daily emissions are predicted values for a representative worst-case day and do not represent the emissions that would occur for every day of construction. Results of the criteria pollutant calculations are presented in **Table 2, Maximum Unmitigated Regional Construction Emissions**. As shown therein, construction-related daily emissions for the criteria and precursor pollutants (VOC, NO_x, CO, SO₂, PM₁₀, and PM_{2.5}) would not exceed SCAQMD significance thresholds. These calculations include appropriate dust control measures required to be implemented during each phase of development, as required by SCAQMD Rule 403 (Control of Fugitive Dust). Therefore, with respect to regional emissions from construction activities, impacts would be less than significant.

TABLE 2
MAXIMUM UNMITIGATED REGIONAL CONSTRUCTION EMISSIONS (POUNDS PER DAY) ^a

Source	VOC	NO _x	CO	SO ₂	PM ₁₀ ^b	PM _{2.5} ^b
Demolition	3	44	90	<1	9	2
Site Preparation/Shoring Beams	<1	1	9	<1	<1	<1
Excavation/Tie Backs/Rakers	4	73	64	<1	6	2
Foundations/Drainage/Basement Slab						
Concrete Pour	1	5	44	<1	1	<1
Subterranean Parking Structure	1	8	25	<1	1	<1
Building Shell/core						
Van Buren Garage	4	44	93	<1	5	1
Building Shell/core						
Van Buren Garage	44	50	125	<1	7	2
Landscape						
Architectural Coating						
Maximum Daily Construction Emissions	44	73	125	<1	10	2
SCAQMD Significance Threshold	75	100	550	150	150	55
Over/(Under)	(31)	(27)	(425)	(150)	(140)	(53)
Exceeds Threshold?	No	No	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Combined rows account for overlapping emissions from the listed activities. Detailed emissions calculations are provided in Appendix C.

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

^c Analysis accounted for emissions from overlapping phases.

SOURCE: ESA PCR, August 2017

(2) Proposed Minor Modification

With the minor modification, estimated maximum haul truck trips per day would increase from a maximum of approximately 209 to 219 trips per day given the condensed construction schedule, which would have a negligible increase in maximum daily constructions emissions. As shown in Table 2, the construction-related daily emissions in the Certified EIR for criteria and precursor pollutants (VOC, NO_x, CO, SO₂, PM₁₀, and PM_{2.5}) would be substantially below SCAQMD significance thresholds. Therefore, the negligible emissions from the 10 additional haul trips per day with the minor modification would similarly not exceed SCAQMD significance thresholds. Therefore, with respect to regional emissions from construction activities, impacts would be less than significant and similar to the Approved Project.

b. Localized Construction Emissions

(1) Approved Project

The localized construction air quality analysis in the Certified EIR was conducted using the methodology described in the SCAQMD Localized Significance Threshold Methodology (June 2003, revised July 2008). The screening criteria provided in the methodology were used to determine localized construction emissions thresholds for the Approved Project. The maximum daily localized emissions for each of the construction phases and localized significance thresholds are presented in **Table 3, Maximum Unmitigated Localized Construction Emissions**. As shown therein, maximum localized construction emissions for sensitive receptors would not exceed the localized thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. Therefore, with respect to localized construction emissions, impacts would be less than significant.

TABLE 3
UNMITIGATED LOCALIZED CONSTRUCTION EMISSIONS ANALYSIS (POUNDS PER DAY) ^a

Source ^c	NO _x	CO	PM ₁₀ ^b	PM _{2.5} ^b
Demolition	6	75	4	1
Site Preparation/Shoring Beams	1	7	<1	<1
Excavation/Tie Backs/Rakers	5	44	<1	<1
Foundations/Drainage/Basement Slab				
Concrete Pour	3	42	<1	<1
Subterranean Parking Structure	5	20	<1	<1
Building Shell/core	38	75	<1	<1
Van Buren Garage				
Building Shell/core				
Van Buren Garage	43	101	<1	<1
Landscape				
Architectural Coating				
Maximum Daily Emissions	43	101	4	1
SCAQMD Significance Threshold	221	1531	13	6
Over/(Under)	(178)	(1430)	(9)	(5)
Exceeds Threshold?	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations. Combined rows account for overlapping emissions from the listed activities. Detailed emissions calculations are provided in Appendix C.

^b Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

^c Analysis accounted for emissions from overlapping phases.

SOURCE: ESA PCR, August 2017

(2) Proposed Minor Modification

With the proposed minor modification, the estimated maximum haul truck trips would increase from approximately 209 to 219 haul truck trips per day, which would have a negligible increase in the maximum daily localized constructions emissions. As shown in Table 3, maximum localized construction emissions for sensitive receptors under the Approved Project would not exceed the localized thresholds for NO_x, CO, PM₁₀, and PM_{2.5}, and the negligible emissions from the 10 additional haul trips per day would not increase emissions beyond these thresholds. Therefore, impacts would be less than significant and similar to the Approved Project.



DRAFT MEMORANDUM

Date: October 3rd, 2018

To: Barry Kurtz, Culver City

C.c.: Sol Blumenfeld, Culver City

Charles Herbertson, Culver City

From: Anjum Bawa, Fehr & Peers

Subject: Additional Hour of Hauling and Deliveries between 8:00 AM and 9:00 AM for Culver Studios CPA #7 Construction

Ref: LA15-2820

This memorandum summarizes an assessment of effects of one additional hour of hauling and deliveries during weekdays in the morning peak hour between 8:00 AM and 9:00 AM as part of overall construction activity of Culver Studios CPA#7 project. Per condition #76 of the Conditions of Approval (COA) provided in Exhibit A of the City's ordinance approving the proposed Culver Studios CPA#7, hours of construction for the project are limited to 8:00 AM to 8:00 PM Monday through Friday; 9:00 AM – 7:00 PM Saturday; and 10:00 AM to 7:00 PM Sunday and National holidays. Dirt hauling, and construction materials deliveries or removal are prohibited during the morning (7:00 AM to 9:00 AM) and afternoon (4:00 PM to 6:00 PM) peak traffic periods.

To expedite construction hauling and reduce the number of days of adverse traffic effect caused by haul and delivery truck traffic on adjacent streets and intersections, the applicant is requesting permission to conduct hauling and material deliveries or removal for one additional hour from 8:00 AM to 9:00 AM, Monday through Friday (all five weekdays). Per information provided by Culver Studios, the additional hour of hauling and deliveries during the morning peak hour would reduce the overall earthwork activity by up to 12 days. This estimated time savings is somewhat conservative because it is based on a reduced earthwork quantity required per the most recent version of the project.

To assess the incremental adverse effect of one additional hour of hauling and deliveries on a weekday between 8:00 AM and 9:00 AM, trip generation analysis, which includes the additional hour of hauling and deliveries was compared to project related trip generation and determined if the requested change in conditions of approval (#76) will result in construction related trips exceeding project related trips. This is consistent with the methodology and approach used in



Section 10 – Construction Impacts discussed in the original Traffic Study for The Culver Studios CPA No. 7 (November 2017).

Per the November 2017 traffic study, as shown in Table 1, peak day of construction activity would occur during Phase 2 when a total of 1,145 daily passenger car equivalent (PCE) trips are expected to be generated, of which 199 PCE trips are estimated to occur during the morning peak hour and 199 PCE trips during the evening peak hour. On this day, a total of 209 haul-truck round trips were estimated to occur over the course of a 6-hour day. A total of 21 round trips for deliveries were estimated during the same peak day.

Based on information provided by The Culver Studios and given the increased traffic activity on adjacent streets and intersections during the morning peak hour, no more than 10 haul-truck round trips are expected to occur during the morning peak hour (8:00 AM - 9:00 AM) requested by the applicant. Similarly, no more than two round trips for deliveries are expected during that same hour. Since most of the hauling activity is expected during the first two phases of construction when majority of the demolition and excavation will take place, additional haul trips were added to both Phases 1 and 2 and not to Phase 3. Delivery trips during the hour of 8:00 AM – 9:00 AM were added to all three phases. Table 2 shows trip generation estimates with the additional hour of hauling and deliveries. As shown in the table, peak day of construction activity would occur during Phase 2 when a total of 1,195 daily PCE trips are expected to be generated, of which 249 PCE trips are estimated to occur during the morning peak hour and 199 PCE trips during the evening peak hour. On this day, a total of 219 haul trucks round trips were estimated to occur over the course of a 7-hour day. A total of 23 round trips for deliveries were estimated during the same peak day.

Comparing it to the original estimates of peak construction period activity under Phase 2, adding one hour on a weekday morning between 8:00 AM and 9:00 AM would result in a net increase of 50 daily and morning peak hour PCE trips. No additional PCE trips are expected to occur in the evening peak hour. However, at any given time, the peak construction activity will continue to generate fewer daily and peak hour trips than are projected for the project once it is completed and occupied (4,562 daily trips, 491 AM peak hour trips, and 468 PM peak hour trips, as shown in Table 6B of the November 2017 traffic study). Additionally, forecasted Year 2021 intersection level of service (Year 2021 plus Culver Studios CPA #7) at Ince Boulevard and Washington Boulevard show that morning peak hour conditions operate at acceptable levels of service (LOS C) and have capacity to accommodate the additional haul truck traffic during the morning peak hour of 8:00 AM – 9:00 AM.



Both City of Culver City and LADOT generally considers construction-related traffic to cause adverse but not significant impacts because, while sometimes inconvenient, construction-related traffic effects are temporary. Also, both Culver City and LADOT require the implementation of construction traffic management plan to ensure that any construction-related effects are minimized to the greatest extent possible.

TABLE 1
CONSTRUCTION PERIOD TRIP GENERATION
(NOVEMBER 2017 TRAFFIC STUDY)

	Peak Day Activity Under Each Phase		
	Phase 1	Phase 2	Phase 3
<i>Construction Workers</i>	146	102	374
Passenger Car Equivalent (PCE) factor	1.0	1.0	1.0
<i>Haul Trucks</i>	128	209	1
Type of Trucks	14 CY	14 CY	14 CY
Passenger Car Equivalent (PCE) factor	2.0	2.0	2.0
<i>Delivery/Equipment Trucks</i>	1	21	37
Type of Truck	Semi-Trailer Truck	Semi-Trailer Truck	Semi-Trailer Truck
Passenger Car Equivalent (PCE) factor	2.5	2.5	2.5

Phase	Daily PCE Trips [1]	Morning Peak Hour PCE Trips			Evening Peak Hour PCE Trips		
		In	Out	Total	In	Out	Total
Phase 1							
Construction Worker Trips[2]	292	58	0	58	0	58	58
Haul Truck Trips [3]	512	43	43	86	43	43	86
Delivery/Equipment Truck Trips [3]	5	0	0	0	0	0	0
Phase 1 Total	809	101	43	144	43	101	144
Phase 2							
Construction Worker Trips[2]	204	41	0	41	0	41	41
Haul Truck Trips [3]	836	70	70	140	70	70	140
Delivery/Equipment Truck Trips [3]	105	9	9	18	9	9	18
Phase 2 Total	1,145	120	79	199	79	120	199
Phase 3							
Construction Worker Trips[2]	748	150	0	150	0	150	150
Haul Truck Trips [3]	4	0	0	0	0	0	0
Delivery/Equipment Truck Trips [3]	185	15	15	30	15	15	30
Phase 3 Total	937	165	15	180	15	165	180

PCE - Passenger car equivalent

Notes:

[1] - Daily trips were calculated by counting two trips, one inbound and one outbound trip for each vehicle

[2] - Up to 40% of the construction workers were assumed to arrive during the morning peak hour of adjacent street traffic. A total of up to 40% worker were assumed to depart during the evening peak hour.

[3] - Daily haul and delivery/equipment truck trips were assumed to occur evenly throughout an 6-hour construction day. Therefore, the daily truck trips were divided by 6 hours to calculate morning and evening peak hour truck trips.

TABLE 2
CONSTRUCTION PERIOD TRIP GENERATION
WITH ADDITIONAL HOUR (8:00 AM - 9:00 AM) OF HAULING AND DELIVERIES ON WEEKDAYS

	Peak Day Activity Under Each Phase		
	Phase 1	Phase 2	Phase 3
<i>Construction Workers</i>	146	102	374
Passenger Car Equivalent (PCE) factor	1.0	1.0	1.0
<i>Haul Trucks</i>	128	209	1
<i>Additional hour Requested (8:00 AM- 9:00 AM)</i>	10	10	0
Type of Trucks	14 CY	14 CY	14 CY
Passenger Car Equivalent (PCE) factor	2.0	2.0	2.0
<i>Delivery/Equipment Trucks</i>	1	21	37
<i>Additional hour Requested (8:00 AM- 9:00 AM)</i>	2	2	2
Type of Truck	Semi-Trailer Truck	Semi-Trailer Truck	Semi-Trailer Truck
Passenger Car Equivalent (PCE) factor	2.5	2.5	2.5

Phase	Daily PCE Trips [1]	Morning Peak Hour PCE Trips [4]			Evening Peak Hour PCE Trips		
		In	Out	Total	In	Out	Total
Phase 1							
Construction Worker Trips[2]	292	58	0	58	0	58	58
Haul Truck Trips [3]	552	63	63	126	43	43	86
Delivery/Equipment Truck Trips [3]	15	5	5	10	0	0	0
Phase 1 Total	859	126	68	194	43	101	144
Phase 2							
Construction Worker Trips[2]	204	41	0	41	0	41	41
Haul Truck Trips [3]	876	90	90	180	70	70	140
Delivery/Equipment Truck Trips [3]	115	14	14	28	9	9	18
Phase 2 Total	1,195	145	104	249	79	120	199
Phase 3							
Construction Worker Trips[2]	748	150	0	150	0	150	150
Haul Truck Trips [3]	4	0	0	0	0	0	0
Delivery/Equipment Truck Trips [3]	195	20	20	40	15	15	30
Phase 3 Total	947	170	20	190	15	165	180

PCE - Passenger car equivalent

Notes:

[1] - Daily trips were calculated by counting two trips, one inbound and one outbound trip for each vehicle

[2] - Up to 40% of the construction workers were assumed to arrive during the morning peak hour of adjacent street traffic. A total of up to 40% worker were assumed to depart during the evening peak hour.

[3] - Daily haul and delivery/equipment truck trips were assumed to occur evenly throughout an 6-hour construction day. Therefore, the daily truck trips were divided by 6 hours to calculate morning and evening peak hour truck trips.

[4] - An additional hour (8:00 AM - 9:00 AM) of hauling (10 round trips) was assumed under Phases 1 and 2. Deliveries (2 round trips) were assumed during the same hour under all three phases.

