10200 JEFFERSON BOULEVARD

Class 32 Categorical Exemption Findings

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CATEGORICAL EXEMPTION

10200 JEFFERSON BOULEVARD

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PROJECT DESCRIPTION

Existing Conditions

The 1.82-acre (79,133-square-foot) Project Site is located at 10150-10200 Jefferson Boulevard in the City of Culver City (City). The Assessor Parcel Number (APN) for the Project Site is 4296-001-002. The Project Site is bounded by Jefferson Boulevard on the northwest, a commercial building and surface building to the northeast, vacant land to the southeast, and residential development to the south. The greater Project Site area is developed with a mix of commercial, residential, and civic uses. Regional access to the Project Site is provided by Interstate 10 located approximately 1.25 miles to the north and Interstate 405 located approximately 1.5 miles to the west. The Project Site is zoned Mixed Use Corridor 2 (MU-2). The General Plan land use designation for the Project Site is also Mixed Use Corridor 2. The Project Site is currently developed with a one-story, 42,333-square-foot warehouse building and surface parking with approximately 76 spaces located on the northeast, southeast, and southwest sides of the building. Vehicle access to the Project Site is provided via a driveway located at the northwestern corner of the site and a driveway located at the southwestern corner of the site.

Project Characteristics

The Project includes adaptive reuse of the existing building and surface parking on the Project Site for limited vehicle services including accessories installation, car washes, and maintenance/repair that are listed as permitted and conditionally-permitted uses in the MU-2 zone in accordance with the Culver City Municipal Code (CCMC) Section 12.220.015, Table 2-6. The Project would employ approximately 40 people.

The Project includes limited interior and exterior improvements, including the following:

- Exterior/interior painting
- Installation of additional/new exterior/interior lighting
- Installation of exterior/interior signage
- Installation of exterior architectural paneling
- Installation of window glazing
- Removal and replacement of non-load-bearing interior walls to create service and office spaces

- Installation of 39 automotive hoists, divided roughly one half for electric vehicle (EV) servicing and one half for internal combustion engine (ICE) service needs. ICE service areas would be equipped with an air filtration/exhaust venting system that complies with Southern California Air Quality Management District's (AQMD) requirements.
- Restriping of parking spaces and drive aisles to include a total of 67 parking spaces, including 7 electric vehicle (EV) charging stations, 7 EV-ready parking spaces, and 14 EV-capable parking spaces.
- Installation of security gates at the two existing driveways

The building would be fully sprinklered in accordance with the 2022 edition of National Fire Protection Association (NFPA) 13, the nationally recognized standard for the installation of sprinkler systems. The Project would not include any other physical changes, demolitions, additions, or expansions to the existing building or site. No gasoline or diesel fueling would occur on the Project Site. Approximately one EV battery would be stored at a time. The battery would be stored uncharged and within a closed cabinet. All service activities would occur within the building and would not occur outside or within parking areas. All proposed uses would occur within the interior of the building between the hours of 7:00 AM and 6:00 PM, Monday through Friday and 8:00 AM to 4:00 PM on Saturday: closed on Sunday.

The Project would implement a safety plan, designed in coordination with the Culver City Fire Department (CCFD). The plan would include standard operating procedures related to fire prevention, preparedness, and response related thermal events associated with internal combustion engines vehicles and EVs. Procedures include training on proper storage and handling of fuels and flammable materials, battery safety, use of electrical equipment, shop cleanliness, use of fire extinguishers, emergency response procedures, etc.

Discretionary and Ministerial Approvals

To allow for the implementation of the Project, the Applicant is seeking approval of the following from the City:

- Conditional Use Permit, P2025-0174-CUP-CE, subject to the Conditions of Approval as stated in the proposed Resolution No. 2025-P011;
- Continuation of the uses and all conditions of Temporary Use Permit, P2025-0141-TUP, until the Applicant is issued final building permits; and
- Building permits and any other permits required by the City or other agencies for development of the Project.

CATEGORICAL EXEMPTION – CLASS 32

Title 14 of the California Code of Regulations, Chapter 3 (Guidelines for Implementation of the California Environmental Quality Act [CEQA]), Article 19 (Categorical Exemptions), Section 15300 (Categorical Exemptions) includes a list of classes of projects that have been determined not to have a significant effect on the environment, and which shall, therefore, be exempt from the provisions of CEQA.

For the reasons discussed in this document, the Project is categorically exempt from the requirement for the preparation of environmental documents under Class 32 in Section 15332, Article 19, Chapter 3, Title 14 of the California Code of Regulations. Class 32 is intended to promote infill development within urbanized areas. The class consists of environmentally benign in-fill projects that are consistent with local general plan and zoning requirements. Class 32 is not intended to be applied to projects that would result in any significant traffic, noise, air quality, or water quality effects. Application of this exemption, as all categorical exemptions, is limited by certain exceptions identified in Section 15300.2 of the CEQA Guidelines.

15332. In-Fill Development Projects.

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

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

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

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

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

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

15300.2. Exceptions

(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located -- a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where

designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

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

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

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

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

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

Discussion of Section 15332(a)

The Project would be consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

As stated previously, the Project Site is zoned MU-2 with a land use designation of Mixed Use Corridor 2 in the City's General Plan 2045. As demonstrated below, the Project's proposed use is allowed under the existing zoning and land use designation for the Project Site and complies with all applicable provisions of Title 17 (Zoning Code) of the CCMC.

Zoning Code Compliance

Chapter 17.220 – Mixed Use Zoning Districts

Vehicle service, including maintenance and repair use, is a conditionally-permitted use within the MU-2 Zoning District. The Project would be consistent with the development standards of the MU-2 Zoning District, as illustrated in Table 1.

Table 1
Zoning Consistency

	MU-2 Development Standards[a]	Existing Building[b]
Maximum non-residential FAR	3.0:1.0	0.5295:1.0
Maximum Height	56 feet	26 feet
Minimum Setbacks		
Street Facing (Jefferson Blvd.)	0 feet (maximum 5 feet)	0 feet
Side (north)	0 feet	33 feet
Side (south)	0 feet	36 feet
Rear (east)	10 feet	45 feet
Automobile Parking[c]	no minimum	76 spaces[b]
Minimum Bicycle Parking[d]		
Short-Term	minimum of 2 spaces	2 spaces
Long-Term	1 space/10,000 sf (minimum of 2 spaces)	0 spaces[b]

FAR = floor area ratio sf = square feet

[a] *CCMC Section 17.220.020*
[b] *With the exception of restriping the parking area that would result in 67 parking spaces and four new long-term bicycle spaces in addition to the 2 existing short-term bicycle spaces, the Project would not alter any of the zoning-related development components of the existing building or site.*
[c] *CCMC Section 17.320.045.*
[d] *CCMC Section 17.320.020*

Chapter 17.300 – General Property Development Standards

Access

CMC Section 17.300.015 (Access) requires that every structure be constructed upon, or moved to, a legally recorded parcel with a permanent means of access to a public street, in compliance with City standards; and that all structures be properly located to ensure safe and convenient access for servicing, fire protection, and parking. The Project involves the adaptive reuse of an existing warehouse building for use as an automotive service center. The building is located along Jefferson Boulevard, on a legally recorded parcel. The Project Site is accessed by two driveways, one at the northwesterly corner of the Project Site to be used for egress and one at the southwesterly corner of the Project Site to be used for ingress.

This section also requires that the Project provide a minimum of one pedestrian walkway of no less than four feet in width, from each adjoining street frontage connecting said street with either the main building entrance or common pedestrian corridor. Pedestrian access to the building would continue to be provided from the existing sidewalk (approximately five feet wide) along Jefferson Boulevard.

Fences, Hedges, and Walls

The Project Site currently maintains walls along the southern, eastern, and northern property lines. The CCMC permits fences and walls of up to eight feet in height when abutting a residential zone, and up to nine feet when abutting a non-residential zone. The existing walls are a maximum of six feet in height, compliant with development standards. The Project includes installation of 8-foot-tall gates at both of the site driveways. The Project would not change the height of any other existing walls/fencing at the Project Site.

Screening

The Project Site is adjacent to residential uses to the south and is subject to screening and separation requirements and standards for equipment, utilities, refuse, service, loading, and outdoor storage areas. As required, the Project Site has an existing a six-foot-tall solid masonry wall with existing plantings along the southern property line, where the Project Site adjoins a residential zoning district that would be retained and maintained by the Project. The Project also proposes to maintain the site's existing utilities including the electric vault, electrical room, water line, Knox box, and fire hydrant, improving enclosures or access to these areas as needed. The existing trash enclosures at the rear corners of the building would be retained with improvements provided in the form of finishing materials to match the building and a new access gate.

Outdoor Lighting

Existing exterior lighting would be retrofitted with new, compliant fixtures meeting today's standards for efficiency and performance.

Chapter 17.310 – Landscaping

SSMC Section 17.310.020 requires that all front and street side setback areas not occupied by driveways, parking areas, walkways, building projections and approved hardscape areas, be landscaped. The Project would maintain the Project Site's existing landscaped planter along Jefferson Boulevard with the existing drought tolerant plantings. The Project would not change the amount of landscaping provided on the site.

Chapter 17.320 – Parking

There is no minimum parking requirement for the site or the proposed vehicle service center use. The Project proposes to re-stripe the existing surface parking area to provide a total of 67 vehicle spaces, including 7 EV charging stations, 7 EV-ready parking spaces, and 14 EV-capable parking spaces.

Chapter 17.400 – Standards for Specific Land Uses

Section 17.400.125 – Vehicle Repair Shop

The Project involves the adaptive reuse of an existing warehouse building for use as an automotive service center. Section 17.400.125 of the CCMC provides the location, development,

and operational standards listed below (provided in underline text); the Project would comply with such standards as described.

A. Operational Standards. All vehicle repair shops shall comply with the following operational standards.

1. All work shall be performed within a fully enclosed structure.

All Project operational activities would occur inside the building.

2. All structures shall be sufficiently soundproofed to prevent a disturbance or a nuisance to the surrounding properties, in compliance with Chapter 9.07 (Noise Regulations) of the CCMC.

The building would comply with CCMC Chapter 9.07 (Noise Regulations).

3. Dismantling of vehicles for purposes other than repair is prohibited.

The Project would operate as an automotive service center for vehicle repair. No dismantling of vehicles would occur.

4. Vehicle parking or loading and unloading shall only occur on site and not in adjoining public streets or alleys.

All employee and customer parking would occur on the Project Site within the existing paved parking area. Car carrier loading/unloading would occur in a loading zone on Jefferson Boulevard in front of the building.

5. Vehicles shall not be stored at the site for purposes of sale (unless the use is also approved as a vehicle sales lot).

Vehicle sales would not occur as part of the Project, nor would vehicles be stored at the Project Site for purposes of sale.

6. Damaged or wrecked vehicles shall not be stored for purposes other than repair.

The Project would operate as an automotive service center for vehicle repair and would not store vehicles for other purposes.

7. Location and display of accessories, batteries, and tires for sale shall be on or within three feet of the main structure's exterior.

All sales display associated with the automotive services would occur on the property, within the building, or within three feet of the building, not including storage of an uncharged EV battery that would occur within a secure storage cabinet.

8. No vehicle rental activities shall be conducted on the vehicle repair shop (unless the use is also approved as a vehicle rental lot).

The Project would not include vehicle rentals.

9. All outdoor/open storage of materials shall be limited to a maximum area of 150 square feet and shall be enclosed by a 6-foot-high, solid decorative masonry wall, subject to the approval of the Director.

Approximately one EV battery would be stored at a time. The battery would be stored uncharged and within a closed cabinet. No other outdoor storage would occur.

B. Development Standards. All vehicle repair shops shall comply with the following development standards:

1. All exterior light sources, including canopy, flood, and perimeter shall be energy efficient, stationary, and shielded or recessed, to ensure that all light, including glare or reflections, is directed away from adjoining properties and public rights-of-way, in compliance with § 17.300.040 (Outdoor Lighting).

Existing exterior lighting would be retrofitted with new, compliant fixtures meeting today's standards for efficiency and performance.

2. All body-damaged or wrecked vehicles awaiting repair shall be effectively screened so as not to be visible from surrounding properties of the same elevation, as determined by the Director.

The Project does not propose to store damaged vehicles within view of surrounding properties.

C. Site Maintenance. All vehicle fueling stations shall comply with the following maintenance standards.

The Project does not include fueling stations.

1. Used or discarded automotive parts or equipment shall not be located outside of the main structure, unless located within an approved outdoor storage area.

Parts and equipment would be stored inside of the service building, with the exception of the storage of one uncharged battery, which would be stored in a closed cabinet.

2. A refuse storage area, completely enclosed with a masonry wall not less than five feet high, with a solid gated opening, and large enough to accommodate standard-sized commercial trash bins, shall be located to be accessible to refuse collection vehicles.

The existing trash enclosures at the rear corners of the building would be retained with improvements provided in the form of finishing materials to match the building and a new access gate. The trash enclosures are located within the paved parking area, accessible to collection vehicles.

3. Driveways and service areas shall be maintained and kept free of oil, grease, and other petroleum products, in addition to litter. These areas shall be periodically cleaned with equipment that dissolves spilled oil, grease, and other petroleum products without washing them into the drainage, gutter, and sewer system.

As part of Project operations, all driveways and service areas would be maintained and periodically cleaned to ensure they are free of all petroleum products and litter, according to City and regulatory standards.

General Plan Consistency

The *Culver City General Plan 2045* (2045 General Plan) guides land use throughout the City. The 2045 General Plan sets forth objectives, policies, and programs to guide day-to-day land use policies and to meet the existing and future needs and desires of the community, while integrating the eight State-mandated elements including Land Use, Circulation, Housing, Conservation, Open Space, Noise, Safety, and Environmental Justice.

The 2045 General Plan designates the Project Site for Mixed Use Corridor 2 land uses that includes moderate-scale mixed use, residential, and neighborhood-serving commercial uses. The Mixed Use Corridor 2 designation corresponds with the MU-2 zone.

Table 2 presents the applicable land use policies from the Land Use and Noise Elements of the 2045 General Plan and a discussion of the Project's consistency with these policies. As shown, the Project would be consistent with the applicable goals and policies.

Table 2
Project Consistency with the 2045 General Plan

Policy	Discussion
Land Use Element[a]	
Policy LU-9.1: Complete neighborhoods. Promote new commercial uses and revitalize existing commercial areas in locations that provide convenient access to a range of goods and services for Culver City's residential neighborhoods.	**Consistent:** The Project includes adaptive reuse of an existing warehouse building as an automotive service center, providing auto services to the neighborhood and surrounding areas.
Policy LU-9.2: Neighborhood-serving commercial location. Encourage existing strip commercial corridors like Washington Boulevard, Sepulveda Boulevard, and Jefferson Boulevard to intensify with standalone uses, concentrating neighborhood-serving commercial uses into mixed use activity centers.	**Consistent:** The Project includes adaptive reuse of an existing warehouse building on Jefferson Boulevard for use as an automotive service center, providing neighborhood-serving auto services.
Policy LU-9.4: Active frontages. Require the first floor street frontage of buildings, including parking structures, to incorporate commercial or other active public uses to enhance pedestrian orientation along commercial and mixed use corridors.	**Consistent:** The Project includes the customer and employee entrances from the pedestrian right-of-way on Jefferson Boulevard, creating an active street frontage along the mixed-use corridor.

Table 2
Project Consistency with the 2045 General Plan

Policy	Discussion
Policy LU-9.5: Pedestrian and bicycle access to the corridor. Require new project applications to foster pedestrian and bicycle access by providing safe, accessible pedestrian connections and creating secure and convenient bike storage.	**Consistent:** The Project includes the customer and employee entrances from the pedestrian right-of-way on Jefferson Boulevard and would provide a minimum of two short-term and four long-term bicycle spaces, which would be provided at the existing bicycle rack at the rear of the building.
GOAL LU-15: Architecture and site design. High level of quality in architecture and site design in all renovation and construction of buildings.	**Consistent:** The Project includes adaptive reuse of an existing warehouse building. The footprint of the building and its massing and the configuration of the overall site would be maintained. Improvements to the building exterior include painting, window glazing, and installation of architectural panels and signage. These improvements would upgrade the appearance of the building.
Policy LU-15.1: Walkable and inviting buildings and spaces. Require building design that creates walkable and inviting spaces, such as locating parking behind buildings, allowing for outdoor plazas and dining, and locating building frontages in close proximity to the sidewalk edge, where appropriate.	**Consistent:** The Project would maintain the existing building's entrances, which are located at the sidewalk edge on Jefferson Boulevard. Vehicular parking would continue to be provided on the sides of and behind the existing building.
Policy LU-15.2: Active street frontages. Require active street frontages, including the following: • Locating uses that engage the street on the ground floor; • Creating comfortable transitions between the ground floor of a building and the street; • Using taller floor to floor heights, greater articulation, and finer details at ground floors; • Creating enhanced entrances; and • Encouraging ground-floor residential units with stoops, dooryards, or similar features on major corridors outside core business areas.	**Consistent:** The Project would maintain the existing building's entrances, which are located at the sidewalk edge on Jefferson Boulevard, continuing to create an active street frontage along the mixed-use corridor.
Policy LU-15.3: Architectural and visual interest in new development. Encourage distinctive architecture and elements that add visual interest to buildings to enhance people's perceptions of Culver City as an interesting and inviting place.	**Consistent:** The Project includes adaptive reuse of an existing warehouse building. The footprint of the building and its massing and the configuration of the overall site would be maintained. Improvements to the building exterior include painting, window glazing, and installation of architectural panels and signage. These

Table 2
Project Consistency with the 2045 General Plan

Policy	Discussion
	improvements would upgrade the appearance of the building.
Policy N-2.1: Noise compatibility. In the land use planning process, consider noise compatibility with existing and proposed land uses, along with the anticipated increase in development needed to accommodate growth.	**Consistent**: As discussed later in this document, the noise generated by the Project and how nearby sensitive land uses could be affected have been considered. As noted, the Project would not result in a noticeable increase in ambient noise levels at the location of the sensitive receptors, and no significant noise impacts would occur as a result of the Project.
Policy N-2.2: Land Use and Noise Compatibility Matrix. Use the Land Use and Noise Compatibility Matrix to assess the compatibility of proposed land uses with the noise environment.	**Consistent**: As discussed later in this document, the Project would not result in a noticeable increase in ambient noise levels and would be compatible with the City's Noise Compatibility Matrix.
Policy N-2.3: Noise analysis and implementation methods. As appropriate, require a noise analysis and implementation of methods to minimize noise for land uses that are not "clearly compatible" as indicated by the Land Use and Noise Compatibility Matrix.	**Consistent**: As discussed later in this document, the Project would not result in a noticeable increase in ambient noise levels and would be compatible with the City's Noise Compatibility Matrix.
Policy N-3.1: Roadway noise. Minimize noise impacts to noise-sensitive land uses from vehicles traveling on major and minor arterial roadways within the city.	**Consistent**: As discussed later in this document, Project traffic would not result in a noticeable increase in noise levels on the roadways traveled by Project traffic.
[a] *Culver City General Plan 2045, approved August 26, 2024.*	

Discussion of Section 15332(b)

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

The 1.82-acre Project Site is located within City limits and is currently developed with a warehouse building and surface parking. The Project Site is bounded by Jefferson Boulevard on the northwest, a commercial building and surface building to the northeast, vacant land to the southeast, and residential development to the south. The greater Project Site area is developed with a mix of commercial, residential, and civic uses. Therefore, the Project is within City limits on a site of no more than five acres that is substantially surrounded by urban uses.

Discussion of Section 15332(c)

The Project Site has no value as habitat for endangered, rare, or threatened species.

The Project Site is located within City limits and is currently developed with a warehouse building and surface parking. The Project Site is located in an urbanized area of the City and is bounded by Jefferson Boulevard on the northwest, a commercial building and surface building to the

northeast, vacant land to the southeast, and residential development to the south. With the exception of ornamental landscaping, the Project Site does not contain any vegetation that would support special-status species, wetlands, or riparian habitat. Additionally, the Project Site is not located within the boundaries of a Significant Ecological Area as mapped by the County of Los Angeles.[1] Thus, the Project Site has no value as habitat for endangered, rare, or threatened species.

Discussion of Section 15332(d)

Approval of the Project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

TRAFFIC

The information and analysis provided below is primarily based on the following sources (refer to Appendix A):

- *Memorandum of Understanding for Transportation Study, City of Culver City.*

Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

The Project would not conflict with any adopted program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The Project involves the adaptive reuse of the existing building and continuation of surface parking on the site for limited vehicle services, including accessories installation, car washes, and maintenance/repair activities. These uses are permitted and conditionally permitted in the Mixed-Use (MU-2) Zone pursuant to CCMC Section 17.220.015, Table 2-6, which identifies such activities as consistent with the intended mix of employment and service-oriented commercial uses along the City's mixed-use corridors.

As discussed below, because the Project would generate fewer than 250 daily traffic trips, a detailed VMT analysis is not required for the Project, and the Project would not result in any significant VMT impacts. No roadway modifications or new driveways are proposed as part of the Project. The Project would not alter or obstruct access to existing transit stops, bicycle lanes, or pedestrian pathways adjacent to the site. All on-site improvements would comply with applicable City design standards, including accessibility and driveway visibility requirements.

For all the reasons above, no significant Project impacts related to this issue would occur.

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[1] *County of Los Angeles, https://egis-lacounty.hub.arcgis.com/datasets/lacounty::significant-ecological-area-sea/explore?location=34.015834%2C-118.390213%2C13.29, accessed November 28, 2025.*

Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

With the adoption of Senate Bill 743 (SB 743) in 2013, the primary methodology for evaluating the potential environmental impacts of proposed development projects in California was changed from level of service (LOS), which measured a project's potential traffic-related impacts based on roadway capacity, vehicle traffic flow, and travel delay, to vehicle miles traveled (VMT), which identifies the impact of the number of miles driven as it relates to achieving the State's goals of reducing greenhouse gas (GHG) emissions, promoting infill and mixed-use developments, and providing sustainable multi-modal transportation networks that encourage and support the use of public transit, bicycling, walking, etc. to reduce the dependence on single-occupant vehicles.

Based on the City's Transportation Study Criteria and Guidelines, projects that generate fewer than 250 day or 25 peak-hour trips are cleared from having to conduct a VMT impact analysis, and a less-than significant transportation impact is presumed. As shown in Table 1 on page 10 of the *Methodologies and Assumptions for 10150 Jefferson Vehicle Service Center Transportation Impact Analysis* included in Appendix A, the Project is estimated to generate approximately 159 net new daily traffic trips. Thus, because the Project would generate fewer than 250 daily traffic trips, the Project would not have a significant VMT impact, and no additional analysis is required.

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)?

The Project would not substantially increase hazards due to a geometric design feature or incompatible use. The Project involves the adaptive reuse of an existing building and continuation of surface parking for limited vehicle service operations, including accessory installation, car washes, and vehicle maintenance/repair. No roadway realignment, new driveways, or geometric modifications to public streets are proposed. Vehicle access to and from the site would continue to occur via the existing driveway(s), which meet City design standards for width, turning radius, and visibility in accordance with City standards.

On-site Project operations would not involve oversized vehicles or unusual equipment not typically associated with warehouse uses that could pose incompatibility or create geometric safety concerns. Any internal circulation or striping improvements would comply with applicable City standards and Americans with Disabilities Act (ADA) requirements to ensure safe vehicular and pedestrian movement on-site. Loading and unloading of cars for repair would occur within the designated loading/unloading zone in front of the building on Jefferson Boulevard and would not require any physical roadway changes.

For all the reasons above, no significant Project impacts related to this issue would occur.

Would the Project result in inadequate emergency access?

The Project would not result in inadequate emergency access. The Project involves adaptive reuse of an existing commercial building and continued use of the existing surface parking area for limited vehicle service activities, including accessory installation, car wash, and vehicle maintenance/repair. No changes to the surrounding roadway network or existing driveway

configuration are proposed. Access to the site would continue to be provided via the existing driveways that meet the City's width, turning radius, and visibility requirements, ensuring that fire and emergency vehicles can enter and exit the site safely. All on-site circulation would comply with applicable City standards, including maintaining adequate fire lanes, clear signage, and unobstructed drive aisles. Car carrier trucks would access a loading zone on Jefferson Boulevard in front of the building approximately once per week to transfer cars for repair. Use of the loading zone would not impede traffic or emergency access. The Project does not include modifications to adjacent streets or alleys that would restrict emergency vehicle movement or access to neighboring properties. Accordingly, the Project would not impair or otherwise adversely affect emergency response or evacuation

For all the reasons above, no significant Project impacts related to this issue would occur.

NOISE

The analysis below is based on the following document prepared by DKA Planning (refer to Appendix B):

- *Technical Noise Report, DKA Planning, November 2025.*

Regulatory Setting

The applicable regulatory setting relevant to noise and vibration is summarized below. These regulations establish the framework for evaluating potential noise impacts associated with the Project and include applicable federal, state, and local standards governing environmental noise levels. For a detailed presentation and comprehensive discussion of the applicable regulatory setting, the reader is referred to the *Technical Noise Report* prepared for the Project, included in Appendix B of this document.

City of Culver City Municipal Code

The City regulates noise to protect the health, safety, and general welfare of its residents and businesses by controlling excessive and unnecessary sound levels generated by various sources, including new development. Noise regulations applicable to development projects are codified in Chapter 9.07 (Noise Control) of the Culver City Municipal Code (CCMC).

Under the CCMC (Section 9.07.035), construction activities are recognized as temporary but potentially significant sources of noise. Pursuant to CCMC Section 9.07.035, construction and demolition activities are exempt from standard noise limits provided that such work occurs only during permitted hours, typically 8:00 A.M. to 7:00 P.M. on weekdays and 10:00 A.M. to 7:00 P.M. on weekends and holidays**.**

Once operational, new development must comply with Section 9.04.015.H (Noise Disturbances) of the CCMC that defines public nuisances and discusses mechanical noise and construction noise near residences. This includes noise generated by building mechanical systems (e.g., HVAC units, compressors, exhaust fans), loading dock activities, and other on-site equipment or operations. The City may condition project approvals to ensure compliance with the code, such

as requiring acoustical analyses**,** sound enclosures, or noise attenuation barriers where necessary. Operational compliance is verified through the City's Code Enforcement Division**,** which may investigate complaints and require corrective measures if excessive noise levels are documented. For certain uses like auto service facilities, entertainment venues, or mixed-use residential/commercial projects, the City may impose site-specific conditions during the entitlement process to address noise compatibility. These conditions typically ensure that operational noise remains below applicable thresholds at adjacent property lines and does not result in a significant increase in ambient noise levels within the community.

Existing Conditions

Noise-Sensitive Receptors

Noise-sensitive receptors in the vicinity of the Project Site include the following:

- Residences, 4804 Salem Village Court; 75 feet southwest of the Project Site.
- Residences, Jackson Avenue; 780 feet west of the Project Site.
- West Los Angeles College; 1,100 feet southeast of the Project Site.

Existing Ambient Noise Conditions

In September 2025, DKA Planning took short-term noise measurements near the Project Site to establish the ambient noise conditions.[2] The measured noise levels are presented in Table 3.

Thresholds of Significance

Construction Noise Threshold

For purposes of this analysis, the on-site construction noise impact would be considered significant if:

- Construction activities would exceed the ambient noise level by 5 dBA (hourly L_{eq}) at a noise-sensitive use between the hours of 8:00 A.M. and 7:00 P.M. Monday through Friday, before 10:00 A.M. or after 7:00 P.M. on Saturday.
- Construction activities would occur outside hours permitted by CCMC Section 9.07.035 (i.e., 8:00 A.M. to 7:00 P.M. on weekdays and 10:00 A.M. to 7:00 P.M. on weekends).

[2] *Noise measurements were taken using a Quest Technologies Sound Examiner SE-400 Meter. The Sound Examiner meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground.*

Table 3
Measured Noise Level

Noise Measurement Locations	Primary Noise Source	Sound Levels		Nearest Sensitive Receptor(s)	Noise/Land Use Compatibility[b, c]
		dBA (L_{eq})	dBA (CNEL)[a]		
4804 Salem Village Ct.	Traffic on Jefferson Blvd.	67.9	65.9	Residences – 4804 Salem Village Ct.	Normally Acceptable/ Clearly Compatible
Jackson Ave. cul-de-sac	General traffic	51.8	49.8	Residences – Jackson Ave.	Normally Acceptable/ Clearly Compatible
West Los Angeles College	General traffic	52.2	50.2	West Los Angeles College	Normally Acceptable/ Clearly Compatible

[a] *Estimated based on short-term (15-minute) noise measurement using Federal Transit Administration procedures from the 2018 Transit Noise and Vibration Impact Assessment Manual, Appendix E, Option 4.*

[b] *Pursuant to California Office of Planning and Research "General Plan Guidelines, Noise Element Guidelines, 2017. When noise measurements apply to two or more land use categories, the more noise-sensitive land use category is used. See Table 2 in the Technical Noise Study in Appendix B for the definitions of compatibility designations.*

[c] *Pursuant to Culver City General Plan 2045 Noise Element, Table 11*

Source: DKA Planning, 2025.

Operational Noise Thresholds

In addition to applicable City standards and guidelines that would regulate or otherwise moderate the Project's operational noise impacts, the following criteria are adopted to assess the impact of the Project's operational noise sources:

- Project operations would cause ambient noise levels at off-site locations to increase by 3 dBA CNEL or more to or within "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, as defined by the State's 2017 General Plan Guidelines.

- Project operations would cause any 5 dBA CNEL or greater noise increase.[3]

[3] *As a 3 dBA increase represents a slightly noticeable change in noise level, this threshold considers any increase in ambient noise levels to or within a land use's "normally unacceptable" or "clearly*

Project Impacts

Would the Project generate 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?

Construction Activities

On-Site Construction Activities

Building and site improvements would generate noise during the construction process that would span approximately four months as shown in Table 4. Noise-generating activities could occur at the Project Site between 8:00 A.M. and 7:00 P.M. Monday through Friday, in accordance with CCMC Section 9.07.035. On Saturdays, noise-generating activities associated with the improvements would be permitted to occur between 10:00 A.M. and 7:00 P.M.

Table 4
Construction Schedule Assumptions

Phase	Duration	Notes
Building Construction	Months 1-4	Interior improvements, cabinetry and carpentry, low voltage systems, trash management.
Architectural Coatings	Months 1-4	Application of interior and exterior coatings and sealants.
Source: DKA Planning, 2025.		

The scope of the improvements would include minor work on the exterior of the building, including installation of window glazing, new architectural paneling, exterior signage, and painting of exterior facades. The bulk of work would involve interior improvements, including replacement of non-load-bearing interior walls and installation of 39 automotive hoists. Smaller equipment such as forklifts, generators, and various powered hand tools and pneumatic equipment would be utilized. Off-site secondary noises would be generated by construction worker vehicles, vendor deliveries, and haul trucks. Figure 1 illustrates how noise would propagate from the construction site during these phases.

unacceptable" noise/land use compatibility categories to be significant so long as the noise level increase can be considered barely perceptible. In instances where the noise level increase would not necessarily result in "normally unacceptable" or "clearly unacceptable" noise/land use compatibility, a 5 dBA increase is still considered to be significant. Increases less than 3 dBA are unlikely to result in noticeably louder ambient noise conditions and would therefore be considered less than significant.

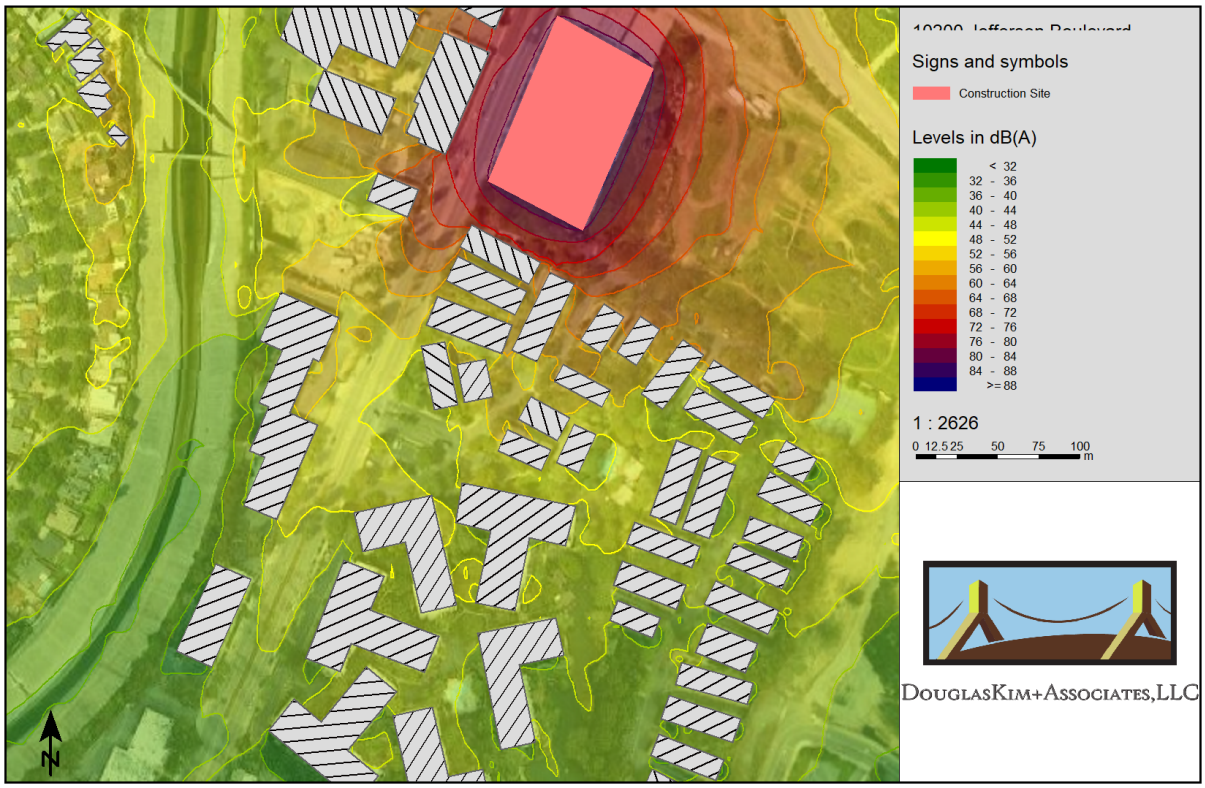


Figure 1
Construction Noise Sound Contours

As shown in Table 5, when considering ambient noise levels, the use of multiple pieces of powered equipment simultaneously would increase ambient noise negligibly. These construction noise levels would not exceed the City's significance threshold of 5 dBA. Therefore, the Project's on-site construction noise impact would not be significant.

Table 5
Estimated Construction Noise Levels at Off-Site Sensitive Receptors

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Significant Impact?
1. Residences – 4804 Salem Village Ct.	66.7	67.9	70.4	2.5	No
2. Residences – Jackson Ave.	52.0	51.8	54.9	3.1	No
3. West Los Angeles College	40.3	52.2	52.5	0.3	No
Source: DKA Planning, 2025.					

Off-Site Construction Activities

The Project would generate noise at off-site locations from the Project Site with vendor trips and worker commute trips. These activities would generate up to an estimated 11 peak-hour passenger car equivalent (PCE) trips, as summarized in Table 6.[4] Jefferson Boulevard is a major arterial that currently carries several thousand vehicles per hour during typical daytime conditions. Traffic noise is logarithmic, and a doubling of traffic volumes is required to produce an approximate 3 dBA increase, which is the minimum change generally considered clearly perceptible to the average listener. An incremental increase of only 11 peak-hour PCE trips on a roadway with existing volumes in the thousands would correspond to a noise increase of well less than 1 dBA, which is below the threshold of human perception. Because Project-related construction traffic would not substantially increase hourly traffic volumes, the resulting change in traffic noise levels along Jefferson Boulevard would be negligible and would not be audible to nearby receptors compared to existing conditions. In addition, construction traffic would occur during daytime hours only and would be temporary over the construction period. Thus, construction-related traffic associated with the project would not result in a substantial, permanent, or perceptible increase in traffic noise levels. Therefore, the Project's noise impacts from construction-related traffic would not be significant.

Table 6
Peak-Hour PCE Construction Vehicle Trips

Construction Phase	Worker Trips[a]	Vendor Trips	Haul Trips	Total Trips
Building Construction	7	4[b]	0	11
Architectural Coating	1	0	0	1

PCE = passenger car equivalent, a variable used to estimate noise generated by medium or larger trucks

[a] *Assumes all worker trips occur in the peak hour of construction activity.*
[b] *This phase would generate about 7.1 vendor truck trips daily over a seven-hour workday. Assumes a blend of medium- and heavy-duty vehicle types and a 13.1 PCE.*

Source: DKA Planning, 2025

Operational Activities

On-Site Operational Noise

During long-term operations, the Project would produce noise from on-site sources such as mechanical equipment associated with the structures themselves or from activity in outdoor spaces.

[4] *This is a conservative, worst-case scenario, as it assumes all workers travel to the worksite at the same time and that vendor and haul trips are made in the same early hour, using the same route as haul trucks to travel to and from the Project Site.*

Mechanical Equipment

The Project would utilize the same mechanical equipment that serves the existing warehouse facility, including building ventilation. In addition, the auto service center would utilize 39 automotive hoists to service vehicles. Each lift would have a 208-230V motor that would drive a hydraulic pump with pressurized fluid that emits a low frequency 60Hz hum.[5] Secondary noise can also be generated as vibration from the motor is transmitted to the structure of the lift. The collective sound power of such systems can range from 75 to 95 dBA based on the size of the motor. However, the motors and pumps for these lifts are mounted directly each lift inside the service garage. As such, mechanical noise from these operations would be largely contained in the garage. The interior of the garage would be ventilated using portable fans powered by electricity. Thus, mechanical noise from all these operations would be contained in the garage. Any transmission of noise outside the facility would be oriented toward the three open bays on the north façade and three on the east façade, where there are no sensitive receptors with a line-of-sight to the sound paths.

A self-contained vehicle car wash system would be located inside the garage that would generate noise mechanical and fluid-related sources. This would include the operation of high-pressure pumps, water spray nozzles, air blowers or dryers, and vehicle movement within the bay. In general, sound levels range from approximately 70 to 85 dBA measured at a distance of 5 to 10 feet from the equipment. The high-pressure pump and water jets are usually the dominant sources, generating intermittent peaks near 85 dBA during wash and rinse cycles. Air dryers or blowers can produce similar levels, sometimes exceeding 90 dBA at close proximity if high-velocity air is used for drying. Inside a garage, these sounds may be amplified by hard, reflective surfaces, resulting in elevated reverberant sound levels compared to outdoor or open-bay installations. Again, any transmission of noise outside the facility would be oriented toward the three open bays on the north façade and three on the east façade, where there are no sensitive receptors with a line-of-sight to the sound paths.

The only source of mechanical operational noise outside the facility would be the operation of one or more roof-mounted air filtration systems would generate noise from both the fan motor and the movement of air through ducts and filters. This would typically produce continuous broadband noise characterized by low- to mid-frequency components associated with airflow turbulence and motor operation. Based on representative sound power levels for rooftop ventilation units (approximately 90 to 95 dBA), sound would attenuate substantially at the nearest residences 75 feet or more from these systems. While each would result in a noise level of 55-60 dBA for each unit, concurrent operation of two units would increase noise by 3 dBA, resulting in a total noise level of approximately 58 to 63 dBA at the property line of the nearest sensitive receptor. Given the ambient noise levels of residences on Salem Village Court (i.e., 67.9 dBA near Jefferson Boulevard), operational noise from the air filtration systems would blend with the existing noise environment and would not result in a substantial increase in ambient noise levels at nearby residential uses.

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[5] *LA Parking Lifts, Products Specification Sheets for PL201 model, https://laparkinglifts.com/specifications/.*

Other sources of noise on the building would include the use of roll-up doors, which would generate brief noise events in the morning when they are raised and the late afternoon when they are lowered. The insulated rolling steel doors would be 30′-4″ wide by 28′-4″ high and operated with a chain hoist mechanism, powered by an electric motor. Each event would generate a short, intermittent mechanical noise during opening/closing from the slat stack, guides/rollers, and hoist chain. While reference noise levels are not generally published, using standard free-field acoustics to estimate likely conditions, a typical point-source operational level of about 70–85 dBA at one meter during brief lift/lower peaks (representative of metal-on-metal mechanical activity) would result in a sound power of 81–96 dBA. That yields estimated instantaneous sound pressure of roughly 46–61 dBA at 50 feet for a single door while it is moving. Because each cycle usually lasts well under a minute, the contribution to hourly L_{eq} would be minor, and exposure at sensitive receptors would be negligible, as the doors would be located on the north and east facades, facing away from residences to the south and west of the Project Site.

Outdoor Uses

While most operations would be conducted inside the development, outdoor activities could generate noise that could impact local sensitive receptors. This would include trash collection, landscape maintenance, and commercial loading. These are discussed below:

- Trash collection. On-site trash and recyclable materials would be managed from the waste collection area at the rear of the Project Site. Haul trucks would access solid waste from Jefferson Boulevard, where solid waste activities would include use of trash compactors and hydraulics associated with the refuse trucks themselves. Noise levels of approximately 71 dBA L_{eq} and 66 dBA L_{eq} could be generated by collection trucks and trash compactors, respectively, at 50 feet of distance.[6] Because these activities would be comparable to those associated with the existing warehouse facility, there would not be a substantial increase in intermittent noise from these activities.

- Landscape maintenance. Noise from gas-powered leaf blowers, lawnmowers, and other landscape equipment can generated substantial bursts of noise during regular maintenance. For example, two gas powered leaf blowers with two-stroke engines and a hose vacuum can generate an average of 85.5 dBA L_{eq} and cause nuisance or potential noise impacts for nearby receptors.[7] Because these activities would be comparable to those associated with the existing warehouse facility, there would not be a substantial increase in intermittent noise from these activities.

- Commercial loading. On-site loading and unloading activities would be managed in the rear of the Project Site. Intermittent use of this area for deliveries would involve minor noise from truck-related maneuvering (e.g., idling, air brakes, back-up alarms, hydraulic lift gates) that generate brief noise. Handling of cargo and goods can involve hydraulically-powered equipment or use of rolling carts. Because these activities

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[6] *RK Engineering Group, Inc. Wal-Mart/Sam's Club reference noise level, 2003.*

[7] *Erica Walker et al, Harvard School of Public Health; Characteristics of Lawn and Garden Equipment Sound; 2017. This equipment generated a range of 74.0-88.5 dBA Leq at 50 feet.*

would be comparable to those associated with the existing warehouse facility, there would not be a substantial increase in intermittent noise from these activities.

- Carrier truck deliveries. In addition, while most cars repaired at the facility would be brought to the Project Site from customers, carrier trucks would transport vehicles to the facility on average of one trip per week. These trucks would access a loading zone on Jefferson Boulevard in front of the facility between 9:00 A.M.-4:00 P.M.[8] During these intermittent operations, noise sources would include diesel engines during approach, idling, and positioning; short bursts from air-brake releases; tonal backup alarms during reversing maneuvers; and mechanical impacts from deployment and retraction of steel loading ramps. Additional noise would occur as vehicles are started and moved from the carrier onto the street.

  Noise from a single vehicle carrier unloading operation would be intermittent and short in duration, generally lasting 10 to 15 minutes. Noise levels from truck loading operations would be approximately 70 dBA L_{eq} at 50 feet for idling, 85 dBA L_{max} for backup alarms and ramp clanks, and up to 90 dBA L_{max} for short air-brake releases.[9] When averaged over a one-hour period, these activities would generate approximately 71.5 dBA at 50 feet, or 68 dBA L_{eq} at 75 feet. The loudest instantaneous events, such as air-brake releases or ramp clanks, could reach 81 to 86 dBA L_{max} at 75 feet, but would occur for only a few seconds.

  The ambient noise levels along Jefferson Boulevard at the Project Site is approximately 67.9 dBA L_{eq}, reflecting a daytime sound environment dominated by traffic activity on the four-lane arterial that often exceeds the 40-mph posted speed limit. Combining the project-related unloading noise with the existing ambient noise results in an overall noise level of approximately 70 dBA L_{eq} at over 75 feet for a single carrier unloading within an hour, representing a less than 3-dBA increase above the existing ambient level at the nearest residences on Salem Village Court. Residences further from Jefferson Boulevard would be exposed to lower noise levels given the attenuation of sound from the increased distance in addition to the building shielding some of the direct line-of-sight.

  Backup alarms. During vehicle delivery and maneuvering operations, truck reverse warning beepers would be activated as carriers or service vehicles back into or reposition within the loading zone on Jefferson Boulevard. For safety reasons, these alarms would be audible above ambient noise levels by at least 5 to 10 dBA,[10] with models ranging from 87-112 dBA at five feet of distance.[11] While the location of the "beep" associated with backup alarms may vary on Jefferson Boulevard, noise from

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[8] *Carrier trucks are allowed by the City to conduct deliveries from 8:00 AM – 5:00 PM, Monday-Friday. However, the Applicant intends to limit the delivery hours to 9:00 AM – 4:00 PM, Monday-Friday.*

[9] *U.S. Department of Transportation, Federal Highway Administration (FHWA). 2017. *Highway Construction Noise Handbook* (FHWA-HEP-06-015).*

[10] *Occupational Safety and Health Administration (OSHA). 29 CFR §1926.601(b)(4): Motor Vehicle Audible Alarm Requirements.*

[11] *Society of Automotive Engineers (SAE). 2008. SAE J994: Back-Up Alarm Standard – Performance Requirements.*

reverse alarms would attenuate by about 25 dBA at the nearest sensitive receptors 75 feet away. This would result in instantaneous noise levels (L_{max}) of 61 to 86 dBA, depending on the alarm type, at these receptors.

While these "beeps" would be audible against background noise, these backup alarms are brief and intermittent. As such, their contribution to the hourly L_{eq} levels would be small. Assuming a baseline ambient level of 67.9 dBA L_{eq}, the hourly noise level would remain within 68 to 71 dBA L_{eq} for standard industrial alarms used less than one minute per hour. This would elevate existing noise levels by about 3 dBA L_{eq}. More importantly, the temporary noise from any backup alarms would not elevate 24-hour CNEL levels by 5 dBA or more, the threshold of significance for such operational noise impacts.

As discussed above, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The Project would also not increase surrounding noise levels by more than 5 dBA CNEL, the minimum threshold of significance based on the noise/land use category of sensitive receptors near the Project Site. As a result, the Project's on-site operational noise impacts would not be significant.

Off-Site Operational Noise

Operational traffic generated by the Project would not result in a noticeable increase in roadway noise levels along Jefferson Boulevard or the surrounding street network. At full operation, the Project is estimated to generate approximately 159 net new daily vehicle trips, including 63 A.M. peak-hour trips and 59 P.M. peak-hour trips. These incremental volumes represent a very small increase when compared to existing and forecast 2026 traffic volumes on Jefferson Boulevard and adjacent arterial roadways, which carry several thousand vehicles per hour during peak periods. Traffic noise is logarithmic, and a doubling of traffic volumes is required to produce an approximate 3 dBA increase, which is the minimum change generally considered clearly perceptible to the average listener. The Project's addition of approximately 59 to 63 peak-hour trips would represent only a minor fraction of existing and future traffic volumes on Jefferson Boulevard When applied to noise modeling principles, this small increase would result in an incremental traffic noise change of well less than 1 dBA, which is not audible to the human ear and far below any threshold used to identify significant noise impacts under CEQA. Moreover, operational trips would be dispersed across the local roadway network, further reducing the potential for concentrated noise increases at any one location. Because the Project would not generate sufficient traffic to double existing or future roadway volumes, the associated change in traffic noise levels would be negligible. Therefore, the Project's traffic noise impact would not be significant.

For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use

airport, would the Project expose people residing or working in the project area to excessive noise levels?

The Project Site is located about 3.3 miles east of the Santa Monica Airport and 4.1 miles north of Los Angeles International Airport. The 2045 General Plan Noise Element notes that "Culver City is not within the aircraft noise exposure area or 65 dBA CNEL noise contour of Santa Monica Airport or within the Airport Land Use Plan area." Because the Project would not be located within the vicinity of a private airstrip or within two miles of a public airport, the Project would not expose local workers or residents in the area to excessive noise levels. This would be considered a less than significant impact.

Would the Project generate excessive groundborne vibration or groundborne noise levels?

Construction

Building Damage Vibration Impact – On-Site Sources

Construction equipment can produce groundborne vibration based on equipment and methods employed. While this spreads through the ground and diminishes in strength with distance, buildings on nearby soil can be affected. This ranges from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibration at moderate levels, and slight damage at the highest levels. Table 7 summarizes vibratory levels for common construction equipment.

Table 7
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV at 25 feet (in/sec)
Pile Driver (impact)	0.644
Pile Drive (sonic)	0.170
Clam shovel drop (slurry wall)	0.202
Hydromill (slurry wall)	0.008
Vibratory Roller	0.210
Hoe Ram	0.089
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Truck	0.076
Jackhammer	0.035
Small Bulldozer	0.003
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.	

Because the Project would not involve demolition of major structures or excavation and grading, the Project would generate a minor amount of groundborne vibration, likely associated with trenching to lay down electric vehicle conduits in the parking lot, as well as possible shoring to cut garage door openings on the north and east facades. As shown in Table 8, vibration velocities of up to 0.007 inches per second PPV are projected to occur at the closest receptor. This level is well below the 0.2 in/sec PPV threshold of significance for Category III structures. Other potential construction activities would produce less vibration and have lesser potential impacts on nearby

receptors. As a result, construction-related structural vibration impacts would not be considered significant.

Table 8
Building Damage Vibration Levels – On-Site Sources

Off-Site Receptor Location	Distance to Project Site (feet)	Vibration Velocity Levels at Off-Site Sensitive Receptors from Construction Equipment (in/sec PPV)					Significance Criterion (PPV)	Significant Impact?
		Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Level (25 Feet)	N/A	0.089	0.089	0.076	0.035	0.003	--	--
Residences – Salem Village Court	75	NA	NA	NA	0.007	0.001	0.20[a]	No

[a] *FTA criterion for Category III (non-engineered timber and masonry buildings)*

Source: DKA Planning, 2025.

Building Damage Vibration Impact – Off-Site Sources

Construction of the Project would generate trips from vendor delivery trucks and worker commutes. As noted earlier, the FTA considers that groundborne vibration from light-duty vehicles and any larger vehicles using rubber tires is negligible. Therefore, the Project's potential to damage roadside buildings and structures as the result of groundborne vibration generated by its construction-related vehicles would not be significant.

Operation

During operation of the auto service center, there would be no significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. Operational groundborne vibration in the Project Site's vicinity would be generated by its related vehicle travel on local roadways. However as previously discussed, road vehicles rarely create vibration levels perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. As a result, the Project's long-term vibration impacts would not be significant.

AIR QUALITY

The analysis below is based on the following source (refer to Appendix C):

- *Air Quality Technical Report, DKA Planning, October 2025.*

A detailed discussion of the applicable regulatory setting is included in this document.

Sensitive Receptors

Sensitive receptors near the Project Site include but are not limited to the following:

- Residences, 4804 Salem Village Court; 75 feet southwest of the Project Site
- Residences, Jackson Avenue; 780 feet west of the Project Site
- West Los Angeles College; 1,100 feet southeast of the Project Site

Existing Project Site Emissions

Daily operational emissions associated with the existing warehouse on the Project Site are shown in Table 9.

Table 9
Existing Daily Operational Emissions

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	1.3	<0.1	1.9	<0.1	<0.1	<0.1
Energy Sources	<0.1	0.2	0.2	<0.1	<0.1	<0.1
Mobile Sources	0.3	0.2	2.2	<0.1	0.4	0.1
Regional Total	1.6	0.4	4.2	<0.1	0.5	0.1

Source: DKA Planning, 2025. Refer to Appendix C.

Thresholds of Significance

The analysis below utilizes factors and considerations recommended by the City of Culver City and the South Coast Air Quality Management District (SCAQMD) thresholds, as appropriate.

Air Quality Management Plan Consistency

In accordance with the SCAQMD's *CEQA Air Quality Handbook*, the following criteria are used to evaluate a project's consistency with the Air Quality Management Plan (AQMP)[12]:

- Will the Project result in any of the following:

[12] *South Coast Air Quality Management District, CEQA Air Quality Handbook, April 1993, p. 12-3.*

- An increase in the frequency or severity of existing air quality violations;
- Cause or contribute to new air quality violations; or
- Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP?

- Will the Project exceed the assumptions utilized in preparing the AQMP?

  - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
  - Does the Project include air quality mitigation measures; or
  - To what extent is Project development consistent with the AQMP land use policies?

The Project's impacts with respect to these criteria are discussed to assess the consistency with the SCAQMD's AQMP and Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). In addition, the Project's consistency with the City of Culver City General Plan Air Quality Element is discussed.

Construction Emissions

The City recommends that determination of significance be made on a case-by-case basis, considering the following criteria to evaluate construction-related air emissions:

Combustion Emissions from Construction Equipment

- Type, number of pieces and usage for each type of construction equipment;
- Estimated fuel usage and type of fuel (diesel, natural gas) for each type of equipment; and
- Emission factors for each type of equipment.

Fugitive Dust—Grading, Excavation and Hauling

- Amount of soil to be disturbed on-site or moved off-site;
- Emission factors for disturbed soil;
- Duration of grading, excavation and hauling activities;
- Type and number of pieces of equipment to be used; and
- Projected haul route.

Fugitive Dust—Heavy-Duty Equipment Travel on Unpaved Road

- Length and type of road;
- Type, number of pieces, weight and usage of equipment; and
- Type of soil.

Other Mobile Source Emissions

- Number and average length of construction worker trips to Project Site, per day; and
- Duration of construction activities.

In addition, the following criteria set forth in the SCAQMD's *CEQA Air Quality Handbook* serve as quantitative air quality standards to be used to evaluate project impacts. Under these thresholds, a significant threshold would occur when[13]:

- Regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 100 pounds per day for nitrogen oxide (NO_X); (2) 75 pounds a day for volatile organic compounds (VOC); (3) 150 pounds per day for particulate matter 10 microns (PM_{10}) or sulfur oxide (SO_X); (4) 55 pounds per day for particulate matter 2.5 microns ($PM_{2.5}$); and (5) 550 pounds per day for carbon monoxide (CO).

- Maximum on-site daily localized emissions exceed the local significance threshold (LST), resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 parts per million [ppm] [23,000 microgram/meter squared {$\mu g/m^3$}] over a 1-hour period or 9.0 ppm [10,350 $\mu g/m^3$] averaged over an 8-hour period) and NO_2 (0.18 ppm [339 $\mu g/m^3$] over a 1-hour period, 0.1 ppm [188 $\mu g/m^3$] over a three-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm [57 $\mu g/m^3$] averaged over an annual period).

- Maximum on-site localized PM_{10} or $PM_{2.5}$ emissions during construction exceed the applicable LSTs, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed the incremental 24-hour threshold of 10.4 $\mu g/m^3$ or 1.0 $\mu g/m^3$ PM_{10} averaged over an annual period.

Operational Emissions

The City bases the determination of significance of operational air quality impacts on criteria set forth in the SCAQMD's *CEQA Air Quality Handbook.*[14] Accordingly, the following serve as quantitative air quality standards to be used to evaluate project impacts. Under these thresholds, a significant impact would occur when:

- Operational emissions exceed 10 tons per year of volatile organic gases or any of the following SCAQMD prescribed threshold levels: (1) 55 pounds a day for VOC;[15] (2) 55 pounds per day for NO_X; (3) 550 pounds per day for CO; (4) 150 pounds per day for SO_X; (5) 150 pounds per day for PM_{10}; and (6) 55 pounds per day for $PM_{2.5}$.[16]

- Maximum on-site daily localized emissions exceed the LST, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 parts per million (ppm) over a 1-hour period or 9.0 ppm

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[13] *South Coast Air Quality Management District, Air Quality Significance Thresholds, revised March 2015.*

[14] *South Coast Air Quality Management District, Air Quality Significance Thresholds, revised March 2015.*

[15] *For purposes of this analysis, emissions of VOC and reactive organic compounds (ROG) are used interchangeably since ROG represents approximately 99.9 percent of VOC emissions.*

[16] *South Coast Air Quality Management District, Quality Significance Thresholds, www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf, last updated March 2015.*

averaged over an 8-hour period) and NO_2 (0.18 ppm over a 1-hour period, 0.1 ppm over a 3-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm averaged over an annual period).[17]

- Maximum on-site localized operational PM_{10} and $PM_{2.5}$ emissions exceed the incremental 24-hour threshold of 2.5 µg/m^3 or 1.0 µg/m^3 PM_{10} averaged over an annual period.[18]

- The Project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 ppm, respectively; or

- The Project creates an odor nuisance pursuant to SCAQMD Rule 402.

Toxic Air Contaminants

The City recommends that the determination of significance shall be made on a case-by-case basis, considering the following criteria to evaluate toxic air contaminants (TACs):

- Would the project use, store, or process carcinogenic or non-carcinogenic toxic air contaminants which could result in airborne emissions?

In assessing impacts related to TACs below, the criteria identified above is used where applicable and relevant. In addition, the following criteria set forth in the SCAQMD's *CEQA Air Quality Handbook* serve as quantitative air quality standards to be used to evaluate project impacts. Under these thresholds, a significant impact would occur when[19]:

- The Project results in the exposure of sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0.[20] For projects with a maximum incremental cancer risk between 1 in one million and 10 in one million, a project would result in a significant impact if the cancer burden exceeds 0.5 excess cancer cases.

Project Design Features. The Project would comply with CalGreen (Title 24, Part 11) mandatory green-building measures (water efficiency, indoor air quality/ventilation minimums, construction waste management, plumbing fixtures, and more). California's Code cycles mean substantive changes landed with the 2025 cycle — notably new embodied-carbon/whole-building low-carbon requirements, and a strengthening of energy and electrification expectations in the 2025 Energy Code (Title 24, Part 6).

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[17] *South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, revised July 2008.*

[18] *South Coast Air Quality Management District, Final—Methodology to Calculate Particulate Matter (PM) 2.5 and $PM_{2.5}$ Significance Thresholds, October 2006.*

[19] *South Coast Air Quality Management District, CEQA Air Quality Handbook, April 1993, Chapter 6 (Determining the Air Quality Significance of a Project) and Chapter 10 (Assessing Toxic Air Pollutants).*

[20] *Hazard index is the ratio of a toxic air contaminant's concentration divided by its Reference Concentration, or safe exposure level. If the hazard index exceeds one, people are exposed to levels of TACs that may pose noncancer health risks.*

The Project would also comply with the Culver City's Green Building Program (originally adopted in 2009) and later Reach Code amendments that add local requirements on top of state Title 24 rules. The city's reach-code approach explicitly adds requirements beyond State energy code (for example, electrification, EV readiness, and prescriptive water and waste measures). The Building Safety Division administers and enforces these local standards. These requirements would include:

- Electrification and gas appliance restrictions or electric-ready requirements for new buildings and substantial remodels (Culver City adopted electrification reach-code measures in phases).
- EV charging and EV-ready requirements for new residential and commercial parking (reach codes often require higher baseline charger counts or conduit/rough-in).
- Water-use reduction and landscaping standards, including irrigation efficiency and low-flow fixtures.
- Construction waste reduction and diversion requirements above state minimums.
- Light pollution and dark-sky controls and bike parking / shower facilities for active-transportation encouragement.

Size-triggered certification: Culver City's municipal code typically requires large projects (e.g., new construction or major renovations ≥ 50,000 square feet) to meet an established set of green measures and submit LEED documentation for some projects. Expect higher scrutiny and additional submittal items for projects that meet local size thresholds.

Project Impacts

Would the Project conflict with or obstruct implementation of the applicable air quality plan?

The Project's air quality emissions would not exceed any state or federal standards. Therefore, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any State and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2020-2045 RTP/SCS regarding population, housing, and growth trends.[21] Determining whether a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project

[21] *While SCAG adopted the 2024-2050 RTP/SCS on April 4, 2024, the region's applicable air quality plan is the 2022 AQMP, which is based on the growth assumptions of the 2020-2045 RTP/SCS. Once the 2022 AQMP is updated with these growth forecasts, consistency with the projections in the applicable air quality plan for the region will be based on the 2024-2050 RTP/SCS.*

mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these three criteria.

- *Is the project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?*

A project is consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2022 AQMP, two sources of data form the basis for the projections of air pollutant emissions: the City of Culver City General Plan and SCAG's 2020-2045 RTP/SCS. The General Plan serves as a comprehensive, long-term plan for future development of the City.

The 202-2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. The 2020-2045 RTP/SCS accommodates a total of 41,700 persons; 20,400 households; and 56,100 jobs in the City of Culver City by 2045.

On April 4, 2024, SCAG adopted the 2024-2050 RTP/SCS, which was certified by CARB on May 7, 2025. The 2024-2050 RPT/SCS accommodates 47,800 persons; 22,200 households; and 66,700 jobs in the City of Culver City by 2050. Once the 2022 AQMP is updated with these growth forecasts, consistency with the projections in the applicable air quality plan for the region will be based on the 2024-2050 RTP/SCS.

The City provided local growth forecasts that were incorporated into the regional projections. The Project Site is classified as "Mixed Use Corridor 2" in the General Plan and zoned MU-2 (Mixed Use Corridor 2), which permits the adaptive reuse of the existing building for limited vehicle services. As such, the RTP/SCS' assumptions about growth in the City accommodate the projected population and housing on the Project Site. As a result, the Project would be consistent with the growth assumptions in the City's General Plan. Because the AQMP accommodates growth forecasts from local General Plans, the emissions associated with this Project are accounted for and mitigated in the region's air quality attainment plans. The air quality impacts of development on the Project Site are accommodated in the region's emissions inventory for the 2020-2045 RTP/SCS and 2022 AQMP

The adaptive reuse of the building would generally not alter the job-serving capacity of the Project Site, as it would remain in commercial use. Thus, the Project's estimated employment impact would be consistent with the local job growth assumptions that formed the basis of the region's AQMP. As a result, the Project would be consistent with the growth projections in the AQMP.

- *Does the project implement feasible air quality mitigation measures?*

As discussed below, the Project would not result in any significant air quality impacts and therefore, would not require mitigation. In addition, the Project would comply with all applicable regulatory standards as required by SCAQMD. Furthermore, with compliance with the regulatory requirements identified above, no significant air quality impacts would occur. As such, the Project meets this AQMP consistency criterion.

- *To what extent is project development consistent with the land use policies set forth in the AQMP?*

With regard to land use developments, the AQMP's air quality policies focus on the reduction of vehicle trips and VMT. The Project would implement a number of land use policies of the City of Culver City, SCAQMD, and SCAG, as it would be designed and constructed to support and promote environmental sustainability. The Project represents an infill development within an urbanized area that would comply with green building principles to comply with the City of Culver City Green Building Code and CALGreen through energy conservation, water conservation, and waste reduction features.

The air quality plan applicable to the Project area is the 2022 AQMP, the current management plan for progression toward compliance with State and federal clean air requirements. The Project would be required to comply with all regulatory measures set forth by the SCAQMD. Implementation of the Project would not interfere with air pollution control measures listed in the 2022 AQMP. As noted earlier, the Project is consistent with the land use policies of the City that were reflected in the regional growth projections for the AQMP. As demonstrated in the following analysis, the Project would not result in significant emissions that would jeopardize regional or localized air quality standards.

City of Culver City Policies

The Project would be consistent with the existing land use pattern in the vicinity that concentrates urban density along major arterials and near transit options and would help reduce air quality emissions. Bus stops 450 feet to the north provide access to Culver City Bus Line 4, which provides north-south local bus service from the Mid-City area of Los Angeles to Marina Del Rey via Jefferson Boulevard near the Project Site. The Ballona Creek Bike Path is a Class I bike path that provides north-south grade-separated infrastructure for bicyclists that access the Project Site.

The City's 2045 General Plan identifies numerous policies with strategies for advancing the City's clean air goals. As illustrated in Table 10, the Project is consistent with the applicable policies, as the Project would implement sustainability features that would reduce air quality emissions.

Table 10
Project Consistency with City of Culver City 2045 General Plan

Policy	Project Consistency
Policy CH-P1.3: New development or expansions must demonstrate that emissions of hazardous air pollutants, criteria pollutants, or odors will not significantly increase burdens in nearby neighborhoods.	**Consistent.** The Project would replace a warehouse facility and would not generate pollutant emissions in excess of applicable thresholds near disadvantaged communities.
Policy CH-P1.5: Require mitigation where pollutant emissions from stationary sources may cause adverse health effects, particularly in sensitive receptor areas.	**Consistent.** The Project would not generate pollutant emissions in excess of applicable thresholds near disadvantaged communities, and no mitigation measures are required.
Policy LU-P4.3: Limit or prohibit automotive repair near sensitive zones unless mitigation and screening are provided.	**Consistent.** The Project's air quality impacts would not exceed the SCAQMD's thresholds of significance for regional or localized emissions.
Policy LU-P4.5: Use buffers, landscaping, and design to reduce impacts between industrial and residential uses.	**Consistent.** A six-foot masonry wall along the south property line and the significant rear yard landscaping on the adjacent residences would provide a buffer between the residences on Salem Village Lane. Further, the entrance and exit to the auto facility would face the rear of the Project Site, away from direct line of sight to the nearby residences
Source: DKA Planning, 2025.	

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?

Project Construction Emissions

The Project's construction emissions were estimated and compared against thresholds of significance established by SCAQMD, shown in Table 11. As indicated in the table, the Project would not generate construction-related pollutant emissions in excess of the significance thresholds. Therefore, the Project's construction-related impacts on air quality would be less than significant.

Table 11
Daily Construction Emissions

Construction Phase Year	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2025	5.9	10.2	12.3	<0.1	0.6	0.4
2026	5.8	9.8	12.1	<0.1	0.6	0.4
Maximum Regional Total	5.9	10.2	12.3	<0.1	0.6	1.6
Regional Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum Localized Total	5.8	9.8	11.1	<0.1	0.3	0.3
Localized Threshold	N/A	103	562	N/A	4	3
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels. Assumes implementation of SCAQMD Rule 403 (Fugitive Dust Emissions).

Emissions were calculated using CalEEMod 2022.1.1.30 model runs. LST analyses based on one-acre site with 25-meter distances to receptors in Northwest Coastal LA County source receptor area. Estimates reflect the peak summer or winter season, whichever is higher. Totals may not add up due to rounding. Modeling sheets included in Appendix C.

Source: DKA Planning, 2025

Operational Emissions

The Project's operational emissions were estimated and compared against thresholds of significance established by SCAQMD, shown in Table 12. As indicated in the table, the Project would not generate operational-related pollutant emissions in excess of the significance thresholds. Therefore, the Project's construction-related impacts on air quality would be less than significant.

Table 12
Daily Operational Emissions

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area Sources	1.3	<0.1	1.9	<0.1	<0.1	<0.1
Energy Sources	<0.1	0.4	0.3	<0.1	<0.1	<0.1
Mobile Sources	0.5	0.4	5.0	<0.1	1.1	0.3
Regional Total	1.9	0.9	7.3	<0.1	1.2	0.3
(Less Existing Total)	*(1.6)*	*(0.4)*	*(4.2)*	*(<0.1)*	*(0.5)*	*(0.1)*
Net Regional Total	***2.0***	***2.0***	***2.0***	***<0.1***	***1.0***	***1.0***
Regional Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Net Localized Total	***<0.1***	***0.2***	***0.1***	***<0.1***	***<0.1***	***<0.1***
Localized Significance Threshold	**N/A**	**103**	**562**	**N/A**	**2**	**1**
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

LST analysis based on one-acre site with 25-meter distances to receptors in Northeast Coastal LA County SRA.

Emissions were calculated using CalEEMod 2022.1.1.29 model runs (included in Appendix C). Totals reflect the summer season maximum and may not add up due to rounding.

Source: DKA Planning, 2025

WATER QUALITY

The Project includes adaptive reuse of an existing warehouse building. The Project would not alter any of the ground surfaces at the Project Site, would not alter drainage at the site, and would not include any surface discharge of water to the storm drain. Thus, the Project would not result in any impacts to water quality.

Discussion of Section 15332(e)

As discussed below, the Project can be adequately served by all required public services and utilities.

PUBLIC SERVICES

Fire Protection

Fire Prevention and emergency medical services in the City are provided by CCFD. Services include paramedic advanced life support, fire suppression, and community risk reduction and education programs. The following fire stations are within 2.5 miles of the Project Site:

- Fire Station 1, located at 9600 Culver Boulevard, approximately 1.1 miles northwest of the Project Site

- Fire Station 2, located at 11252 Washington Boulevard, approximately 2.2 miles southwest of the Project Site

- Fire Station 3, located at 6030 Bristol Parkway, approximately 2.0 miles southwest of the Project Site

The Project includes adaptive reuse of the existing warehouse building at the Project Site for limited vehicle services including accessories installation, car washes, and maintenance/repair. Importantly, the Project does not involve the construction of a new building or the introduction of an entirely new land use. Because the existing warehouse building has historically been occupied by active uses, the Project would not represent a net increase in land use activity on the site. Rather, the Project would continue the utilization of the existing structure at a comparable intensity. As such, the Project would not generate a net increase in the need for emergency response or fire suppression resources. Accordingly, the Project would not create a net increase in the need for fire protection services beyond what has historically been provided to the site. Furthermore, the Project would be required to comply with applicable provisions of the City's Municipal Code, including requirements for fire access, fire flow, and installation of any necessary fire safety systems within the building.

Further, Simpson Gumpertz & Heger Inc. (SGH) has prepared a memorandum to address fire risk and life safety concerns (Fire Safety Memo) related to the proposed vehicle storage and light industrial maintenance facility (refer to Appendix D). The Fire Safety Memo accounts for potential safety impacts associated with repair and maintenance for both conventional internal combustion engine (ICE) vehicles and EVs, including building fire protection systems, fire risk of facility operations, and life safety measures for occupants.

The building would be fully sprinklered in accordance with the 2022 edition of NFPA 13, the nationally recognized standard for the installation of sprinkler systems. In addition to sprinklers, the building comply with all relevant fire and building code requirements for a vehicle repair garage occupancy (classified as a light industrial Group S-1 use per the CCBC). This includes features such as fire resistance rated construction where required for separations, a fire alarm system for occupant notification, and adequate means of egress for safe evacuation. The automatic sprinkler system, designed in accordance with NFPA 13 for an Ordinary Hazard Group 2 occupancy, would activate in the event of a fire, immediately discharging water at the design density needed to control the fire, cool surrounding materials, and prevent spread to adjacent vehicles. The sprinkler waterflow signal would also simultaneously activate the fire alarm system to notify occupants and automatically transmit an alarm to the CCFD. The building would also be equipped with portable fire extinguishers and other fire protection features as required by code. In summary, the fire protection design for the building would meet or exceeds applicable standards, providing a high level of protection for both occupants and property.

The building would adhere to guidance in NFPA 30A, *Code for Motor Fuel Dispensing Facilities and Repair Garages*. NFPA 30A addresses construction features that limit fire growth and fuel migration, including liquid spill control and drainage that direct leaks to safe locations, separation of service bays from other uses, and housekeeping limits on combustibles. It requires mechanical ventilation strategies that remove heavier-than-air gasoline vapors at low elevations and discharge them to safe locations, which reduces the chance of flammable vapor accumulation. Electrical installations are governed for locations where flammable vapors could be present, which

limits ignition sources by requiring properly rated equipment and by prohibiting open flames and unprotected heating appliances in repair areas.

Operational provisions include hot-work permitting, limits and containerization for flammable and combustible liquids, prohibition of indoor fuel dispensing, emergency shutdowns, and staff training with spill kits and response procedures. In an internal-combustion-engine (ICE) vehicle fire, these measures restrict the availability and spread of fuel, reduce vapor ignition potential, and work with the NFPA 13 sprinkler system to cool and control the fire before it can involve adjacent vehicles. Although NFPA 30A does not directly regulate vehicle traction batteries, its repair garage safeguards operate together with the electrical code and listed EV charging equipment to reduce the likelihood and consequences of a battery event during charging. Ground fault and overcurrent protection in the charging equipment automatically would de-energize a faulted circuit, ventilation would dilute smoke and gases, and the sprinkler system would provide cooling that limits heat transfer to nearby vehicles and building elements. These combined measures support early control of either an ICE or battery fire while maintaining safe egress and fire department access.

The handling of any flammable liquids (such as engine oil, lubricants, or small quantities of fuel drained during maintenance) would occur in accordance with applicable NFPA and Fire Code standards. This means flammables would be stored in approved containers or cabinets, and any hot work (welding, cutting) would be controlled by permit, so the use-related hazards are properly managed.

Compliance with these existing regulations would ensure that the Project would maintain adequate on-site fire prevention measures. Therefore, the Project would not result in the need for new or expanded fire protection facilities or personnel and would not result in a significant impact related to fire protection services

Police Protection

The Culver City Police Department (CCPD) is a full-service municipal law enforcement agency that operates 24 hours a day, seven days a week, providing emergency and non-emergency services throughout the City. The CCPD consists of approximately 161 full-time employees, including 109 sworn officers and 52 professional civilian staff.

The Project includes adaptive reuse of the existing warehouse building at the Project Site for limited vehicle services including accessories installation, car washes, and maintenance/repair The Project does not involve the construction of a new building or the development of an entirely new land use but instead repurposes an existing commercial building and parking lot. Because the existing warehouse building has historically supported active uses, the Project would not represent a net increase in land use activity or on-site population that would affect law enforcement demand. Rather, the Project continues utilization of the site at a comparable intensity. Accordingly, the Project would not result in a net increase in calls for service, patrol needs, or law enforcement presence compared to historic conditions. Furthermore, the Project would be required to comply with standard City security and safety requirements, including adherence to applicable zoning and building code provisions, installation of lighting, and implementation of any site-specific safety measures that may be required during the City's development review process. Therefore, the Project would not necessitate new or expanded

police protection facilities or personnel and would not result in a significant impact related to police services.

Schools

The Project Site falls within the boundaries of the Culver City Unified School District (CCUSD). The Project includes adaptive reuse of the existing warehouse building at the Project Site for limited vehicle services Because the Project does not include residential development, it would not generate new students or increase direct demand for school facilities or services. Additionally, under California law, all new development projects are subject to payment of statutory school impact fees, as authorized by Government Code Section 65995. The Project would be required to pay these developer fees prior to issuance of building permits. These fees are considered by statute to fully mitigate any potential indirect impacts that could result from development on school services and facilities. As a result, the Project would not create a need for new or expanded school facilities, and any incremental indirect effect would be offset through payment of required school impact fees. Therefore, the Project would not result in a significant impact on school services.

Parks

The Project includes adaptive reuse of the existing warehouse building at the Project Site for limited vehicle services. Because the Project does not include residential uses or other land use components that would increase the local population, it would not generate new demand for parks within the City. Adaptive reuse of a commercial property for vehicle services does not create new residents or employees in numbers that would strain existing recreational resources, nor would it displace existing park facilities. As a result, the project would not result in the need for the construction or expansion of parks or recreational facilities. The City's existing park system would continue to serve the existing and future population consistent with planned growth under the Culver City General Plan. Accordingly, the project would not result in significant impacts to parks or recreational facilities.

Other Public Facilities

The Project includes adaptive reuse of the existing warehouse building at the Project Site for limited vehicle services. Because the Project does not include residential development or any other use that would increase the local population, it would not generate new demand for library services or facilities. Library demand is generally tied to population growth and associated residential development, and as a result, adaptive reuse of a commercial building for vehicle-related services would not result in additional library users or place strain on existing library resources. Since the Project would not contribute to an increase in population, it would not create the need for new or expanded library facilities. Therefore, the Project would not result in a significant impact on library services.

UTILITIES AND SERVICE SYSTEMS

The Project includes adaptive reuse of the existing warehouse building at the Project Site for limited vehicle services. The Project would not expand the size of the existing building or otherwise intensify the physical development of the site. Because the Project would rely on the

reuse of the existing structure without increasing its footprint or capacity, the Project would not result in a net increase in utility demands compared to existing conditions. Specifically, the Project would not generate additional water consumption or wastewater flows beyond what has historically been associated with prior uses of the building. Similarly, energy consumption would not increase since the building envelope and operational scale would remain comparable to past conditions, and the project would be required to comply with current Title 24 and CALGreen energy efficiency standards. Solid waste generation would likewise remain consistent with existing conditions, limited to operational refuse associated with vehicle service activities, and would be subject to City requirements for waste reduction, recycling, and diversion. Thus, the adaptive reuse of the existing building would not create a net increase in demand for utilities or service systems and would not result in the need for new or expanded utility infrastructure. Therefore, Project impacts related to utilities would be less than significant.

Categorical Exemption Exceptions

Section 15300.2 (Exceptions), Article 19, Chapter 3, Title 14 of the California Code of Regulations includes Exceptions to Categorical Exemptions for certain activities. For the reasons discussed below, none of the Exceptions apply to the Project.

15300.2. Exceptions

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

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

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

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

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

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

Discussion of Exceptions

Section 15300.2 (a) - Location:

This Exception is not applicable to the Project, because the Project does not fall under the definitions of Classes 3, 4, 5, 6, or 11.

Section 15300.2(b) - Cumulative Impacts

The cumulative impact analysis considers the potential impacts associated with implementation of the Project in conjunction with other "successive projects of the same type in the same place, over time." Based on information provided by the City, two related projects are located within 0.25 miles of the Project Site (refer to Table 13). A figure showing the location of the related projects in proximity to the Project Site is included in Appendix E.

Table 13
Related Projects Within 0.25 Miles of Project Site

#	Address	Distance from Project Site	Use	Size	Status
1	10301-10395 Jefferson Blvd.	500 feet	Office	13,186 sf	Administrative Site Plan Review approved August 2023. Under construction.
2	9925 Jefferson Blvd.	600 feet	Office	21,203 sf	In Building permit plan check

sf = square feet

Source: City of Culver City.

As discussed in detail below, the Project would not contribute to any significant cumulative impacts.

Air Quality

The SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable.[22] Individual projects that generate emissions not in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. As discussed previously, the Project would not produce pollutant emissions in excess of SCAQMD's significance thresholds. Therefore, the

[22] *White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix D, p. D-3.*

cumulative air quality impact of successive projects of the same type in the same place over time would not be significant.

Water Quality

The sites of the Project and the related project are located in an urbanized area where most of the surrounding properties are already developed. The existing storm drainage system serving this area of the City has been designed to accommodate runoff from an urban built-out environment. When new construction occurs, it generally does not lead to substantial additional runoff, since new development is required to control the amount and quality of stormwater runoff coming from their respective sites. Moreover, little if any additional cumulative runoff is expected from the Project and the related project sites, since the area is highly developed with impervious surfaces. Additionally, all development in the City is required to comply with the City's Low Impact Development (LID) strategies and incorporate appropriate stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Any subsequent developments would be required to perform the same level of water quality impact analysis as the Project, and any impacts would be mitigated as necessary/appropriate. Therefore, the cumulative water quality impact of successive projects of the same type in the same place over time would not be significant.

Noise

Construction Noise

During construction of the Project, there could be other construction activity in the area that could temporarily increase noise levels in the Project Site area, if construction of one or both of the related projects overlaps with the construction of the Project. As discussed previously, there are two related projects located with 0.25 miles of the Project Site

As summarized in Table 14, the cumulative noise levels at the analyzed sensitive receptors would not be considered significant, as they would not exceed 5.0 dBA L_{eq}. Construction noise levels associated with more distant related projects have minimal effect on construction noise levels in the Project Site area due to intervening structures that shield noise from more distant construction sites. Therefore, the cumulative on-site construction noise impact of successive projects of the same type in the same place over time would not be significant.

Table 14
Estimated Cumulative Construction Noise Levels

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Significant Impact?
1. Residences – 4804 Salem Village Ct.	66.5	67.9	70.3	2.4	No
2. Residences – Jackson Ave.	54.7	51.8	56.5	4.7	No
3. West Los Angeles College	47.5	52.2	53.5	1.3	No
Source: DKA Planning, 2025.					

Off-Site Construction Noise

Other concurrent construction activities from related projects could contribute to cumulative off-site noise levels if haul trucks, vendor trucks, or worker trips for any related project(s) were to utilize the same roadways as Project trips. Distributing trips to and from each related project construction site substantially reduces the potential that cumulative development could more than double traffic volumes on existing streets, which would be necessary to increase ambient noise levels by 3 dBA. As noted previously in Table 6, Project would contribute with vendor trips and worker commute trips. These activities would generate 11 peak-hour PCE trips, representing approximately 1.3 percent of the 2,538 vehicles that used the intersection of Jefferson Boulevard and Slauson Avenue in the A.M. peak hour. Any combination of cumulative development would have to add 2,505 peak-hour vehicle trips to double volumes on this north-south arterial.

The two related projects within 0.25 miles of the Project Site would not be capable of generating this much truck traffic.

1. 10301-10395 Jefferson Boulevard. The expansion of office uses at this location would be comparable in scale and scope as the construction of the Project. As such, this related would involve construction traffic that adds a comparable number of vehicles to Jefferson Boulevard as the Project.

2. 9925 Jefferson Boulevard. The proposed office project would be comparable in scale and scope as the construction of the Project. As such, this related project would involve construction traffic that adds a comparable number of vehicles to Jefferson Boulevard as the Project.

As a result, when combined with the Project, cumulative development could generate up to approximately 200 to 300 PCE trips on to Jefferson Boulevard. Since this would represent a less than 12 percent increase in traffic volumes on this major arterial, cumulative noise due to construction truck traffic from the Project and related projects do not have the potential to double traffic volumes on any roadway necessary to elevate traffic noise levels by 3 dBA, let alone the 5 dBA threshold of significance for traffic impacts. Therefore, the cumulative off-site construction noise impact of successive projects of the same type in the same place over time would not be significant.

Operational Noise

The Jefferson Boulevard corridor near the Project Site has been developed with commercial and industrial land uses that have previously generated, and will continue to generate, noise from a number of operational noise sources, including mechanical equipment (e.g., HVAC systems), outdoor activity areas, and vehicle travel. The two related projects in the vicinity of the Project Site are office developments and would also generate stationary-source and mobile-source noise due to ongoing day-to-day operations. This type of use generally does not involve use of noisy heavy-duty equipment such as compressors, diesel-fueled equipment, or other sources typically associated with excessive noise generation.

On-Site Stationary Noise Sources

Noise from on-site mechanical equipment (e.g., HVAC units) and any other human activities from related projects would not be typically associated with excessive noise generation that could result in increases of 5 dBA or in ambient noise levels at sensitive receptors when combined with operational noise from the Project. Because of the non-residential zoning of the corridor flanked by the Ballona Creek and Jefferson Boulevard, most sensitive receptors to the west would have negligible exposure to operational noise from the Project and related projects. Therefore, the cumulative on-site operational noise impact of successive projects of the same type in the same place over time would not be significant.

Off-Site Mobile Noise Sources

As discussed previously, the Project would add approximately 159 daily vehicle trips, including 63 A.M. peak-hour trips and 59 P.M. peak-hour trips, to the local roadway network on weekdays when the development is operational. The related projects would have to add an additional 2,500 vehicle trips onto Jefferson Boulevard in the A.M. peak hour to elevate noise by 3 dBA, given that Jefferson Boulevard carries thousands of daily and peak-hour trips. Instead, the two nearby related projects would generate about 73 A.M. peak hour trips.[23] As this would not increase traffic volumes by 100 percent, cumulative noise impacts due to off-site traffic would not increase ambient noise levels by 3 dBA. Therefore, the cumulative off-site operational noise impact of successive projects of the same type in the same place over time would not be significant.

Construction Vibration

On-Site Construction Vibration

During construction of the Project, vibration impacts are generally limited to buildings and structures located near the construction site (i.e., as close as 50 feet as related to building damage). Beyond this distance, cumulative groundborne vibration impacts from a second project are unlikely, as the amplitude of vibration waves decrease substantially due to geometric spreading and material damping within the ground. The rate of this reduction is steep; doubling the distance from the source can reduce vibration levels by more than half. As noted earlier, the Project's potential to damage nearby buildings would be negligible and be considered less than significant.

However, nearby structures could be subject to cumulative vibration levels if concurrent construction and vibration activities were to occur within close proximity. The two related projects are 500 and 600 feet (respectively) from the Project Site, distances that would substantially attenuate any vibration at receptors from construction activities at those construction sites, as vibration amplitudes decrease sharply due to geometric spreading and soil damping under the ground. The presence of vehicle traffic on Jefferson Boulevard would further dampen any vibration from both related projects, which are across this major arterial from the Project Site. As

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[23] *Based on Transportation Engineers, Trip Generation Rates (11th Edition).*

such, there is no potential for a significant cumulative construction vibration impact that subjects nearby buildings to vibration levels that exceed applicable criteria for historic buildings. Therefore, the cumulative on-site construction vibration impact of successive projects of the same type in the same place over time would not be significant.

Off-Site Construction Vibration

While haul trucks from any related projects and other concurrent construction projects could generate additional vibration along haul routes, the potential to damage buildings is extremely low. The Project would not involve grading and major demolition activities and the need for heavy-duty haul trucks. The FTA finds that "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." The vibration generated by a typical heavy truck would be approximately 0.00566 in/sec PPV at a distance of 50 feet.

As discussed above, there are existing buildings that are near the right-of-way of the anticipated haul route for the Project (e.g., Jefferson Boulevard). These buildings are anticipated to be exposed to groundborne vibration levels that are far less than the levels recommended by FTA as potential thresholds for building damage. Trucks from any related projects are expected to generate similar groundborne vibration levels. Therefore, the vibration levels generated from off-site construction trucks associated with the Project and other related projects along the anticipated haul route would be below the most stringent building damage threshold of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, the cumulative off-site construction vibration impact of successive projects of the same type in the same place over time would not be significant.

Operational Vibration

On-Site Operation Vibration

During operation of the Project, vibration impacts are generally limited to buildings and structures located near the construction site (i.e., within 15 feet as related to building damage). The related projects located near the Project Site include office land uses that do not operate impact equipment and operations and would not generate substantial vibration. As a result, operation of new cumulative development in the area would have no potential to exceed FTA vibration damage standards at off-site receptors. Therefore, the cumulative on-site operational vibration impact of successive projects of the same type in the same place over time would not be significant.

Off-Site Operation Vibration

As with the Project, the normal passenger vehicle traffic generated by the related projects near the Project Site would generate negligible changes to roadway vibration. Use of larger heavy-duty trucks for delivery of goods and materials would be intermittent and would generate vibration levels similar to what is currently experienced. Cumulative traffic would not result in significant, cumulative increases in groundborne vibration on Jefferson Boulevard and other local roadways. Therefore, the cumulative off-site operational vibration impact of successive projects of the same type in the same place over time would not be significant.

Traffic

OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA* states the following regarding cumulative traffic impacts:

> *Cumulative Impacts. A project's cumulative impacts are based on an assessment of whether the "incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." (Pub. Resources Code, § 21083, subd. (b)(2); see CEQA Guidelines, § 15064, subd. (h)(1).) When using an absolute VMT metric, i.e., total VMT (as recommended below for retail and transportation projects), analyzing the combined impacts for a cumulative impacts analysis may be appropriate. However, metrics such as VMT per capita or VMT per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency-based threshold that is aligned with long-term goals and relevant plans has no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa. This is similar to the analysis typically conducted for greenhouse gas emissions, air quality impacts, and impacts that utilize plan compliance as a threshold of significance. (See Center for Biological Diversity v. Department of Fish & Wildlife (2015) 62 Cal.4th 204, 219, 223; CEQA Guidelines, § 15064, subd. (h)(3).)*

As discussed above, the Project would not result in any significant VMT impacts. For this reason, the cumulative traffic impact of successive projects of the same type in the same place over time would not be significant.

Public Services and Utilities

The Project involves the adaptive reuse of an existing warehouse building and associated surface parking areas for limited vehicle services such as accessory installation and vehicle maintenance and repair, uses that are permitted or conditionally permitted within the MU-2 zone pursuant to CCMC Section 12.220.015, Table 2-6. Because the Project reuses an existing structure rather than constructing new facilities, the Project would not generate a net increase in demand for utilities or public services such as water supply, wastewater treatment, solid waste disposal, fire protection, police protection, schools, or other public services. Likewise, no substantial population growth or new housing would result from the Project. Given the absence of new development intensity or service demand, the Project would not contribute to any potential cumulative impacts when considered in combination with other development in the vicinity. Even if other new projects are constructed in the surrounding area, this Project would not have the potential to result in, or contribute to, a cumulatively considerable impact, because the Project would not increase overall service needs, infrastructure demands, or environmental burdens. Therefore, the cumulative public services and utilities impact of successive projects of the same type in the same place over time would not be significant.

Section 15300.2(c) – Significant Effects Due to Unusual Circumstances

The Project Site is located adjacent to the Inglewood Oil Field, a historically active oil-producing area within the Baldwin Hills and Culver City region. Oil extraction in this portion of the field began in the early 1900s but has long since ceased. According to the California Geologic Energy Management Division (CalGEM) Well Finder database, all wells near the Project Site have been properly abandoned and capped in accordance with PRC Section 3208 and Title 14 California Code of Regulations Sections 1723–1723.5.[24] There are no active, idle, or newly permitted wells on or immediately adjacent to the Project Site, and no associated aboveground equipment, tanks, or pipelines remain in operation. The closest active well is located approximately 637 feet northeast of the Project Site (refer to Figure 3 in the Safety Plan included in Appendix D).[25] This distance provides both an atmospheric and radiant heat buffer that prevents heat exposure to the facility in the unlikely event of a surface fire or leak at a well. Conversely, a fire originating at the Project Site would not affect a distant well.

Oil and gas operations in California are regulated under the California Geologic Energy Management Division (CalGEM) oversight, which includes periodic pipeline integrity testing, annual inspections in sensitive areas, and ongoing mechanical integrity programs for injection and storage wells. These safety measures, combined with emergency shut-off systems (such as automatic float switches) and on-site fire protection at wellheads, further reduce the likelihood of any incident escalating or spreading. In combination, the Projects' code-compliant siting, robust regulatory framework, and existing safety infrastructure point to the fact that nearby oil wells do not pose a fire hazard to the Project, nor does the Project create any increased risk to those wells.

Accordingly, although the Project Site is located near a former oil field, this condition does not constitute an "unusual circumstance" under CEQA Guidelines Section 15300.2(c) because proximity to former oil-production areas is common throughout the Los Angeles Basin, and especially throughout Culver City (refer to Figure 4 in the Safety Plan included in Appendix D). All nearby wells have been closed and sealed, eliminating any ongoing potential for leakage, gas migration, or subsidence that could create site-specific hazards.

The Project involves the adaptive reuse of an existing warehouse building for limited vehicle-service uses, which would include the storage of batteries for electric vehicles. Battery storage and handling would be conducted in accordance with applicable fire and hazardous-materials regulations enforced by the Los Angeles County Fire Department, Health Hazardous Materials Division (HHMD) and the City of Culver City Building and Safety Division, consistent with the Los Angeles County Fire Code Chapter 50 (Hazardous Materials Management) and related provisions governing energy-storage systems. These regulations ensure that any stored batteries are properly contained, ventilated, monitored, and inspected to prevent fire, explosion, or chemical-release hazards. (Also, refer to the previous discussion of the Project's safety measures under

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[24] *California Geologic Energy Management Division, Well Finder, https://maps.conservation.ca.gov/calGEM/wellfinder/v2/?utm_source=chatgpt.com#/-118.38840/34.01132/19, accessed October 25, 2025.*

[25] *Ibid.*

Public Services – Fire Protection summarizing additional fire safety measures to avoid and minimize potential hazards related to the Project's proposed use.)

Further, the potential fire hazard associated with storing multiple vehicles, including gasoline, diesel, and electric models, inside a building does not constitute an unusual circumstance. In practice, these vehicles are identical to those found throughout the community (e.g., in public parking garages, residential garages, and service centers) and thus, do not represent a novel ignition hazard. Vehicles would be stored and maintained in accordance with the CCFC, the California Mechanical Code (CMC), NFPA standards, and OSHA rules applicable to repair garages. Engines would not be idled indoors, no fuel dispensing would occur inside the building, and any repair activities on fuel systems would follow code-compliant procedures. Flammable and combustible liquids (e.g., gasoline drained during maintenance, solvents) would be kept in approved safety cans and approved flammable-liquid storage cabinets.

Statistics do not show privately owned vehicles (whether gasoline or electric) spontaneously igniting at a significant rate under normal conditions. Multiple independent reviews (including government and research groups) find that EVs do not ignite more frequently than ICE vehicles and often appear less likely to ignite on a per-vehicle basis, though methods and definitions vary by dataset. Gasoline vehicles carry a flammable fuel, but modern fuel systems are very safe; the primary fire risk for any vehicle (gas or electric) is during a severe collision or if a fire is deliberately set, which are scenarios not relevant to secure storage.

When considered together, the site's location adjacent to a former oil field and the proposed storage of electric-vehicle batteries would not result in, or contribute to, any significant environmental effect. There is no reasonable possibility that residual subsurface conditions from historic oil operations could interact with properly managed battery-storage activities. Therefore, these characteristics do not represent an unusual circumstance that would preclude reliance on the Class 32 Categorical Exemption, consistent with CEQA Guidelines § 15300.2(c) and the standards established in *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086.

Section 15300.2(d) – Scenic Highways

The Project Site is not located within view from a state scenic highway. The closest designated scenic highway is a segment of the Topanga Canyon State Highway located approximately 11 miles northwest of the Project Site.[26] Therefore, this Exception does not apply to the Project.

Section 15300.2(e) – Hazardous Waste Sites

EnviroStor mapping maintained by the California Department of Toxic Substances Control (DTSC) indicates a symbol at the Project Site (10200 Jefferson Boulevard, Culver City; APN 4296-001-002) suggesting potential contamination by petroleum hydrocarbons and hazardous

[26] *Caltrans, California State Scenic Highway System Map, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed February 2, 2024.*

substances.[27] However, a review of DTSC records confirms that the symbol's placement is erroneous. The actual site associated with the former contamination is located at 10100 Jefferson Boulevard (APNs 4296-001-001, -010, and -004), immediately adjacent to but separate from the Project Site.[28] The 10100 Jefferson Boulevard property was previously subject to corrective actions related to historic underground storage tanks and associated petroleum impacts; that site has since been remediated and closed under regulatory oversight. Accordingly, the Project Site at 10200 Jefferson Boulevard is not listed on the Cortese List or any other hazardous materials site databases maintained by DTSC, the State Water Resources Control Board, or other responsible agencies. The Project Site therefore meets the Class 32 criterion regarding the absence of listed contamination, and the erroneous EnviroStor mapping symbol does not preclude reliance on the Class 32 Categorical Exemption.

Section 15300.2(f) – Historical Resources

A records search of the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR) confirms that the building located at 10200 Jefferson Boulevard, Culver City (APN 4296-001-002) is not listed in either registry.[2930] The property is also not identified in any local inventory of historic resources maintained by the City (such as the City's Historic Resources Inventory or Cultural Resources Survey).[31] No known determinations of eligibility have been made for the structure under PRC Section 5024.1 or CEQA Guidelines Section 15064.5(a)(2).

The Project involves adaptive reuse of the existing warehouse building for limited vehicle services, including accessory installation and vehicle maintenance and repair. The proposed improvements would consist of minor interior and exterior alterations consistent with the existing warehouse character of the building. Importantly, the Project would leave the existing structure intact and would not alter the building's vertical or horizontal footprint, height, or massing. The exterior envelope and overall form of the building would remain substantially unchanged.

Because the building is not listed in the NRHP, CRHR, or any local historic register, the building is not considered a historical resource under CEQA. Accordingly, the Project would not cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(b).

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[27] *Refer to a view from the EnviroStor website indicating the correct site of the contamination and the erroneous placement of the symbol.*

[28] *Refer to the Voluntary Cleanup Agreement between DTSC and Hunter Property Investments, LLC for cleanup of the Westway Development Property located at 10100 Jefferson Boulevard, Culver City, CA 90230 in Appendix F.*

[29] *National Register of Historic Places, https://www.nps.gov/subjects/nationalregister/database-research.htm#table, accessed June 21, 2025.*

[30] *California Historical Resources, https://ohp.parks.ca.gov/ListedResources/?view=name&criteria=culver, accessed June 21, 2025.*

[31] *City of Culver City, Historic Preservation Program, https://www.culvercity.gov/Explore/Arts-Culture/Preservation, accessed June 21, 2025.*

APPENDIX A – TRAFFIC MOU

Memorandum of Understanding for Transportation Study

This Memorandum of Understanding (MOU) acknowledges and agrees to all the City of Culver City requirements and fees for the review of a transportation study for the following project.

Date Submitted: July 2, 2025 **MOU Version #** 1

Project Name: 10150 Jefferson Vehicle Service Center

Project Address: 10150-10200 Jefferson Blvd

Project Description: A conversion of an existing 43,167 warehousing facility to a vehicle service center at 10150-10200 Jefferson Blvd.

Land Use	Gross Floor Area (sq. ft.) *Defined per latest ITE publication*	Residential Units (#)
Vehicle Service Center	43,167	

Project Horizon Year: See attached memo **Ambient Growth Rate (% per year):** See attached memo

Directional Distribution (%): N: 17% S: 45% E: 9% W: 29%

Trip Generation Rates: Show AM, PM and daily trip generation rates for each land use and attach total daily trips generation calculations. Indicate ITE Latest Edition/Other Case-specific, see Table 1

Land Use	ITE Code#	AM Trips		PM Trips		Daily Totals	
		In	Out	In	Out	In	Out

Study Intersections: Show all study intersections, intersections subject to capacity analysis credit for advanced traffic signal control synchronization, whether intersections are signalized or non-signalized, and use the same numbering system for all lists of intersections and figures in the study. See Figure 3

No.	Intersection	Signalized/Non-Signalized	Jurisdiction

Residential Streets: Show all residential streets to be studied. See attached memo

No.	Street Name	Limits	Jurisdiction

Trip Credits: Indicate trip credits to be requested (subject to City approval)

	Trip Credits	Yes/No
Existing Uses	See Table 1	Yes
Pass-By Trips	N/A	No
Internal Trip Capture	N/A	No
Transit-Oriented Development (TOD)	N/A	No
Transportation Demand Management (TDM)	N/A	No

Related Projects: Before the start of any proposed project analysis, consultants shall: See attached memo

1. Obtain a list of related projects from the Culver City Current Planning Division and other affected jurisdictions.
2. Prepare a draft list of "related projects specific to the proposed project."
3. Obtain written approval from the City of the "related projects specific to the proposed project."

Maps: The following maps shall be attached to the MOU:

1. A map showing the study intersections and street segments to be analyzed, including City limit lines where applicable. Figure 3
2. A map showing the project's trip distribution percentages for each land use (inbound and outbound) on the area's road network. Figure 2
3. A map showing the project's trip assignments at the study intersections and project driveways, as well as road segments when applicable. Figure 4
4. A site plan of the project showing property lines, alleys, project's driveways and nearby driveways and intersections on both sides of the street including dimensions. Figure 1

Proposed Mitigation and Transportation Improvements: Any proposed transportation improvement(s) or mitigation measure(s) shall be listed and accompanied by plans of the existing and proposed improvements, including city limit lines and existing and proposed property lines. The City may initially accept conceptual plans to be included in the Transportation Study. Detailed design of such improvements will be part of the project's plans submittals.

Post-Occupancy Traffic Counts: By signing below, the Property Owner/ Developer/Applicant hereby agrees to pay for and submit to the City a post-occupancy traffic count analysis of the development to the satisfaction of the City. The analysis shall determine the amount of actual traffic (motor vehicle, bicycle, and pedestrian) generated by the development compared to the ITE trip generation rates. The analysis shall include a traffic count of all onsite driveways taken upon reaching eighty-five percent (85%) occupancy of the total building gross floor area or within one (1) year of the issuance of the first Temporary Certificate of Occupancy (TCO), as determined by the City. The data shall be used to confirm the findings in the approved study and not result in any additional traffic mitigation measures and/or conditions of approval on the subject project.

Fees: Payment of a fee to the City's PWD for the City's processing of the MOU shall be required before the City approves the MOU. Payment for review of the Transportation Study shall be paid before the City's PWD completes its review of the Transportation Study. Said fees shall be per the most recent Fee Schedule as approved by the City Council.

Applicant Information:

	Property Owner/Applicant	Developer/Applicant	Traffic Consultant
Name	Marianne Maguire		Jeremiah LaRose
Title	CFO		Senior Associate
Company	Silvertip Automotive Group Inc.	dba Cadillac of Beverly Hills	Fehr & Peers
Street Address	8767 Wilshire Blvd., Suite 101		600 Wilshire Blvd, Suite 1050
City, State, Zip	Beverly Hills, CA 90211-2714		Los Angeles, CA 90017
Office	(424) 499-1085		213-261-3079
Cell			
Fax			310-394-7663
Email	Marianne.Maguire@CadillacBeverlyHills.com		J.LaRose@fehrandpeers.com

Public Agency Information: If any of the intersection(s) to be studied as part of this study are located within the City of Los Angeles, the unincorporated areas of Los Angeles County and/or impact any other public agency (i.e., Caltrans), then this MOU shall also be approved by the reviewing staff representative from each agency:

	City of Los Angeles	County of Los Angeles	Other Public Agency
Name			
Title			
Company	Central Development Review		
Street Address	100 S. Main Street		
City, State, Zip	Los Angeles, CA 90012		
Office			
Cell			
Fax			
Email	ladot.devreview.cen@lacity.org		

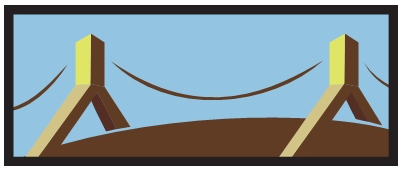
Signatures/Expiration: This MOU shall become valid as of the date of the City's signature and expire one year thereafter. If the administrative draft of the study has not been filed with the City by the expiration date, the MOU shall expire and a new MOU filing, fee, review, and approval process shall be required.

Approved By: _____ Property Owner/Applicant	Date: 08/06/25
Developer/Applicant _____	08/06/25
Traffic Consultant _____	8/11/25
City of Culver City	

APPENDIX B – TECHNICAL NOISE REPORT

10150-10200 JEFFERSON BOULEVARD PROJECT

Noise and Vibration Technical Report



Prepared by DKA Planning
November 2025

NOISE AND VIBRATION TECHNICAL REPORT

Introduction

This technical report evaluates noise and vibration impacts from construction and operation of a Project at 10150-10200 Jefferson Boulevard in the City of Culver City. The analysis discusses applicable regulations and compares impacts to appropriate thresholds of significance. Noise measurements, calculation worksheets, and a map of noise receptors and measurement locations are included in the Technical Appendix to this report.

Fundamentals of Noise

Characteristics of Sound

Sound can be described in terms of its loudness (amplitude) and frequency (pitch). The standard unit of measurement for sound is the decibel (dB). Because the human ear is not equally sensitive to sound at all frequencies, the A-weighted scale (dBA) is used to reflect the normal hearing sensitivity range. On this scale, the range of human hearing extends from 3 to 140 dBA. Table 1 provides examples of A-weighted noise levels from common sources.

Table 1
A-Weighted Decibel Scale

Typical A-Weighted Sound Levels	Sound Level (dBA L_{eq})
Near Jet Engine	130
Rock and Roll Band	110
Jet flyover at 1,000 feet	100
Power Motor	90
Food Blender	80
Living Room Music	70
Human Voice at 3 feet	60
Residential Air Conditioner at 50 feet	50
Bird Calls	40
Quiet Living Room	30
Average Whisper	20
Rustling Leaves	10
Source: Cowan, James P., Handbook of Environmental Acoustics, 1993.	
These noise levels are approximations intended for general reference and informational use.	

Noise Definitions. This noise analysis discusses sound levels in terms of equivalent noise level (L_{eq}), maximum noise level (L_{max}) and the Community Noise Equivalent Level (CNEL).

- Equivalent Noise Level (L_{eq}): L_{eq} represents the average noise level on an energy basis for a specific time period. Average noise level is based on the energy content (acoustic energy) of sound. For example, the L_{eq} for one hour is the energy average noise level

during that hour. L_{eq} can be thought of as a continuous noise level of a certain period equivalent in energy content to a fluctuating noise level of that same period.

- Maximum Noise Level (L_{max}): L_{max} represents the maximum instantaneous noise level measured during a given time period.

- Community Noise Equivalent Level (CNEL): CNEL is an adjusted noise measurement scale of average sound level during a 24-hour period. Due to increased noise sensitivities during evening and night hours, human reaction to sound between 7:00 P.M. and 10:00 P.M. is as if it were actually 5 dBA higher than had it occurred between 7:00 A.M. and 7:00 P.M. From 10:00 P.M. to 7:00 A.M., humans perceive sound as if it were 10 dBA higher. To account for these sensitivities, CNEL figures are obtained by adding an additional 5 dBA to evening noise levels between 7:00 P.M. and 10:00 P.M. and 10 dBA to nighttime noise levels between 10:00 P.M. and 7:00 A.M. As such, 24-hour CNEL figures are always higher than their corresponding actual 24-hour averages.

Effects of Noise. The degree to which noise can impact an environment ranges from levels that interfere with speech and sleep to levels that can cause adverse health effects. Most human response to noise is subjective. Factors that influence individual responses include the intensity, frequency, and pattern of noise; the amount of background noise present; and the nature of work or human activity exposed to intruding noise. According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of 70 dBA or less, even after continuous exposure, are unlikely to cause hearing loss.[1] The World Health Organization (WHO) reports that adults should not be exposed to sudden "impulse" noise events of 140 dB or greater. For children, this limit is 120 dB.[2]

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping environments, the WHO recommends that continuous interior noise levels not exceed 30 dBA and that individual noise events of 45 dBA or higher be avoided.[3] Assuming a conservative exterior to interior sound reduction of 15 dBA, continuous exterior noise levels should therefore not exceed 45 dBA. Individual exterior events of 60 dBA or higher should also be limited. Some epidemiological studies have shown a weak association between long-term exposure to noise levels of 65 to 70 dBA and cardiovascular effects, including ischemic heart disease and hypertension. However, at this time, the relationship is largely inconclusive.

People with normal hearing sensitivity can recognize small changes in sound levels of approximately 3 dBA. Changes of at least 5 dBA can be readily noticeable while sound level

1 National Institute of Health, National Institute on Deafness and Other Communication, www.nidcd.nih.gov/health/noise-induced-hearing-loss.

2 World Health Organization, Guidelines for Community Noise, 1999.

3 Ibid.

increases of 10 dBA or greater are perceived as a doubling in loudness.[4] However, during daytime, few people are highly annoyed by noise levels below 55 dBA L_{eq}.[5]

Noise Attenuation. Noise levels decrease as the distance from noise sources to receivers increases. For each doubling of distance, noise from stationary sources can decrease by about 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt and grass). For example, if a point source produces a noise level of 89 dBA at a reference distance of 50 feet over an asphalt surface, its noise level would be approximately 83 dBA at a distance of 100 feet, 77 dBA at 200 feet, etc. Noises generated by mobile sources such as roadways decrease by about 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of distance. It should be noted that because decibels are logarithmic units, they cannot be added or subtracted. For example, two cars each producing 60 dBA of noise would not produce a combined 120 dBA.

Noise is most audible when traveling by direct line of sight, an unobstructed visual path between noise source and receptor. Barriers that break line of sight between sources and receivers, such as walls and buildings, can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. As a result, sound barriers can generally reduce noise levels by up to 15 dBA.[6] The effectiveness of barriers can be greatly reduced when they are not high or long enough to completely break line of sight from sources to receivers.

Regulatory Framework

Noise

Federal. No federal noise standards regulate environmental noise associated with short-term construction activities or long-term operations of development projects. As such, temporary and long-term noise impacts produced by the Project would be largely regulated or evaluated by State and City of Culver City standards designed to protect public well-being and health.

State. The State's 2017 General Plan Guidelines establish county and city standards for acceptable exterior noise levels based on land use. These standards are incorporated into land use planning processes to prevent or reduce noise and land use incompatibilities. Table 2 illustrates State compatibility considerations between land uses and exterior noise levels.

California Government Code Section 65302 also requires each county and city to prepare and adopt a comprehensive long-range general plan for its physical development. Section 65302(f) requires a noise element to be included in the general plan. This noise element must identify and appraise noise problems in the community, recognize State noise control guidelines, and analyze and quantify current and projected noise levels.

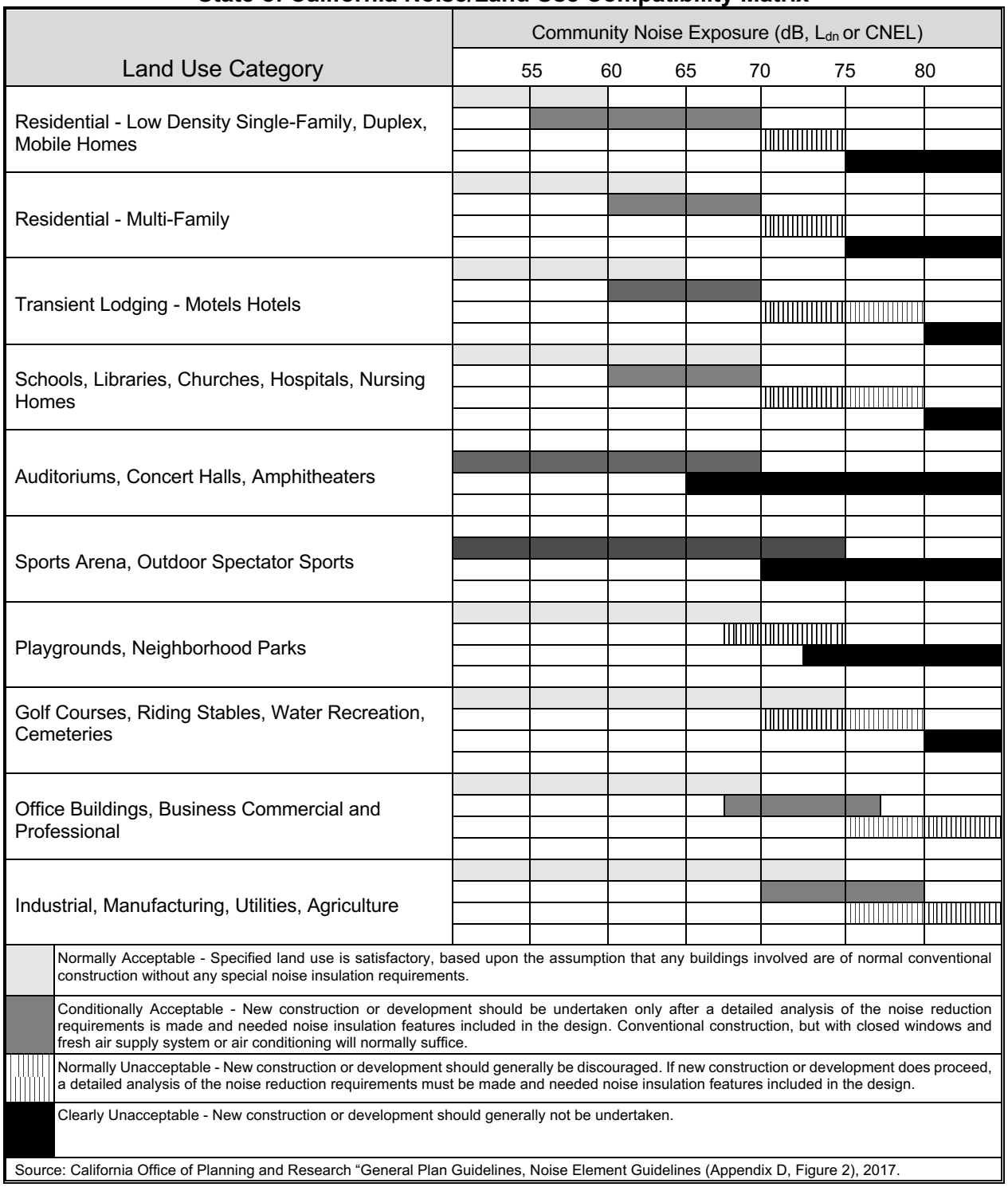
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4 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2018.

5 World Health Organization, Guidelines for Community Noise, 1999.

6 California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf

Table 2
State of California Noise/Land Use Compatibility Matrix



Source: California Office of Planning and Research "General Plan Guidelines, Noise Element Guidelines (Appendix D, Figure 2), 2017.

Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan. In Los Angeles County, the Regional Planning Commission has the responsibility for acting as the Airport

Land Use Commission and for coordinating the airport planning of public agencies within the County. The Airport Land Use Commission coordinates planning for the areas surrounding public use airports. The Comprehensive Land Use Plan provides for the orderly expansion of Los Angeles County's public use airports and the areas surrounding them. It is intended to provide for the adoption of land use measures that will minimize the public's exposure to excessive noise and safety hazards. In formulating the Comprehensive Land Use Plan, the Los Angeles County Airport Land Use Commission has established provisions for safety, noise insulation, and the regulation of building height within areas adjacent to each of the public airports in the County.

City of Culver City General Plan Noise Element. The City of Culver City 2045 General Plan includes a Noise Element that includes policies and standards to guide the control of noise to protect residents, workers, and visitors. Its primary goal is to regulate long-term noise impacts to preserve acceptable noise environments for all types of land uses. It includes programs applicable to construction projects that call for protection of noise sensitive uses and use of best practices to minimize short-term noise impacts. It notes that "[t]he City's Municipal Code includes noise restrictions and exemptions for noise standards within the city as well as specific design and operational standards that must be incorporated into new projects to minimize noise from development and redevelopment project construction."

However, the Noise Element contains no quantitative or other thresholds of significance for evaluating a project's noise impacts. Instead, it adopts the State's guidance on noise and land use compatibility, shown in Table 2, "to help guide determination of appropriate land use and mitigation measures vis-à-vis existing or anticipated ambient noise levels." Table 11 of the Noise Element finds that uses similar to the Project (i.e., automobile service station, auto dealership, manufacturing, warehousing, wholesale, utilities) are "Clearly Compatible" with noise environments with a CNEL of up to 70 dBA and "Compatible with Controls" in areas louder than 70 dBA CNEL.

The Noise Element includes a number of goals, objective that are relevant for the Project.

Goal N-1 A peaceful community. A community with a peaceful noise environment that reduces or prohibits new sources of intrusive noise and effectively enforces noise standards.

Policy N-1.2 Land use decisions. Consistently apply noise standards and criteria in all land use decisions.

Goal N-2 Adjacent uses. A City review and approval process for new development that ensures projects are compatible with adjacent land uses.

Policy N-2:1 Noise compatibility. In the land use planning process, consider noise compatibility with existing and land uses, along with the anticipated increase in development needed to accommodate growth.

Policy N-2:2 Land Use and Noise Compatibility Matrix. Use the Land Use and Noise Compatibility Matrix to assess the compatibility of land uses with the noise environment.

Policy N-2.3 Noise analysis and implementation methods. As appropriate, require a noise analysis and implementation of methods to minimize noise for land uses that are not "clearly compatible" as indicated by the Land Use and Noise Compatibility Matrix.

Policy N-2.4 Land use incompatibility. Evaluate and identify ways to avoid locating incompatible land uses adjacent to freeways, and noisy industrial or recreational activities in the land use planning and development/environmental review process.

Goal N-4 Construction noise. Minimized noise and vibration generated from construction activities.

Policy N-4.1 Limit disturbance from new construction. Minimize construction noise and vibration impacts to reduce the disturbance from new development.

Policy N-4.2 Construction hour enforcement. Enforce limits on construction hours as included in the City's Municipal Code.

Policy N-4.4 Noise-sensitive construction techniques. Encourage using construction techniques that minimize noise and vibration levels.

City of Culver City Municipal Code. The City of Culver City regulates noise to protect the health, safety, and general welfare of its residents and businesses by controlling excessive and unnecessary sound levels generated by various sources, including new development. Noise regulations applicable to development projects are codified in Chapter 9.07 (Noise Control) of the Culver City Municipal Code (CCMC). Under the CCMC (Section 9.07.035), construction activities are recognized as temporary but potentially significant sources of noise. Pursuant to CCMC Section 9.07.035, construction and demolition activities are exempt from standard noise limits provided that such work occurs only during permitted hours, typically 8:00 A.M. to 7:00 P.M. on weekdays and 10:00 A.M. to 7:00 P.M. on weekends and holidays**.**

Once operational, new development must comply with the CCMC. This includes Section 9.04.015.H (Noise Disturbances), which defines public nuisances, discusses mechanical noise and construction noise near residences.

Fundamentals of Vibration

Characteristics of Vibration. Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, and acceleration. Unlike noise, vibration is not a common environmental problem, as it is unusual for vibration from vehicle sources to be perceptible. Common sources of vibration include trains, construction activities, and certain industrial operations.

Vibration Definitions. This analysis discusses vibration in terms of Peak Particle Velocity (PPV). PPV is commonly used to describe and quantify vibration impacts to buildings and other structures. PPV levels represent the maximum instantaneous peak of a vibration signal and are

usually measured in inches per second.[7] This analysis also discusses the vibration of events in decibel scale, known as Vibration Decibels (VdB), which is a unitless measure of vibration that is expressed on a logarithmic scale.

Effects of Vibration. High levels of vibration may cause physical personal injury or damage to buildings. However, groundborne vibration levels rarely affect human health. Instead, most people consider groundborne vibration to be an annoyance that can disrupt concentration or disturb sleep. Groundborne vibration can also interfere with certain types of highly sensitive equipment and machines, especially imaging devices used in medical laboratories.

Perceptible Vibration Changes. Unlike noise, groundborne vibration is not an environmental issue that most people experience every day. Background vibration levels in residential areas are usually well below the threshold of perception for humans, approximately 0.01 inches per second. 8 Perceptible indoor vibrations are most often caused by sources within buildings themselves, such as slamming doors or heavy footsteps. Common outdoor sources of groundborne vibration include construction equipment, trains, and traffic on rough or unpaved roads. Traffic vibration from smooth and well-maintained roads is typically not perceptible.

Regulatory Framework

Federal

Federal Transit Administration (FTA). In 2018, the FTA published the Transit Noise and Vibration Impact Assessment Manual to aid in the estimation and analysis of vibration impacts. Typically, potential building and structural damages are the foremost concern when evaluating the impacts of construction-related vibrations. Table 3 summarizes FTA's vibration guidelines for building and structural damage. While these are reference values for vibration levels at 25 feet of distance, this analysis uses logarithmic equations to determine whether building damage would occur regardless of actual distance between construction activity and nearby buildings.

Table 3
FTA Vibration Damage Potential Threshold Criteria

Structure and Condition	Threshold Criteria (in/sec PPV) at 25 Feet
I. Reinforced-concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
Source: Federal Transit Administration "Transit Noise and Vibration Impact Assessment Manual", September 2018.	

[7] California Department of Transportation, Transportation and Construction Vibration Guidance Manual, April 2020; https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf.

[8] Ibid.

The FTA Assessment Manual also cites criteria for cases where more detailed analysis may be required. For buildings consisting of concrete wall and floor foundations, masonry or concrete walls, or stone masonry retaining walls, continuous vibrations of 0.3 inches per second PPV can be damaging. For buildings consisting of steel or reinforced concrete, such as factories, retaining walls, bridges, steel towers, open channels, underground chambers and tunnels with and without concrete alignment, continuous vibrations of 0.5 inches per second PPV can be damaging.

State

California's Civil Code Section 832 protects adjacent properties when excavation of a site occurs.

> *Each coterminous owner is entitled to the lateral and subjacent support which his land receives from the adjoining land, subject to the right of the owner of the adjoining land to make proper and usual excavations on the same for purposes of construction or improvement, under the following conditions:*
>
> 1. *Any owner of land or his lessee intending to make or to permit an excavation shall give reasonable notice to the owner or owners of adjoining lands and of buildings or other structures, stating the depth to which such excavation is intended to be made, and when the excavating will begin.*
>
> 2. *In making any excavation, ordinary care and skill shall be used, and reasonable precautions taken to sustain the adjoining land as such, without regard to any building or other structure which may be thereon, and there shall be no liability for damage done to any such building or other structure by reason of the excavation, except as otherwise provided or allowed by law.*
>
> 3. *If at any time it appears that the excavation is to be of a greater depth than are the walls or foundations of any adjoining building or other structure, and is to be so close as to endanger the building or other structure in any way, then the owner of the building or other structure must be allowed at least 30 days, if he so desires, in which to take measures to protect the same from any damage, or in which to extend the foundations thereof, and he must be given for the same purposes reasonable license to enter on the land on which the excavation is to be or is being made.*
>
> 4. *If the excavation is intended to be or is deeper than the standard depth of foundations, which depth is defined to be a depth of nine feet below the adjacent curb level, at the point where the joint property line intersects the curb and if on the land of the coterminous owner there is any building or other structure the wall or foundation of which goes to standard depth or deeper than the owner of the land on which the excavation is being made shall, if given the necessary license to enter on the adjoining land, protect the said adjoining land and any such building or other structure thereon without cost to the owner thereof, from any damage by reason of the excavation, and shall be liable to the owner of such property for any such damage, excepting only for minor settlement cracks in buildings or other structures.*

California Building Code (CBC) Section 3307 provides additional protection of adjoining property from damage during construction, remodeling, and demolition work. Protection must be provided for footings, foundations, party walls, chimneys, skylights, and roofs.

Caltrans has identified building damage significance guidance that provides thresholds for different categories of structures, including historic buildings that may not be considered extremely fragile (refer to Table 4).

Table 4
Caltrans Vibration Damage Potential Threshold Criteria

Structure and Condition	Significance Thresholds (in/sec PPV)	
	Transient Sources	Continuous/ Frequent/ Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5
Source: California Department of Transportation, 2013. Transient noise is that whose average properties do not remain constant over time and are considered extremely short in duration (e.g., single gunshot)		

City of Culver City General Plan Noise Element. The City of Culver City 2045 General Plan includes a Noise Element that includes policies and standards to guide the control of groundborne vibration to protect residents, workers, and visitors. Its primary goal is to regulate short- and long-term vibration to preserve acceptable noise environments for all types of land uses. It includes programs applicable to construction projects that call for use of best practices to minimize short-term vibration impacts.

The Noise Element includes a goal and several policies specific to groundborne vibration that are relevant for the Proposed Project, including:

Goal N-4. Construction noise. Minimized noise and vibration generated from construction activities.

Policy N-4.1 Limit disturbance from new construction. Minimize construction noise and vibration impacts to reduce the disturbance from new development.

Policy N-4.3 Construction vibration analysis. Require analysis of construction vibration in accordance with established construction vibration guidelines.

Policy N-4.4 Noise-sensitive construction techniques. Encourage using construction techniques that minimize noise and vibration levels.

Existing Conditions

Noise Sensitive Receptors

The Project Site is located along a commercial portion of the Jefferson Boulevard corridor. Noise -sensitive receptors within 0.25 miles of the Project Site include, but are not limited to, the following representative sampling:

- Residences, 4804 Salem Village Court; 75 feet southwest of the Project Site.
- Residences, Jackson Avenue; 780 feet west of the Project Site.
- West Los Angeles College; 1,100 feet southeast of the Project Site.

Existing Ambient Noise Levels

The Project Site is improved with a 42,333 square-foot warehouse facility that has minor sources of operational noise. There is also intermittent noise from the operation of the parking lot that encircles the building, including tire friction as vehicles and trucks navigate to and from parking spaces, minor engine acceleration, doors slamming, and occasional car alarms. Most of these sources are instantaneous (e.g., car alarm chirp, door slam) while others may last a few seconds. There is also infrequent noise from occasional solid waste management and collection activities as well as landscaping activities that are of short duration, as is occasional loading of goods via three roll-up doors on the rear elevation facing east, away from Jefferson Boulevard and nearby residences.

Traffic is the primary source of noise near the Project Site, largely from the operation of vehicles with internal combustion engines and frictional contact with the ground and air.[9] This includes traffic on Jefferson Boulevard, which carries over 20,000 vehicles on an average day.[10] The ambient noise levels along Jefferson Boulevard are dominated by traffic activity on the four-lane arterial often exceeding the 40 mph posted speed limit. Existing development contributes about 74 daily vehicle trips to and from the Project Site along local roads.[11]

In September 2025, DKA Planning took short-term noise measurements near the Project site to determine the ambient noise conditions of the neighborhood near sensitive receptors.[12] As shown in Table 5, noise levels along roadways near the Project Site ranged from 51.8 to 67.9 dBA L_{eq}, which was generally consistent with the traffic volumes from local streets (e.g., Jackson Avenue) to major arterials (e.g., Jefferson Boulevard). Figure 1 illustrates where ambient noise levels were measured near the Project Site to establish the noise environment and their relationship to the applicable sensitive receptor(s). 24-hour CNEL noise levels are generally considered “Normally

9 World Health Organization, https://www.who.int/docstore/peh/noise/Comnoise-2.pdf.

10 City of Culver City, General Plan 2045 Noise Element, Figure 45.

11 Fehr & Peers; Transportation Impact Analysis, Methodologies and Assumptions for 10150 Jefferson Vehicle Service Center; July 2025.

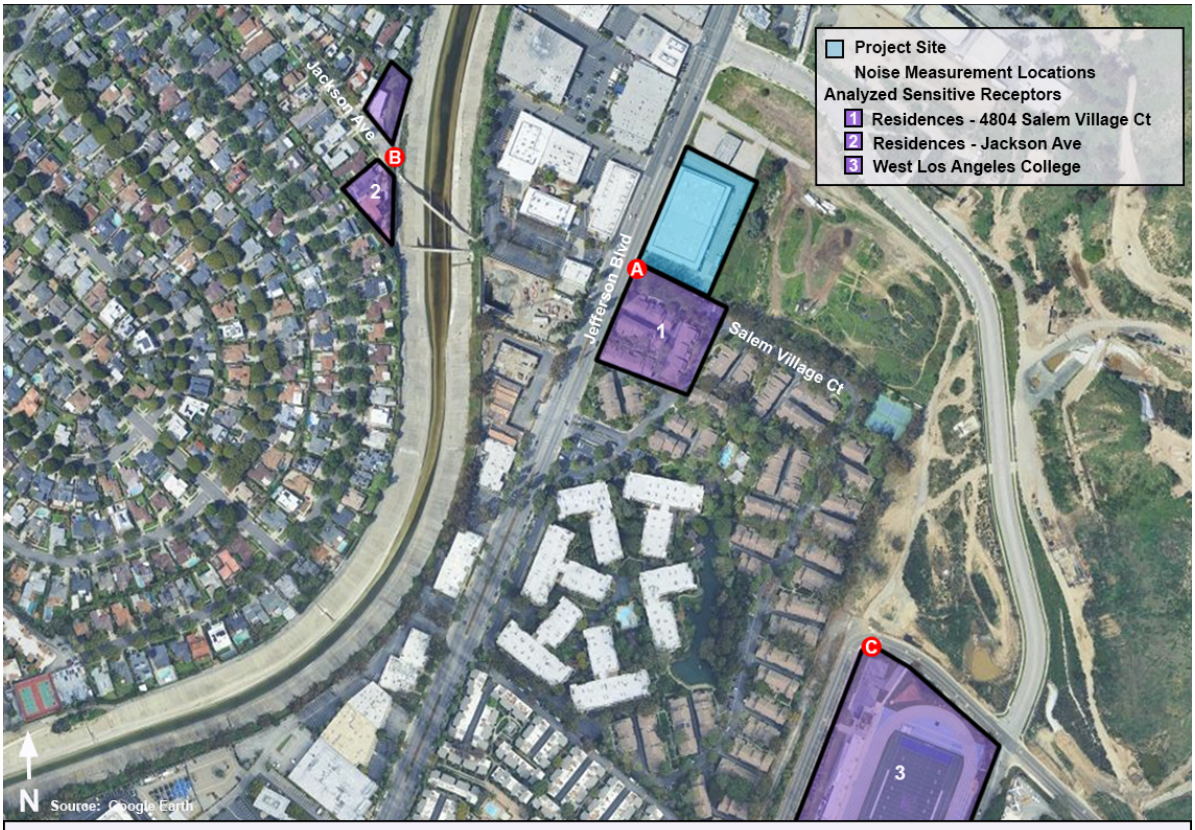
12 Noise measurements were taken using a Quest Technologies Sound Examiner SE-400 Meter. The Sound Examiner meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day’s measurements, and set at approximately five feet above the ground.

Acceptable" for the types of land uses near the Project Site. All would be considered "Clearly Compatible" noise environments for auto service-related uses, pursuant to the City's General Plan Noise Element.

Table 5
Existing Noise Levels

Noise Measurement Locations	Primary Noise Source	Sound Levels		Nearest Sensitive Receptor(s)	Noise/Land Use Compatibility[b,c]
		dBA (L_{eq})	dBA (CNEL)[a]		
A. 4804 Salem Village Ct.	Traffic on Jefferson Blvd.	67.9	65.9	Residences – 4804 Salem Village Ct.	Normally Acceptable/ Clearly Compatible
B. Jackson Ave. cul-de-sac	General traffic	51.8	49.8	Residences – Jackson Ave.	Normally Acceptable/ Clearly Compatible
C. West Los Angeles College	General traffic	52.2	50.2	West Los Angeles College	Normally Acceptable/ Clearly Compatible

[a] Estimated based on short-term (15-minute) noise measurement using Federal Transit Administration procedures from 2018 Transit Noise and Vibration Impact Assessment Manual, Appendix E, Option 4.
[b] Pursuant to California Office of Planning and Research "General Plan Guidelines, Noise Element Guidelines, 2017. When noise measurements apply to two or more land use categories, the more noise-sensitive land use category is used. See Table 2 above for definition of compatibility designations.
[c] Pursuant to Culver City General Plan 2045 Noise Element, Table 11.
Source: DKA Planning, 2025



DouglasKim+Associates,LLC

Figure 1
Noise Measurement Locations

Project Impacts

Methodology – Noise

On-Site Construction Activities. Construction noise levels at off-site sensitive receptors were modeled employing the ISO 9613-2 sound attenuation methodologies using the SoundPLAN Essential model (version 5.1). This software package considers reference equipment noise levels, maximum allowable noise levels allowed by the CCMC, noise management techniques, distance to receptors, and any attenuating features to predict noise levels from sources like construction equipment. Construction noise sources were modeled as area sources to reflect the mobile nature of construction equipment. These vehicles would not operate directly where the Project's property line abuts adjacent structures, as they would retain some setback to preserve maneuverability. This equipment would also occasionally operate at reduced power and intensity to maintain precision at these locations.

Off-Site Construction Noise Activities. The Project's off-site construction noise impact from haul trucks, vendor deliveries, worker commutes, and other vehicles accessing the Project Site was analyzed by considering the Project's anticipated vehicle trip generation with existing traffic and roadway noise levels along local roadways, particularly those likely to be part of any haul route. Because it takes a doubling of traffic volumes on a roadway to generate the increased sound energy it takes to elevate ambient noise levels by 3 dBA[13], the analysis focused on whether truck and auto traffic would double traffic volumes on key roadways to be used for hauling soils to and/or from the Project Site during construction activities.[14] Because haul trucks generate more noise than traditional passenger vehicles, a 19.1 passenger car equivalency (PCE) was used to convert haul truck trips to a reference level conversion to an equivalent number of passenger vehicles.[15] For vendor deliveries, a 13.1 PCE was used to reflect an even blend of medium- and heavy-duty vehicles.[16] It should be noted that because an approved haul route may not be approved as of the preparation of this analysis, assumptions were made about logical routes that would minimize haul truck traffic on local streets in favor of major arterials that can access regional-serving freeways.

On-Site Operational Noise Activities. The Project's potential to result in significant noise impacts from on-site operational noise sources was evaluated by identifying sources of on-site noise and considering the impact that they could produce given the nature of the source (i.e., loudness and whether noise would be produced during daytime or more-sensitive nighttime hours), distances

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13 Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

14 A tripling of traffic volumes (i.e., 3.15x) is needed to elevate traffic noise levels by 5 dBA.

15 Caltrans, Technical Noise Supplement Table 3-3, 2013. Assumes 35 mph speed. While trucks traveling at higher speeds would have lower equivalency values (e.g., PCE is 15.1 at 40 mph), this analysis assumes a posted speed limit typical of major arterials (35 mph). While these equivalent vehicle factors do not consider source heights, Caltrans' factors are appropriate for use, as the local roads used by haul trucks would not involve a sound path where noise levels are intercepted by a barrier or natural terrain feature.

16 Caltrans, Technical Noise Supplement Table 3-3, 2013. Medium-duty trucks have a 7.1 PCE at 35 mph.

to nearby sensitive receptors, ambient noise levels near the Project Site, the presence of similar noise sources in the vicinity, and maximum noise levels permitted by the CCMC.

Off-Site Operational Noise Activities. The Project's off-site noise impact from Project-related traffic was evaluated based its potential to increase traffic volumes on local roadways that serve the Project site. Because it takes a doubling of traffic volumes on a roadway to generate the increased sound energy it takes to elevate ambient noise levels by 3 dBA, the analysis focused on whether auto trips generated by the Project would double traffic volumes on key roadways that access the Project Site.

Methodology

Construction Vibration. Ground-borne vibration impacts during construction activities were evaluated for both on-site and off-site construction activities by identifying potential vibration sources (e.g., construction equipment), estimating the vibration levels at off-site structures, and comparing the proposed impacts against applicable vibration significance thresholds.

Operational Vibration. The Project does not include uses that would generate high levels of ground-borne vibration. Instead, any vibration related to operation of the Project would involve vehicle activity traveling to and from the Project Site. However, vibration from vehicle activities using rubber-tired wheels is unlikely to be perceptible by people. Rubber-tired vehicles traveling at a distance of 50 feet typically generate groundborne vibration of approximately 63.5 VdB.[17] The typical threshold of perception for groundborne vibration is approximately 65 VdB.[18] As such, operational impacts on ground-borne vibration are not analyzed further.

Thresholds of Significance

Construction Noise Thresholds. For purposes of this analysis, the on-site construction noise impact would be considered significant if:

- Construction activities would exceed the ambient noise level by 5 dBA (hourly L_{eq}) at a noise-sensitive use between the hours of 8:00 A.M. and 7:00 P.M. Monday through Friday, before 10:00 A.M. or after 7:00 P.M. on Saturday.

- Construction activities would occur outside hours permitted by CCMC Section 9.07.035 (i.e., 8:00 A.M. to 7:00 P.M. on weekdays and 10:00 A.M. to 7:00 P.M. on weekends).

Operational Noise Thresholds. In addition to applicable City standards and guidelines that would regulate or otherwise moderate the Project's operational noise impacts, the following criteria are adopted to assess the impact of the Project's operational noise sources:

- Project operations would cause ambient noise levels at off-site locations to increase by 3 dBA CNEL or more to or within "normally unacceptable" or "clearly unacceptable"

[17] Federal Transportation Administration, Transit Noise and Vibration Impact Assessment Manual; Generalized Ground Surface Vibration Equations (Table 6-10); September 2018.

[18] Ibid.

noise/land use compatibility categories, as defined by the State's 2017 General Plan Guidelines.

- Project operations would cause any 5 dBA CNEL or greater noise increase.[19]

Groundborne Vibration Thresholds. There are no adopted City standards or other applicable regulations that would govern the Project's groundborne vibration impacts. In assessing impacts related to groudborne vibration, the FTA's criteria in its 2018 Transit Noise and Vibration Impact Assessment manual is used where applicable and relevant. In addition, Caltrans' thresholds for historic buildings are used when structures are not Category IV structures considered extremely susceptible to vibration damage.

Analysis of Project Impacts

Would the Project generate 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?

Construction

On-Site Construction Activities

Building and site improvements would generate noise during the construction process that would span approximately four months as shown in Table 6. Noise-generating activities could occur at the Project Site between 8:00 A.M. and 7:00 P.M. Monday through Friday, in accordance with CCMC Section 9.07.035. On Saturdays, noise-generating activities associated with the improvements would be permitted to occur between 10:00 A.M. and 7:00 P.M.

Table 6
Construction Schedule Assumptions

Phase	Duration	Notes
Building Construction	Months 1-4	Installation of new garage doors on the north and east facades. Interior improvements, cabinetry and carpentry, low voltage systems, trash management.
Architectural Coatings	Months 1-4	Application of interior and exterior coatings and sealants.
Source: DKA Planning, 2025.		

The scope of the improvements would include minor work on the exterior of the building, including installation of window glazing, new architectural paneling, exterior signage, and painting of

[19] As a 3 dBA increase represents a slightly noticeable change in noise level, this threshold considers any increase in ambient noise levels to or within a land use's "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories to be significant so long as the noise level increase can be considered barely perceptible. In instances where the noise level increase would not necessarily result in "normally unacceptable" or "clearly unacceptable" noise/land use compatibility, a 5 dBA increase is still considered to be significant. Increases less than 3 dBA are unlikely to result in noticeably louder ambient noise conditions and would therefore be considered less than significant.

exterior facades. On the east façade, two new roll-up doors and replacement of one door would be done. On the north façade, three new roll-up doors would be installed. Air conditioning equipment would be installed on the roof to climate control customer areas, offices, and the parts facility. The bulk of work would involve interior improvements, including replacement of non-load-bearing interior walls and installation of 39 automotive hoists. Any air filtration equipment required by the SCAQMD would be installed on the roof and would be electrically-powered units that involve a negative flow to exhaust fumes to the outside of the facility.

Smaller equipment such as forklifts, generators, and various powered hand tools and pneumatic equipment would be utilized for most of the. work. Off-site secondary noises would be generated by construction worker vehicles and vendor deliveries. Figure 2 illustrates how noise would propagate from the construction site during building construction, the most intensive phase.

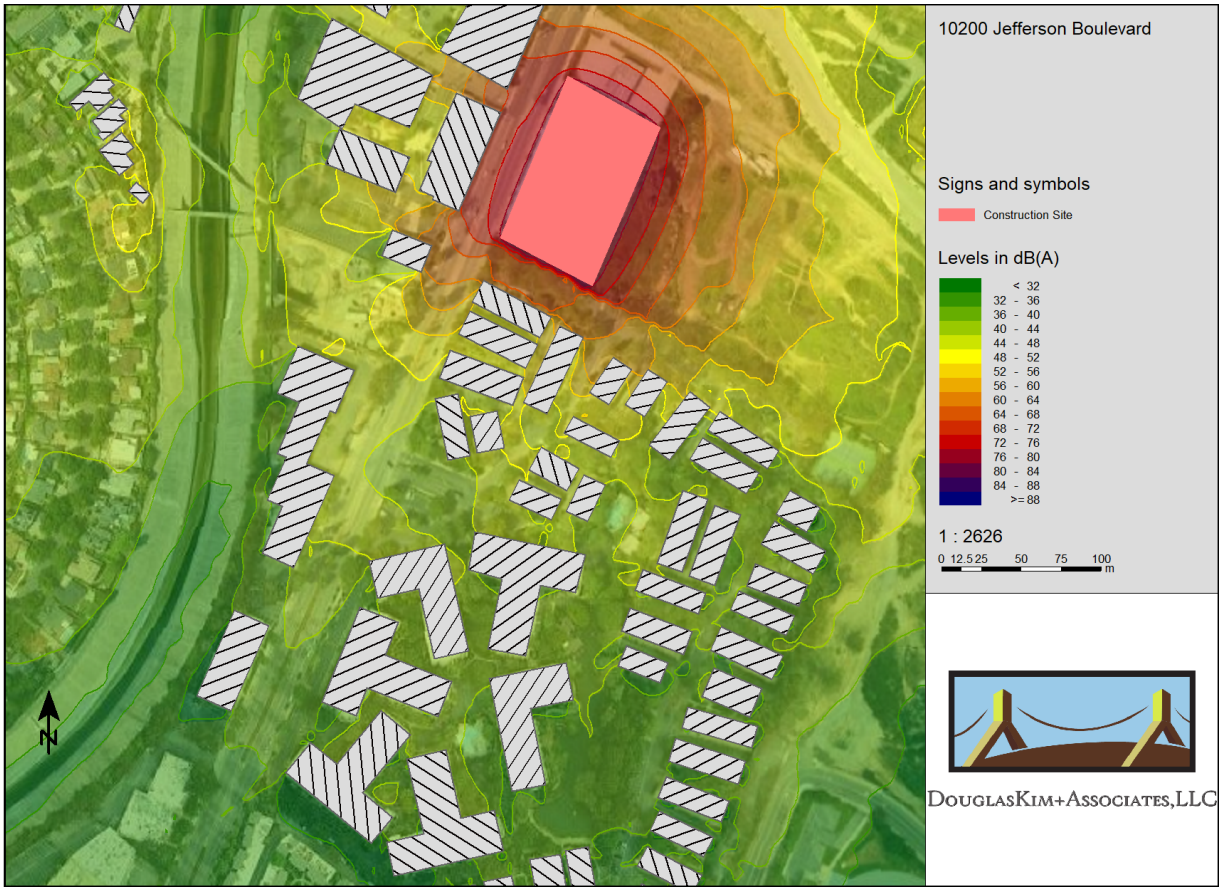


Figure 2
Construction Noise Contours

As shown in Table 7, when considering ambient noise levels, the use of multiple pieces of powered equipment simultaneously would increase ambient noise negligibly. These construction noise levels would not exceed the significance threshold of 5 dBA. Therefore, the Project's on-site construction noise impact would not be significant.

Table 7
Construction Noise Levels at Off-Site Sensitive Receptors

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Significant Impact?
1. Residences – 4804 Salem Village Ct.	61.9	67.9	68.9	1.0	No
2. Residences – Jackson Ave.	51.8	51.8	53.1	1.3	No
3. West Los Angeles College	35.5	52.2	52.3	0.1	No

Source: DKA Planning, 2025.

Off-Site Construction Activities

The Project would generate noise at off-site locations from the Project Site with vendor trips and worker commute trips. These activities would generate up to an estimated eleven peak-hour PCE trips, as summarized in Table 8.[20] Jefferson Boulevard is a major arterial that currently carries several thousand vehicles per hour during typical daytime conditions. Traffic noise is logarithmic, and a doubling of traffic volumes is required to produce an approximate 3 dBA increase, which is the minimum change generally considered clearly perceptible to the average listener. An incremental increase of only eleven hourly PCE trips on a roadway with existing volumes in the thousands would correspond to a noise increase of well less than 1 dBA, which is below the threshold of human perception. Because Project-related construction traffic would not substantially increase hourly traffic volumes, the resulting change in traffic noise levels along Jefferson Boulevard would be negligible and would not be audible to nearby receptors compared to existing conditions. In addition, construction traffic would occur during daytime hours only and would be temporary over the construction period. Thus, construction-related traffic associated with the project would not result in a substantial, permanent, or perceptible increase in traffic noise levels. Therefore, the Project's noise impacts from construction-related traffic would not be significant.

Table 8
Construction Vehicle Trips (Maximum Hourly Passenger Car Equivalents)

Construction Phase	Worker Trips[a]	Vendor Trips	Haul Trips	Total Trips
Building Construction	7	4[b]	0	11
Architectural Coating	1	0	0	1

[a] *Assumes all worker trips occur in the peak hour of construction activity.*
[b] *This phase would generate about 7.1 vendor truck trips daily over a seven-hour workday. Assumes a blend of medium- and heavy-duty vehicle types and a 13.1 PCE.*

Source: DKA Planning, 2025

[20] This is a conservative, worst-case scenario, as it assumes all workers travel to the worksite at the same time and that vendor and haul trips are made in the same early hour, using the same route as haul trucks to travel to and from the Project Site.

Because the Project's construction-related trips would not cause a doubling in traffic volumes (i.e., 100 percent increase) on Jefferson Boulevard, the Project's construction-related traffic would not increase existing noise levels by 3 dBA or more[21], let alone the 5 dBA threshold of significance for off-site construction noise activities. Therefore, the Project's noise impacts from construction-related traffic would not be significant.

Operation

On-Site Operational Noise

During long-term operations, the Project would produce noise from on-site sources such as mechanical equipment associated with the structure itself and from activity at the site. The facility would operate from 7:00 A.M.-6:00 P.M. on weekdays and 8:00 A.M.-4:00 P.M. on Saturdays.

Mechanical Equipment

The Project would utilize the same mechanical equipment that serves the existing warehouse facility, including building ventilation. No auto body work, painting, or use of spray booths is proposed. Instead, the auto service center would utilize 39 automotive hoists to service vehicles. Each lift would have a 208-230V motor that would drive a hydraulic pump with pressurized fluid that emits a low frequency 60Hz hum.[22] Secondary noise would also be generated as vibration from the motor is transmitted to the structure of the lift. The collective sound power of such systems can range from 75 to 95 dBA based on the size of the motor. However, the motors and pumps for these lifts are mounted directly each lift inside the service garage. Installation of auto accessories would also be done within the garage. The interior of the garage would be ventilated using portable fans powered by electricity. As such, mechanical noise from all these operations would be contained in the garage. Any transmission of noise outside the facility would be oriented toward the three open bays on the north façade and three on the east façade, where there are no sensitive receptors with a line-of-sight to the sound paths.

A self-contained vehicle car wash system would be located inside the garage that would generate noise mechanical and fluid-related sources. This would include the operation of high-pressure pumps, water spray nozzles, air blowers or dryers, and vehicle movement within the bay. In general, sound levels range from approximately 70 to 85 dBA measured at a distance of 5 to 10 feet from the equipment. The high-pressure pump and water jets are usually the dominant sources, generating intermittent peaks near 85 dBA during wash and rinse cycles. Air dryers or blowers can produce similar levels, sometimes exceeding 90 dBA at close proximity if high-velocity air is used for drying. Inside a garage, these sounds may be amplified by hard, reflective surfaces, resulting in elevated reverberant sound levels compared to outdoor or open-bay installations. Again, any transmission of noise outside the facility would be oriented toward the

[21] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

[22] LA Parking Lifts, Products Specification Sheets for PL201 model, https://laparkinglifts.com/specifications/.

three open bays on the north façade and three on the east façade, where there are no sensitive receptors with a line-of-sight to the sound paths.

The only source of mechanical operational noise outside the facility would be the operation of six roof-mounted air filtration units that would generate noise from both the fan motor and the movement of air through ducts and filters during the development's hours of operation. This would typically produce continuous broadband noise characterized by low- to mid-frequency components associated with airflow turbulence and motor operation. Based on representative sound power levels for rooftop ventilation units (approximately 90 to 95 dBA), sound would attenuate substantially at the nearest residences 75 feet or more from these systems (Figure 3). Given the ambient noise levels of residences on Salem Village Court (i.e., 67.9 dBA near Jefferson Boulevard), operational noise from the air filtration systems would blend with the existing noise environment and would not result in a substantial increase in ambient noise levels at nearby residential uses. As summarized in Table 9, noise from the operation of these fan-like units (when combined with other operational noise from carrier truck transport of vehicles) would produce negligible impacts over a 24-hour period.

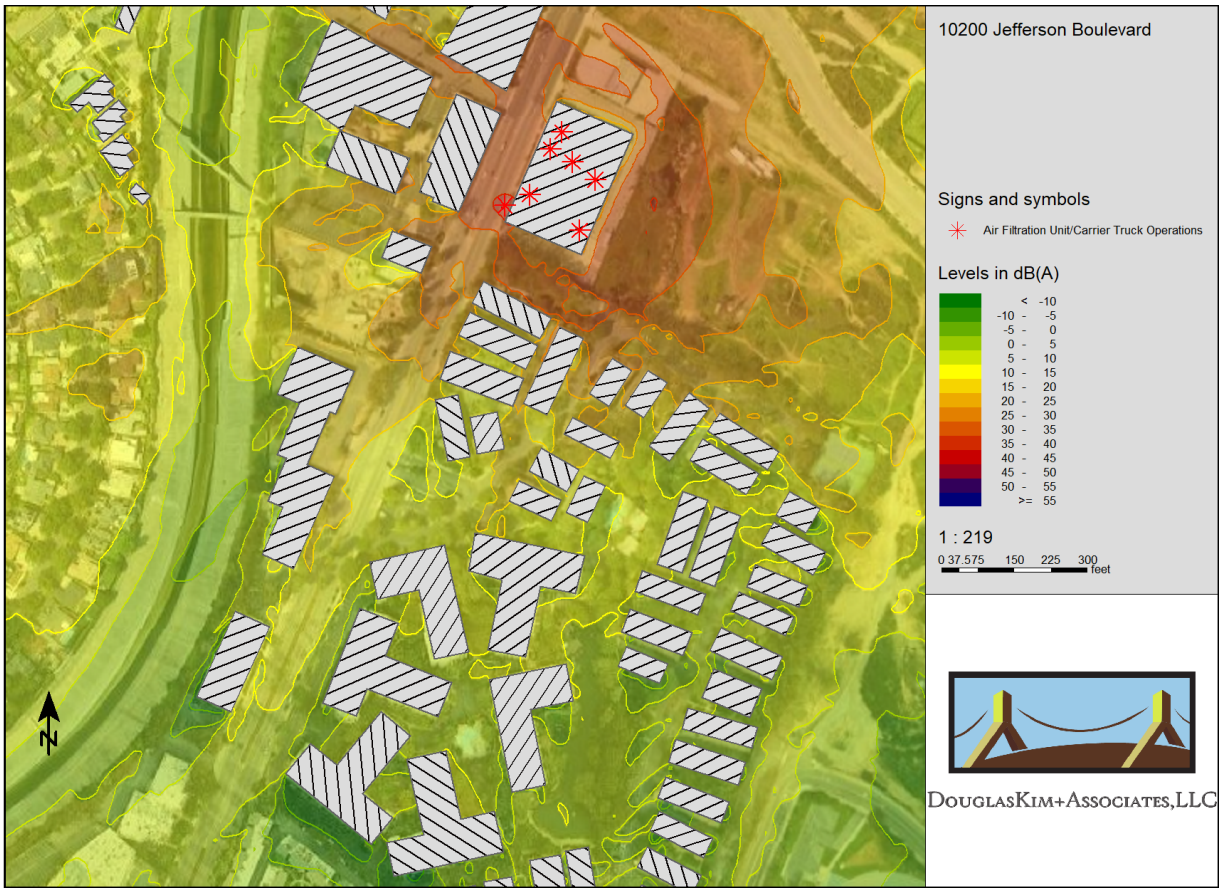


Figure 3
Operations Noise Contours

Table 9
Operations Noise Levels at Off-Site Sensitive Receptors

Receptor	Maximum Noise Level (dBA CNEL)	Existing Ambient Noise Level (dBA CNEL)	New Ambient Noise Level (dBA CNEL)	Increase (dBA CNEL)	Significant Impact?
1. Residences – 4804 Salem Village Ct.	39.9	65.9	65.9	<0.1	No
2. Residences – Jackson Ave.	24.6	49.8	49.8	<0.1	No
3. West Los Angeles College	15.8	50.2	50.2	<0.1	No
Source: DKA Planning, 2025.					

Other sources of noise on the building would include the use of roll-up doors, which would generate brief noise events in the morning when they are raised and the late afternoon when they are lowered. The insulated rolling steel doors would be 30′-4″ wide by 28′-4″ high and operated with a chain hoist mechanism, powered by an electric motor. Each event will generate a short, intermittent mechanical noise during opening/closing from the slat stack, guides/rollers, and hoist chain. While reference noise levels are not generally published, using standard free-field acoustics to estimate likely conditions, a typical point-source operational level of about 70–85 dBA at one meter during brief lift/lower peaks (representative of metal-on-metal mechanical activity) would result in a sound power of 81–96 dBA. That yields estimated instantaneous sound pressure of roughly 46–61 dBA at 50 feet for a single door while it's moving. Because each cycle usually lasts well under a minute, the contribution to hourly L_{eq} is minor and exposure at sensitive receptors would be negligible, as the doors would be located on the north and east facades, facing away from residences to the south and west of the Project Site.

Outdoor Uses

While most operations would be conducted inside the development, outdoor activities could generate noise, including trash collection, landscape maintenance, and commercial loading. These are discussed below.

- Trash collection. On-site trash and recyclable materials would be managed from two waste collection areas at the rear of the Project Site along the east façade. Haul trucks would access solid waste from Jefferson Boulevard, where solid waste activities would include use of trash compactors and hydraulics associated with the refuse trucks themselves. Noise levels of approximately 71 dBA L_{eq} and 66 dBA L_{eq} could be generated by collection trucks and trash compactors, respectively, at 50 feet of distance.[23] Because these activities would be comparable to those associated with the existing warehouse facility, there would not be an increase in intermittent noise from these activities when compared to typical intermittent noise associated with existing and historic use of the site.

23 RK Engineering Group, Inc. Wal-Mart/Sam's Club reference noise level, 2003.

- Landscape maintenance. Noise from gas-powered leaf blowers, lawnmowers, and other landscape equipment can generated substantial bursts of noise during regular maintenance. For example, two gas powered leaf blowers with two-stroke engines and a hose vacuum can generate an average of 85.5 dBA L_{eq} and cause nuisance or potential noise impacts for nearby receptors.[24] Because these activities would be comparable to those associated with the existing warehouse facility, there would not be an increase in intermittent noise from these activities when compared to typical intermittent noise associated with existing and historic use of the site.

- Commercial loading. On-site loading and unloading activities would be managed in the rear of the Project Site. Intermittent use of this area for deliveries would involve minor noise from truck-related maneuvering (e.g., idling, air brakes, back-up alarms, hydraulic lift gates) that generate brief noise. Handling of cargo and goods can involve hydraulically-powered equipment or use of rolling carts. Because these activities would be comparable to those associated with the existing warehouse facility, there would not be an increase in intermittent noise from these activities when compared to typical intermittent noise associated with existing and historic use of the site.

- Carrier truck deliveries. In addition, while most cars repaired at the facility would be brought to the Project Site from customers, carrier trucks would occasionally transport multiple vehicles to the facility on average of one trip per week. These trucks would access a loading zone on Jefferson Boulevard in front of the facility between 9:00 A.M.-4:00 P.M. During these intermittent operations, noise sources would include diesel engines during approach, idling, and positioning; short bursts from air-brake releases; tonal backup alarms during reversing maneuvers; and mechanical impacts from deployment and retraction of steel loading ramps. Additional noise would occur as vehicles are started and moved from the carrier onto the street.

  Noise from a single vehicle carrier unloading operation would be intermittent and short in duration, generally lasting 10 to 15 minutes. Noise levels from truck loading operations would be approximately 70 dBA L_{eq} at 50 feet for idling, 85 dBA L_{max} for backup alarms and ramp clanks, and up to 90 dBA L_{max} for short air-brake releases.[25] When averaged over a one-hour period, these activities would generate approximately 71.5 dBA at 50 feet, or 68 dBA L_{eq} at 75 feet. The loudest instantaneous events, such as air-brake releases or ramp clanks, could reach 81 to 86 dBA L_{max} at 75 feet, but would occur for only a few seconds.

  The ambient noise levels along Jefferson Boulevard at the Project Site is approximately 67.9 dBA L_{eq}, reflecting a daytime sound environment dominated by traffic activity on the four-lane arterial that often exceeds the 40 mph posted speed limit. Combining the project-related unloading noise with the existing ambient noise results in an overall noise level of approximately 70 dBA L_{eq} at over 75 feet for a single carrier unloading within an hour, representing a less than 3-dBA increase above the existing ambient level at the nearest

[24] Erica Walker et al, Harvard School of Public Health; Characteristics of Lawn and Garden Equipment Sound; 2017. This equipment generated a range of 74.0-88.5 dBA Leq at 50 feet.

[25] U.S. Department of Transportation, Federal Highway Administration (FHWA). 2017. *Highway Construction Noise Handbook* (FHWA-HEP-06-015).

residences on Salem Village Court. As summarized in Table 9, the impact of these occasional events would negligibly impact 24-hour CNEL levels at sensitive receptors near the Project Site when combined with noise from rooftop equipment that would be installed. Residences further from Jefferson Boulevard would be exposed to lower noise levels given the attenuation of sound from the increased distance in addition to the building shielding some of the direct line-of-sight.

- Backup alarms. During vehicle delivery and maneuvering operations, truck reverse warning beepers would be activated as carriers or service vehicles back into or reposition within the loading zone on Jefferson Boulevard. For safety reasons, these alarms would be audible above ambient noise levels by at least 5 to 10 dBA,[26] with models ranging from 87-112 dBA at five feet of distance.[27] While the location of the "beep" associated with backup alarms may vary on Jefferson Boulevard, noise from reverse alarms would attenuate by about 25 dBA at the nearest sensitive receptors 75 feet away. This would result in instantaneous noise levels (L_{max}) of 61 to 86 dBA, depending on the alarm type, at these receptors.

  While these "beeps" would be audible against background noise, these backup alarms are brief and intermittent. As such, their contribution to the hourly L_{eq} levels would be small. Assuming a baseline ambient level of 67.9 dBA L_{eq}, the hourly noise level would remain within 68 to 71 dBA L_{eq} for standard industrial alarms used less than one minute per hour. This would elevate existing noise levels by about 3 dBA L_{eq}. More importantly, the temporary noise from any backup alarms would not elevate 24-hour CNEL levels by 5 dBA or more, the threshold of significance for such operational noise impacts.

As discussed above, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The Project would also not increase surrounding noise levels by more than 5 dBA CNEL, the minimum threshold of significance based on the noise/land use category of sensitive receptors near the Project Site. As a result, the Project's on-site operational noise impacts would not be significant.

Off-Site Operational Noise

Operational traffic generated by the Project would not result in a noticeable increase in roadway noise levels along Jefferson Boulevard or the surrounding street network. At full operation, the Project is estimated to generate approximately 159 average daily vehicle trips, including 63 A.M. peak-hour trips and 59 P.M. peak-hour trips. These incremental volumes represent a very small increase when compared to existing and forecast 2026 traffic volumes on Jefferson Boulevard and adjacent arterial roadways, which carry several thousand vehicles per hour during peak periods. Traffic noise is logarithmic, and a doubling of traffic volumes is required to produce an approximate 3 dBA increase, which is the minimum change generally considered clearly perceptible to the average listener. The Project's addition of approximately 59 to 63 peak-hour

[26] Occupational Safety and Health Administration (OSHA). 29 CFR §1926.601(b)(4): Motor Vehicle Audible Alarm Requirements.

[27] Society of Automotive Engineers (SAE). 2008. SAE J994: Back-Up Alarm Standard – Performance Requirements.

trips would represent only a minor fraction of existing and future traffic volumes on Jefferson Boulevard When applied to noise modeling principles, this small increase would result in an incremental traffic noise change of well less than 1 dBA, which is not audible to the human ear and far below any threshold used to identify significant noise impacts under CEQA. Moreover, operational trips would be dispersed across the local roadway network, further reducing the potential for concentrated noise increases at any one location. Because the Project would not generate sufficient traffic to double existing or future roadway volumes, the associated change in traffic noise levels would be negligible. Therefore, the Project's traffic noise impact would not be significant.

For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?

The Project Site is located about 3.3 miles east of the Santa Monica Airport and 4.1 miles north of Los Angeles International Airport. The 2045 General Plan Noise Element notes that "Culver City is not within the aircraft noise exposure area or 65 dBA CNEL noise contour of Santa Monica Airport or within the Airport Land Use Plan area." Because the Project would not be located within the vicinity of a private airstrip or within two miles of a public airport, the Project would not expose local workers or residents in the area to excessive noise levels. This would be considered a less than significant impact.

Would the Project generate excessive groundborne vibration or groundborne noise levels?

Construction

Building Damage Vibration Impact – On-Site Sources

Construction equipment can produce groundborne vibration based on equipment and methods employed. While this spreads through the ground and diminishes in strength with distance, buildings on nearby soil can be affected. This ranges from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibration at moderate levels, and slight damage at the highest levels. Table 10 summarizes vibratory levels for common construction equipment.

As the Proposed Project does not involve demolition of major structures or excavation and grading, it would generally have minimal impacts from any groundborne vibration. However, some minor vibration would be generated by activities such as trenching to lay down electric vehicle conduits in the parking lot, as well as possible shoring to cut garage door openings on the north and east facades. As shown in Table 11, vibration velocities of up to 0.007 inches per second PPV are projected to occur at the closest receptor. This level is well below the 0.2 in/sec PPV threshold of significance for Category III structures. Other potential construction activities would produce less vibration and have lesser potential impacts on nearby receptors. As a result, construction-related structural vibration impacts would not be considered significant.

Table 10
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV at 25 feet (in/sec)
Pile Driver (impact)	0.644
Pile Drive (sonic)	0.170
Clam shovel drop (slurry wall)	0.202
Hydromill (slurry wall)	0.008
Vibratory Roller	0.210
Hoe Ram	0.089
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Truck	0.076
Jackhammer	0.035
Small Bulldozer	0.003
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.	

Table 11
Building Damage Vibration Levels – On-Site Sources

Off-Site Receptor Location	Distance to Project Site (feet)	Vibration Velocity Levels at Off-Site Sensitive Receptors from Construction Equipment (in/sec PPV)					Significance Criterion (PPV)	Significant Impact?
		Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Level (25 Feet)	N/A	0.089	0.089	0.076	0.035	0.003	--	--
Residences – Salem Village Ct.	75	N/A	N/A	N/A	0.007	0.001	0.20[a]	No
[a] *FTA criterion for Category III (non-engineered timber and masonry buildings)* *Source: DKA Planning, 2025.*								

Building Damage Vibration Impact – Off-Site Sources

Construction of the Project would generate trips from vendor delivery trucks and worker commutes. As noted earlier, the FTA considers that groundborne vibration from light-duty vehicles and any larger vehicles using rubber tires is negligible. Therefore, the Project's potential to damage roadside buildings and structures as the result of groundborne vibration generated by its construction-related vehicles would not be significant.

Operation

During operation of the auto service center, there would be no significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. Operational groundborne vibration in the Project Site's vicinity would be generated by its related vehicle travel on local roadways. However as previously discussed, road vehicles rarely create vibration levels perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. As a result, the Project's long-term vibration impacts would not be significant.

Cumulative Impacts (Noise)

During construction of the proposed Project, there could be other construction activity in the area that contributes to cumulative noise impacts at sensitive receptors. Noise from construction of development projects is localized and can affect noise-sensitive uses within 500 feet, based on the City's screening criteria. As such, noise from two construction sites within 1,000 feet of each other can contribute to cumulative noise impacts for receptors located between. There are two potential related projects identified by the City of Culver City within 0.25 miles of the Proposed Project (Table 12), illustrated in Figure 4. These projects are assumed to undergo concurrent construction with the Proposed Project.

Table 12
Related Projects Within 0.25 Miles of Project Site

#	Address	Distance from Project Site	Use	Size	Status
1	10301-10395 Jefferson Blvd.	500 ft.	Office	13,186 sf	Administrative Site Plan Review approved August 2023. Under construction.
2	9925 Jefferson Blvd.	600 ft.	Office	21,203 sf	In Building permit plan check

Source: City of Culver City.

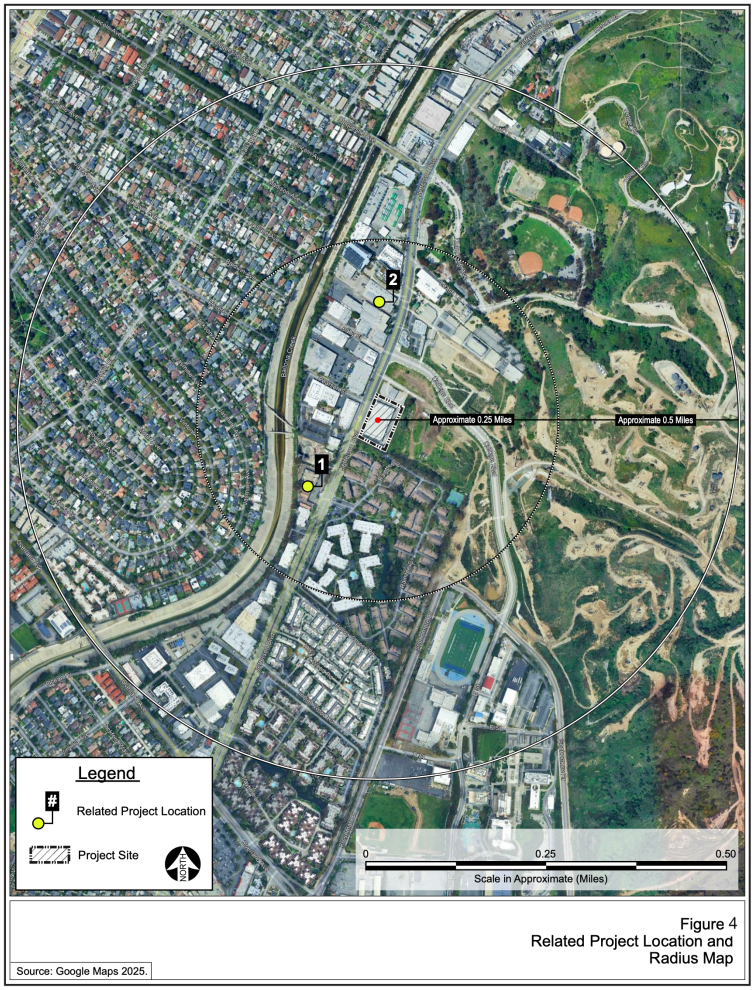


Figure 4
Related Project Location and Radius Map

As summarized in Table 13, the cumulative noise impacts at the analyzed sensitive receptors would not be considered significant, as they would not exceed 5.0 dBA L_{eq}. These cumulative noise levels at analyzed sensitive receptors are marginally higher than impacts from the Proposed Project alone, as more distant related projects have minimal impact on construction noise levels due to intervening structures that shield noise from more distant construction sites. Based on this, there would not be cumulative noise impacts at any nearby sensitive uses located near the Project Site and related projects in the event of concurrent construction activities.

Table 13
Cumulative Construction Noise Impacts at Off-Site Sensitive Receptors

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant ?
1. Residences – 4804 Salem Village Ct.	66.5	67.9	70.3	2.4	No
2. Residences – Jackson Ave.	54.7	51.8	56.5	4.7	No
3. West Los Angeles College	47.5	52.2	53.5	1.3	No
Source: DKA Planning, 2024.					

Off-Site Construction Noise

Other concurrent construction activities from related projects can contribute to cumulative off-site impacts if haul trucks, vendor trucks, or worker trips for any related project(s) were to utilize the same roadways. Distributing trips to and from each related project construction site substantially reduces the potential that cumulative development could more than double traffic volumes on existing streets, which would be necessary to increase ambient noise levels by 3 dBA. The Project would contribute with vendor trips and worker commute trips. These activities would generate eleven peak-hour PCE trips.

The two related projects within 0.25 miles of the Project Site would not be capable of generating this much truck traffic:

1. 10301-10395 Jefferson Boulevard. The expansion of office uses at this location would be comparable in scale and scope as the construction of the Proposed Project. As such, the Project could involve construction traffic that adds a comparable number of vehicles to Jefferson Boulevard as the Proposed Project.

2. 9925 Jefferson Boulevard. The proposed office project would be comparable in scale and scope as the construction of the Proposed Project. As such, the Project could involve construction traffic that adds a comparable number of vehicles to Jefferson Boulevard as the Proposed Project.

As a result, these projects, when combined with the Proposed Project, could generate up to 200-300 PCE trips on to Jefferson Boulevard. Since Jefferson Boulevard carries thousands of daily and peak-hour trips, cumulative noise due to construction truck traffic from the Project and related projects do not have the potential to double traffic volumes on any roadway necessary to elevate traffic noise levels by 3 dBA, let alone the 5 dBA threshold of significance for traffic impacts. As such, cumulative noise impacts from off-site construction would be less than significant.

Operation

The Jefferson Boulevard corridor near the Project Site has been developed with commercial and industrial land uses that have previously generated, and will continue to generate, noise from a number of operational noise sources, including mechanical equipment (e.g., HVAC systems), outdoor activity areas, and vehicle travel. The two related projects in the vicinity of the Project Site are office developments and would also generate stationary-source and mobile-source noise due to ongoing day-to-day operations. This type of use generally does not involve use of noisy heavy-duty equipment such as compressors, diesel-fueled equipment, or other sources typically associated with excessive noise generation.

On-Site Stationary Noise Sources

Noise from on-site mechanical equipment (e.g., HVAC units) and any other human activities from related projects would not be typically associated with excessive noise generation that could result in increases of 5 dBA or more in ambient noise levels at sensitive receptors when combined with operational noise from the Proposed Project. Because of the non-residential zoning of the corridor flanked by the Ballona Creek and Jefferson Boulevard, most sensitive receptors to the west would have negligible exposure to operational noise from the Proposed Project and related projects. Therefore, cumulative stationary source noise impacts associated with operation of the Project and related projects would be less than significant.

Off-Site Mobile Noise Sources

The Project would add approximately 159 daily vehicle trips, including 63 A.M. peak-hour trips and 59 P.M. peak-hour trips, to the local roadway network on weekdays when the development is operational.[28] This includes 27 trips in the A.M. peak hour and 23 in the P.M. peak hour at the intersection of Leahy Street and College Boulevard, and 38 trips in the A.M. peak hour and 36 trips in the P.M. peak hour at the intersection of Raintree Circle. This would represent a negligible addition of traffic volumes on Jefferson Boulevard, a major regional arterial.

Related projects would have to generate 2,500 additional vehicle trips onto Jefferson Boulevard in the peak A.M. hour to elevate noise by 3 dBA. Instead, the two nearby related projects would generate about 73 A.M. peak hour trips (Table 14).[29] When combined with the Proposed Project,

[28] Fehr & Peers. Transportation Impact Analysis; Methodologies and Assumptions for 10150 Jefferson Vehicle Service Center. July 2025.

[29] Institute of Transportation Engineers, Trip Generation Rates (11th Edition).

these three developments would add 100 A.M. peak hour trips onto local roadways, an up to 3.9 percent increase in traffic volume on Jefferson Boulevard in the A.M. peak hour, assuming all vehicle trips use this roadway segment. As this would not increase traffic volumes by 100 percent, cumulative noise impacts due to off-site traffic would not increase ambient noise levels by 3 dBA, let alone by the 5 dBA threshold of significance. Additionally, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Table 14
Related Project Trip Generation

Related Project	Address	A.M. Peak Hour	P.M. Peak Hour
1	10301-10395 Jefferson Blvd.	29	31
2	9925 Jefferson Blvd.	44	46
TOTAL		73	77

Source: Institute of Transportation Engineers, Trip Generation Rates (11th Edition). Trip generation rates based on Peak Hour of Adjacent Street Traffic (One Hour Between 7-9 A.M. and 4-6 P.M.).

Therefore, cumulative noise impacts due to off-site traffic would not increase ambient noise levels by 3 dBA to or within their respective "Normally Unacceptable" or "Clearly Unacceptable" noise categories, or by 5 dBA or greater overall. Additionally, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Cumulative Impacts (Vibration)

On-Site Construction Vibration

During construction of the Project, vibration impacts are generally limited to buildings and structures located near the construction site (i.e., as close as 50 feet as related to building damage). Beyond this distance, cumulative groundborne vibration impacts from a second project are unlikely, as the amplitude of vibration waves decrease substantially due to geometric spreading and material damping within the ground. The rate of this reduction is steep; doubling the distance from the source can reduce vibration levels by more than half. As noted earlier, the Project's potential to damage nearby buildings would be negligible and be considered less than significant.

However, nearby structures could be subject to cumulative vibration levels if concurrent construction and vibration activities were to occur within close proximity. The two reasonably foreseeable related projects are 500 feet or more from the Project Site, distances that would substantially attenuate any vibration from construction activities, as vibration amplitudes decrease sharply due to geometric spreading and soil damping under the ground. The presence of vehicle traffic on Jefferson Boulevard would further dampen any vibration from both related projects,

which are across this major arterial from the Project Site. As such, there is no potential for a cumulative construction vibration impact that subjects nearby buildings to vibration levels that exceed the FTA's vibration damage criteria or Caltrans criteria for historic buildings.

Off-Site Construction Vibration

While haul trucks from any related projects and other concurrent construction projects could generate additional vibration along haul routes, the potential to damage buildings is extremely low. The Project would not involve grading and major demolition activities and the need for heavy-duty haul trucks. The FTA finds that "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." The vibration generated by a typical heavy truck would be approximately 0.00566 in/sec PPV at a distance of 50 feet.

As discussed above, there are existing buildings that are near the right-of-way of the anticipated haul route for the Project (e.g., Jefferson Boulevard). These buildings are anticipated to be exposed to groundborne vibration levels that are far less than the levels recommended by FTA as potential thresholds for building damage. Trucks from any related projects are expected to generate similar groundborne vibration levels. Therefore, the vibration levels generated from off-site construction trucks associated with the Project and other related projects along the anticipated haul route would be below the most stringent building damage threshold of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, potential cumulative vibration impacts with respect to building damage from off-site construction would be less than significant.

On-Site Operation Vibration

During operation of the Project, vibration impacts are generally limited to buildings and structures located near the construction site (i.e., within 15 feet as related to building damage). In general, related projects in this corridor would be office land uses that do not operate impact equipment and operations and would not generate substantial vibration. As a result, operation of new cumulative development in the area would have no potential to exceed FTA vibration damage standards at off-site receptors.

Off-Site Operation Vibration

Like the Project, any concurrent development near the Project Site such as the two related office developments would contribute normal passenger vehicle traffic that would generate negligible changes to roadway vibration. Use of larger heavy-duty trucks for delivery of goods and materials would be intermittent and not result in significant, cumulative increases in groundborne vibration on Jefferson Boulevard and other local roadways. Therefore, potential cumulative vibration impacts with respect to building damage from off-site operations would be less than significant.

TECHNICAL APPENDIX



DouglasKim+Associates,LLC

AMBIENT NOISE MEASUREMENTS



DouglasKim+Associates,LLC

Figure 1
Noise Measurement Locations

Session Report

9/10/2025

Information Panel

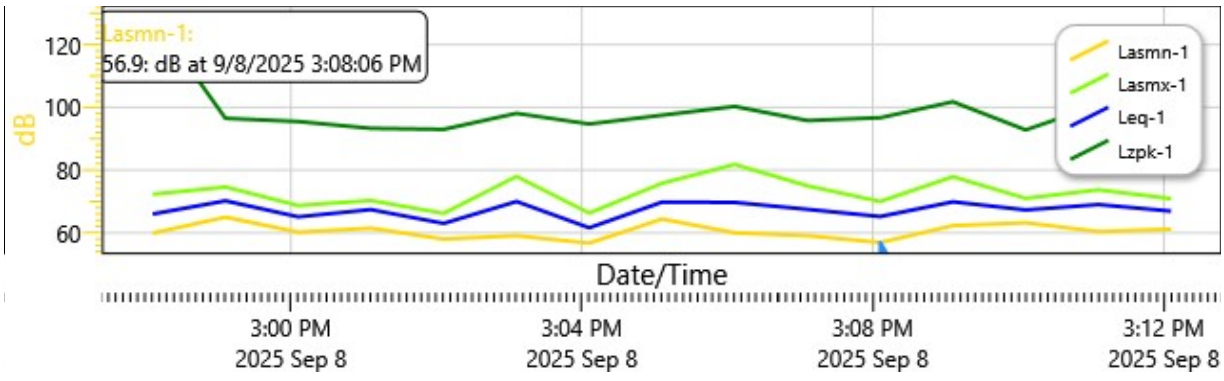
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Run Time	00:15:35
Serial Number	SE40213991
Device Name	SE40213991
Model Type	Sound Examiner
Device Firmware Rev	R.11F
Company Name	
Description	
Location	
User Name	

Summary Data Panel

Description	Meter	Value	Description	Meter	Value
Leq	1	67.9 dB			
Exchange Rate	1	3 dB	Weighting	1	A
Response	1	SLOW	Bandwidth	1	OFF

Logged Data Chart

Salem Village Court: Logged Data Chart



Logged Data Table

Date/Time	Lzpk-1	Lasmn-1	Lasmx-1	Leq-1
9/8/2025 2:58:06 PM	129	59.9	72.3	66
2:59:06 PM	96.5	65	74.6	70.2
3:00:06 PM	95.5	60.2	68.7	65.1
3:01:06 PM	93.3	61.5	70.3	67.4
3:02:06 PM	93	58	66.2	63
3:03:06 PM	98.1	59.1	78	70
3:04:06 PM	94.7	56.7	66.3	61.6
3:05:06 PM	97.5	64.4	75.8	69.8
3:06:06 PM	100.3	60	81.8	69.7
3:07:06 PM	95.8	59.1	75	67.5
3:08:06 PM	96.7	56.9	70	65.2
3:09:06 PM	101.8	62.3	77.9	69.9
3:10:06 PM	92.8	63.2	71	67.3
3:11:06 PM	100.8	60.4	73.7	69
3:12:06 PM	89.6	61.2	70.9	66.9

Session Report

9/10/2025

Information Panel

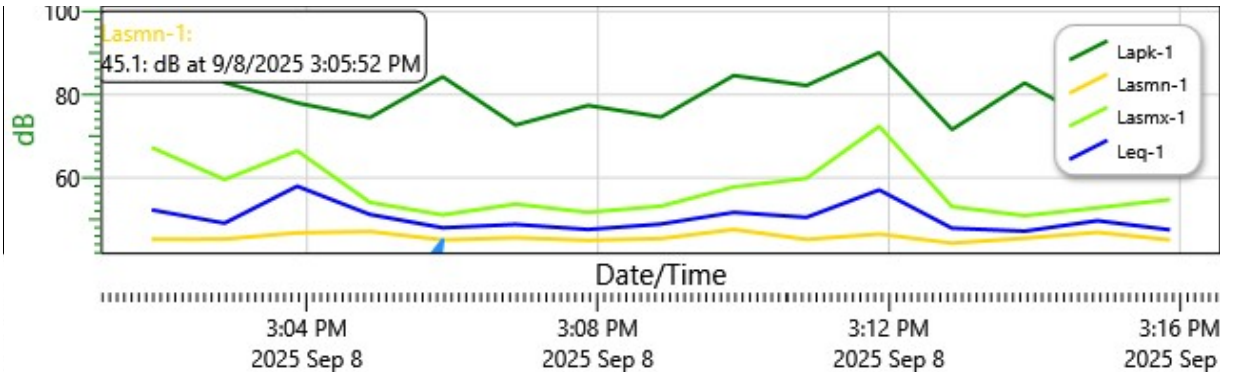
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Run Time	00:15:36
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Model Type	Sound Examiner
Device Firmware Rev	R.11F
Company Name	
Description	
Location	
User Name	

Summary Data Panel

Description	Meter	Value	Description	Meter	Value
Leq	1	51.8 dB			
Exchange Rate	1	3 dB	Weighting	1	A
Response	1	SLOW	Bandwidth	1	OFF

Logged Data Chart

Jackson Ave Cul-De-Sac: Logged Data Chart



Logged Data Table

Date/Time	Lapk-1	Lasmn-1	Lasmx-1	Leq-1
9/8/2025 3:01:52 PM	98.8	45.2	67.3	52.3
3:02:52 PM	82.9	45.3	59.6	49.1
3:03:52 PM	78	46.8	66.5	58
3:04:52 PM	74.5	47.1	54.1	51.2
3:05:52 PM	84.3	45.1	51.1	48
3:06:52 PM	72.7	45.6	53.7	48.8
3:07:52 PM	77.4	45	51.7	47.6
3:08:52 PM	74.6	45.4	53.2	48.9
3:09:52 PM	84.6	47.6	57.8	51.7
3:10:52 PM	82.2	45.2	59.9	50.5
3:11:52 PM	90.1	46.5	72.4	57.1
3:12:52 PM	71.6	44.3	53.1	47.9
3:13:52 PM	82.8	45.5	50.9	47.2
3:14:52 PM	73.1	46.9	52.8	49.7
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Session Report

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Information Panel

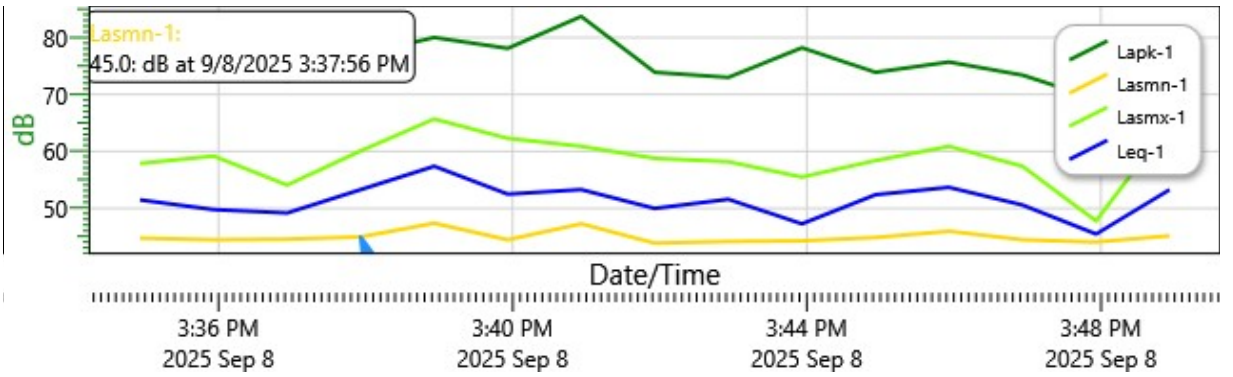
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Run Time	00:15:38
Serial Number	SE40214325
Device Name	SE40214325
Model Type	Sound Examiner
Device Firmware Rev	R.11F
Company Name	
Description	
Location	
User Name	

Summary Data Panel

Description	Meter	Value	Description	Meter	Value
Leq	1	52.2 dB			
Exchange Rate	1	3 dB	Weighting	1	A
Response	1	SLOW	Bandwidth	1	OFF

Logged Data Chart

West Los Angeles College: Logged Data Chart



Logged Data Table

Date/Time	Lapk-1	Lasmn-1	Lasmx-1	Leq-1
9/8/2025 3:34:56 PM	81.2	44.8	57.9	51.5
3:35:56 PM	76.5	44.5	59.2	49.8
3:36:56 PM	72.4	44.6	54.1	49.2
3:37:56 PM	77	45	60.1	53.3
3:38:56 PM	80	47.4	65.7	57.4
3:39:56 PM	78.1	44.5	62.3	52.5
3:40:56 PM	83.7	47.3	60.9	53.3
3:41:56 PM	73.9	43.9	58.8	50
3:42:56 PM	73	44.2	58.2	51.6
3:43:56 PM	78.2	44.3	55.5	47.3
3:44:56 PM	73.9	44.9	58.4	52.4
3:45:56 PM	75.7	46	60.9	53.7
3:46:56 PM	73.4	44.5	57.4	50.6
3:47:56 PM	69.2	44.1	47.8	45.5
3:48:56 PM	77.3	45.2	64.9	53.3



DouglasKim+Associates,LLC

CONSTRUCTION NOISE CALCULATIONS

Phase: Building Construction

Equipment	Sound Power (Lw, dBA)	Load Factor	Minutes per Hour	Hours per Day	Lw Adjusted (1-hr dBA)	Lw Adjusted (8-hr dBA)
Crane, Mobile	118	0.29	15	6	106.6	105.4
Forklift	115	0.2	15	6	102.0	100.7
Generator	117	0.74	60	8	115.7	115.7
Tractor	119	0.37	15	6	108.7	107.4
Welder	109	0.45	15	8	99.5	99.5
Welder	109	0.45	15	8	99.5	99.5
Welder	109	0.45	15	8	99.5	99.5
TOTAL (Cumulative)	123.9				Lw Adjusted (1-hr dBA (total))	117.3
					Lw Adjusted (8-hr dBA (total))	117.0

Phase: Architectural Coatings

Equipment	Sound Power (Lw, dBA)	Load Factor	Minutes per Hour	Hours per Day	Lw Adjusted (1-hr dBA)	Lw Adjusted (8-hr dBA)
Air Compressor	115	0.48	30	6	108.8	107.6
TOTAL (Cumulative)	115.0				Lw Adjusted (1-hr dBA (total))	108.8
					Lw Adjusted (8-hr dBA (total))	107.6

Noise emissions of industry sources

Source name	Size m/m²	Reference	Level Day dB(A)	Level Evening dB(A)	Level Night dB(A)	Corrections Cwall dB	Corrections CI dB	Corrections CT dB
Construction Site	7146 m²	Lw/unit	117.3	-	-	-	-	-

Receiver list

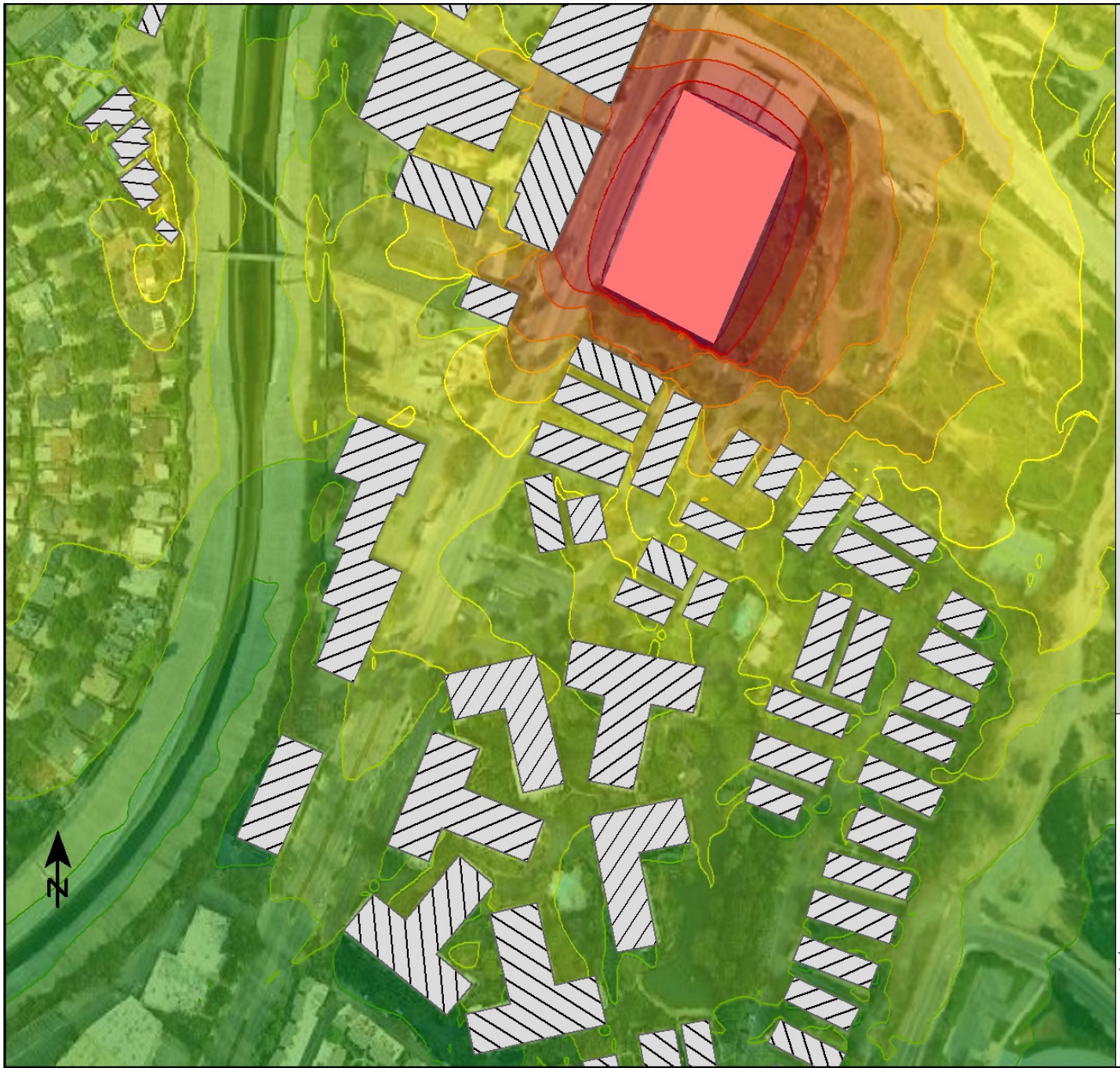
No.	Receiver name	Coordinates X Y in meter	Building side	Floor	Height abv.grd. m	Limit Day dB(A)	Level Day dB(A)	Conflict Day dB
1	Residences - Jackson Ave.	11371447.173764344.91	North east	GF	22.05	-	47.2	-
2	Residences - Salem Village Ct.	11371670.513764258.00	North east	GF	25.25	-	61.9	-
3	West Los Angeles College	11371871.473763934.01	-	GF	30.74	-	35.5	-

Contribution levels of the receivers

Source name		Level Day dB(A)
Residences - Jackson Ave.	GF	47.2
Construction Site		47.2
Residences - Salem Village Ct.	GF	61.9
Construction Site		61.9
West Los Angeles College	GF	35.5
Construction Site		35.5

Mean propagation

Source	Source type	Time slice	L'w dB(A)	Lw dB(A)	KI dB	KT dB	DΩ dB	S m	Adiv dB	Agr dB	Abar dB	Aatm dB	Amisc dB	ADI dB	dLrefl dB	Ls dB(A)	Cmet dB	dLother/dB	dLw dB	ZR dB	Lr dB(A)
Residences - Jackson Ave. , GF																					
1	Area	Day	-38.5	0.0	0.0	0.0	0.0	282.1	-60.0	0.0	-5.2	-0.5	0.0	0.0	0.8	-64.9	0.0	-5.1	117.3	0.0	47.2
1		Evenin	-38.5	0.0	0.0	0.0	0.0	282.1	-60.0	0.0	-5.2	-0.5	0.0	0.0	0.8	-64.9	0.0	0.0	0.0	0.0	0.0
1		Night	-38.5	0.0	0.0	0.0	0.0	282.1	-60.0	0.0	-5.2	-0.5	0.0	0.0	0.8	-64.9	0.0	0.0	0.0	0.0	0.0
1		Lden	-38.5	0.0	0.0	0.0	0.0	282.1	-60.0	0.0	-5.2	-0.5	0.0	0.0	0.8	-64.9	0.0	-5.1	114.2	0.0	44.2
West Los Angeles College , GF																					
1	Area	Day	-38.5	0.0	0.0	0.0	0.0	411.1	-63.3	0.0	-14.0	-0.8	0.0	0.0	2.9	-75.2	0.0	-6.5	117.3	0.0	35.5
1		Evenin	-38.5	0.0	0.0	0.0	0.0	411.1	-63.3	0.0	-14.0	-0.8	0.0	0.0	2.9	-75.2	0.0	0.0	0.0	0.0	0.0
1		Night	-38.5	0.0	0.0	0.0	0.0	411.1	-63.3	0.0	-14.0	-0.8	0.0	0.0	2.9	-75.2	0.0	0.0	0.0	0.0	0.0
1		Lden	-38.5	0.0	0.0	0.0	0.0	411.1	-63.3	0.0	-14.0	-0.8	0.0	0.0	2.9	-75.2	0.0	-6.5	114.2	0.0	32.5
Residences - Salem Village Ct. , GF																					
1	Area	Day	-38.5	0.0	0.0	0.0	0.0	71.64	-48.1	-0.3	-5.3	-0.1	0.0	0.0	0.5	-53.3	0.0	-2.0	117.3	0.0	61.9
1		Evenin	-38.5	0.0	0.0	0.0	0.0	71.64	-48.1	-0.3	-5.3	-0.1	0.0	0.0	0.5	-53.3	0.0	0.0	0.0	0.0	0.0
1		Night	-38.5	0.0	0.0	0.0	0.0	71.64	-48.1	-0.3	-5.3	-0.1	0.0	0.0	0.5	-53.3	0.0	0.0	0.0	0.0	0.0
1		Lden	-38.5	0.0	0.0	0.0	0.0	71.64	-48.1	-0.3	-5.3	-0.1	0.0	0.0	0.5	-53.3	0.0	-2.0	114.2	0.0	58.9



10200 Jefferson Boulevard

Signs and symbols

Construction Site

Levels in dB(A)

< 32
32 - 36
36 - 40
40 - 44
44 - 48
48 - 52
52 - 56
56 - 60
60 - 64
64 - 68
68 - 72
72 - 76
76 - 80
80 - 84
84 - 88
>= 88

1 : 2626

0 12.5 25 50 75 100 m

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10200 Jefferson Boulevard

Signs and symbols

- Analyzed Outdoor Sensitive Receptor
- Analyzed Sensitive Receptor
- Construction Site

1 : 2626

0 12.5 25 50 75 100 m

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OFF-SITE CONSTRUCTION-RELATED TRAVEL VOLUMES

Construction Phase	Worker Trips	Vendor Trips	Haul Trips	Total
Building Construction	6.9	3.8		10.7
Architectural Coatings	1.4	0.0		1.4

Haul trips represent heavy-duty truck trips with a 19.1 Passenger Car Equivalent applied; Vendor trips are an e



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CUMULATIVE PROJECTS



Figure 1
Related Project Location and Radius Map

Source: Google Maps 2025.



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CUMULATIVE CONSTRUCTION NOISE IMPACTS

Noise emissions of industry sources

Source name	Size m/m²	Reference	Level Day dB(A)	Level Evening dB(A)	Level Night dB(A)	Corrections Cwall dB	Corrections CI dB	Corrections CT dB
Project Construction Site	7146 m²	Lw/unit	117.3	-	-	-	-	-
Related Project - 9925 Jefferson Bl.	7625 m²	Lw/unit	117.3	-	-	-	-	-
Related Project - 10301-10395 Jefferson Bl.	7571 m²	Lw/unit	117.3	-	-	-	-	-

Receiver list

No.	Receiver name	Coordinates X Y in meter	Building side	Floor	Height abv.grd. m	Limit Day dB(A)	Level Day dB(A)	Conflict Day dB
1	Residences - Jackson Ave.	11371447.173764344.91	North east	GF	22.05	-	54.7	-
2	Residences - Salem Village Ct.	11371670.513764258.00	North east	GF	25.25	-	66.5	-
3	West Los Angeles College	11371871.473763934.01	-	GF	30.74	-	47.5	-

Contribution levels of the receivers

Source name		Level Day dB(A)
Residences - Jackson Ave.	GF	54.7
Project Construction Site		51.9
Related Project - 9925 Jefferson Bl.		47.9
Related Project - 10301-10395 Jefferson Bl.		48.8
Residences - Salem Village Ct.	GF	66.5
Project Construction Site		66.4
Related Project - 9925 Jefferson Bl.		44.8
Related Project - 10301-10395 Jefferson Bl.		38.3
West Los Angeles College	GF	47.5
Project Construction Site		45.2
Related Project - 9925 Jefferson Bl.		40.1
Related Project - 10301-10395 Jefferson Bl.		41.1

Mean propagation

Source	Source type	Time slice	L'w dB(A)	Lw dB(A)	KI dB	KT dB	DΩ dB	S m	Adiv dB	Agr dB	Abar dB	Aatm dB	Amisc dB	ADI dB	dLrefl dB	Ls dB(A)	Cmet dB	dLother/dB	dLw dB	ZR dB	Lr dB(A)
Residences - Jackson Ave. , GF																					
1	Area	Day	-38.5	0.0	0.0	0.0	3.0	281.9	-60.0	-4.3	-3.5	-0.5	0.0	0.0	0.0	-65.4	0.0	116.3	117.3	0.0	51.9
1		Evenin	-38.5	0.0	0.0	0.0	3.0	281.9	-60.0	-4.3	-3.5	-0.5	0.0	0.0	0.0	-65.4	0.0	-935.6	0.0	0.0	0.0
1		Night	-38.5	0.0	0.0	0.0	3.0	281.9	-60.0	-4.3	-3.5	-0.5	0.0	0.0	0.0	-65.4	0.0	-935.6	0.0	0.0	0.0
1		Lden	-38.5	0.0	0.0	0.0	3.0	281.9	-60.0	-4.3	-3.5	-0.5	0.0	0.0	0.0	-65.4	0.0	109.9	114.3	0.0	48.9
3		Day	78.5	117.3	0.0	0.0	3.0	384.4	-62.7	-4.3	-4.6	-0.7	0.0	0.0	0.0	47.9	0.0	-1.0	0.0	0.0	47.9
3		Evenin	78.5	117.3	0.0	0.0	3.0	384.4	-62.7	-4.3	-4.6	-0.7	0.0	0.0	0.0	47.9	0.0	-1048.9	0.0	0.0	0.0
3		Night	78.5	117.3	0.0	0.0	3.0	384.4	-62.7	-4.3	-4.6	-0.7	0.0	0.0	0.0	47.9	0.0	-1048.9	0.0	0.0	0.0
3		Lden	78.5	117.3	0.0	0.0	3.0	384.4	-62.7	-4.3	-4.6	-0.7	0.0	0.0	0.0	47.9	0.0	-7.4	-3.0	0.0	44.9
2		Day	76.2	115.0	0.0	0.0	3.0	225.7	-58.1	-3.9	-6.9	-0.4	0.0	0.0	0.0	48.8	0.0	-1.0	0.0	0.0	48.8
2		Evenin	76.2	115.0	0.0	0.0	3.0	225.7	-58.1	-3.9	-6.9	-0.4	0.0	0.0	0.0	48.8	0.0	-1049.8	0.0	0.0	0.0
2		Night	76.2	115.0	0.0	0.0	3.0	225.7	-58.1	-3.9	-6.9	-0.4	0.0	0.0	0.0	48.8	0.0	-1049.8	0.0	0.0	0.0
2		Lden	76.2	115.0	0.0	0.0	3.0	225.7	-58.1	-3.9	-6.9	-0.4	0.0	0.0	0.0	48.8	0.0	-7.4	-3.0	0.0	45.8
West Los Angeles College , GF																					
1	Area	Day	-38.5	0.0	0.0	0.0	3.0	410.8	-63.3	-4.8	-6.3	-0.8	0.0	0.0	0.0	-72.1	0.0	116.3	117.3	0.0	45.2
1		Evenin	-38.5	0.0	0.0	0.0	3.0	410.8	-63.3	-4.8	-6.3	-0.8	0.0	0.0	0.0	-72.1	0.0	-928.9	0.0	0.0	0.0
1		Night	-38.5	0.0	0.0	0.0	3.0	410.8	-63.3	-4.8	-6.3	-0.8	0.0	0.0	0.0	-72.1	0.0	-928.9	0.0	0.0	0.0
1		Lden	-38.5	0.0	0.0	0.0	3.0	410.8	-63.3	-4.8	-6.3	-0.8	0.0	0.0	0.0	-72.1	0.0	109.9	114.3	0.0	42.2
3		Day	78.5	117.3	0.0	0.0	3.0	717.5	-68.1	-4.7	-6.0	-1.4	0.0	0.0	0.0	40.1	0.0	-1.0	0.0	0.0	40.1
3		Evenin	78.5	117.3	0.0	0.0	3.0	717.5	-68.1	-4.7	-6.0	-1.4	0.0	0.0	0.0	40.1	0.0	-1041.1	0.0	0.0	0.0
3		Night	78.5	117.3	0.0	0.0	3.0	717.5	-68.1	-4.7	-6.0	-1.4	0.0	0.0	0.0	40.1	0.0	-1041.1	0.0	0.0	0.0
3		Lden	78.5	117.3	0.0	0.0	3.0	717.5	-68.1	-4.7	-6.0	-1.4	0.0	0.0	0.0	40.1	0.0	-7.4	-3.0	0.0	37.1
2		Day	76.2	115.0	0.0	0.0	3.0	383.5	-62.7	-4.7	-8.9	-0.8	0.0	0.0	0.1	41.1	0.0	-1.0	0.0	0.0	41.1
2		Evenin	76.2	115.0	0.0	0.0	3.0	383.5	-62.7	-4.7	-8.9	-0.8	0.0	0.0	0.1	41.1	0.0	-1042.1	0.0	0.0	0.0
2		Night	76.2	115.0	0.0	0.0	3.0	383.5	-62.7	-4.7	-8.9	-0.8	0.0	0.0	0.1	41.1	0.0	-1042.1	0.0	0.0	0.0
2		Lden	76.2	115.0	0.0	0.0	3.0	383.5	-62.7	-4.7	-8.9	-0.8	0.0	0.0	0.1	41.1	0.0	-7.4	-3.0	0.0	38.1
Residences - Salem Village Ct. , GF																					
1	Area	Day	-38.5	0.0	0.0	0.0	3.0	71.57	-48.1	-3.6	-2.1	-0.1	0.0	0.0	0.1	-50.9	0.0	116.3	117.3	0.0	66.4
1		Evenin	-38.5	0.0	0.0	0.0	3.0	71.57	-48.1	-3.6	-2.1	-0.1	0.0	0.0	0.1	-50.9	0.0	-950.1	0.0	0.0	0.0
1		Night	-38.5	0.0	0.0	0.0	3.0	71.57	-48.1	-3.6	-2.1	-0.1	0.0	0.0	0.1	-50.9	0.0	-950.1	0.0	0.0	0.0
1		Lden	-38.5	0.0	0.0	0.0	3.0	71.57	-48.1	-3.6	-2.1	-0.1	0.0	0.0	0.1	-50.9	0.0	109.9	114.3	0.0	63.4
3		Day	78.5	117.3	0.0	0.0	3.0	374.8	-62.5	-4.6	-7.7	-0.7	0.0	0.0	0.0	44.8	0.0	-1.0	0.0	0.0	44.8
3		Evenin	78.5	117.3	0.0	0.0	3.0	374.8	-62.5	-4.6	-7.7	-0.7	0.0	0.0	0.0	44.8	0.0	-1045.8	0.0	0.0	0.0
3		Night	78.5	117.3	0.0	0.0	3.0	374.8	-62.5	-4.6	-7.7	-0.7	0.0	0.0	0.0	44.8	0.0	-1045.8	0.0	0.0	0.0
3		Lden	78.5	117.3	0.0	0.0	3.0	374.8	-62.5	-4.6	-7.7	-0.7	0.0	0.0	0.0	44.8	0.0	-7.4	-3.0	0.0	41.8
2		Day	76.2	115.0	0.0	0.0	3.0	154.1	-54.8	-4.4	-20.4	-0.3	0.0	0.0	0.1	38.3	0.0	-1.0	0.0	0.0	38.3
2		Evenin	76.2	115.0	0.0	0.0	3.0	154.1	-54.8	-4.4	-20.4	-0.3	0.0	0.0	0.1	38.3	0.0	-1039.3	0.0	0.0	0.0
2		Night	76.2	115.0	0.0	0.0	3.0	154.1	-54.8	-4.4	-20.4	-0.3	0.0	0.0	0.1	38.3	0.0	-1039.3	0.0	0.0	0.0
2		Lden	76.2	115.0	0.0	0.0	3.0	154.1	-54.8	-4.4	-20.4	-0.3	0.0	0.0	0.1	38.3	0.0	-7.4	-3.0	0.0	35.3



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OPERATIONS NOISE CALCULATIONS

Noise emissions of industry sources

Source name	Size	Reference	Level		Frequency spectrum [dB(A)]								Corrections		
					63	125	250	500	1	2	4	8	Cwall	CI	CT
	m/m²			dB(A)	Hz	Hz	Hz	Hz	kHz	kHz	kHz	kHz	dB	dB	dB
Carrier Truck Operations	-	Lw/unit	Day	63.2	30.2	40.2	47.3	53.3	56.2	57.2	57.3	55.2	-	-	-
			Evening	-	-	-	-	-	-	-	-	-	-	-	-
			Night	-	-	-	-	-	-	-	-	-	-	-	-
Air Filtration Unit	-	Lw/unit	Day	89.0									-	-	-
			Evening	-									-	-	-
			Night	-									-	-	-
	-	Lw/unit	Day	89.0									-	-	-
			Evening	-									-	-	-
			Night	-									-	-	-
	-	Lw/unit	Day	89.0									-	-	-
			Evening	-									-	-	-
			Night	-									-	-	-
	-	Lw/unit	Day	89.0									-	-	-
			Evening	-									-	-	-
			Night	-									-	-	-
	-	Lw/unit	Day	89.0									-	-	-
			Evening	-									-	-	-
			Night	-									-	-	-
	-	Lw/unit	Day	89.0									-	-	-
			Evening	-									-	-	-
			Night	-									-	-	-

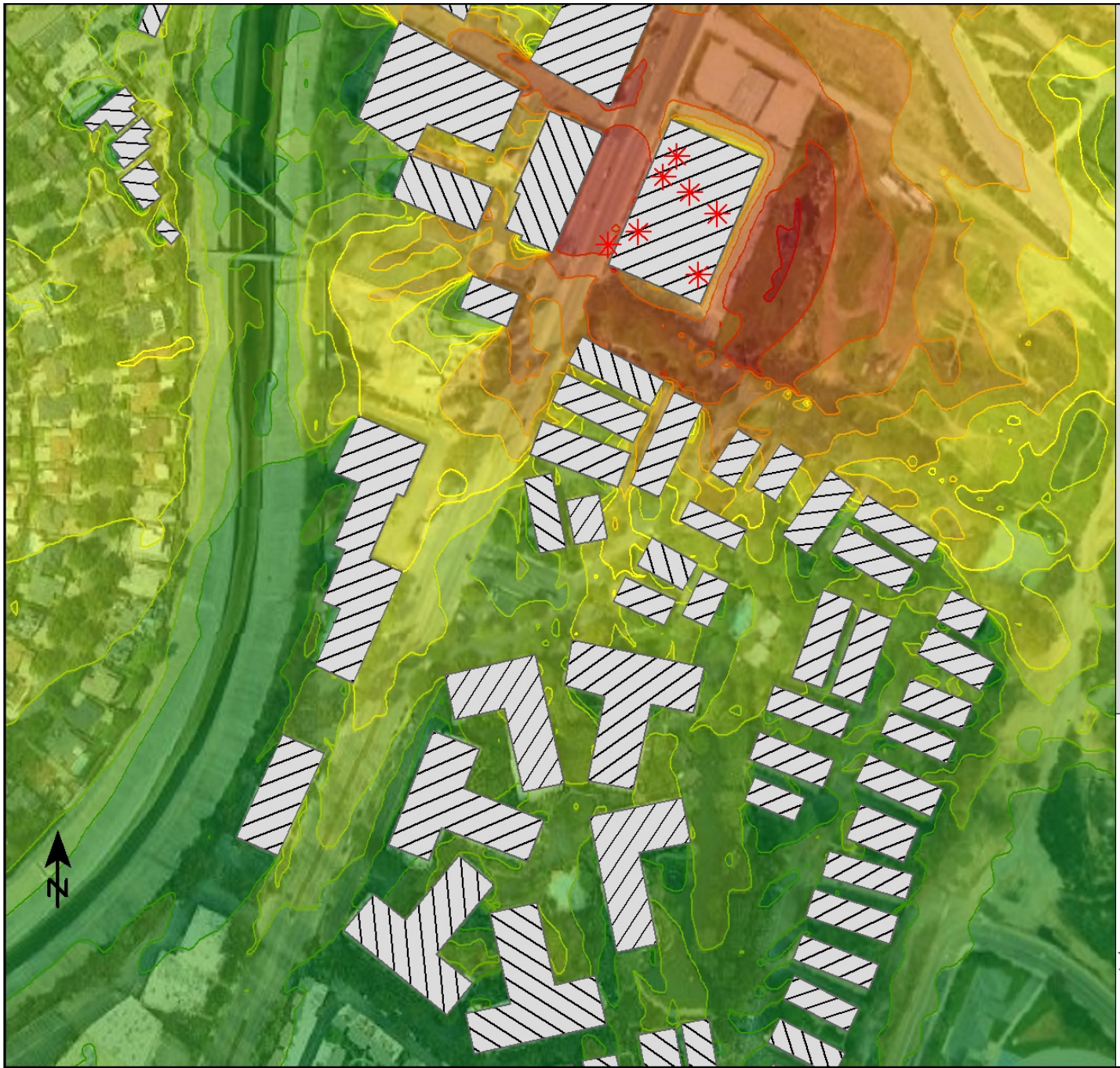
Receiver list

No.	Receiver name	Coordinates X in meter	Coordinates Y in meter	Building side	Floor	Heigh abv.gr m	Limit Day dB(A)	Limit Eveni dB(A)	Limit Night dB(A)	Limit Lden dB(A)	Level Day dB(A)	Level Eveni dB(A)	Level Night dB(A)	Level Lden dB(A)	Conflict Day dB	Conflict Eveni dB	Conflict Night dB	Conflict Lden dB
1	Residences - Jackson Av	113714	3764344	North ea	GF	22.05	-	-	-	-	27.7	0.0	0.0	24.6	-	-	-	-
3	West Los Angeles Colleg	113718	3763934	-	GF	30.74	-	-	-	-	18.8	0.0	0.0	15.8	-	-	-	-
	Residences - Salem Villa	113716	3764253	North ea	GF	25.25	-	-	-	-	43.0	0.0	0.0	39.9	-	-	-	-



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OPERATIONS NOISE CALCULATIONS
(DAY)



10200 Jefferson Boulevard

Signs and symbols

Air Filtration Unit/Carrier Truck Operations

Levels in dB(A)

< 20
20 - 23
23 - 26
26 - 29
29 - 32
32 - 35
35 - 38
38 - 41
41 - 44
44 - 47
47 - 50
50 - 53
53 - 56
56 - 59
59 - 62
>= 62

1 : 219

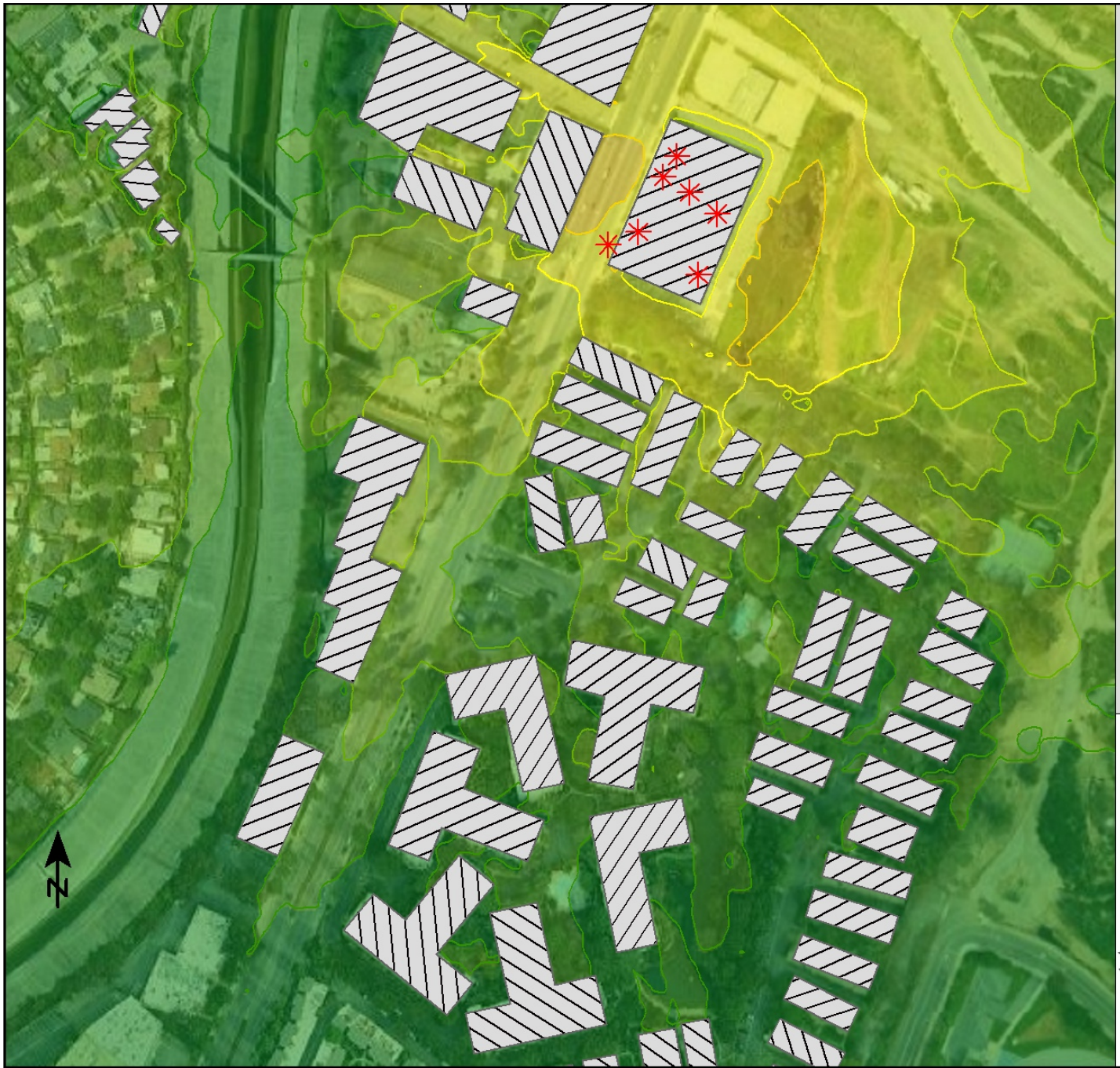
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DouglasKim+Associates,LLC

OPERATIONS NOISE CALCULATIONS
(CNEL)



10200 Jefferson Boulevard

Signs and symbols

Air Filtration Unit/Carrier Truck Operations

Levels in dB(A)

< 20
20 - 25
25 - 30
30 - 35
35 - 40
40 - 45
45 - 50
50 - 55
55 - 60
60 - 65
65 - 70
70 - 75
75 - 80
80 - 85
>= 85

1 : 219

0 37.575 150 225 300 feet

DouglasKim+Associates,LLC

Operations Noise Impacts

DouglasKim+Associates,LLC

Receptor	Existing Leq	Noise	New Leq	Difference Leq	Significant?
Residences - Salem Village Court	65.9	39.9	65.9	0.0	**No**
Residences - Jackson Ave.	49.8	24.6	49.8	0.0	**No**
West Los Angeles College	50.2	15.8	50.2	0.0	**No**



DouglasKim+Associates,LLC

RELATED PROJECT TRIP GENERATION ESTIMATES

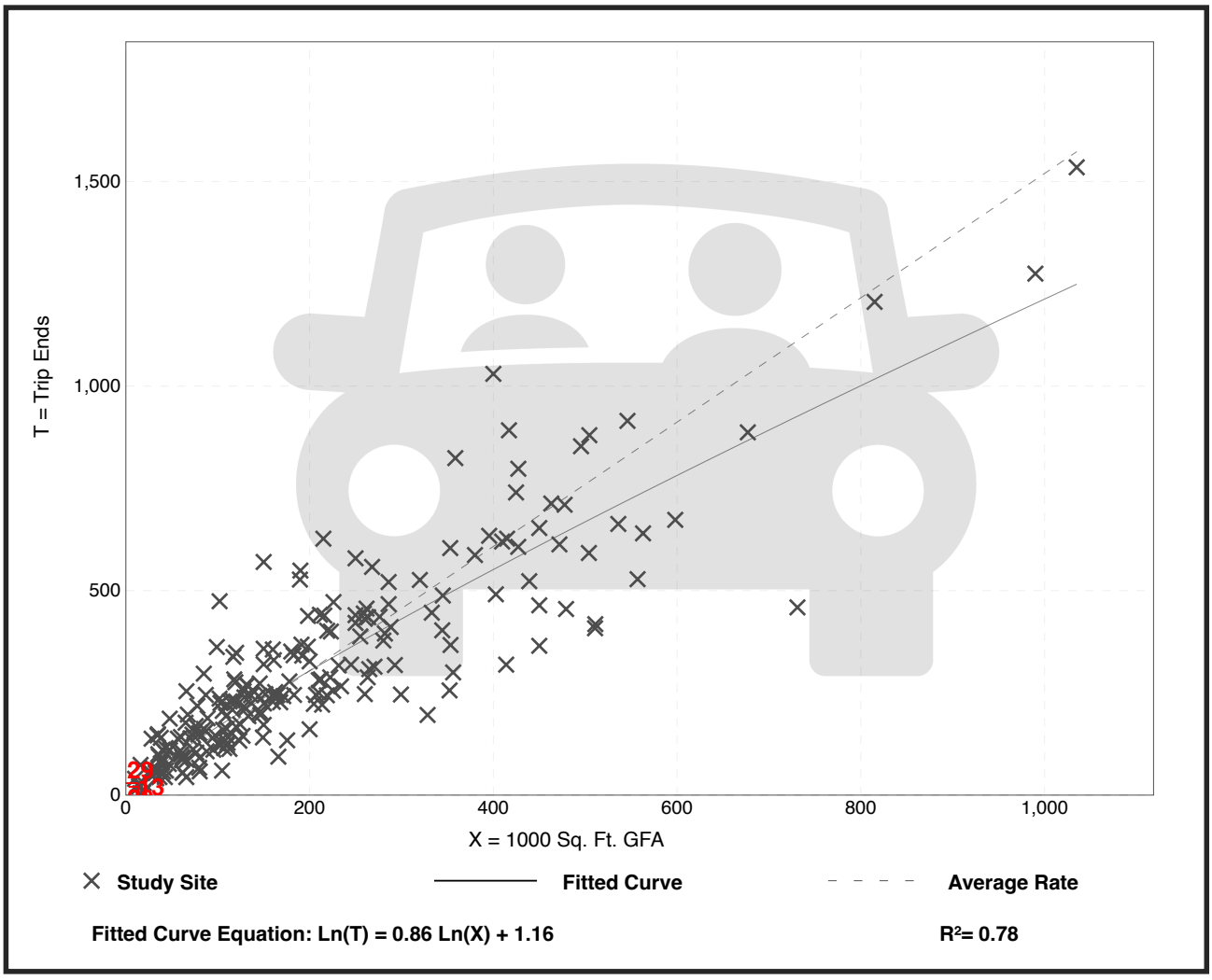
General Office Building
(710)

Vehicle Trip Ends vs: **1000 Sq. Ft. GFA**
On a: **Weekday,**
Peak Hour of Adjacent Street Traffic,
One Hour Between 7 and 9 a.m.
Setting/Location: **General Urban/Suburban**
Number of Studies: 221
Avg. 1000 Sq. Ft. GFA: 201
Directional Distribution: 88% entering, 12% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
1.52	0.32 - 4.93	0.58

Data Plot and Equation



Trip Gen Manual, 11th Edition ● Institute of Transportation Engineers

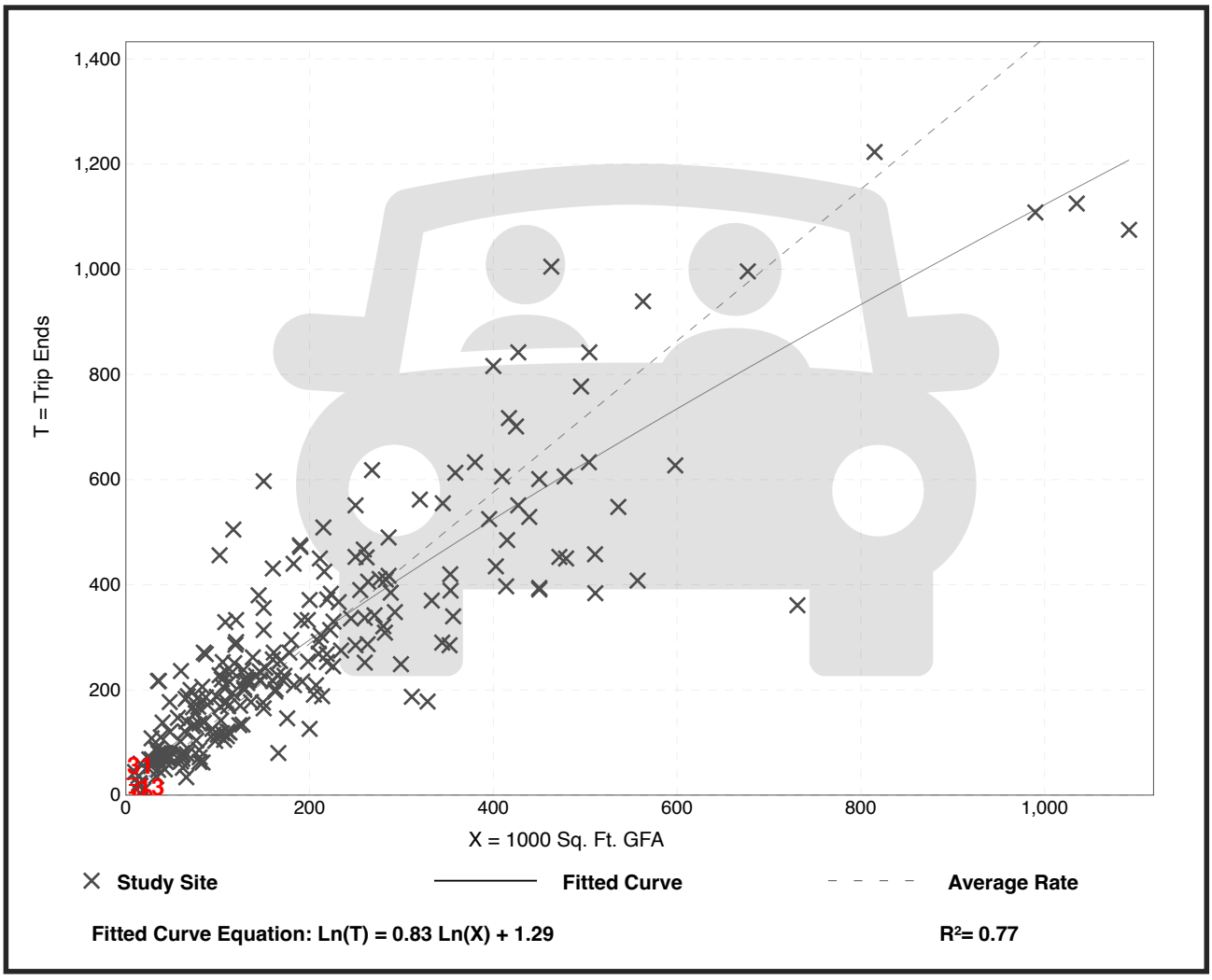
General Office Building
(710)

Vehicle Trip Ends vs: **1000 Sq. Ft. GFA**
On a: **Weekday,**
Peak Hour of Adjacent Street Traffic,
One Hour Between 4 and 6 p.m.
Setting/Location: **General Urban/Suburban**
Number of Studies: 232
Avg. 1000 Sq. Ft. GFA: 199
Directional Distribution: 17% entering, 83% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
1.44	0.26 - 6.20	0.60

Data Plot and Equation



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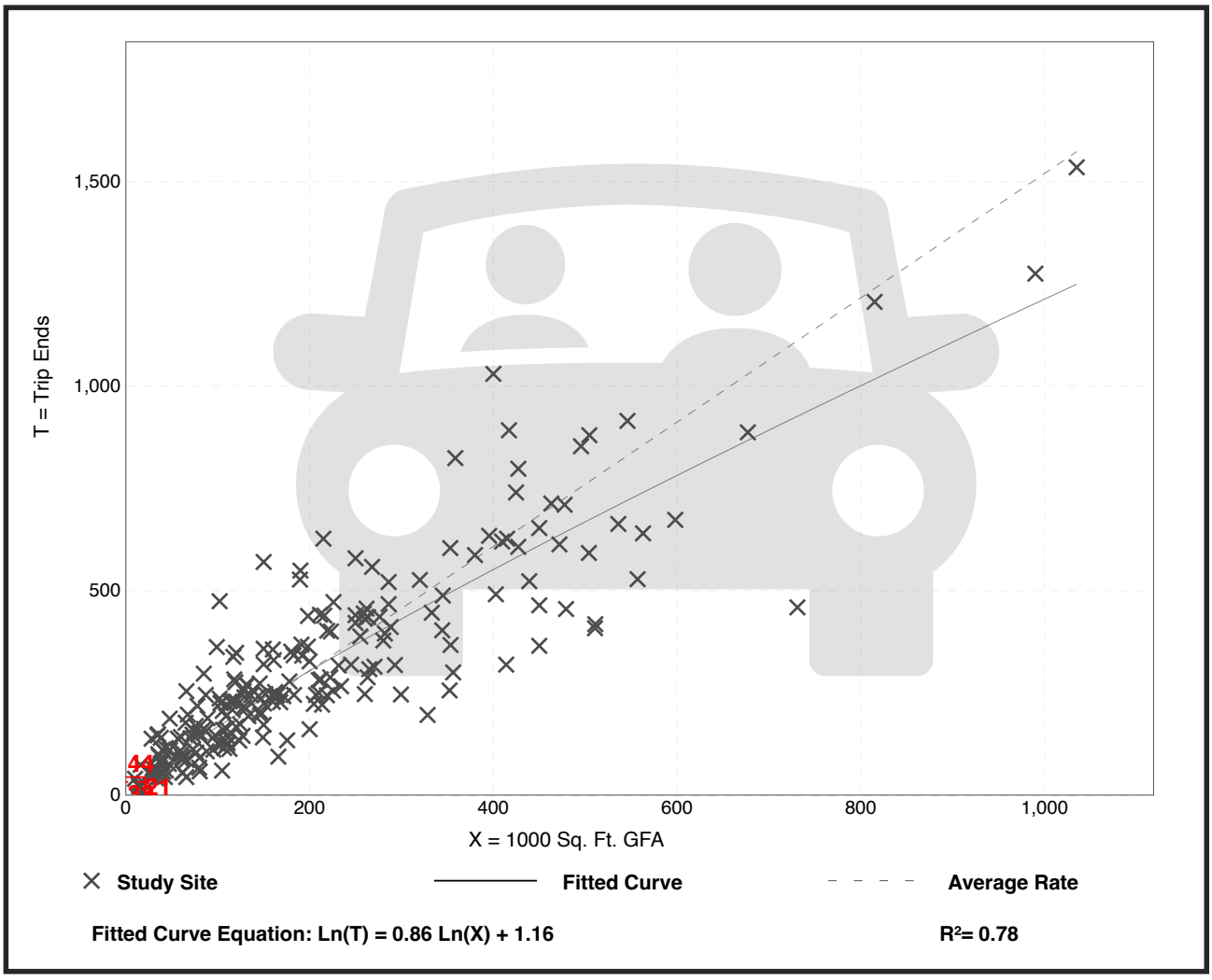
General Office Building
(710)

Vehicle Trip Ends vs: **1000 Sq. Ft. GFA**
On a: **Weekday,**
Peak Hour of Adjacent Street Traffic,
One Hour Between 7 and 9 a.m.
Setting/Location: **General Urban/Suburban**
Number of Studies: 221
Avg. 1000 Sq. Ft. GFA: 201
Directional Distribution: 88% entering, 12% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
1.52	0.32 - 4.93	0.58

Data Plot and Equation



Trip Gen Manual, 11th Edition ● Institute of Transportation Engineers

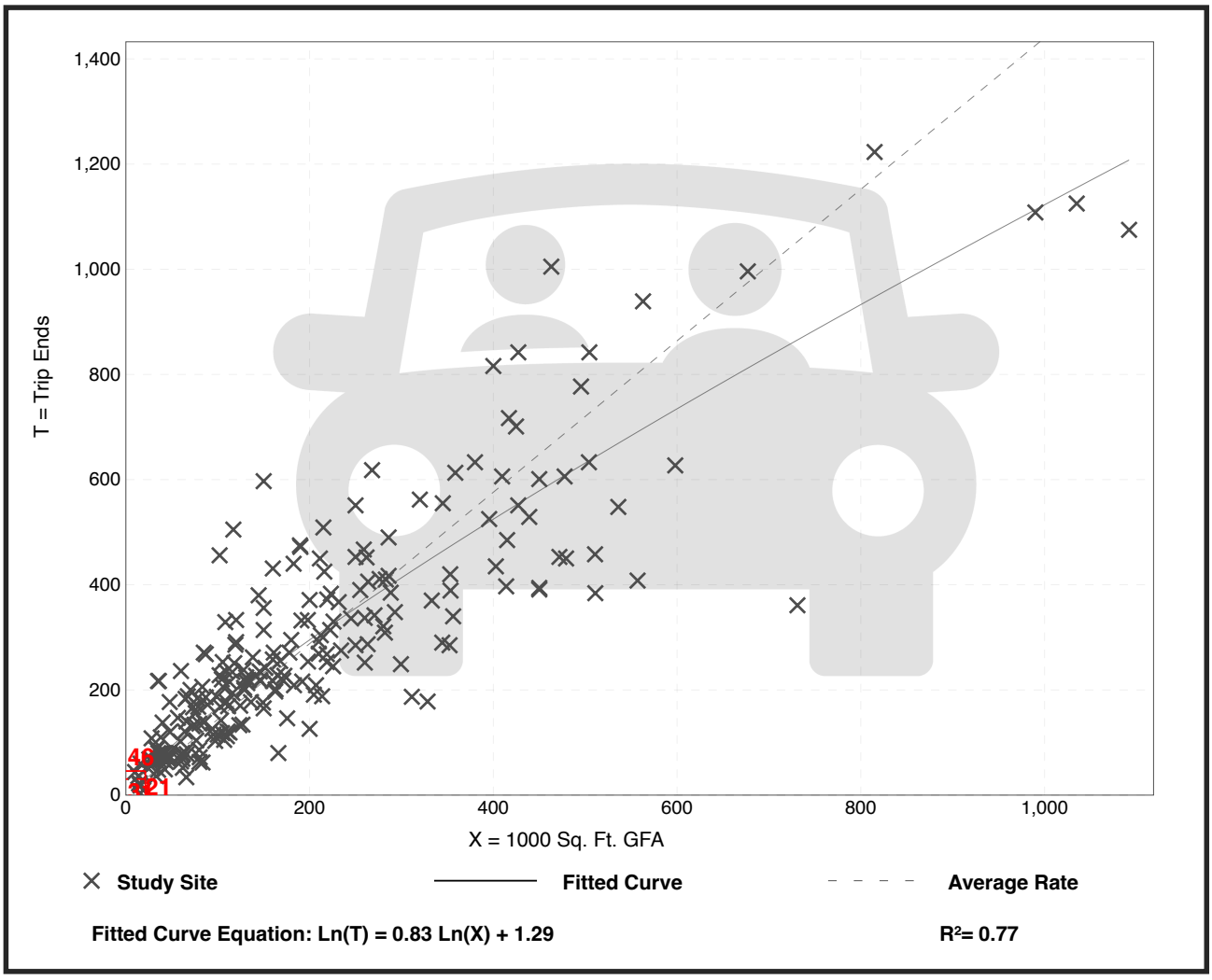
General Office Building
(710)

Vehicle Trip Ends vs: **1000 Sq. Ft. GFA**
On a: **Weekday,**
Peak Hour of Adjacent Street Traffic,
One Hour Between 4 and 6 p.m.
Setting/Location: **General Urban/Suburban**
Number of Studies: 232
Avg. 1000 Sq. Ft. GFA: 199
Directional Distribution: 17% entering, 83% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
1.44	0.26 - 6.20	0.60

Data Plot and Equation



Trip Gen Manual, 11th Edition ● Institute of Transportation Engineers



DouglasKim+Associates,LLC

CONSTRUCTION VIBRATION CALCULATIONS

DouglasKim+Associates,LLC

10200 Jefferson Boulevard Project

Construction Vibration

Receptor: Residences - Salem Village Court
Equipment: Small Dozer-Type Equipment

Source PPV (in/sec)	0.003
Reference Distance (ft)	25
Ground Factor (N)	1.5
Distance (ft)	75
Vibration Level (in/sec)	**0.001**

Receptor: Residences - Salem Village Court
Equipment: Jackhammer

Source PPV (in/sec)	0.035
Reference Distance (ft)	25
Ground Factor (N)	1.5
Distance (ft)	75
Vibration Level (in/sec)	**0.007**

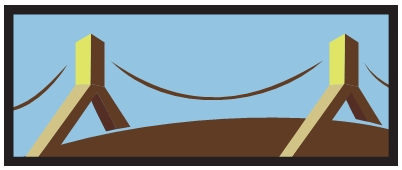
Sources

California Department of Transportation (Caltrans), *Transportation and Construction Vibration Guidance Manual*,
Federal Transit Administration (FTA), *Transit Noise and Vibration Impact Assessment*, September 2018

APPENDIX C – TECHNICAL AIR QUALITY REPORT

10150-10200 JEFFERSON BOULEVARD PROJECT

Air Quality Technical Report



Prepared by DKA Planning
November 2025

AIR QUALITY TECHNICAL REPORT

Introduction

This technical report addresses the air quality impacts generated by construction and operation of a Project at 10150-10200 Jefferson Boulevard in the City of Culver City. The analysis evaluates the consistency of the Project with air quality policies set forth in the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP) and the City's General Plan. The analysis of Project-generated air emissions focuses on whether the Project would cause an exceedance of an ambient air quality standard or SCAQMD significance threshold. Calculation worksheets, assumptions, and model outputs used in the analysis are included in the Technical Appendix to this report.

Regulatory Framework

Federal

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years, with the most recent amendments in 1990. At the federal level, the United States Environmental Protection Agency (USEPA) is responsible for implementation of some portions of the CAA (e.g., certain mobile source and other requirements). Other portions of the CAA (e.g., stationary source requirements) are implemented by state and local agencies. In California, the California Clean Air Act (CCAA) is administered by the California Air Resources Board (CARB) at the State level and by the air quality management districts and air pollution control districts at the regional and local levels.

The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the National Ambient Air Quality Standard (NAAQS). These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA which are most applicable to the Project include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).

NAAQS have been established for seven major air pollutants: CO (carbon monoxide), NO_2 (nitrogen dioxide), O_3 (ozone), $PM_{2.5}$ (particulate matter, 2.5 microns), PM_{10} (particulate matter, 10 microns), SO_2 (sulfur dioxide), and Pb (lead).

The CAA requires the USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. Title I provisions are implemented for the purpose of attaining NAAQS. The federal standards are summarized in Table 1. The USEPA has classified the Los Angeles County portion of the South Coast Air Basin (Basin) as a nonattainment area for O_3, $PM_{2.5}$, and Pb.

Table 1
State and National Ambient Air Quality Standards and Attainment Status for LA County

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O_3)	1-hour	0.09 ppm (180 µg/m^3)	Non-attainment	--	--
	8-hour	0.070 ppm (137 µg/m^3)	Non-attainment	0.070 ppm (137 µg/m^3)	Non-attainment
Respirable Particulate Matter (PM_{10})	24-hour	50 µg/m^3	Non-attainment	150 µg/m^3	Attainment
	Annual Arithmetic Mean	20 µg/m^3	Non-attainment	--	--
Fine Particulate Matter ($PM_{2.5}$)	24-hour	--	--	35 µg/m^3	Non-attainment
	Annual Arithmetic Mean	12 µg/m^3	Non-attainment	12 µg/m^3	Non-attainment
Carbon Monoxide (CO)	1-hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Attainment
	8-hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Attainment
Nitrogen Dioxide (NO_2)	1-hour	0.18 ppm (338 µg/m^3)	Attainment	100 ppb (188 µg/m^3)	Attainment
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	Attainment	53 ppb (100 µg/m^3)	Attainment
Sulfur Dioxide (SO_2)	1-hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
	24-hour	0.04 ppm (105 µg/m^3)	Attainment	--	--
Lead (Pb)	30-day average	1.5 µg/m^3	Attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m^3	Non-attainment
Visibility Reducing Particles	8-hour	Extinction of 0.07 per kilometer	N/A	No Federal Standards	
Sulfates	24-hour	25 µg/m^3	Attainment	No Federal Standards	
Hydrogen Sulfide (H_2S)	1-hour	0.03 ppm (42 µg/m^3)	Unclassified	No Federal Standards	
Vinyl Chloride	24-hour	0.01 ppm (26 µg/m^3)	N/A	No Federal Standards	

N/A = not available
ppm = parts per million; µg/m^3 – micrograms per cubic meter; mg/m^3 – milligrams per cubic meter
Source: USEPA, NAAQS Table (https://www.epa.gov/criteria-air-pollutants/naaqs-table) and CARB, California Ambient Air Quality Standards (https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards). Attainment status data from CARB, Ambient Air Quality Standards, and attainment status (www.arb.ca.gov/desig/adm/adm.htm).

CAA Title II pertains to mobile sources, such as cars, trucks, buses, and planes. Reformulated gasoline and automobile pollution control devices are examples of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have been strengthened in recent years to improve air quality. For example, the standards for NO_X emissions have been lowered substantially and the specification requirements for cleaner burning gasoline are more stringent.

The USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside state waters (e.g., beyond the outer continental shelf) and establishes various emission standards, including those for vehicles sold in states other than California. Automobiles sold in California must meet stricter emission standards established by CARB. USEPA adopted multiple tiers of emission standards to reduce emissions from non-road diesel engines (e.g., diesel-powered construction equipment) by integrating engine and fuel controls as a system to gain the greatest emission reductions. The first federal standards (Tier 1) for new non-road (or off-road) diesel engines were adopted in 1994 for engines over 50 horsepower, to be phased in from 1996 to 2000. On August 27, 1998, USEPA introduced Tier 1 standards for equipment under 37 kW (50 horsepower) and increasingly more stringent Tier 2 and Tier 3 standards for all equipment with phase-in schedules from 2000 to 2008. The Tier 1 through 3 standards were met through advanced engine design, with no or only limited use of exhaust gas after-treatment (oxidation catalysts). Tier 3 standards for NO_X and hydrocarbon are similar in stringency to the 2004 standards for highway engines. However, Tier 3 standards for particulate matter were never adopted. On May 11, 2004, USEPA signed the final rule introducing Tier 4 emission standards, which were phased-in between 2008 and 2015. The Tier 4 standards require that emissions of particulate matter and NO_X be further reduced by about 90 percent. Such emission reductions are achieved through the use of control technologies—including advanced exhaust gas after-treatment.

The current Trump administration has promulgated several changes to air quality regulations, including suspending State-level emission waivers for automobiles, eliminating federal tailpipe emission standards, and pausing incentives for electric vehicles and charging infrastructure. The state's regulatory power could be substantially curtailed pending court outcomes and the durability of federal-state legal dynamics. These could affect California's ability to meet its zero emission vehicle mandates and its attainment strategies.

State

California Clean Air Act. In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the CCAA. In California, CCAA is administered by CARB at the state level and by the air quality management districts and air pollution control districts at the regional and local levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for meeting the state requirements of the CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to endeavor to achieve and maintain the CAAQS. CAAQS are generally more stringent than the corresponding federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

CARB regulates mobile air pollution sources, such as motor vehicles. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications in

March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The State standards are summarized in Table 1.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the non-desert Los Angeles County portion of the Basin is designated as a nonattainment area for O_3, PM_{10}, and $PM_{2.5}$.

In August 2022, CARB approved regulations to ban new gasoline-powered cars beginning with 2035 models. Automakers were to gradually electrify their fleet of new vehicles, beginning with 35 percent of 2026 models sold. Trucking companies were also to gradually convert their existing fleets to zero emission vehicles. However, the second Trump Administration revoked California's ability to set its own vehicle emission standards on June 12, 2025. This halted efforts to implement California's Clean Cars II regulation, Advanced Clean Trucks regulation, and its Omnibus Low NO_x regulations. While these were challenged by eleven states, these programs are on hold pending further resolution.

Toxic Air Contaminant Identification and Control Act. The public's exposure to toxic air contaminants (TACs) is a significant public health issue in California. CARB's statewide comprehensive air toxics program was established in the early 1980s. The Toxic Air Contaminant Identification and Control Act created California's program to reduce exposure to air toxics. Under the Toxic Air Contaminant Identification and Control Act, CARB is required to use certain criteria in the prioritization for the identification and control of air toxics. In selecting substances for review, CARB must consider criteria relating to "the risk of harm to public health, amount or potential amount of emissions, manner of, and exposure to, usage of the substance in California, persistence in the atmosphere, and ambient concentrations in the community" [Health and Safety Code Section 39666(f)].

The Toxic Air Contaminant Identification and Control Act also requires CARB to use available information gathered from the Air Toxics "Hot Spots" Information and Assessment Act program to include in the prioritization of compounds. CARB identified particulate emissions from diesel-fueled engines (diesel PM) TACs in August 1998. Following the identification process, CARB was required by law to determine if there is a need for further control, which led to the risk management phase of the program. For the risk management phase, CARB formed the Diesel Advisory Committee to assist in the development of a risk management guidance document and a risk reduction plan. With the assistance of the Diesel Advisory Committee and its subcommittees, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines. CARB approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase. During the control measure phase, specific Statewide regulations designed to further reduce diesel PM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce diesel PM emissions. Breathing H_2S at levels above the State standard could result in exposure to a disagreeable rotten eggs odor. The State does not regulate other odors.

California Air Toxics Program. The California Air Toxics Program was established in 1983, when the California Legislature adopted Assembly Bill (AB) 1807 to establish a two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air.[1] In the risk identification step, CARB and the Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or "listed," as a TAC in California. Since inception of the program, a number of such substances have been listed, including benzene, chloroform, formaldehyde, and particulate emissions from diesel-fueled engines, among others.[2] In 1993, the California Legislature amended the program to identify the 189 federal hazardous air pollutants as TACs.

In the risk management step, CARB reviews emission sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on results of that review, CARB has promulgated a number of airborne toxic control measures (ATCMs), both for mobile and stationary sources. In 2004, CARB adopted an ATCM to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel PM and other TACs. The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given time.

In addition to limiting exhaust from idling trucks, CARB adopted regulations on July 26, 2007 for off-road diesel construction equipment such as bulldozers, loaders, backhoes, and forklifts, as well as many other self-propelled off-road diesel vehicles to reduce emissions by installation of diesel particulate filters and encouraging the replacement of older, dirtier engines with newer emission-controlled models. In April 2021, CARB proposed a 2020 Mobile Source Strategy that seeks to move California to 100 percent zero-emission off-road equipment by 2035.

Assembly Bill 2588 Air Toxics "Hot Spots" Program. The AB 1807 program is supplemented by the AB 2588 Air Toxics "Hot Spots" program, which was established by the California Legislature in 1987. Under this program, facilities are required to report their air toxics emissions, assess health risks, and notify nearby residents and workers of significant risks if present. In 1992, the AB 2588 program was amended by Senate Bill (SB) 1731 to require facilities that pose a significant health risk to the community to reduce their risk through implementation of a risk management plan.

Air Quality and Land Use Handbook: A Community Health Perspective. The *Air Quality and Land Use Handbook: A Community Health Perspective* provides important air quality information about certain types of facilities (e.g., freeways, refineries, rail yards, ports) that should be considered when siting sensitive land uses such as residences.[3] CARB provides recommended site distances from certain types of facilities when considering siting new sensitive land uses. The recommendations are advisory and should not be interpreted as defined "buffer zones." If a project is within the siting distance, CARB recommends further analysis.

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1 California Air Resources Board, California Air Toxics Program, https://ww2.arb.ca.gov/our-work/programs/air-toxics-program, last reviewed by CARB September 24, 2015.

2 California Air Resources Board, Toxic Air Contaminant Identification List, https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants.

3 California Air Resources Board, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.

Where possible, CARB recommends a minimum separation between new sensitive land uses and existing sources. Some examples of CARB's siting recommendations include the following: (1) avoid siting sensitive receptors within 500 feet of a freeway, urban road with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day; (2) avoid siting sensitive receptors within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week); and (3) avoid siting sensitive receptors within 300 feet of any dry cleaning operation using perchloroethylene and within 500 feet of operations with two or more machines.

California Code of Regulations. The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended or repealed by the state agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in CCR Title 13 states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) used during construction shall be limited to five minutes at any location. In addition, Section 93115 in CCR Title 17 states that operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

Applicable requirements for the Project would include Section 2485 in Title 13 of the CCR, where the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location. Pursuant to Section 93115 in Title 17 of the CCR, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

Regional (SCAQMD)

The SCAQMD was created in 1977 to coordinate air quality planning efforts throughout Southern California. SCAQMD is the agency principally responsible for comprehensive air pollution control in the region. Specifically, SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain the CAAQS and NAAQS in the district. SCAQMD has jurisdiction over an area of 10,743 square miles consisting of Orange County; the non-desert portions of Los Angeles, Riverside, and San Bernardino counties; and the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin. The Basin portion of SCAQMD's jurisdiction covers an area of 6,745 square miles. The Basin includes all of Orange County and the non-desert portions of Los Angeles (including the Project Area), Riverside, and San Bernardino counties.

Programs that were developed by SCAQMD to attain and maintain the CAAQS and NAAQS include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases. However, SCAQMD has primary authority over about 20 percent of NO_x emissions, a precursor to ozone formation. All projects in the SCAQMD jurisdiction are subject to SCAQMD rules and regulations, including, but not limited to the following:

- Rule 401 (Visible Emissions): This rule prohibits air discharge that results in a plume that is as dark as or darker than what is designed as No. 1 Ringelmann Chart by the United States Bureau of Mines for an aggregate of three minutes in any one hour.

- Rule 402 (Nuisance): This rule prohibits the discharge of "such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of people or the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."

- Rule 403 (Fugitive Dust): This rule mandates that projects reduce the amount of particulate matter entrained in the ambient air as a result of fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions from any active operation, open storage pile, or disturbed surface area.

- Rule 431.2 (Sulfur Content of Liquid Fuels): This rule would require use of low-sulfur fuel in construction equipment.

- Rule 1113 Architectural Coatings: This rule limits the volatile organic compound (VOC) content of architectural coatings.

- Rule 1171: SCAQMD limits the VOC content of cleaning solvents and requires proper housekeeping and storage.

- Rule 219: Any equipment that emits air contaminants (e.g., engine repair equipment, parts washers) may require permits.

- Rule 301(e): Larger facilities may be required to report annual emissions

Air Quality Management Plan. SCAQMD adopted the 2022 Air Quality Management Plan (AQMP) on December 2, 2022, updating the region's air quality attainment plan to address the "extreme" ozone non-attainment status for the Basin and the severe ozone non-attainment for the Coachella Valley Basin by laying a path for attainment by 2037. This includes reducing NO_x emissions by 67 percent more than required by adopted rules and regulations in 2037. The AQMP calls on strengthening many stationary source controls and addressing new sources like wildfires but still concludes that the region will not meet air quality standards without a significant shift to zero emission technologies and significant federal action. The 2022 AQMP relies on the growth assumptions in the Southern California Association of Governments' (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

Multiple Air Toxics Exposure Study V. To date, the most comprehensive study on air toxics in the Basin is the Multiple Air Toxics Exposure Study V, released in August 2021.[4] The report included refinements in aircraft and recreational boating emissions and diesel conversion factors. It finds a Basin average cancer risk of 455 in a million (population-weighted, multi-pathway), which represents a decrease of 54 percent compared to the estimate in MATES IV. The monitoring program measured more than 30 air pollutants, including both gases and particulates. The monitoring study was accompanied by computer modeling that estimated the risk of cancer from breathing toxic air pollution based on emissions and weather data. About 88 percent of the risk is attributed to emissions associated with mobile sources,

[4] South Coast Air Quality Management District, MATES-V Study. https://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v

with the remainder attributed to toxics emitted from stationary sources, which include large industrial operations, such as refineries and metal processing facilities, as well as smaller businesses such as gas stations and chrome plating facilities. The results indicate that diesel PM is the largest contributor to air toxics risk, accounting on average for about 50 percent of the total risk.

Regional (SCAG)

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with air quality and transportation stakeholders in Southern California to ensure compliance with federal and state air quality requirements, including the Transportation Conformity Rule and other applicable federal, state, and air district laws and regulations. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG is required by law to ensure that transportation activities "conform" to, and are supportive of, the goals of regional and state air quality plans to attain the NAAQS. In addition, SCAG is a co-producer, with the SCAQMD, of the transportation strategy and transportation control measure sections of the AQMP for the Air Basin.

SCAG adopted the 2020-2045 RTP/SCS on September 23, 2020. The RTP/SCS addresses the transportation and air quality impacts of 3.7 million additional residents, 1.6 additional households, and 1.6 million additional jobs from 2016 to 2045. The Plan calls for $639 billion in transportation investments and reducing vehicle miles traveled (VMT) by 19 percent per capita from 2005 to 2035. The updated plan accommodates 21.3 percent growth in population from 2016 (3,933,800) to 2045 (4,771,300) and a 15.6 percent growth in jobs from 2016 (1,848,300) to 2045 (2,135,900). The regional plan projects several benefits:

- Decreasing drive-along work commutes by three percent
- Reducing per capita VMT by five percent and vehicle hours traveled per capita by nine percent
- Increasing transit commuting by two percent
- Reducing travel delay per capita by 26 percent
- Creating 264,500 new jobs annually
- Reducing greenfield development by 29 percent by focusing on smart growth
- Locating six more percent household growth in High Quality Transit Areas (HQTAs), which concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.
- Locating 15 percent more jobs in HQTAs
- Reducing $PM_{2.5}$ emissions by 4.1 percent
- Reducing greenhouse gas (GHG) emissions by 19 percent by 2035

SCAG adopted the 2024-2050 RTP/SCS on April 4, 2024, which was certified by CARB on May 7, 2025. The RTP/SCS addresses the transportation and air quality impacts of two million additional residents, 1.6 additional households, and 1.3 million additional jobs by 2050. The Plan calls for $751.7 billion in transportation investments and reducing VMT and is the latest long-range plan, continuing to recognize that transportation investments and future land use patterns are inextricably linked, and acknowledging how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region. To this end, the 2024-2050 RTP/SCS

land use pattern continues the trend of focusing 66 percent of new households and 54 percent of new jobs in Priority Development Areas and the region's High Quality Transit Corridors (HQTCs) and aims to enhance and build out the region's transit network. HQTCs are a cornerstone of land use planning best practice in the SCAG region, and studies have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption.

Local (City of Culver City)

City of Culver City General Plan Air Quality Element. The City's General Plan 2045 sets forth the goals, policies, and actions that guide the City in the implementation of air quality improvement programs and strategies. The General Plan acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and air quality goals in several Elements and includes the following goals, policies and actions relevant to development projects.

Community Health & Environmental Justice Element

Goal CH-1.1: Promote health equity and reduce disparities in environmental exposure across the city, especially in SB 1000 Priority Neighborhoods.
Goal CH-1.2: Safeguard residents from harmful pollution, including airborne contaminants, with an emphasis on preventing new or worsening exposures.
Policy CH-P1.3: New development or expansions must demonstrate that emissions of hazardous air pollutants, criteria pollutants, or odors will not significantly increase burdens in nearby neighborhoods.
Policy CH-P1.5: Require mitigation where pollutant emissions from stationary sources may cause adverse health effects, particularly in sensitive receptor areas.
Action CH-A1.2: Require health-risk assessments as part of environmental review for emission-producing projects.

Land Use & Community Design Element

Goal LU-1.1: Promote land use compatibility to prevent harm to residential or sensitive uses from odor, emissions, or nuisance impacts.
Policy LU-P4.1: Require performance standards so non-residential uses do not emit smoke, fumes, or odors beyond property lines.
Policy LU-P4.3: Limit or prohibit automotive repair near sensitive zones unless mitigation and screening are provided.
Policy LU-P4.5: Use buffers, landscaping, and design to reduce impacts between industrial and residential uses.

Conservation Element

Goal C-4: Air quality is improved and air pollutant emissions are reduced.
Policy C-4.3: Discourage siting of new sensitive uses, such as schools, daycare centers, and hospitals, within 500 feet from the I-405, I-10, and SR-90.
Policy C-4.4: Discourage new sensitive uses, such as schools, daycare centers, and hospitals within 500 feet from the active oil and gas uses within the IOF (Inglewood Oil Field).

City of Culver City Municipal Code. The City of Culver City regulates air quality to protect the health, safety, and general welfare of its residents and businesses. Section 9.04.015.B (Pollution) of the Culver City Municipal Code (CCMC) determines that "[t]he production of dense smoke, noxious fumes, gas, soot, cinders, or smoke by any commercial or industrial or other organization, through furnaces or other facilities, in such quantities as to be detrimental to the public health or which unnecessarily interferes with the health, comfort, or safety of any person."

California Environmental Quality Act. In accordance with CEQA requirements, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation. The City uses the SCAQMD's *CEQA Air Quality Handbook* and SCAQMD's supplemental online guidance/information for the environmental review of development proposals within its jurisdiction.

Existing Conditions

Pollutants and Effects

Air quality is defined by ambient air concentrations of seven specific pollutants identified by the USEPA to be of concern with respect to health and welfare of the general public. These specific pollutants, known as "criteria air pollutants," are defined as pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. Criteria air pollutants include carbon monoxide (CO), ground-level ozone (O_3), nitrogen oxides (NO_X), sulfur oxides (SO_X), particulate matter ten microns or less in diameter (PM_{10}), particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), and lead (Pb). The following descriptions of each criteria air pollutant and their health effects are based on information provided by the SCAQMD.[5]

Carbon Monoxide (CO). CO is primarily emitted from combustion processes and motor vehicles due to incomplete combustion of fuel. Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of CO can cause nausea, dizziness, and headaches at moderate concentrations and can be fatal at high concentrations.

Ozone (O_3). O_3 is a gas that is formed when VOCs and nitrogen oxides (NO_X)—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. An elevated level of O_3 irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower lung efficiency.

Nitrogen Dioxide (NO_2). NO_2 is a byproduct of fuel combustion and major sources include power plants, large industrial facilities, and motor vehicles. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), which reacts quickly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. NO_2 absorbs blue light and results in a brownish-red cast to the atmosphere and

[5] South Coast Air Quality Management District, Final Program Environmental Impact Report for the 2012 AQMP, December 7, 2012.

reduced visibility. NO_2 also contributes to the formation of PM_{10}. Nitrogen oxides irritate the nose and throat, and increase one's susceptibility to respiratory infections, especially in people with asthma. The principal concern of NO_X is as a precursor to the formation of ozone.

Sulfur Dioxide (SO_2). Sulfur oxides (SO_X) are compounds of sulfur and oxygen molecules. SO_2 is the pre- dominant form found in the lower atmosphere and is a product of burning sulfur or burning materials that contain sulfur. Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of sulfur dioxide aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO_2 potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of sulfur dioxide, and long-term exposures to both pollutants leads to higher rates of respiratory illness.

Particulate Matter (PM_{10} and $PM_{2.5}$). The human body naturally prevents the entry of larger particles into the body. However, small particles, with an aerodynamic diameter equal to or less than 10 microns (PM_{10}), and even smaller particles with an aerodynamic diameter equal to or less than 2.5 microns ($PM_{2.5}$), can enter the body and become trapped in the nose, throat, and upper respiratory tract. These small particulates can potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM_{10} and $PM_{2.5}$. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates can become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

Lead (Pb). Lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting or processing the metal is the primary source of lead emissions, which is primarily a regional pollutant. Lead affects the brain and other parts of the body's nervous system. Exposure to lead in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

State-Only Criteria Pollutants

Visibility-Reducing Particles. Deterioration of visibility is one of the most obvious manifestations of air pollution and plays a major role in the public's perception of air quality. Visibility reduction from air pollution is often due to the presence of sulfur and NO_X, as well as PM.

Sulfates (SO_4^{2-}). Sulfates are the fully oxidized ionic form of sulfur. Sulfates occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized during the combustion process and subsequently converted to sulfate compounds in the atmosphere. Effects of sulfate exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardio-pulmonary disease. Sulfates are particularly effective in degrading visibility, and, due to fact that they are usually acidic, can harm ecosystems and damage materials and property.

Hydrogen Sulfide (H_2S). H_2S is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas and can be emitted as the result of geothermal energy exploitation. Breathing H_2S at levels above the state standard could result in exposure to a very disagreeable odor.

Vinyl Chloride. Vinyl chloride is a colorless, flammable gas at ambient temperature and pressure. It is also highly toxic and is classified as a known carcinogen by the American Conference of Governmental Industrial Hygienists and the International Agency for Research on Cancer. At room temperature, vinyl chloride is a gas with a sickly-sweet odor that is easily condensed. However, it is stored at cooler temperatures as a liquid. Due to the hazardous nature of vinyl chloride to human health, there are no end products that use vinyl chloride in its monomer form. Vinyl chloride is a chemical intermediate, not a final product. It is an important industrial chemical chiefly used to produce polyvinyl chloride (PVC). The process involves vinyl chloride liquid fed to polymerization reactors where it is converted from a monomer to a polymer PVC. The final product of the polymerization process is PVC in either a flake or pellet form. Billions of pounds of PVC are sold on the global market each year. From its flake or pellet form, PVC is sold to companies that heat and mold the PVC into end products such as PVC pipe and bottles. Vinyl chloride emissions are historically associated primarily with landfills.

Toxic Air Contaminants (TACs)

TACs refer to a diverse group of "non-criteria" air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above but because their effects tend to be local rather than regional. TACs are classified as carcinogenic and noncarcinogenic, where carcinogenic TACs can cause cancer and noncarcinogenic TAC can cause acute and chronic impacts to different target organ systems (e.g., eyes, respiratory, reproductive, developmental, nervous, and cardiovascular). CARB and OEHHA determine if a substance should be formally identified, or "listed," as a TAC in California. A complete list of these substances is maintained on CARB's website.[6]

Diesel particulate matter (DPM), which is emitted in the exhaust from diesel engines, was listed by the state as a TAC in 1998. DPM has historically been used as a surrogate measure of exposure for all diesel exhaust emissions. DPM consists of fine particles (diameter less than 2.5 micrometer (μm)), including a subgroup of ultrafine particles (diameter less than 0.1 μm). Collectively, these particles have a large surface area which makes them an excellent medium for absorbing organics. The visible emissions in diesel exhaust include carbon particles or "soot." Diesel exhaust also contains a variety of harmful gases and cancer-causing substances.

Exposure to DPM may be a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. DPM levels and resultant potential health effects may be higher in close proximity to heavily traveled roadways with substantial truck traffic or near industrial facilities. According to CARB, DPM exposure may lead to the following adverse health effects: (1) aggravated asthma; (2) chronic bronchitis; (3) increased respiratory and cardiovascular hospitalizations; (4) decreased lung function in children; (5) lung cancer; and (6) premature deaths for people with heart or lung disease.[7,8]

Existing Conditions

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6 California Air Resources Board, Toxic Air Contaminant Identification List, https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants.

7 California Air Resources Board, Overview: Diesel Exhaust and Health, www.arb.ca.gov/research/diesel/diesel-health.htm, last reviewed by CARB April 12, 2016.

8 California Air Resources Board, Fact Sheet: Diesel Particulate Matter Health Risk Assessment Study for the West Oakland Community: Preliminary Summary of Results, March 2008.

The Project Site is located within the South Coast Air Basin (the Basin); named so because of its geographical formation is that of a basin, with the surrounding mountains trapping the air and its pollutants in the valleys or basins below. The 6,745-square-mile Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. It is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto Mountains to the north and east; and the San Diego County line to the south. Ambient pollution concentrations recorded in Los Angeles County portion of the Basin are among the highest in the four counties comprising the Basin. USEPA has classified Los Angeles County as nonattainment areas for O_3, $PM_{2.5}$, and lead. This classification denotes that the Basin does not meet the NAAQS for these pollutants. In addition, under the CCAA, the Los Angeles County portion of the Basin is designated as a nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The air quality within the Basin is primarily influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, industry, and meteorology.

Air pollutant emissions are generated in the local vicinity by stationary and area-wide sources, such as commercial activity, space and water heating, landscaping maintenance, consumer products, and mobile sources primarily consisting of automobile traffic.

Air Pollution Climatology. The topography and climate of Southern California combine to make the Basin an area of high air pollution potential. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cooler surface layer which inhibits the pollutants from dispersing upward. Light winds during the summer further limit ventilation. Additionally, abundant sunlight triggers photochemical reactions which produce O_3 and the majority of particulate matter.

Air Monitoring Data. The SCAQMD monitors air quality conditions at 38 source receptor areas (SRA) throughout the Basin. The Project Site is located in SCAQMD's Northwest Coastal LA County receptor area. Historical data from the area was used to characterize existing conditions in the vicinity of the Project area. Table 2 shows pollutant levels, State and federal standards, and the number of exceedances recorded in the area from 2022 through 2024. The one-hour State standard for O_3 was exceeded once during this three-year period. The federal standard was not exceeded in that same period. There was incomplete data for PM_{10}, $PM_{2.5}$, CO, SO_2, and NO_2.

Existing Health Risk in the Surrounding Area. Based on the MATES-V model, the calculated cancer risk in the Project area (zip code 90232) is approximately 468 in a million.[9] The cancer risk in this area is predominantly influenced by nearby sources of diesel particulate matter (e.g., diesel trucks and traffic on the San Diego Freeway 1.35 miles to the southwest and Jefferson Boulevard to the west). In general, the risk at the Project Site is higher than 54 percent of the population across the South Coast Air Basin.

The Office of Environmental Health Hazard Assessment, on behalf of the California Environmental Protection Agency (CalEPA), provides a screening tool called CalEnviroScreen that can be used to help identify California communities disproportionately burdened by multiple sources of pollution. According to CalEnviroScreen, the Project Site (Census tract 6037702502) is located in the 53rd percentile, which

[9] South Coast Air Quality Management District, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-V), MATES V Interactive Carcinogenicity Map, 2021, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/home/?data_id=dataSource_105-a5ba9580e3aa43508a793fac819a5a4d%3A26&views=view_39%2Cview_1, accessed October 7, 2025.

means the Project Site has an overall environmental pollution burden higher than at least 53 percent of other communities within California.[10]

Table 2
Ambient Air Quality Data

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of Exceedance Standards		
	2022	2023	2024
Ozone (O_3)			
Maximum 1-hour Concentration (ppm)	0.081	0.109	0.093
Days > 0.09 ppm (State 1-hour standard)	0	1	0
Days > 0.070 ppm (Federal 8-hour standard)	0	0	0
Carbon Monoxide (CO_2)			
Maximum 1-hour Concentration (ppm)	N/A	N/A	N/A
Days > 20 ppm (State 1-hour standard)	0	0	0
Maximum 8-hour Concentration (ppm)	N/A	N/A	N/A
Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide (NO_2)			
Maximum 1-hour Concentration (ppm)	0.0514	0.0439	0.0800
Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM_{10}			
Maximum 24-hour Concentration (µg/m^3)	N/A	N/A	N/A
Days > 50 µg/m^3 (State 24-hour standard)	N/A	N/A	N/A
$PM_{2.5}$			
Maximum 24-hour Concentration (µg/m^3)	N/A	N/A	N/A
Days > 35 µg/m^3 (Federal 24-hour standard)	N/A	N/A	N/A
Sulfur Dioxide (SO_2)			
Maximum 1-hour Concentration (ppb)	N/A	N/A	N/A
Days > 0.25 ppm (State 1-hour standard)	N/A	N/A	N/A

ppm = parts by volume per million of air.
µg/m^3 = micrograms per cubic meter.
N/A = not available at this monitoring station.
Source: SCAQMD annual monitoring data at Northwest Coastal LA County subregion (http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year) accessed October 7, 2025.

Sensitive Receptors. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified several groups that are most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

[10] Office of Environmental Health Hazard Assessment, https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40, accessed October 7, 2025.

The Project Site is located along a commercial portion of the Jefferson Boulevard corridor. Sensitive receptors near the Project Site include, but are not limited to, the following representative sampling:

- Residences, 4804 Salem Village Court; 75 feet southwest of the Project Site
- Residences, Jackson Avenue; 780 feet west of the Project Site
- West Los Angeles College; 1,100 feet southeast of the Project Site

Existing Project Site Emissions. The Project Site is improved with a 42,333 square-foot warehouse facility with limited vehicle storage and accessory installation for new vehicles in the process of being sold. Most existing air quality emissions are associated with the 74 daily vehicle trips traveling to and from the Project Site.[11] This includes an average of two vehicle transport trucks every other day, with parts delivery occurring weekly. While the redevelopment of the Project Site would remove the emissions from this vehicle activity, this analysis does not consider "crediting" these emissions against emissions from the proposed facility to ensure a conservative analysis that is protective of public health.

Project Impacts

Methodology

The air quality analysis conducted for the Project is consistent with the methods described in the SCAQMD CEQA Air Quality Handbook (1993 edition), as well as the updates to the CEQA Air Quality Handbook, as provided on the SCAQMD website. The SCAQMD recommends the use of the California Emissions Estimator Model (CalEEMod) as a tool for quantifying emissions of air pollutants that will be generated by constructing and operating development projects. The analyses focus on the potential emissions from construction and operation of the Project. Methodologies used to evaluate these emissions are discussed below.

Construction. Sources of air pollutant emissions associated with construction activities include heavy-duty off-road diesel equipment and vehicular traffic to and from the Project construction site. Where available, project-specific information was provided on the schedule of construction activities and the anticipated equipment inventory. Otherwise, model default values were used for equipment usage rates, worker trip lengths, emission factors for heavy-duty equipment, passenger vehicles, and haul trucks that have been derived by CARB. Maximum daily emissions were quantified for each construction activity based on the number of equipment and daily hours of use, in addition to vehicle trips to and from the Project Site. Details pertaining to the schedule and equipment can be found in the Technical Appendix to this analysis.

The SCAQMD recommends that air pollutant emissions be assessed for both regional scale and localized impacts. The regional emissions analysis includes both on-site and off-site sources of emissions, while the localized emissions analysis focuses only on sources of emissions that would be located on the Project Site.

Localized impacts were analyzed in accordance with the SCAQMD Localized Significance Threshold (LST) methodology.[12] The localized effects from on-site portion of daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to the SCAQMD's LST

[11] Fehr & Peers; Transportation Impact Analysis, Methodologies and Assumptions for 10150 Jefferson Vehicle Service Center; July 2025.

[12] South Coast Air Quality Management District, Final Localized Significance Methodology, revised July 2008.

methodology, which uses on-site mass emission look-up tables and Project-specific modeling, where appropriate.[13] SCAQMD provides LSTs applicable to the following criteria pollutants: NO_X, CO, PM_{10}, and $PM_{2.5}$. SCAQMD does not provide an LST for SO_2 since land use development projects typically result in negligible construction and long-term operation emissions of this pollutant. Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in O_3 formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The mass rate look-up tables were developed for each source receptor area and can be used to determine whether or not a project may generate significant adverse localized air quality impacts. SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to five acres. If the project exceeds the LST look-up values, then the SCAQMD recommends that project-specific air quality modeling must be performed. In accordance with SCAQMD guidance, maximum daily emissions of NO_X, CO, PM_{10}, and $PM_{2.5}$ from on-site sources during each construction activity were compared to LST values for a one-acre site having sensitive receptors within 25 meters (82 feet).[14] This is appropriate given the 1.82-acre site and the proximity of sensitive receptors as close as 75 feet from the Project Site. The use of LSTs for a one-acre site helps to ensure this analysis is conservative and protective of public health, as the thresholds of significance for all pollutants are lower for one-acre sites than two-acre sites.

The Basin is divided into 38 SRAs, each with its own set of maximum allowable LST values for on-site emissions sources during construction and operations based on locally monitored air quality. Maximum on-site emissions resulting from construction activities were quantified and assessed against the applicable LST values.

The significance criteria and analysis methodologies in the SCAQMD's CEQA Air Quality Handbook were used in evaluating impacts in the context of the CEQA significance criteria listed below. The SCAQMD LSTs for NO_2, CO, and PM_{10} were initially published in June 2003 and revised in July 2008.[15] The LSTs for $PM_{2.5}$ were established in October 2006 and updated on October 21, 2009.[16] [17] Table 3 presents the significance criteria for both construction and operational emissions. Emissions estimates from the CalEEMod model reflect the highest levels for the summer or winter season.

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13 South Coast Air Quality Management District, LST Methodology Appendix C-Mass Rate LST Look-Up Table, https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2, October 2009.

14 South Coast Air Quality Management District, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf, 2008.

15 Ibid.

16 South Coast Air Quality Management District, Final – Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds, https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/particulate-matter-(pm)-2.5-significance-thresholds-and-calculation-methodology/final_pm2_5methodology.pdf, October 2006.

17 South Coast Air Quality Management District, Final Localized Significance Threshold Methodology Appendix C – Mass Rate LST Look-Up Tables, https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2, October 21, 2009.

Table 3
SCAQMD Emissions Thresholds

Criteria Pollutant	Construction Emissions		Operation Emissions	
	Regional	Localized /a/	Regional	Localized /a/
Volatile Organic Compounds (VOC)	75	--	55	--
Nitrogen Oxides (NO_X)	100	103	55	103
Carbon Monoxide (CO)	550	562	550	562
Sulfur Oxides (SO_X)	150	--	150	--
Respirable Particulates (PM_{10})	150	4	150	1
Fine Particulates ($PM_{2.5}$)	55	3	55	1

/a/ Localized significance thresholds for the Northwest Coastal LA County source receptor area assumed a 1-acre and 25-meter (82-foot) receptor distance, which are the applicable thresholds for a 1.87-acre site with adjacent receptors as close as 75 feet away. Pursuant to SCAQMD guidance, sensitive receptors closer than 25 meters to a construction site are to use the LSTs for receptors at 25 meters (SCAQMD Final Localized Significance Threshold Methodology, June 2008). The SCAQMD has not developed LST values for VOC or SO_X.
Source: SCAQMD.

Operations. CalEEMod also generates estimates of daily and annual emissions of air pollutants resulting from future operation of a project. Operational emissions are produced by mobile sources (vehicular travel) and stationary sources (e.g., utilities demand). Utilities for the Project Site are provided by Southern California Edison for electricity and Southern California Gas for natural gas, where applicable. CalEEMod has derived default emissions factors for electricity and natural gas use that are applied to the size and land use type of the Project. CalEEMod also estimates operational emissions associated with water use, wastewater generation, and solid waste disposal.

Similar to construction, SCAQMD's CalEEMod software was used for the evaluation of Project emissions during operation. CalEEMod was used to calculate on-road fugitive dust, architectural coatings, landscape equipment, energy use, mobile source, and stationary source emissions.[18] To determine if a significant air quality impact would occur, the net increase in regional and local operational emissions generated by the Project was compared against SCAQMD's significance thresholds.[19, 20] Details describing the operational emissions of the Project can be found in in the Technical Appendix.

Toxic Air Contaminants Impacts (Construction and Operations). Potential TAC impacts are evaluated by conducting a qualitative analysis consistent with the CARB Handbook followed by a more detailed analysis (i.e., dispersion modeling), as necessary. The qualitative analysis consists of reviewing the Project to identify any new or modified TAC emissions sources. If the qualitative evaluation does not

[18] Energy consumption estimates with CalEEMod 2022.1.1.30 are based on the California Energy Commission's Commercial Forecast database, both of which reflected the 2019 Title 24 energy efficiency standards. These energy consumption estimates were adjusted to reflect the 2022 Title 24 standards that cumulatively produce a 0.49 percent reduction in electricity use and 0.45 percent reduction in natural gas use when compared to the 2019 standards.

[19] South Coast Air Quality Management District, Air Quality Significance Thresholds, revised March 2015. SCAQMD based these thresholds, in part on the federal Clean Air Act and, to enable defining "significant" for CEQA purposes, defined the setting as the South Coast Air Basin. (See SCAQMD, CEQA Air Quality Handbook, April 1993, pp. 6-1-6-2).

[20] As the operational thresholds of significance are based on aggregate of area, energy, and mobile source emissions, a total that represents a mix of different seasonal scenarios would not accurately reflect a project's impact on ozone-season exceedances (this differs from the construction thresholds of significance, where any daily exceedance regardless of season can trigger a significant impact). The SCAQMD's CEQA Air Quality Handbook noted that it "…established these operational thresholds, in part, on Section 182(e) of the federal Clean Air Act, which identifies ten tons a year of volatile organic gases as the significance level for stationary sources of emissions in extreme non-attainment areas for ozone." Since ozone exceedances are a summer season phenomenon, the summer season emissions are appropriate for determining the potential to contribute to seasonal ozone exceedances.

rule out significant impacts from a new source, or modification of an existing TAC emissions source, a more detailed analysis is conducted.

Thresholds of Significance

Would the Project:

a) *Conflict with or obstruct implementation of the applicable air quality plan;*

b) *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;*

c) *Expose sensitive receptors to substantial pollutant concentrations; or*

d) *Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

The analysis below utilizes factors and considerations recommended by the City of Culver City and SCAQMD Thresholds, as appropriate.

In accordance with the SCAQMD's *CEQA Air Quality Handbook*, the following criteria are used to evaluate a project's consistency with the AQMP[21]:

- Will the Project result in any of the following:
  - An increase in the frequency or severity of existing air quality violations;
  - Cause or contribute to new air quality violations; or
  - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP?
- Will the Project exceed the assumptions utilized in preparing the AQMP?
  - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
  - Does the Project include air quality mitigation measures; or
  - To what extent is Project development consistent with the AQMP land use policies?

The Project's impacts with respect to these criteria are discussed to assess the consistency with the SCAQMD's AQMP and SCAG regional plans and policies. In addition, the Project's consistency with the City of Culver City General Plan Air Quality Element is discussed.

(a) Construction

[21] South Coast Air Quality Management District, CEQA Air Quality Handbook, April 1993, p. 12-3.

The City recommends that determination of significance be made on a case-by-case basis, considering the following criteria to evaluate construction-related air emissions:

(i) Combustion Emissions from Construction Equipment

- Type, number of pieces and usage for each type of construction equipment;
- Estimated fuel usage and type of fuel (diesel, natural gas) for each type of equipment; and
- Emission factors for each type of equipment.

(ii) Fugitive Dust—Grading, Excavation and Hauling

- Amount of soil to be disturbed on-site or moved off-site;
- Emission factors for disturbed soil;
- Duration of grading, excavation and hauling activities;
- Type and number of pieces of equipment to be used; and
- Projected haul route.

(iii) Fugitive Dust—Heavy-Duty Equipment Travel on Unpaved Road

- Length and type of road;
- Type, number of pieces, weight and usage of equipment; and
- Type of soil.

(iv) Other Mobile Source Emissions

- Number and average length of construction worker trips to Project Site, per day; and
- Duration of construction activities.

In addition, the following criteria set forth in the SCAQMD's *CEQA Air Quality Handbook* serve as quantitative air quality standards to be used to evaluate project impacts. Under these thresholds, a significant threshold would occur when[22]:

- Regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 100 pounds per day for NO_X; (2) 75 pounds a day for VOC; (3) 150 pounds per day for PM_{10} or SO_X; (4) 55 pounds per day for $PM_{2.5}$; and (5) 550 pounds per day for CO.

22 South Coast Air Quality Management District, Air Quality Significance Thresholds, revised March 2015.

- Maximum on-site daily localized emissions exceed the LST, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 ppm [23,000 µg/m^3] over a 1-hour period or 9.0 ppm [10,350 µg/m^3] averaged over an 8-hour period) and NO_2 (0.18 ppm [339 µg/m^3] over a 1-hour period, 0.1 ppm [188 µg/m^3] over a three-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm [57 µg/m^3] averaged over an annual period).

- Maximum on-site localized PM_{10} or $PM_{2.5}$ emissions during construction exceed the applicable LSTs, resulting in predicted ambient concentrations in the vicinity of the Project Site to exceed the incremental 24-hour threshold of 10.4 µg/m^3 or 1.0 µg/m^3 PM_{10} averaged over an annual period.

(b) Operation

The City bases the determination of significance of operational air quality impacts on criteria set forth in the SCAQMD's *CEQA Air Quality Handbook.*[23] Accordingly, the following serve as quantitative air quality standards to be used to evaluate project impacts. Under these thresholds, a significant impact would occur when:

- Operational emissions exceed 10 tons per year of volatile organic gases or any of the following SCAQMD prescribed threshold levels: (1) 55 pounds a day for VOC;[24] (2) 55 pounds per day for NO_X; (3) 550 pounds per day for CO; (4) 150 pounds per day for SO_X; (5) 150 pounds per day for PM_{10}; and (6) 55 pounds per day for $PM_{2.5}$.[25]

- Maximum on-site daily localized emissions exceed the LST, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 parts per million (ppm) over a 1-hour period or 9.0 ppm averaged over an 8-hour period) and NO_2 (0.18 ppm over a 1-hour period, 0.1 ppm over a 3-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm averaged over an annual period).[26]

- Maximum on-site localized operational PM_{10} and $PM_{2.5}$ emissions exceed the incremental 24-hour threshold of 2.5 µg/m^3 or 1.0 µg/m^3 PM_{10} averaged over an annual period.[27]

- The Project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 ppm, respectively; or

- The Project creates an odor nuisance pursuant to SCAQMD Rule 402.

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23 South Coast Air Quality Management District, Air Quality Significance Thresholds, revised March 2015.

24 For purposes of this analysis, emissions of VOC and reactive organic compounds (ROG) are used interchangeably since ROG represents approximately 99.9 percent of VOC emissions.

25 South Coast Air Quality Management District, Quality Significance Thresholds, www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf, last updated March 2015.

26 South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, revised July 2008.

27 South Coast Air Quality Management District, Final—Methodology to Calculate Particulate Matter (PM) 2.5 and $PM_{2.5}$ Significance Thresholds, October 2006.

(c) Toxic Air Contaminants

The City recommends that the determination of significance shall be made on a case-by-case basis, considering the following criteria to evaluate TACs:

- Would the project use, store, or process carcinogenic or non-carcinogenic toxic air contaminants which could result in airborne emissions?

In assessing impacts related to TACs below, the criteria identified above is used where applicable and relevant. In addition, the following criteria set forth in the SCAQMD's *CEQA Air Quality Handbook* serve as quantitative air quality standards to be used to evaluate project impacts. Under these thresholds, a significant impact would occur when[28]:

- The Project results in the exposure of sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0.[29] For projects with a maximum incremental cancer risk between 1 in one million and 10 in one million, a project would result in a significant impact if the cancer burden exceeds 0.5 excess cancer cases.

Project Design Features. The Project would comply with CalGreen (Title 24, Part 11) mandatory green-building measures (water efficiency, indoor air quality/ventilation minimums, construction waste management, plumbing fixtures, and more). California's Code cycles mean substantive changes landed with the 2025 cycle — notably new embodied-carbon/whole-building low-carbon requirements, and a strengthening of energy and electrification expectations in the 2025 Energy Code (Title 24, Part 6).

The Project would also comply with the Culver City's Green Building Program (originally adopted in 2009) and later Reach Code amendments that add local requirements on top of state Title 24 rules. The city's reach-code approach explicitly adds requirements beyond State energy code (for example, electrification, EV readiness, and prescriptive water and waste measures). The Building Safety Division administers and enforces these local standards. These requirements would include:

- Electrification and gas appliance restrictions or electric-ready requirements for new buildings and substantial remodels (Culver City adopted electrification reach-code measures in phases).
- EV charging and EV-ready requirements for new residential and commercial parking (reach codes often require higher baseline charger counts or conduit/rough-in).
- Water-use reduction and landscaping standards, including irrigation efficiency and low-flow fixtures.
- Construction waste reduction and diversion requirements above state minimums.
- Light pollution and dark-sky controls and bike parking / shower facilities for active-transportation encouragement.
- Size-triggered certification: Culver City's municipal code typically requires large projects (e.g., new construction or major renovations ≥ 50,000 sq ft) to meet an established set of green

[28] South Coast Air Quality Management District, CEQA Air Quality Handbook, April 1993, Chapter 6 (Determining the Air Quality Significance of a Project) and Chapter 10 (Assessing Toxic Air Pollutants).

[29] Hazard index is the ratio of a toxic air contaminant's concentration divided by its Reference Concentration, or safe exposure level. If the hazard index exceeds one, people are exposed to levels of TACs that may pose noncancer health risks.

measures and submit LEED documentation for some projects. Expect higher scrutiny and additional submittal items for projects that meet local size thresholds.

Analysis of Project Impacts

Would the Project conflict with or obstruct implementation of the applicable air quality plan?

The Project's air quality emissions would not exceed any State or federal standards. Therefore, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any State and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

With respect to the determination of consistency with the 2022 AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2020-2045 RTP/SCS regarding population, housing, and growth trends.[30] Determining whether a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these three criteria.

- *Is the project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?*

A project is consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2022 AQMP, two sources of data form the basis for the projections of air pollutant emissions: the City of Culver City General Plan and SCAG's 2024-2045 RTP/SCS. The General Plan serves as a comprehensive, long-term plan for future development of the City.

The 2020-2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. The 2020-2045 RTP/SCS accommodates a total of 41,700 persons; 20,400 households; and 56,100 jobs in the City of Culver City by 2045.

On April 4, 2024, SCAG adopted the 2024-2050 RTP/SCS, which was certified by CARB on May 7, 2025. The 2024-2050 RPT/SCS, accommodates 47,800 persons; 22,200 households; and 66,700 jobs in the City of Culver City by 2050. Once the 2022 AQMP is updated with these growth forecasts, consistency with the projections in the applicable air quality plan for the region will be based on the 2024-2050 RTP/SCS. However, consistency with the 2022 AQMP is based on the forecast projections under the 2020-2045 RTP/SCS.

The City provided local growth forecasts that were incorporated into the regional projections. The Project Site is classified as "Mixed Use Corridor 2" in the General Plan and zoned MU-2 (Mixed Use Corridor

[30] While SCAG adopted the 2024-2050 RTP/SCS on April 4, 2024, the region's applicable air quality plan is the 2022 AQMP, which is based on the growth assumptions of the 2020-2045 RTP/SCS. Once the 2022 AQMP is updated with these growth forecasts, consistency with the projections in the applicable air quality plan for the region will be based on the 2024-2050 RTP/SCS.

2), which permits the adaptive reuse of the existing building for limited vehicle services. As such, the RTP/SCS' assumptions about growth in the City accommodate the projected population and housing on the Project Site. As a result, the Project would be consistent with the growth assumptions in the City's General Plan. Because the AQMP accommodates growth forecasts from local General Plans, the emissions associated with this Project are accounted for and mitigated in the region's air quality attainment plans. The air quality impacts of development on the Project Site are accommodated in the region's emissions inventory for the 2020-2045 RTP/SCS and 2022 AQMP

The adaptive reuse of the building would generally not alter the job-serving capacity of the Project Site, as it would remain in commercial use. Thus, the Project's estimated employment impact would be consistent with the local job growth assumptions that formed the basis of the region's AQMP. As a result, the Project would be consistent with the growth projections in the AQMP.

- *Does the project implement feasible air quality mitigation measures?*

As discussed below, the Project would not result in any significant air quality impacts and therefore, would not require mitigation. In addition, the Project would comply with all applicable regulatory standards as required by SCAQMD. Furthermore, with compliance with the regulatory requirements identified above, no significant air quality impacts would occur. As such, the Project meets this AQMP consistency criterion.

- *To what extent is project development consistent with the land use policies set forth in the AQMP?*

With regard to land use developments, the AQMP's air quality policies focus on the reduction of vehicle trips and VMT. The Project would implement a number of land use policies of the City of Culver City, SCAQMD, and SCAG, as it would be designed and constructed to support and promote environmental sustainability. The Project represents an infill development within an urbanized area that would comply with green building principles to comply with the City of Culver City Green Building Code and CALGreen through energy conservation, water conservation, and waste reduction features.

The air quality plan applicable to the Project area is the 2022 AQMP, the current management plan for progression toward compliance with State and federal clean air requirements. The Project would be required to comply with all regulatory measures set forth by the SCAQMD. Implementation of the Project would not interfere with air pollution control measures listed in the 2022 AQMP. As noted earlier, the Project is consistent with the land use policies of the City that were reflected in the regional growth projections for the AQMP. As demonstrated in the following analysis, the Project would not result in significant emissions that would jeopardize regional or localized air quality standards.

City of Culver City Policies

The Project would be consistent with the existing land use pattern in the vicinity that concentrates urban density along major arterials and near transit options and would help reduce air quality emissions. Bus stops 450 feet to the north provide access to Culver City Bus Line 4, which provides north-south local bus service from the Mid-City area of Los Angeles to Marina Del Rey via Jefferson Boulevard near the Project Site. The Ballona Creek Bike Path is a Class I bike path that provides north-south grade-separated infrastructure for bicyclists that access the Project Site.

The City's 2045 General Plan identifies numerous policies with strategies for advancing the City's clean air goals. As illustrated in Table 4, the Project is consistent with the applicable policies, as the Project would implement sustainability features that would reduce air quality emissions.

Table 4
Project Consistency with City of Culver City 2045 General Plan

Policy	Project Consistency
Policy CH-P1.3: New development or expansions must demonstrate that emissions of hazardous air pollutants, criteria pollutants, or odors will not significantly increase burdens in nearby neighborhoods.	**Consistent.** As detailed in this report, the Project includes the adaptive reuse of an existing warehouse building. As discussed below, the Project would not generate pollutant emissions in excess of applicable thresholds. Additionally, the Project would not be a source of odors. Therefore, the Project would not significantly increase burdens from use of the Project Site on nearby residences.
Policy CH-P1.5: Require mitigation where pollutant emissions from stationary sources may cause adverse health effects, particularly in sensitive receptor areas.	**Consistent.** As discussed below, the Project would not generate pollutant emissions in excess of applicable thresholds., and no mitigation measures are required. Thus, the Project would not result in significant net increase in criteria pollutants and exposure at nearby sensitive receptors.
Policy LU-P4.3: Limit or prohibit automotive repair near sensitive zones unless mitigation and screening are provided.	**Consistent.** The Project's air quality impacts would not exceed the SCAQMD's thresholds of significance for regional or localized emissions.
Policy LU-P4.5: Use buffers, landscaping, and design to reduce impacts between industrial and residential uses.	**Consistent.** A six-foot masonry wall along the south property line and the significant rear yard landscaping on the adjacent residences would provide a buffer between the residences on Salem Village Lane. Further, the entrance and exit to the auto facility would face the rear of the Project Site, away from direct line of sight to the nearby residences
Source: DKA Planning, 2025.	

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

A cumulatively considerable net increase would occur if a project's construction impacts substantially contribute to air quality violations when considering other projects that may undertake construction activities at the same time. Individual projects that generate emissions that do not exceed SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to assess the impacts associated with these emissions.[31]

[31] South Coast Air Quality Management District, 2003 White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, https://www.aqmd.gov/docs/default-source/Agendas/Environmental-

Construction-related emissions were estimated using the SCAQMD's CalEEMod 2022.1.1.30 model and a projected construction schedule of at least four months. Table 5 summarizes the potential construction schedule that was modeled for air quality impacts.

Table 5
Construction Schedule Assumptions

Phase	Duration	Notes
Building Construction	Months 1-4	Interior improvements, cabinetry and carpentry, low voltage systems, trash management.
Architectural Coatings	Months 1-4	Application of interior and exterior coatings and sealants.
Source: DKA Planning, 2025.		

The scope of the improvements would include minor work on the exterior of the building, including installation of window glazing, new architectural paneling, exterior signage, and painting of exterior facades. On the east façade, two new roll-up doors and replacement of one door would be done. On the north façade, three new roll-up doors would be installed. Air conditioning equipment would be installed on the roof to climate control customer areas, offices, and the parts facility The bulk of work would involve interior improvements, including replacement of non-load-bearing interior walls and installation of 39 automotive hoists. Any air filtration equipment required by the SCAQMD would be installed on the roof and would be electrically-powered units that involve a negative flow to exhaust fumes to the outside of the facility.

The Project would be required to comply with the following regulations, as applicable:

- SCAQMD Rule 1113, which limits the VOC content of architectural coatings.
- SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location.
- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf: "As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR…Projects that exceed the project-specific significance threshold are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are not considered to be cumulatively significant.

- Rule 431.2 (Sulfur Content of Liquid Fuels): This rule would require use of low-sulfur fuel in construction equipment.

- Rule 1113 Architectural Coatings: This rule limits the volatile organic compound (VOC) content of architectural coatings.

Regional Emissions

As shown in Table 6, construction of the Project would not produce VOC, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ emissions in excess of SCAQMD's regional thresholds. As a result, construction of the Project would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). Therefore, this impact would not be significant.

Table 6
Daily Construction Emissions

Construction Phase Year	Daily Emissions (Pounds Per Day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
2025	5.9	10.2	12.3	<0.1	0.6	0.4
2026	5.8	9.8	12.1	<0.1	0.6	0.4
Maximum Regional Total	5.9	10.2	12.3	<0.1	0.6	1.6
Regional Threshold	75	100	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum Localized Total	5.8	9.8	11.1	<0.1	0.3	0.3
Localized Threshold	N/A	103	562	N/A	4	3
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels. Assumes implementation of SCAQMD Rule 403 (Fugitive Dust Emissions)

Source: DKA Planning, 2025, based on CalEEMod 2022.1.1.30 model runs. LST analyses based on one-acre site with 25-meter distances to receptors in Northwest Coastal LA County source receptor area. Estimates reflect the peak summer or winter season, whichever is higher. Totals may not add up due to rounding. Modeling sheets included in the Technical Appendix.

Localized Emissions

In addition to maximum daily regional emissions, maximum localized (on-site) emissions were quantified for each construction activity. The localized construction air quality analysis was conducted using the methodology promulgated by the SCAQMD. Look-up tables provided by the SCAQMD were used to determine localized construction emissions thresholds for the Project.[32] LSTs represent the maximum

[32] South Coast Air Quality Management District, LST Methodology Appendix C-Mass Rate LST Look-Up Table, https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2, October 2009.

emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are based on the most recent background ambient air quality monitoring data (2022-2024) for the Project area.

Maximum on-site daily construction emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for the Northwest LA County SRA based on construction site acreage that is less than or equal to one acre. Potential impacts were evaluated at the closest off-site sensitive receptor, which are the residences to the south of the Project Site on Salem Village Court. The closest receptor distance on the SCAQMD mass rate LST look-up tables is 25 meters.

As shown in Table 6, the Project would not produce emissions in excess of SCAQMD's recommended localized standards of significance for NO_2 and CO during the construction phase. Similarly, construction activities would not produce PM_{10} and $PM_{2.5}$ emissions in excess of localized thresholds recommended by the SCAQMD. These estimates assume the use of Best Available Control Measures (BACMs) that address fugitive dust emissions of PM_{10} and $PM_{2.5}$ through SCAQMD Rule 403. Therefore, construction impacts on localized air quality would not be significant.

Operation

The Project would be required to comply with the following regulations, as applicable:

- Rule 1171: SCAQMD limits the VOC content of cleaning solvents and requires proper housekeeping and storage.

- Rule 219: Any equipment that emits air contaminants (e.g., engine repair equipment, parts washers) may require permits.

- Rule 301(e): Larger facilities may be required to report annual emissions

Operational emissions of criteria pollutants would come from area, energy, and mobile sources. Area sources include products such as solvents and cleaners, architectural coatings for routine maintenance, and landscaping equipment.[33] Energy sources include electricity and natural gas use for space cooling and heating and water heating. The CalEEMod model generates estimates of emissions from energy use based on the land use type and size. The Project would also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project Site. The Project could add approximately 233 daily vehicle trips to local roadways and the region's air quality airshed on a weekday at the start of operations in 2026.[34]

As shown in Table 7, the Project's emissions would not exceed the SCAQMD's regional or localized significance thresholds. Therefore, the operational impacts of the Project on regional and localized air quality would not be significant.

[33] In 2021, CARB adopted regulations requiring that all small (25 horsepower and below) spark-ignited off-road engines (e.g., lawn and gardening equipment) be zero emission starting in model year 2024. Standards for portable generators and large pressure washers are given until model year 2028 to be electric powered.

[34] Fehr & Peers. Transportation Impact Analysis; Methodologies and Assumptions for 10150 Jefferson Vehicle Service Center. July 2025.

Table 7
Daily Operations Emissions

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	1.3	<0.1	1.9	<0.1	<0.1	<0.1
Energy Sources	<0.1	0.4	0.3	<0.1	<0.1	<0.1
Mobile Sources	0.5	0.4	5.0	<0.1	1.1	0.3
Regional Total	1.9	0.9	7.3	<0.1	1.2	0.3
Regional Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Total	1.3	0.4	2.2	<0.1	<0.1	<0.1
Localized Significance Threshold	**N/A**	**103**	**562**	**N/A**	**2**	**1**
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

LST analyses based on one-acre site with 25-meter distances to receptors in Northwest Coastal LA County SRA
Source: DKA Planning, 2025 based on CalEEMod 2022.1.1.30 model runs (included in the Technical Appendix). Totals reflect the summer season maximum and may not add up due to rounding.

Would the Project expose sensitive receptors to substantial pollutant concentrations?

As mentioned previously, representative sensitive receptors closest to the Project Site include but are not limited to the following:

- Residences, 4804 Salem Village Court; 75 feet southwest of the Project Site.
- Residences, Jackson Avenue; 780 feet west of the Project Site.
- West Los Angeles College; 1,100 feet southeast of the Project Site.

Construction

Construction of the Project could expose sensitive receptors to substantial pollutant concentrations if maximum daily emissions of regulated pollutants generated by sources located on and/or near the Project Site exceeded the applicable LST values presented in Table 3, or if construction activities generated significant emissions of TACs that could result in carcinogenic risks or non-carcinogenic hazards exceeding the SCAQMD Air Quality Significance Thresholds of ten excess cancers per million or non-carcinogenic Hazard Index greater than 1.0, respectively. As discussed above, the LST values were derived by the SCAQMD for the criteria pollutants NO_X, CO, PM_{10}, and $PM_{2.5}$ to prevent the occurrence of concentrations exceeding the air quality standards at sensitive receptor locations based on proximity and construction site size.

As shown in Table 6, during construction of the Project, maximum daily localized unmitigated emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ from sources on the Project Site would remain below each of the respective LST values. Unmitigated maximum daily localized emissions would not exceed any of the localized standards for receptors that are within 25 meters of the Project's construction activities. Therefore, based on SCAQMD guidance, localized emissions of criteria pollutants would not have the potential to expose sensitive receptors to substantial concentrations that would present a public health concern.

The primary TAC that would be generated by construction activities is diesel PM, which would be released from the exhaust of mobile construction equipment. The construction emissions modeling conservatively assumed that all equipment present on the Project Site would be operating simultaneously throughout most of the day, though this would rarely be the case. Daily emissions of diesel PM would be negligible throughout the course of Project construction. Therefore, the magnitude of daily diesel PM emissions, would not be sufficient to result in substantial pollutant concentrations at off-site locations nearby.

Furthermore, according to SCAQMD methodology, health risks from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 30-year period will contract cancer based on the use of standard risk-assessment methodology. The entire duration of construction activities associated with implementation of the Project is anticipated to be approximately four months, and the magnitude of diesel PM emissions will vary over this time period. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period, construction TAC emissions would result in a less than significant impact. Therefore, construction of the Project would not expose sensitive receptors to substantial diesel PM concentrations, and this impact would be less than significant.

Operation

The Project Site would be redeveloped with an automotive service center, a land use that is not typically associated with TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The Project would not include these types of potential industrial manufacturing process sources. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides) for the types of proposed land uses would be below thresholds warranting further study under California Accidental Release Program.

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit TACs. CARB has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective, which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).[35] The SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.[36] Together, CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

The primary sources of potential air toxics associated with Project operations include DPM from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets). However, these activities, and the land uses associated with the Project, are not considered land uses that generate substantial TAC emissions. It should be noted that the SCAQMD recommends that health risk assessments (HRAs) be conducted for substantial individual sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport

35 California Air Resources Board, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.

36 South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005.

refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.[37] Based on this guidance, the Project would not include these types of land uses and is not considered to be a substantial source of DPM warranting a refined HRA since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, CARB-mandated airborne toxic control measures (ATCM) limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than five minutes at any given time, which would further limit diesel particulate emissions.

As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of ten in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would not be significant.

The Project would generate long-term emissions on-site from area and energy sources that would generate negligible pollutant concentrations of CO, NO_2, $PM_{2.5}$, or PM_{10} at nearby sensitive receptors. While long-term operations of the Project would add traffic to local roads that produces off-site emissions, these would not result in exceedances of CO air quality standards at roadways in the area due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce emissions concentrations needed to trigger a CO hotspot, as it would add 159 net daily vehicle trips to the local roadway network on weekdays when the development could be operational in 2026.[38] The majority of vehicle-related impacts at the Project Site would come from 63 and 58 vehicles entering and exiting the development during the A.M. and P.M. peak hours, respectively.[39] This would represent approximately a fraction of the thousands of daily and peak-hour traffic trips on Jefferson Boulevard, well below the traffic volumes that would be needed to generate CO exceedances of the ambient air quality standard.[40]

Finally, the Project would not result in any substantial emissions of TACs during the construction or operations phase. During the construction phase, the primary air quality impacts would be associated with the combustion of diesel fuels, which produce exhaust-related particulate matter that is considered a toxic air contaminant by CARB based on chronic exposure to these emissions.[41] However, construction activities would not produce chronic, long-term exposure to diesel particulate matter. During long-term project operations, the Project does not include typical sources of acutely and chronically

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37 South Coast Air Quality Management District, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, 2002.

38 Fehr & Peers. Transportation Impact Analysis; Methodologies and Assumptions for 10150 Jefferson Vehicle Service Center. July 2025.

39 Ibid

40 South Coast Air Quality Management District; 2003 AQMP. As discussed in the 2003 AQMP, the 1992 CO Plan included a CO hotspot analysis at four intersections in the peak A.M. and P.M. time periods, including Long Beach Boulevard and Imperial Highway (Lynwood), Wilshire Boulevard and Veteran Avenue (Westwood), Sunset Boulevard and Highland Avenue (Hollywood), and La Cienega Boulevard and Century Boulevard (Inglewood). The busiest intersection was Wilshire and Veteran, used by 100,000 vehicles per day. The 2003 AQMP estimated a 4.6 ppm one-hour concentration at this intersection, which meant that an exceedance (20 ppm) would not occur until daily traffic exceeded more than 400,000 vehicles per day.

41 California Office of Environmental Health Hazard Assessment. Health Effects of Diesel Exhaust. www.http://oehha.ca.gov/public_info/facts/dieselfacts.html

hazardous TACs such as industrial manufacturing processes and automotive repair facilities. As a result, the Project would not create substantial concentrations of TACs.

In addition, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.[42] The Project would not generate a substantial number of truck trips. Based on the limited activity of TAC sources, the Project would not warrant the need for a health risk assessment associated with on-site activities. Therefore, the Project's operational impacts on local sensitive receptors would not be significant.

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

The Project would not result in activities that create objectionable odors. The Project is an auto service center development that would not include any activities typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD regulations that govern nuisances (i.e., Rule 402, Nuisances) would regulate any intermittent odors. As a result, any odor impacts from the Project would be considered less than significant.

Cumulative Impacts

While the Project would generate short- and long-term emissions during the construction and operations phases, respectively, the presence of any other development projects could produce cumulative impacts. Any potential development closer to the Project Site and/or sensitive receptors could contribute to localized air quality impacts. Beyond 1,000 feet of the Project Site, any sensitive receptors between the Project Site and any related project would be negligibly impacted, as localized pollutants substantially disperse as a function of distance, meteorology, and terrain. The U.S. EPA finds that in the context of roadway pollutants, "…concentrations generally decrease to background levels within 500-600 feet."[43] CARB also finds that air pollution levels can be significantly higher within 500 feet of freeways or other major sources.[44]

There are two potential related projects identified by the City of Culver City within 0.25 miles of the Project (Table 8), illustrated in Figure 1. These projects are assumed to potentially undergo concurrent construction with the Project. The impact of cumulative development on air quality from short-term construction and long-term operations is discussed below.

Table 8
Related Projects Within 0.25 Miles of Project Site

#	Address	Distance from Project Site	Use	Size	Status
1	10301-10395 Jefferson Blvd.	500 ft.	Office	13,186 sf	
2	9925 Jefferson Blvd.	600 ft.	Office	21,203 sf	
Source: City of Culver City.					

42 South Coast Air Quality Management District, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.

43 U.S. EPA. Near Roadway Air Pollution and Health: Frequently Asked Questions. August 2014.

44 South Coast Air Quality Management District. Guidance Document: Air Quality Issues Regarding Land Use.

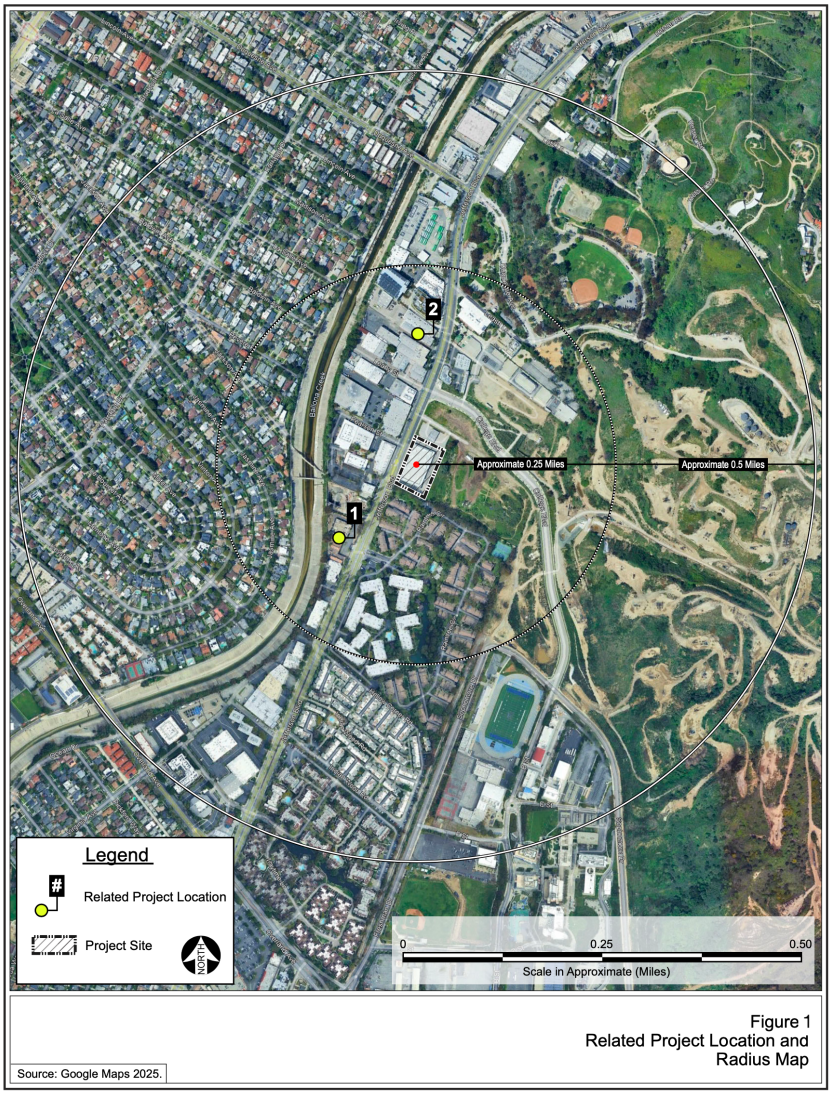


Figure 1
Related Project Location and
Radius Map

Source: Google Maps 2025.

AQMP Consistency

Cumulative development is not expected to result in a significant impact in terms of conflicting with, or obstructing implementation of the 2022 AQMP. As discussed previously, growth considered to be consistent with the AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified in the 2020-2045 RTP/SCS, implementation of the AQMP will not be obstructed by such growth. In addition, as discussed previously, the population growth resulting from the Project would be consistent with the growth projections of the AQMP. Any related project would implement feasible air quality mitigation measures to reduce the criteria air pollutants, if required due to any significant emissions impacts. In addition, each related project would be evaluated for its consistency with the land use policies set forth in the AQMP. Therefore, the Project's contribution to the cumulative impact would not be cumulatively considerable and, therefore, would be less than significant.

Construction

SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds

identified above also be considered cumulatively considerable.[45] Individual projects that generate emissions not in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

As summarized in Table 6, the Project would not exceed the SCAQMD's mass emissions thresholds and would not contribute to any potential cumulative impact. If any related project was projected to exceed LST thresholds (after mitigation), it could perform dispersion modeling to confirm whether health-based air quality standards would be violated. The SCAQMD's LST thresholds recognize the influence of a receptor's proximity, setting mass emissions thresholds for PM_{10} and $PM_{2.5}$ that generally double with every doubling of distance.

The Project would comply with regulatory requirements, including the SCAQMD Rule 403 requirements listed above. Based on SCAQMD guidance, individual construction projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. As shown above, construction-related daily emissions at the Project Site would not exceed any of the SCAQMD's regional or localized significance thresholds. Therefore, the Project's contribution to cumulative air quality impacts would not be cumulatively considerable and, therefore, would be less than significant.

Similar to the Project, the greatest potential for TAC emissions at each related project would generally involve diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 30-year period will contract cancer, based on the use of standard risk-assessment methodology. Construction activities are temporary and short-term events, thus construction activities at each related project would not result in a long-term substantial source of TAC emissions. Additionally, the SCAQMD CEQA guidance does not require a health risk assessment for short-term construction emissions. It is therefore not meaningful to evaluate long-term cancer impacts from construction activities, which occur over relatively short durations. As such, given the short-term nature of these activities, cumulative toxic emission impacts during construction would be less than significant.

Operation

As discussed above, the Project's operational air quality emissions and cumulative impacts would be less than significant. According to the SCAQMD, if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase of these criteria pollutants. As operational emissions would not exceed any of the SCAQMD's regional or localized significance thresholds, the emissions of non-attainment pollutants and precursors generated by Project operations would not be cumulatively considerable.

With respect to TAC emissions, neither the Project nor any likely related projects (which are largely residential, retail/commercial in nature), would represent a substantial source of TAC emissions, which

[45] White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix D, p. D-3.

are typically associated with large-scale industrial, manufacturing, and transportation hub facilities. The Project and related projects would be consistent with the recommended screening level siting distances for TAC sources, as set forth in CARB's Land Use Guidelines, and the Project and related projects would not result in a cumulative impact requiring further evaluation. However, any related projects could generate minimal TAC emissions related to the use of consumer products and landscape maintenance activities, among other things. Pursuant to AB 1807, which directs the CARB to identify substances as TACs and adopt airborne toxic control measures to control such substances, the SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. Therefore, the Project would not result in any substantial sources of TACs that have been identified by the CARB's Land Use Guidelines, and thus, would not contribute to a cumulative impact.

TECHNICAL APPENDIX



DouglasKim+Associates,LLC

FUTURE EMISSIONS

10200 Jefferson Boulevard (Future) Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	10200 Jefferson Boulevard (Future)
Construction Start Date	12/1/2025
Operational Year	2026
Lead Agency	City of Culver City
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	8.20
Location	10200 Jefferson Blvd, Culver City, CA 90232, USA
County	Los Angeles-South Coast
City	Culver City
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4472
EDFZ	16
Electric Utility	Southern California Edison
Gas Utility	Southern California Gas
App Version	2022.1.1.30

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Automobile Care Center	43.2	1000sqft	1.87	43,167	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Winter (Max)	—	—	—	—	—	—	—
Unmit.	—	2,377	2,377	0.10	0.06	0.04	2,396
Average Daily (Max)	—	—	—	—	—	—	—
Unmit.	—	390	390	0.02	0.01	0.10	393
Annual (Max)	—	—	—	—	—	—	—
Unmit.	—	64.5	64.5	< 0.005	< 0.005	0.02	65.1

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—
Daily - Winter (Max)	—	—	—	—	—	—	—
2025	—	2,377	2,377	0.10	0.06	0.04	2,396
2026	—	2,368	2,368	0.10	0.06	0.04	2,387
Average Daily	—	—	—	—	—	—	—
2025	—	173	173	0.01	< 0.005	0.05	175
2026	—	390	390	0.02	0.01	0.10	393
Annual	—	—	—	—	—	—	—
2025	—	28.7	28.7	< 0.005	< 0.005	0.01	28.9
2026	—	64.5	64.5	< 0.005	< 0.005	0.02	65.1

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Unmit.	96.7	2,167	2,264	9.82	0.07	8,954	11,485
Daily, Winter (Max)	—	—	—	—	—	—	—
Unmit.	96.7	2,107	2,204	9.82	0.07	8,949	11,421
Average Daily (Max)	—	—	—	—	—	—	—
Unmit.	96.7	1,954	2,050	9.81	0.07	8,951	11,267
Annual (Max)	—	—	—	—	—	—	—
Unmit.	16.0	323	339	1.62	0.01	1,482	1,865

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Mobile	—	1,248	1,248	0.06	0.05	4.22	1,268
Area	—	7.72	7.72	< 0.005	< 0.005	—	7.75
Energy	—	885	885	0.08	0.01	—	889
Water	7.78	26.2	34.0	0.80	0.02	—	59.8
Waste	88.9	0.00	88.9	8.88	0.00	—	311
Refrig.	—	—	—	—	—	8,949	8,949
Total	96.7	2,167	2,264	9.82	0.07	8,954	11,485
Daily, Winter (Max)	—	—	—	—	—	—	—
Mobile	—	1,196	1,196	0.06	0.05	0.11	1,212
Area	—	—	—	—	—	—	—
Energy	—	885	885	0.08	0.01	—	889

Water	7.78	26.2	34.0	0.80	0.02	—	59.8
Waste	88.9	0.00	88.9	8.88	0.00	—	311
Refrig.	—	—	—	—	—	8,949	8,949
Total	96.7	2,107	2,204	9.82	0.07	8,949	11,421
Average Daily	—	—	—	—	—	—	—
Mobile	—	1,037	1,037	0.05	0.04	1.56	1,052
Area	—	5.29	5.29	< 0.005	< 0.005	—	5.31
Energy	—	885	885	0.08	0.01	—	889
Water	7.78	26.2	34.0	0.80	0.02	—	59.8
Waste	88.9	0.00	88.9	8.88	0.00	—	311
Refrig.	—	—	—	—	—	8,949	8,949
Total	96.7	1,954	2,050	9.81	0.07	8,951	11,267
Annual	—	—	—	—	—	—	—
Mobile	—	172	172	0.01	0.01	0.26	174
Area	—	0.88	0.88	< 0.005	< 0.005	—	0.88
Energy	—	147	147	0.01	< 0.005	—	147
Water	1.29	4.34	5.63	0.13	< 0.005	—	9.89
Waste	14.7	0.00	14.7	1.47	0.00	—	51.5
Refrig.	—	—	—	—	—	1,482	1,482
Total	16.0	323	339	1.62	0.01	1,482	1,865

3. Construction Emissions Details

3.1. Building Construction (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	—	1,801	1,801	0.07	0.01	—	1,807
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	—	131	131	0.01	< 0.005	—	132
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	—	21.7	21.7	< 0.005	< 0.005	—	21.8
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	—	181	181	0.01	0.01	0.02	183
Vendor	—	225	225	0.01	0.03	0.02	234
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	—	13.4	13.4	< 0.005	< 0.005	0.02	13.6
Vendor	—	16.3	16.3	< 0.005	< 0.005	0.02	17.1
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Worker	—	2.21	2.21	< 0.005	< 0.005	< 0.005	2.24
Vendor	—	2.71	2.71	< 0.005	< 0.005	< 0.005	2.82
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	—	1,801	1,801	0.07	0.01	—	1,807
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	—	296	296	0.01	< 0.005	—	297
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	—	49.0	49.0	< 0.005	< 0.005	—	49.2
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	—	177	177	0.01	0.01	0.02	180
Vendor	—	221	221	0.01	0.03	0.02	230
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	—	29.6	29.6	< 0.005	< 0.005	0.05	30.0
Vendor	—	36.3	36.3	< 0.005	0.01	0.04	37.9
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Worker	—	4.90	4.90	< 0.005	< 0.005	0.01	4.97
Vendor	—	6.00	6.00	< 0.005	< 0.005	0.01	6.27
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Architectural Coating (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	—	9.72	9.72	< 0.005	< 0.005	—	9.75
Architectural Coatings	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	—	1.61	1.61	< 0.005	< 0.005	—	1.61
Architectural Coatings	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	—	36.2	36.2	< 0.005	< 0.005	< 0.005	36.7
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	—	2.67	2.67	< 0.005	< 0.005	< 0.005	2.71
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Worker	—	0.44	0.44	< 0.005	< 0.005	< 0.005	0.45
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Architectural Coating (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Off-Road Equipment	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Off-Road Equipment	—	21.9	21.9	< 0.005	< 0.005	—	22.0
Architectural Coatings	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—
Off-Road Equipment	—	3.63	3.63	< 0.005	< 0.005	—	3.65
Architectural Coatings	—	—	—	—	—	—	—
Onsite truck	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Worker	—	35.5	35.5	< 0.005	< 0.005	< 0.005	35.9
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—
Worker	—	5.92	5.92	< 0.005	< 0.005	0.01	6.00
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—

Worker	—	0.98	0.98	< 0.005	< 0.005	< 0.005	0.99
Vendor	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Mobile source emissions results are presented in Sections 2.6. No further detailed breakdown of emissions is available.

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Automobile Care Center	—	397	397	0.04	< 0.005	—	399
Total	—	397	397	0.04	< 0.005	—	399
Daily, Winter (Max)	—	—	—	—	—	—	—
Automobile Care Center	—	397	397	0.04	< 0.005	—	399
Total	—	397	397	0.04	< 0.005	—	399
Annual	—	—	—	—	—	—	—
Automobile Care Center	—	65.7	65.7	0.01	< 0.005	—	66.0
Total	—	65.7	65.7	0.01	< 0.005	—	66.0

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Automobile Care Center	—	489	489	0.04	< 0.005	—	490
Total	—	489	489	0.04	< 0.005	—	490
Daily, Winter (Max)	—	—	—	—	—	—	—
Automobile Care Center	—	489	489	0.04	< 0.005	—	490
Total	—	489	489	0.04	< 0.005	—	490
Annual	—	—	—	—	—	—	—
Automobile Care Center	—	80.9	80.9	0.01	< 0.005	—	81.2
Total	—	80.9	80.9	0.01	< 0.005	—	81.2

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Consumer Products	—	—	—	—	—	—	—
Architectural Coatings	—	—	—	—	—	—	—
Landscape Equipment	—	7.72	7.72	< 0.005	< 0.005	—	7.75
Total	—	7.72	7.72	< 0.005	< 0.005	—	7.75
Daily, Winter (Max)	—	—	—	—	—	—	—
Consumer Products	—	—	—	—	—	—	—
Architectural Coatings	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—

Consumer Products	—	—	—	—	—	—	—
Architectural Coatings	—	—	—	—	—	—	—
Landscape Equipment	—	0.88	0.88	< 0.005	< 0.005	—	0.88
Total	—	0.88	0.88	< 0.005	< 0.005	—	0.88

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Automobile Care Center	7.78	26.2	34.0	0.80	0.02	—	59.8
Total	7.78	26.2	34.0	0.80	0.02	—	59.8
Daily, Winter (Max)	—	—	—	—	—	—	—
Automobile Care Center	7.78	26.2	34.0	0.80	0.02	—	59.8
Total	7.78	26.2	34.0	0.80	0.02	—	59.8
Annual	—	—	—	—	—	—	—
Automobile Care Center	1.29	4.34	5.63	0.13	< 0.005	—	9.89
Total	1.29	4.34	5.63	0.13	< 0.005	—	9.89

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—

Automobile Care Center	88.9	0.00	88.9	8.88	0.00	—	311
Total	88.9	0.00	88.9	8.88	0.00	—	311
Daily, Winter (Max)	—	—	—	—	—	—	—
Automobile Care Center	88.9	0.00	88.9	8.88	0.00	—	311
Total	88.9	0.00	88.9	8.88	0.00	—	311
Annual	—	—	—	—	—	—	—
Automobile Care Center	14.7	0.00	14.7	1.47	0.00	—	51.5
Total	14.7	0.00	14.7	1.47	0.00	—	51.5

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Automobile Care Center	—	—	—	—	—	8,949	8,949
Total	—	—	—	—	—	8,949	8,949
Daily, Winter (Max)	—	—	—	—	—	—	—
Automobile Care Center	—	—	—	—	—	8,949	8,949
Total	—	—	—	—	—	8,949	8,949
Annual	—	—	—	—	—	—	—
Automobile Care Center	—	—	—	—	—	1,482	1,482
Total	—	—	—	—	—	1,482	1,482

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—

—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Building Construction	Building Construction	12/1/2025	3/11/2026	6.00	87.0	—
Architectural Coating	Architectural Coating	12/1/2025	3/11/2026	6.00	87.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Building Construction	Cranes	Diesel	Average	1.00	6.00	367	0.29
Building Construction	Forklifts	Diesel	Average	1.00	6.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	1.00	6.00	84.0	0.37
Building Construction	Welders	Diesel	Average	3.00	8.00	46.0	0.45
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Building Construction	—	—	—	—
Building Construction	Worker	13.8	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	7.08	10.2	HHDT,MHDT

Building Construction	Hauling	0.00	40.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	2.76	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	40.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	64,751	21,584	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Automobile Care Center	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2025	0.00	349	0.03	< 0.005
2026	0.00	346	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Total all Land Uses	159	159	0.00	49,744	1,590	1,590	0.00	497,443

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	64,751	21,584	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Automobile Care Center	418,126	346	0.0330	0.0040	1,525,371

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Automobile Care Center	4,061,199	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Automobile Care Center	165	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Automobile Care Center	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Automobile Care Center	Supermarket refrigeration and condensing units	R-404A	3,922	26.5	16.5	16.5	18.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	5.68	annual days of extreme heat
Extreme Precipitation	5.50	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	0	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	0	0	0	N/A

Wildfire	0	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	42.6
AQ-PM	66.4
AQ-DPM	54.3
Drinking Water	61.0
Lead Risk Housing	20.9
Pesticides	10.2
Toxic Releases	80.6
Traffic	80.8
Effect Indicators	—
CleanUp Sites	51.7
Groundwater	85.8
Haz Waste Facilities/Generators	64.6
Impaired Water Bodies	66.7
Solid Waste	94.6
Sensitive Population	—
Asthma	42.0
Cardio-vascular	39.8
Low Birth Weights	39.9
Socioeconomic Factor Indicators	—
Education	—
Housing	16.3
Linguistic	56.9
Poverty	18.4
Unemployment	33.6

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	75.5806493
Employed	95.58578211
Median HI	79.23777749
Education	—
Bachelor's or higher	96.4711921
High school enrollment	100
Preschool enrollment	95.7141024
Transportation	—
Auto Access	19.90247658
Active commuting	64.90440139
Social	—
2-parent households	69.11330681
Voting	76.55588349
Neighborhood	—
Alcohol availability	51.76440395
Park access	81.35506224
Retail density	95.0468369
Supermarket access	69.20313102
Tree canopy	68.06108046
Housing	—
Homeownership	74.34877454
Housing habitability	77.10766072
Low-inc homeowner severe housing cost burden	43.62889773
Low-inc renter severe housing cost burden	56.79455922

Uncrowded housing	86.21840113
Health Outcomes	—
Insured adults	73.50186064
Arthritis	0.0
Asthma ER Admissions	65.4
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	94.6
Cognitively Disabled	26.7
Physically Disabled	37.2
Heart Attack ER Admissions	70.9
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	54.8
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0

Children	76.4
Elderly	8.7
English Speaking	51.2
Foreign-born	39.2
Outdoor Workers	78.0
Climate Change Adaptive Capacity	—
Impervious Surface Cover	37.6
Traffic Density	65.7
Traffic Access	48.6
Other Indices	—
Hardship	11.2
Other Decision Support	—
2016 Voting	70.3

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	53.0
Healthy Places Index Score for Project Location (b)	89.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	—
Construction: Construction Phases	—
Construction: Trips and VMT	—



DouglasKim+Associates,LLC

MATES V TOXIC EMISSIONS OVERVIEW

About Air Toxics Cancer Risk

Information about community profile statistics
Information about emission sources
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Residential Air Toxics Cancer Risk at MATES Monitoring Sites

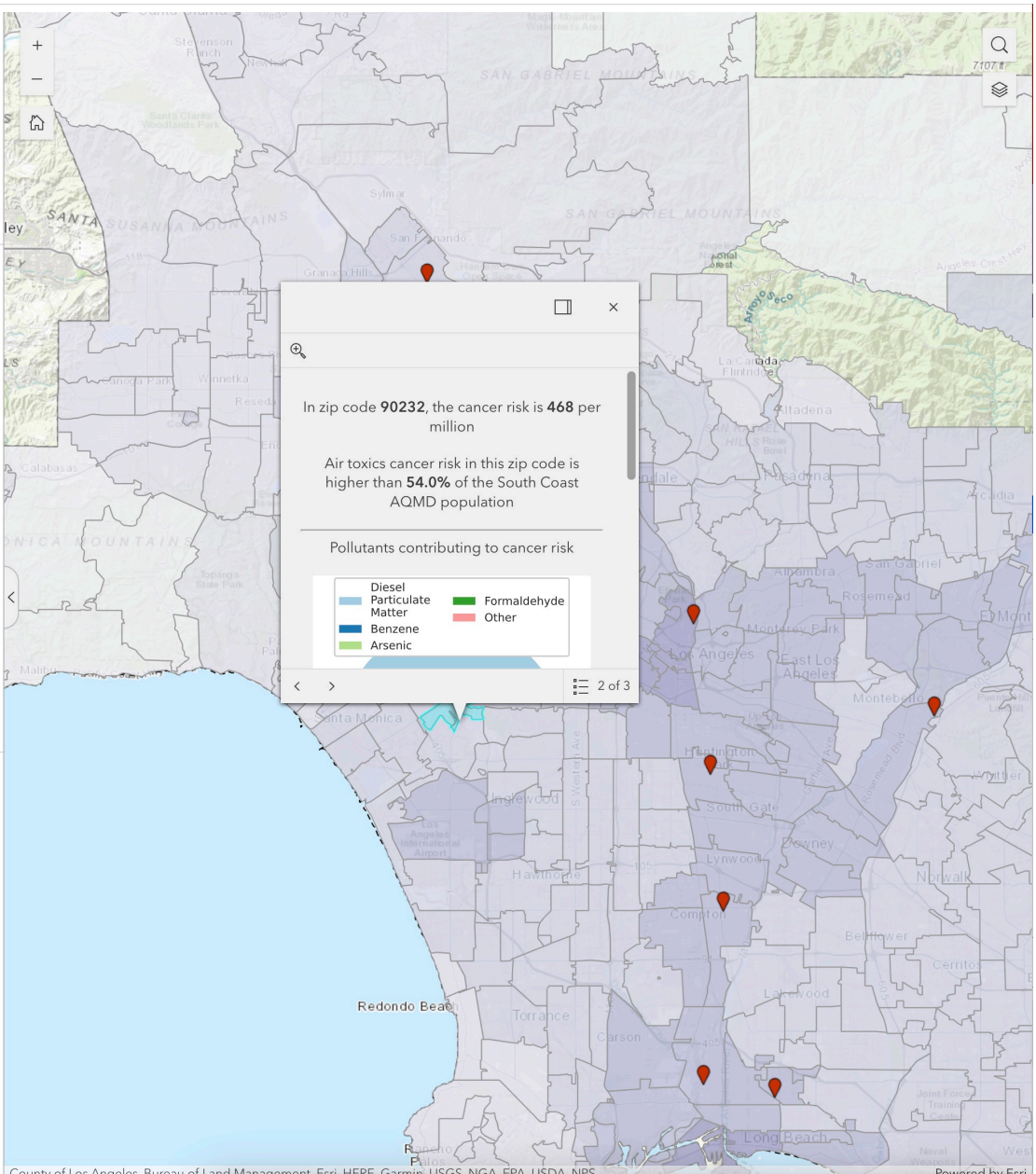
Residential Air Toxics Cancer Risk Calculated from Model Data

Cancer Risk [per million]

- 0 - 100
- 101 - 250
- 251 - 400
- 401 - 550
- 551 - 700
- 701 - 850
- 851 - 1000
- 1001 - 1150
- 1151 - 1300
- 1301 - 1450
- 1451 - 1600
- 1601 - 4800

South Coast AQMD Boundary

The air toxics cancer risk data presented in the MATES Data Visualization is calculated using a population-weighted average.

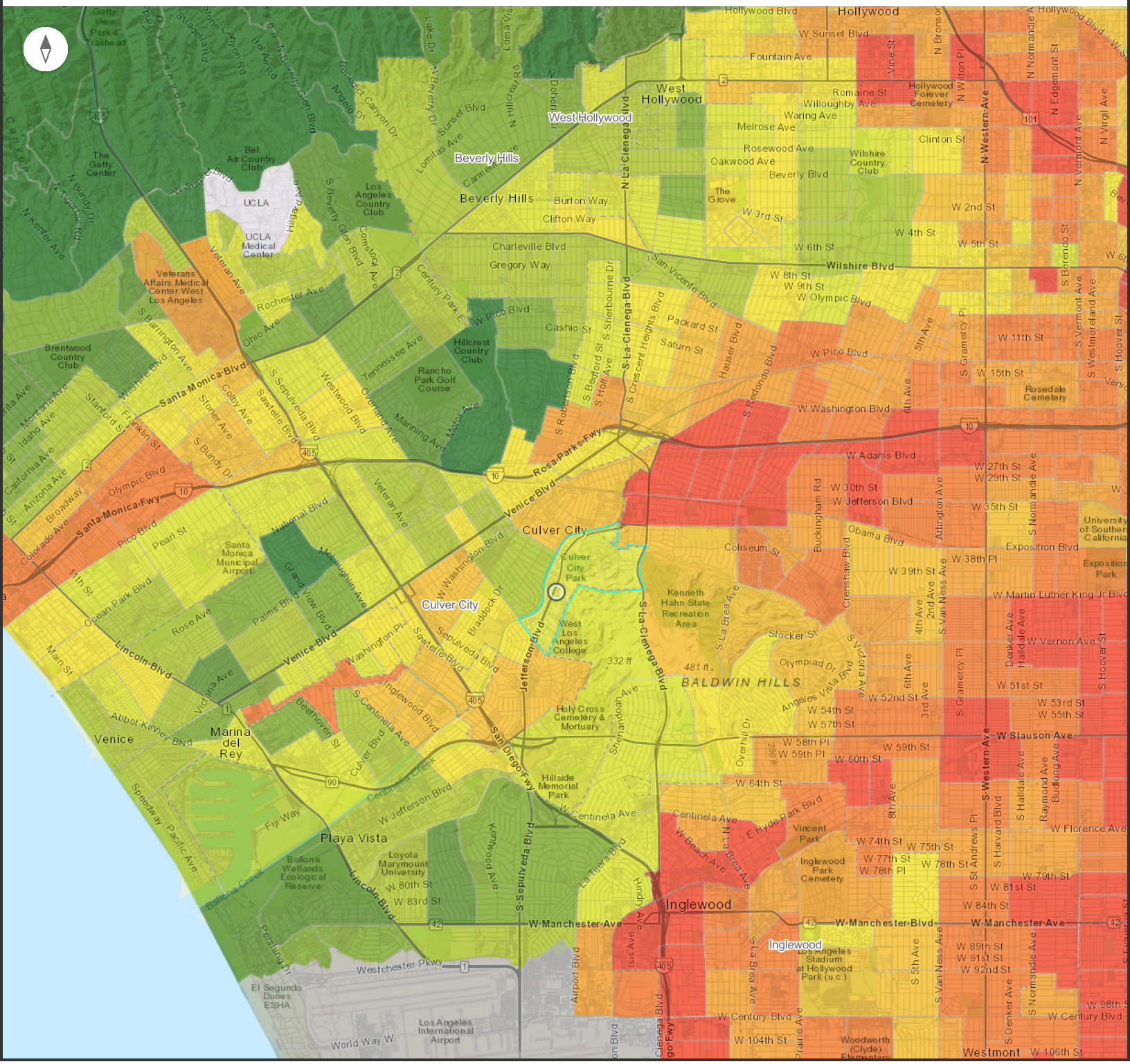




DouglasKim+Associates,LLC

CALENVIROSCREEN 4.0 OUTPUT

CalEnviroScreen 4.0 - October 2021



County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, METI/NASA, NGA, EPA, USDA

Legend

CalEnviroScreen 4.0 Results

≥ 90 – 100 (Highest Scores)	> 80 – 90	> 70 – 80	> 60 – 70	> 50 – 60	> 40 – 50	> 30 – 40	≥ 20 – 30
> 10 – 20	0 – 10 (Lowest Scores)						

Census Tract: 6037702502 (Population: 3,757)

The results for each indicator range from 0-100 and represent the percentile ranking of census tract 6037702502 relative to other census tracts.

Overall Percentiles	
CalEnviroScreen 4.0 Percentile	53
Pollution Burden Percentile	90
Population Characteristics Percentile	29

Exposures	
Ozone	43
Particulate Matter 2.5	66
Diesel Particulate Matter	54
Toxic Releases	81
Traffic	81
Pesticides	10
Drinking Water	61
Lead from Housing	21

Environmental Effects	
Cleanup Sites	52
Groundwater Threats	86
Hazardous Waste	65
Impaired Waters	67
Solid Waste	95

Sensitive Populations	
Asthma	42
Low Birth Weight	40
Cardiovascular Disease	40

Socioeconomic Factors	
Education	N/A
Linguistic Isolation	57
Poverty	18
Unemployment	34
Housing Burden	16





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CUMULATIVE PROJECTS



Figure 1
Related Project Location and Radius Map

Source: Google Maps 2025.

APPENDIX D – FIRE SAFETY PLAN

VIA EMAIL

4 November 2025
(Revised 10 November 2025)

Jim Suhr
James Suhr and Associates
jim@suhrandassociates.com

Project 248181.01 – Automotive Service and Storage Project, 10200 Jefferson Boulevard, Culver City, CA

Re: Response to Appeal

Dear Mr. Suhr:

Simpson Gumpertz & Heger Inc. (SGH) has prepared this letter to address fire risk and life safety concerns related to the proposed vehicle storage and light industrial maintenance facility at 10200 Jefferson Boulevard. This letter provides a fact-based assessment of the fire safety issues that have been raised, focusing on fire life safety aspects; all other California Environmental Quality Act (CEQA)-related concerns are outside the scope of this report. The building in question will house both conventional internal combustion engine (ICE) vehicles and electric vehicles (EVs), will include a repair/maintenance workshop, and will be fully equipped with an automatic sprinkler system in accordance with National Fire Protection Association (NFPA) 13 standards. Below, each relevant issue is discussed in turn, citing applicable codes, standards, and research findings.

1. SCOPE OF THIS ASSESSMENT

This assessment covers only fire life safety concerns: building fire protection systems, fire risk of facility operations, and life safety measures for occupants. Other topics raised in the CEQA process, such as traffic impact, noise, air quality, general environmental or community impacts, are not addressed herein as they fall outside the fire life safety domain. Those non-fire issues are being handled by other specialists or in other documentation. By focusing on fire risk and life safety, this letter provides a technical rebuttal specifically to claims about fire hazards or safety deficiencies. Any issues not discussed herein should not be interpreted as being overlooked; rather, they are acknowledged as important in the overall project review but are not within the scope of fire protection engineering to evaluate. The intent of this letter is to provide decision-makers and the public with a clear understanding of the fire safety considerations: that the project meets all relevant fire protection codes and standards, and that the fire life safety risks have been addressed by design.

2. COMMENT RESPONSE

2.1 Introduction and Applicable Codes and Standards

The subject building is located at 10200 Jefferson Boulevard in Culver City, California. The applicable building code is the 2022 California Building Code with Culver City Amendments,[1] referred to herein as the CCBC. This structure consists mainly of Group S-1 repair garage occupancies and has accessory Group S-2 parking, Group B office space, and Group S-1 utility spaces. See Figure 1 for the general layout of the building. The applicable fire code is the 2022 California Fire Code with Culver City amendments, referred to herein as CCFC.[2]

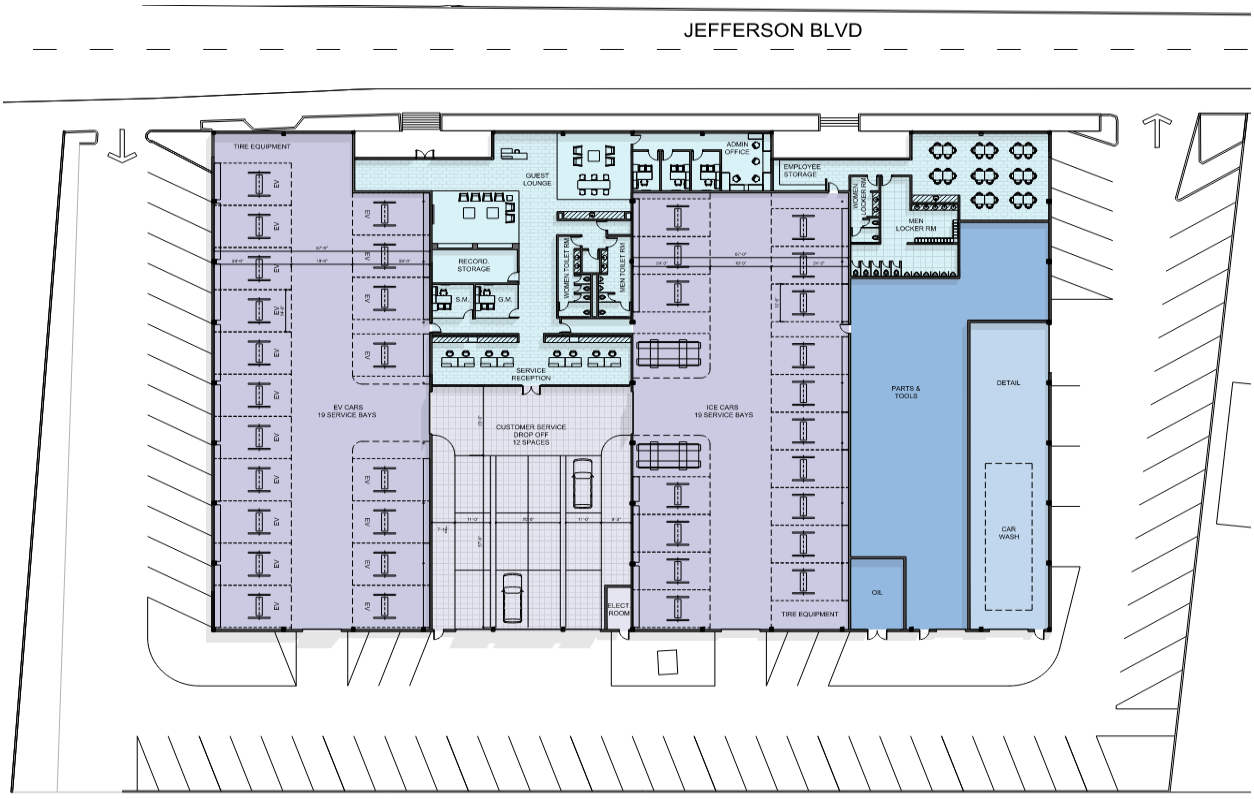


Figure 1 – Overall Building Layout

2.2 Fire Protection Systems and Code Compliance

The facility will be fully sprinklered in accordance with the 2022 edition of NFPA 13, the nationally recognized standard for the installation of sprinkler systems. A fully sprinklered

[1] https://codelibrary.amlegal.com/codes/culvercity/latest/culvercity_ca/0-0-0-13669. Note that the 2025 California Building Code will be effective 1 January 2026.
[2] https://codelibrary.amlegal.com/codes/culvercity/latest/culvercity_ca/0-0-0-5100. Note that the 2025 California Fire Code will be effective 1 January 2026.

building controls fire risks by detecting and suppressing fires at an early stage. Notably, modern codes have strengthened sprinkler requirements for facilities storing vehicles due to the fire load of today's automobiles. For example, the 2022 edition of NFPA 13 reclassified automobile parking facilities from Ordinary Hazard Group 1 to Ordinary Hazard Group 2, mandating a higher level of sprinkler protection to address modern vehicle fire challenges. In addition, the 2023 edition of NFPA 88A (standard for parking structures) now requires all new parking structures (open or enclosed, of any size) to be fully protected with fire sprinklers. The building fire protection design aligns with these stringent standards. The sprinkler system will be engineered to the appropriate hazard classification (Ordinary Hazard Group 2 or higher as needed), so that it will deliver sufficient water density to control a vehicle fire and hinder fire spread. This level of protection provides a critical safety factor; in the event of a fire involving a vehicle or equipment, the activated sprinklers will contain and cool the fire, greatly limiting heat release and preventing flashover.

In addition to sprinklers, the facility will comply with all relevant fire and building code requirements for a vehicle repair garage occupancy (classified as a light industrial Group S-1 use per the CCBC). This includes features such as fire resistance rated construction where required for separations, a fire alarm system for occupant notification, and adequate means of egress for safe evacuation. The automatic sprinkler system, designed in accordance with NFPA 13 for an Ordinary Hazard Group 2 occupancy, will activate when the heat from a developing fire raises the air temperature near the ceiling to approximately 135°F to 170°F, depending on the specific sprinkler temperature rating. In a vehicle fire scenario, this typically occurs within 1 to 2 min. of ignition when flames reach the ceiling plane in a single vehicle bay. Activation of one or more sprinklers at that point will immediately discharge water at the design density needed to control the fire, cool surrounding materials, and prevent spread to adjacent vehicles. The sprinkler waterflow signal will simultaneously activate the fire alarm system to notify occupants and automatically transmit an alarm to the Culver City Fire Department. The building will also be equipped with portable fire extinguishers and other fire protection features as required by code. In summary, the fire protection design meets or exceeds applicable standards for this occupancy, providing a high level of protection for both occupants and property.

While not required by the CCBC, the building will adhere to guidance in NFPA 30A, *Code for Motor Fuel Dispensing Facilities and Repair Garages*. NFPA 30A addresses construction features that limit fire growth and fuel migration, including liquid spill control and drainage that direct leaks to safe locations, separation of service bays from other uses, and housekeeping limits on combustibles. It requires mechanical ventilation strategies that remove heavier-than-air gasoline vapors at low elevations and discharge them to safe locations, which reduces the chance of flammable vapor accumulation. Electrical installations are governed for locations where flammable vapors could be present, which limits ignition sources by requiring properly rated equipment and by prohibiting open flames and unprotected heating appliances in repair areas.

Operational provisions include hot-work permitting, limits and containerization for flammable and combustible liquids, prohibition of indoor fuel dispensing, emergency shutdowns, and staff training with spill kits and response procedures. In an ICE vehicle fire, these measures restrict the availability and spread of fuel, reduce vapor ignition potential, and work with the NFPA 13 sprinkler system to cool and control the fire before it can involve adjacent vehicles. Although NFPA 30A does not directly regulate vehicle traction batteries, its repair garage safeguards operate together with the electrical code and listed EV charging equipment to reduce the likelihood and consequences of a battery event during charging. Ground fault and overcurrent protection in the charging equipment will automatically de-energize a faulted circuit, ventilation will help dilute smoke and gases, and the sprinkler system will provide cooling that limits heat transfer to nearby vehicles and building elements. These combined measures support early control of either an ICE or battery fire while maintaining safe egress and fire department access.

2.3 Vehicles as Fuel Load – Comparison to Ordinary Surroundings

A concern was raised about the potential fire hazard associated with storing multiple vehicles, including gasoline, diesel, and electric models, inside a building. In practice, these vehicles are identical to those found throughout the community (e.g., in public parking garages, residential garages, and service centers) and therefore do not represent a novel ignition hazard. The facility is classified as a Group S-1 repair garage under CCBC 406 and is regulated under the 2022 California Fire Code (CCFC 2311)—both of which establish the minimum safety standards for such occupancies.

The facility's design further mitigates fire risk by providing a fully sprinklered environment in accordance with NFPA 13 (2022 edition), with systems designed for Ordinary Hazard Group 2 density per §19.3.3.2 to address modern vehicle fire loads. In addition, NFPA 88A (2023 edition) now requires all new parking structures to be sprinkler-protected, reinforcing that a properly designed indoor facility provides superior protection compared to many open-air storage areas. These standards are adopted nationally and represent current best practice for vehicle storage and repair operations.

Bringing vehicles into a code-compliant, sprinkler-protected environment meaningfully reduces the overall fire risk. The automatic sprinkler system will activate when ceiling temperatures reach approximately 135°F to 170°F (depending on the temperature rating), which typically occurs within 1 to 2 min. of a developing vehicle fire. Once activated, the sprinklers discharge water at the prescribed density to control flame spread, cool adjacent materials, and prevent ignition of nearby vehicles. The system's waterflow alarm will also initiate building notifications and automatically transmit an alarm signal to the Culver City Fire Department, facilitating rapid response.

Operationally, the facility will conform to NFPA 30A, *Code for Motor Fuel Dispensing Facilities and Repair Garages*, which governs ventilation, electrical systems, and vapor control, and will employ

hot work permits in accordance with CCFC Chapter 35. Collectively, these provisions demonstrate that the proposed vehicle storage and service activities are being conducted within a regulated, sprinkler-protected setting that provides a significantly lower fire risk than typical outdoor or unprotected environments.

Vehicles will be stored and maintained in accordance with the California Fire Code (CFC), NFPA standards, and OSHA rules applicable to repair garages. Engines will not be idled indoors, no fuel dispensing will occur inside the building, and any repair activities on fuel systems will follow code-compliant procedures. Flammable and combustible liquids (e.g., gasoline drained during maintenance, solvents) will be kept in approved safety cans and approved flammable-liquid storage cabinets:

- **Approved Safety Can (portable container):** Defined by Cal/OSHA as a listed container with a maximum capacity of 5 gal, equipped with a spring-closing lid, spout cover, and flame arrester. The container must safely relieve internal pressure when exposed to fire. Safety cans are limited to 2 gal for Category 1 liquids and 5 gal for Categories 2 to 4 and must be listed or labeled by a Nationally Recognized Testing Laboratory, such as UL or FM.

- **Approved (listed) Flammable-liquid Storage Cabinet:** Must be constructed of 18 ga steel with double walls and a 1-1/2 in. air space, tight welded or riveted joints, a three-point lock, and a 2 in. raised door sill. The cabinet must keep its internal temperature below 325°F during a 10 min. fire test, bear the marking "FLAMMABLE—KEEP FIRE AWAY," and be limited to 120 gal total capacity (no more than 60 gal of Category 1 to 3 liquids within that total).

Hot work (welding, cutting, grinding, etc.) will be controlled by a documented NFPA 51B hot work permit program, including fire watch and area preparation per the standard and CFC Chapter 35.

Mechanical ventilation will comply with the 2022 California Mechanical Code (CMC) and 2022 CFC. In repair garages, exhaust airflow will be provided at a minimum rate of 1.5 cu ft per minute per square foot, consistent with the requirements for auto repair rooms in the CMC.

For enclosed parking areas, mechanical ventilation will comply with the CMC. The system will operate continuously and be capable of at least 0.75 cfm per square foot of floor area when in full-on mode. As permitted by the CMC, approved automatic detection (using carbon monoxide and nitrogen dioxide sensing) may modulate the system to maintain contaminant levels within code limits. As an alternate design basis, the system may be sized for 14,000 cfm per operating vehicle, with the number of operating vehicles taken as 2.5% of total parking stalls but not fewer than one.

Below-grade pits or depressions will be mechanically ventilated to prevent accumulation of flammable vapors, as required by the CMC and CFC. Where work involves lighter-than-air-fueled vehicles, such as those powered by compressed natural gas, liquefied natural gas, or hydrogen, the ventilation system will include interlocks to the gas detection system and meet the corresponding mechanical exhaust provisions of the CFC.

The vehicles will be stored and maintained in accordance with all applicable safety standards. For example, no idling of engines or fuel dispensing will occur indoors, and any repair activities involving fuel systems will follow proper safety procedures. Any flammable liquids (such as engine oil, lubricants, or small quantities of fuel drained during maintenance) will be handled in accordance with applicable NFPA standards and the fire code. This means flammables will be stored in approved containers or cabinets, and any hot work (welding, cutting) will be controlled by permit, so the use-related hazards are properly managed. Additionally, the building's mechanical ventilation system will comply with code requirements to inhibit the accumulation of flammable vapors or exhaust gases during vehicle repair operations, thereby minimizing explosion or asphyxiation hazard. In short, the fire load from vehicles and repair activities is typical of a standard automotive repair garage—a well-understood occupancy for which the fire protection measures have been appropriately developed and used in practice for decades.

It is also worth highlighting that statistics do not show privately owned vehicles (whether gasoline or electric) spontaneously igniting at a significant rate under normal conditions. Multiple independent reviews (including government and research groups) find that EVs do not ignite more frequently than ICE vehicles and often appear less likely to ignite on a per-vehicle basis, though methods and definitions vary by dataset.[3]

Gasoline vehicles carry a flammable fuel, but modern fuel systems are very safe; the primary fire risk for any vehicle (gas or electric) is during a severe collision or if a fire is deliberately set, which are scenarios not relevant to secure storage. Even so, should a vehicle fire occur inside the facility, the sprinklers would quickly activate to contain it. NFPA and USFA datasets show that automatic sprinklers are highly reliable at keeping fires small; when sprinklers operate, only one to five heads typically open in the vast majority of structure fires, indicating rapid control.[4] While this is not garage-specific, it is directly relevant to expected control of a single-vehicle fire indoors. Additionally, the vast majority of parking garage fires in the United States (95%) are extinguished within an hour,[5] often by sprinkler intervention or fire department response.

This facility's design is such that any single-vehicle fire is unlikely to spread to other vehicles, as the sprinkler system will limit the fire's heat release, and adjacent vehicles will be physically

[3] Office for Zero Emission Vehicles, Electric Vehicles: Costs, Charging and Infrastructure, "Electric vehicles: costs, charging and infrastructure."
[4] McGree, T., *US Experience with Sprinklers*, NFPA Research Foundation, April 2024.
[5] National Fire Protection Association, *NFPA Journal*, March/April 2019.

separated by appropriate distances. A single modern passenger-vehicle fire often peaks in the 4 to 8 MW range regardless of powertrain, with similar total heat release (THR) for ICE and EV. Using a conservative radiant fraction (0.35), the free-field radiant heat flux from a 5 MW fire falls to 15 to 16 kW/m² at 3 m (10 ft). Sprinkler cooling reduces both heat release rate (HRR) and plume temperatures, lowering received flux at adjacent vehicles further, below typical critical heat flux for piloted ignition of common plastics (12.5 to 20 kW/m² depending on ventilation). In code-compliant bays/aisles, this decreases the probability of car-to-car ignition.

2.4 Electric Vehicle Charging and Battery Fire Risk

Another specific concern raised is the fire risk associated with charging EVs. This is addressed with the following data and code-mandated safety provisions:

- **Low Incidence of EV Fires:** Empirical data shows that EVs are actually less likely to experience fires than conventional gasoline vehicles.[6] According to National Transportation Safety Board data, as reported by Kelly Blue Book, EVs have about twenty-five fires per 100,000 vehicles, compared to approximately 1,530 fires per 100,000 for gasoline vehicles.[7] In other words, gasoline cars are statistically more fire-prone due to the presence of highly flammable fuel. The notion that EVs pose a greater fire hazard is not supported by overall incident rates; it is a misconception fueled in part by media attention on the rare EV fire cases.

- **EV Charging Equipment Safety:** Charging vehicles is fundamentally an electrical process and, when conducted with properly installed equipment and tested battery management systems, does not represent a significant ignition hazard. Electric Vehicle Supply Equipment (EVSE) is designed with layered safety systems to prevent fire, including overcurrent and ground fault protection, temperature monitoring, and automatic shutoff in response to electrical anomalies. All EV chargers in the facility will be UL-listed and installed in accordance with the National Electrical Code (NFPA 70, Article 625), which governs branch-circuit sizing, overcurrent protection, ventilation, and labeling requirements.

  UL 2594, AC Level 1/2 EVSE, covers wall-mounted or pedestal-type AC chargers commonly used in homes and workplaces. It specifies construction, performance, and protective functions such as overcurrent protection, personnel protection via UL 2231-1/-2 interfaces, abnormal temperature response, and automatic shutdown under fault conditions. UL 2202, DC Fast Chargers, applies to off-board direct-current chargers and establishes requirements for electrical insulation, fault detection, thermal protection, and safe response to abnormal conditions.

[6] https://www.kbb.com/car-news/report-evs-less-likely-to-catch-fire-than-gas-powered-cars/
[7] https://www.kbb.com/car-news/study-electric-vehicles-involved-in-fewest-car-fires/

Together, these standards confirm that listed EVSE incorporates multiple independent safeguards (i.e., overcurrent protection, ground fault detection, temperature monitoring, controlled pilot communication, and auto-shutoff, to prevent abnormal heating and ignition).

While there is no single national dataset quantifying fires per charging unit, current data indicate a very low incident rate. As of late 2024, the United States had approximately 200,000 public charging ports and several million home (Level 2) chargers. According to the global dataset maintained by EV FireSafe,[8] about 15% of verified EV battery fires occurred while a vehicle was connected to charge or had recently completed charging. This correlation does not imply the charger was the cause. Given the scale of the installed base and the small number of verified charging-related events, the implied per-charger fire incidence is extremely low. NFPA has not yet published a definitive U.S. per-EVSE fire-rate statistic; if such a figure is requested, the report should note this limitation and reference the above data sources.

Additional studies documented by the NFPA[9] show that EV charging units were implicated in an extremely small number of fires, on the order of two incidents per 100,000 charging units, which is negligible compared to common household appliances like kitchen stoves or heaters. In fact, an EV charger is statistically far less likely to cause a fire than a kitchen stove or a clothes dryer. Properly installed charging stations pose no inherent fire threat on their own, similar to other major electrical appliance in daily use.

- **Battery Fire Considerations:** Lithium-ion batteries used in EVs can experience thermal runaway if severely damaged or defective, producing high heat and difficult-to-extinguish fires. While this characteristic is acknowledged, such events are rare and represent a known, managed hazard within modern facilities.

  During service, EVs will be unplugged and electrically isolated. Technicians will disable high-voltage systems using manufacturer-approved procedures, such as removing the manual service disconnect and disconnecting the 12-volt battery, in accordance with NFPA 70E principles for establishing an electrically safe work condition. These measures eliminate energized circuits during maintenance and prevent electrical faults or unintended activation.

  With respect to provided fire protection, the sprinkler system will be designed to NFPA 13 Ordinary Hazard Group 2 criteria at 0.20 gpm per square foot over 1,500 sq ft plus 250 gpm for hose streams. Hydraulic analysis demonstrates that the available water supply meets or exceeds this demand at the riser, and where a fire pump is used,

[8] https://www.evfiresafe.com/research-ev-fire-charging
[9] https://www.metroev.ca/blog/ev-charger-fires

performance will be documented against the required curve. This level of protection aligns with NFPA 13 and current industry practice, including jurisdictions such as San Francisco, which specify OH-2 protection for new repair garages.

The conclusion that EV charging and service do not introduce undue fire risk is based on research showing comparable total and peak HRRs between EV and ICE vehicles, the proven ability of NFPA 13 sprinkler systems to control vehicle fires, and the built-in protective functions of UL-listed EVSE (UL 2594 and UL 2202), which monitor temperature, detect faults, and shut down automatically.

It should be noted that the facility will accommodate both ICE and EV vehicles, with uniform fire protection, ventilation, and hot-work controls applied to all vehicle types. While battery fires may require prolonged cooling, their likelihood is low, and the combination of design safeguards, sprinkler coverage, and emergency response planning provides an equivalent level of protection to that found in any modern repair or parking facility.

- **EV Fire Characterization:** The HRR of a vehicle (the rate at which energy is released during combustion, measured in kilowatts) is a standard metric for assessing overall fire severity. Full-scale studies by the NFPA Fire Protection Research Foundation[10] and other agencies show that modern passenger vehicles, whether powered by ICEs or electric batteries, exhibit peak heat release rates (PHRR) generally in the range of 4 to 8 MW, with THR values of roughly 4,400 to 5,200 MJ (Figure 2). While powertrain type influences the character of the fire (e.g., the potential for battery re-ignition in EVs or flammable liquid involvement in ICE vehicles), it does not significantly change the overall magnitude of heat output for a single vehicle fire.

  NFPA testing found that the two EVs studied had peak HRRs of 2.9 MW and 1.9 MW, compared to 7.9 MW and 5.3 MW for the ICE vehicles tested. The EVs also took longer to reach their peak, providing additional time for fire department intervention. However, because the total energy release was comparable between the two types, the design implications are similar: both EV and ICE vehicle fires fall within the same order of hazard for sprinklered garage environments.

  These findings reinforce that EVs do not present a higher fundamental fire load than ICE vehicles. Both are well-addressed under NFPA 13 Ordinary Hazard Group 2 (OH-2) design criteria, which provide sufficient water density and coverage to control single-vehicle fires and prevent spread, regardless of propulsion type.

[10] NFPA Research Foundation, *Modern Vehicle Hazards in Parking Structures and Vehicle Carriers Phase II*, 2024.

ID	1	2	3	4
Reference No	1	1	1	1
Number of Tests	4	4	4	4
Testing Facility Information	RISE	RISE	RISE	RISE
Objective	Water spray fire suppression comparrison of gasoline fueled and electric vehicles involved in fire			
Vehicle ID	1	2	3	4
Fuel Type	Gasoline	Electric	Gasoline	Electric
Vehicle Condition	New	New	Used	Used
Ventilation Conditions	Large Scale Calorimeter Lab			
Target Vehicles	Heat Flux and Temperature			
Number of Target Vehicles	Sensors on all 4 sides			
Ignition Type	Fuel Leak-Ignited	Battery Damaged-Ignited	Fuel Leak-Ignited	Battery Damaged-Ignited
Ignition Location	Leaked Fuel on the Floor	At the Battery	Floor	At the Battery
Ignition Source	Electronic	Electronic	Electronic	Electronic
Explosion	No	No	No	No
Burn Time (Minutes)	90	90	90	90
Extinguishment	Sprinklers	Sprinklers	Sprinklers	Sprinklers
Extinguishment Start Time (min)	1	13	1	17
HRR Chart	Link	Link	Link	Link
HRR Measurement Method	Calorimetry-Oxygen Depletion			
Peak HRR (kW)	7978	2944	5324	1975
Time to Peak HRR (min)	3	20	4	17
Total Heat Released (MJ)	5241	4510	4765	4474
Initial Mass (Kg)	1614	2120	1295	1598
Mass Loss Total (kg)	-	-	-	-
Heat Flux Target Distance (m)	-	-	-	-
Heat Flux (at Targets)(kW/m^2)	98-138	6-7	44-59	5-6
Heat Flux Table/Chart	Link	Link	Link	Link
CO Curve	-	-	-	-
Oxygen Curve	-	-	-	-
CO2	-	-	-	-
Other Species	-	-	-	-
Temperature Curve	Link	Link	Link	Link
Temperature Location	Gas Temp-above			
Flame Height (m)	-	-	-	-
Sprnklers	Yes	Yes	Yes	Yes
Sprinkler Flow Rate (LPM)	372	372	372	372
Sprinkler Density (mm/min)	10	10	10	10

Table 4. Example of data extracted from one of the publications (Arvidson and Westlund [[50]]) and presented in the database. Similar data (where available) was included into the database from the publications summarized above.

Figure 2 – Heat Release Rate Comparison EV versus ICE

2.5 Proximity to Oil Wells

A comment was made regarding the facility's proximity to nearby oil wells and the potential for fire or explosion hazards. The analysis concludes that the oil wells present no significant concern due to the distance and separation from the facility. The facility is sufficiently remote from any active or inactive oil wells, such that it exceeds the typical safety separation distances mandated by fire codes. The CCFC (Section 5706.3) stipulates that buildings not essential to oil well

operations must be at least 100 ft from an oil well (or 300 ft for sensitive occupancies, such as schools or assembly buildings). The proposed building lies well beyond these distances from the nearest well, meaning it complies with the intent of those safety requirements. A map of oil wells was provided in the report titled *Capital Investment Amortization Study for the City of Culver City Portion of the Inglewood Oil Field*.[11] The nearest well is approximately 630 ft from the nearest corner of the existing building. See Figure 3 for the measurement to the nearest oil well utilizing Google Earth and Figure 4, and Figure 5 for oil well location relative to the existing building at 10200 Jefferson Boulevard.

The building is also located in compliance with applicable code requirements, including Los Angeles Municipal Code (LAMC) 91.6105, which mandates a minimum separation of 50 ft from the centerline of a well casing for taller structures. This distance provides both an atmospheric and radiant heat buffer that prevents heat exposure to the facility in the unlikely event of a surface fire or leak at a well. Conversely, a fire originating at the facility would not affect a distant well.

Oil and gas operations in California are regulated under the California Geologic Energy Management Division (CalGEM) oversight, which includes periodic pipeline integrity testing, annual inspections in sensitive areas, and ongoing mechanical integrity programs for injection and storage wells. These safety measures, combined with emergency shut-off systems (such as automatic float switches) and on-site fire protection at wellheads, further reduce the likelihood of any incident escalating or spreading.

In combination, the facility's code-compliant siting, robust regulatory framework, and existing safety infrastructure point to the fact that nearby oil wells do not pose a fire hazard to the project, nor does the project create any increased risk to those wells.

[11] http://culvercity.gov/files/assets/public/v/1/documents/city-manager/inglewood-oil-field/bakerobrienreportandexhibi.pdf



Figure 3 – Measurement to Nearest Oil Well

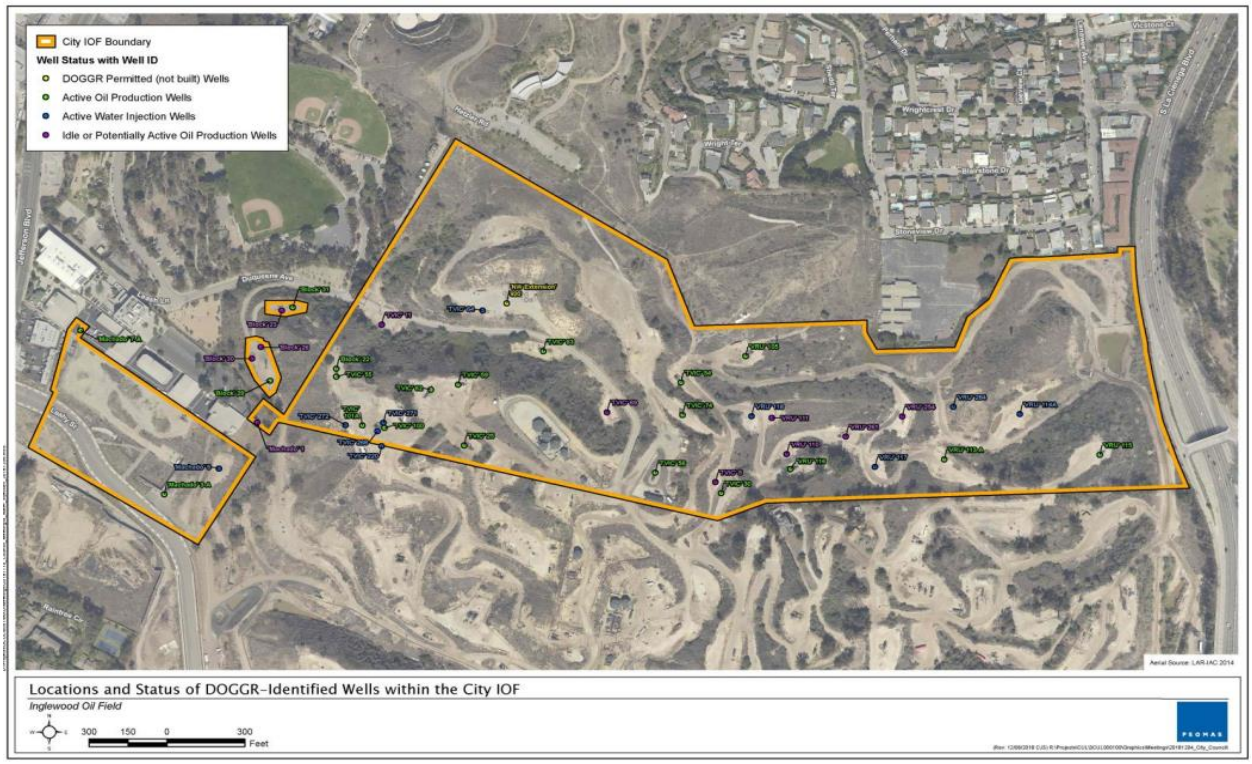


Figure 4 – Oil Well Map

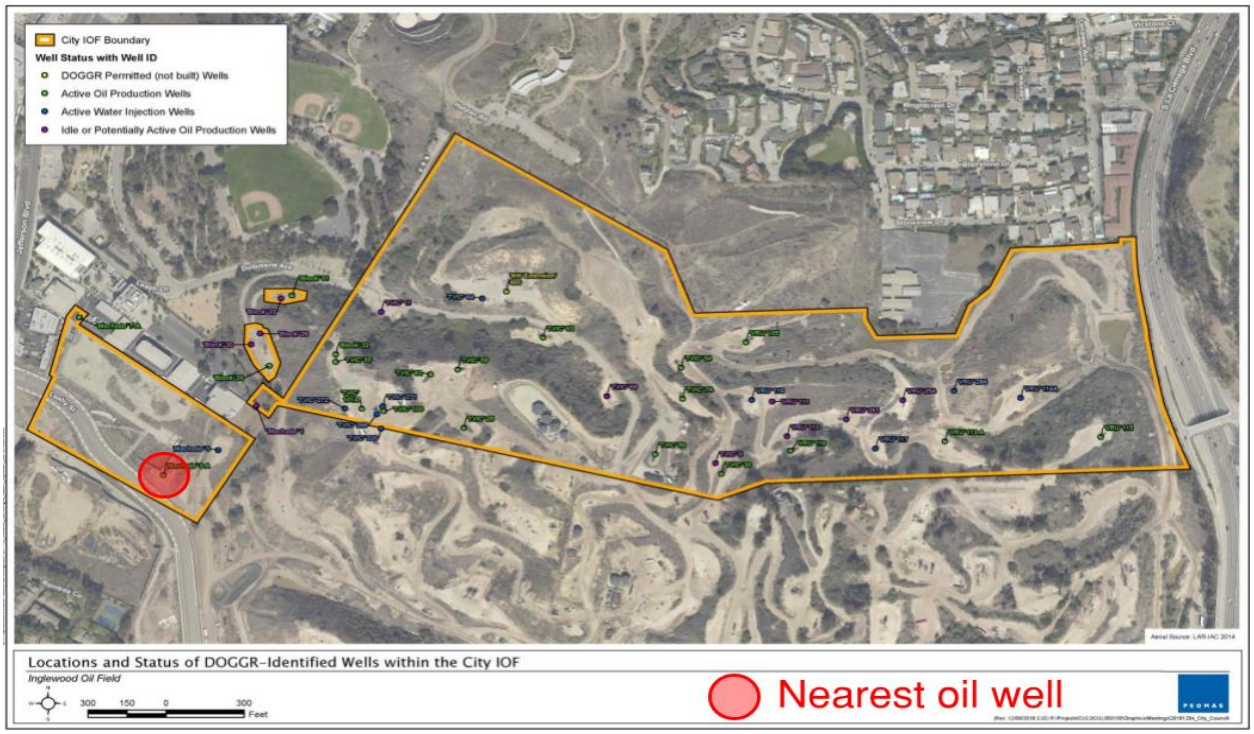


Figure 5 – Oil Well Map with Nearest Highlighted

2.6 Site Location

Reviewers raised concerns about the subject property's proximity to the wildland–urban interface, incorrectly stating that the building lies adjacent to (but not within) a Very High Fire Hazard Severity Zone. In fact, the subject property abuts a Moderate Fire Hazard Severity Zone, which the CCFC does not identify for additional protective measures. See Figure 6 and Figure 7 for maps of the property relative to the fire hazard severity zones.

Residents in the residential development south of the subject property expressed concern that a fire on the subject property could generate combustion products carried toward their units by wind. The wind rose[12] in Figure 8 shows prevailing winds from the southwest and west-southwest (approximately 45% of observations), while northerly winds, which would transport a plume south, occur less than 2% of the time. Based on this wind climatology, a plume originating on the subject property would seldom travel toward the residences to the south.

We also evaluated wind-driven plume dynamics under an unfavorable wind scenario directed toward the residences, which is historically uncommon. Research summarized in an NFPA and the Fire Protection Research Foundation[13] presentation uses computational fluid dynamics to

[12] https://mesonet.agron.iastate.edu/sites/windrose.phtml?station=SMO&network=CA_ASOS
[13] https://www.nfpa.org/education-and-research/research/fire-protection-research-foundation/projects-and-reports/improving-firefighter-safety-on-firegrounds-involving-lithium-ion-batteries

derive safety standoff distances at Immediately Dangerous to Life or Health (IDLH) thresholds as a function of battery capacity, wind, and state of charge. Figure 9 presents the tested ranges. For an approximately 200 kWh battery (comparable to the largest currently used by General Motors), the mean safety distance ranges from about 5 m to 20 m (16 ft to 65 ft). The nearest residential units lie roughly 40 m (131 ft) from the subject property, which exceeds these mean IDLH-based distances (Figure 10). The study spans vehicle-scale batteries through utility-scale energy storage; EV fire hazards also exist on adjacent roadways serving the residential development.

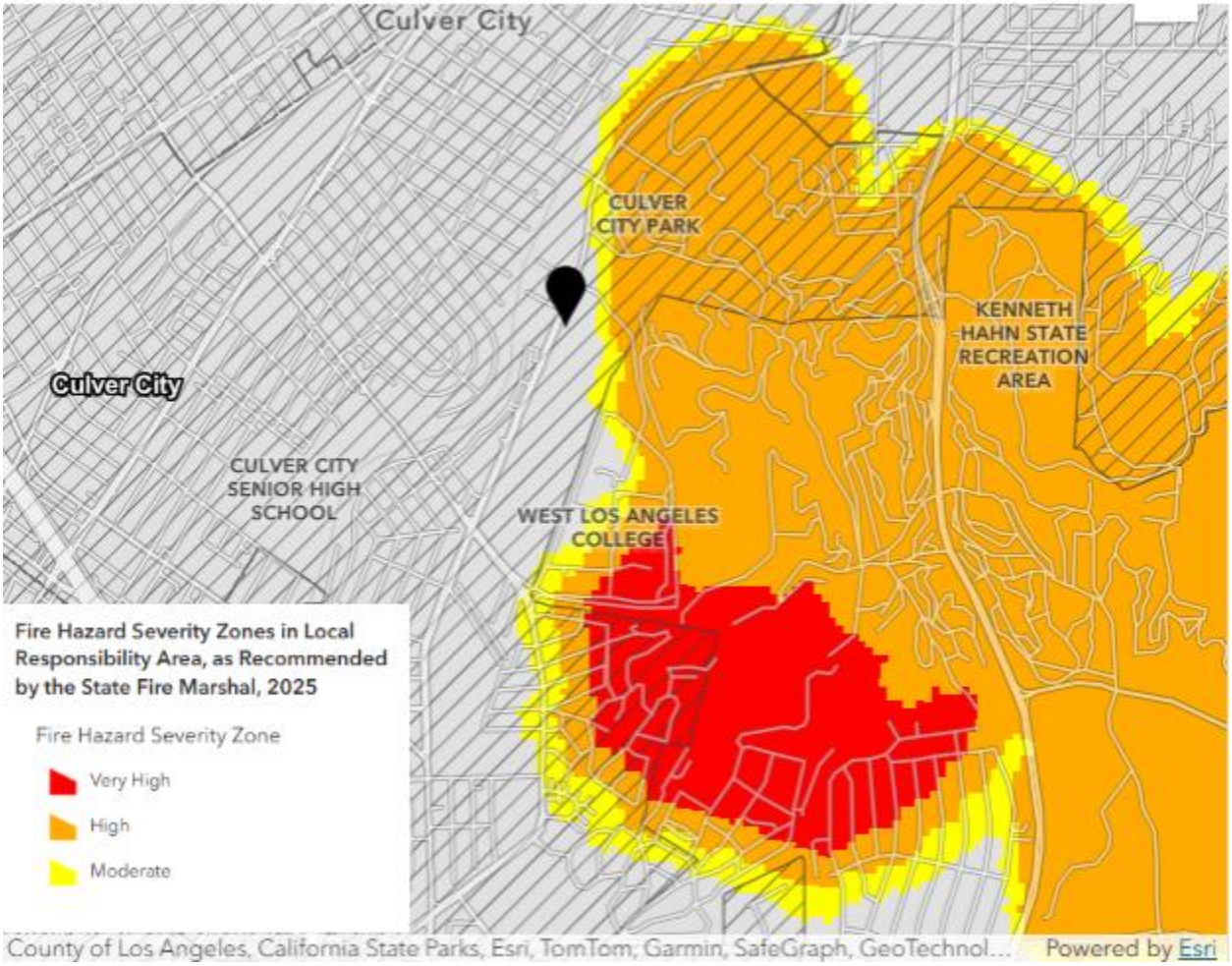


Figure 6 – Fire Hazard Severity Zone Map Overview



Figure 7 – Fire Hazard Severity Zone Map Closeup

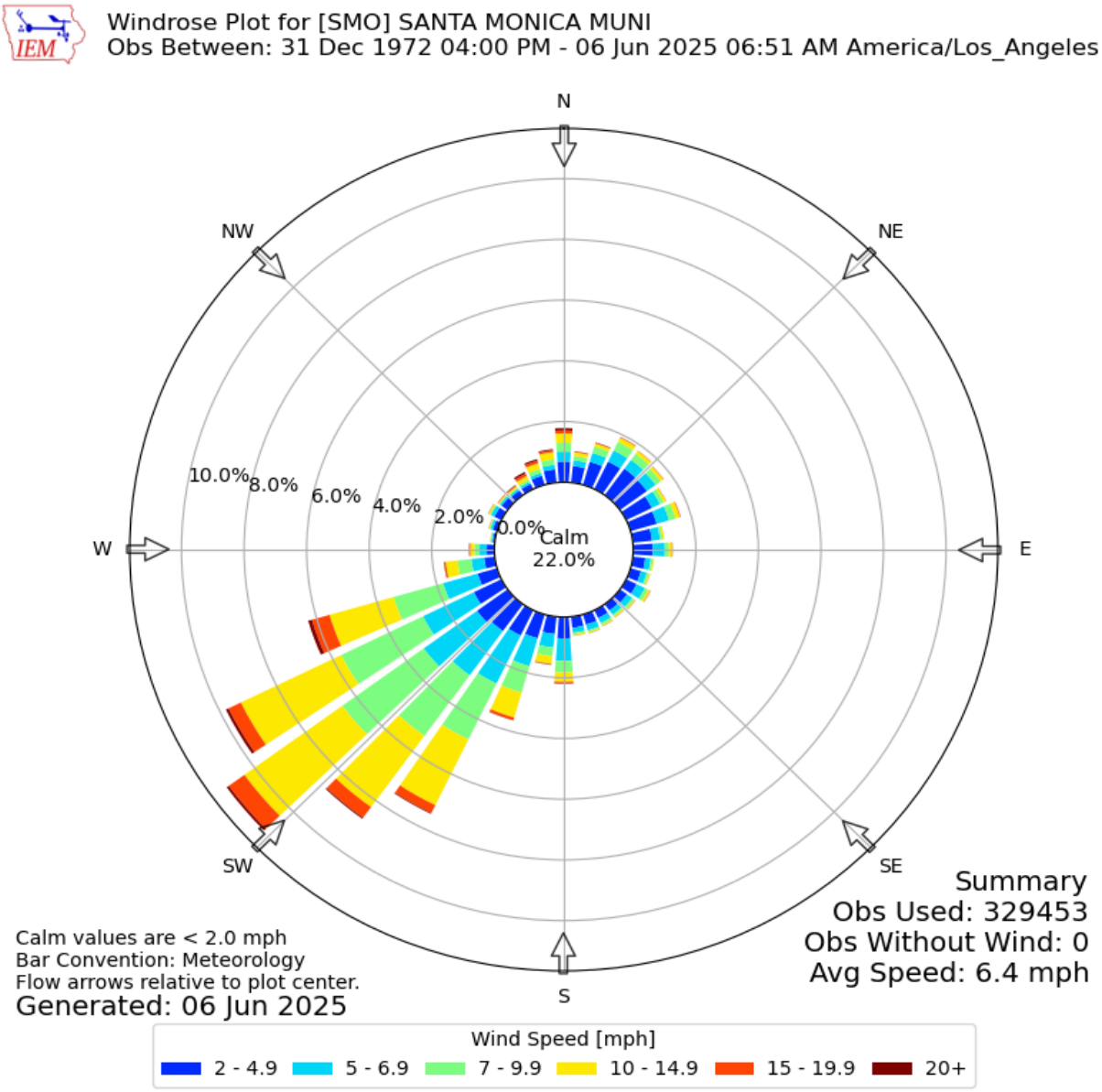


Figure 8 – Santa Monica Airport Windrose

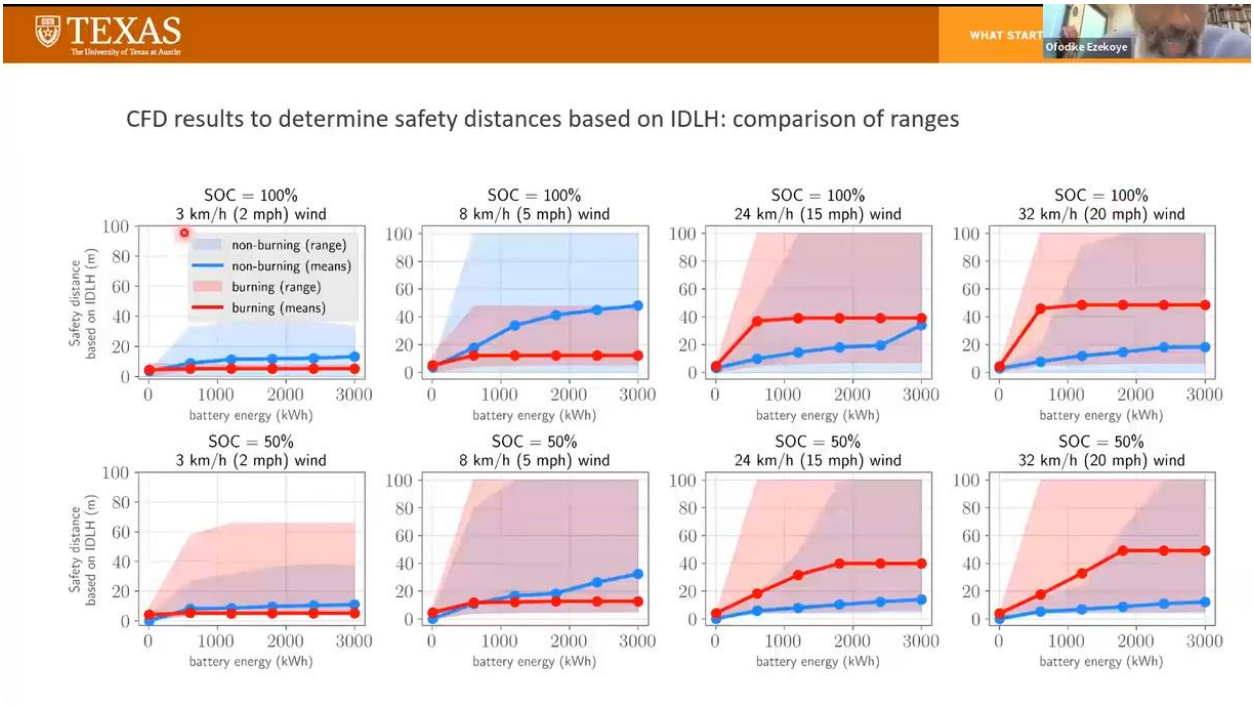


Figure 9 – Battery Fire IDLH Ranges

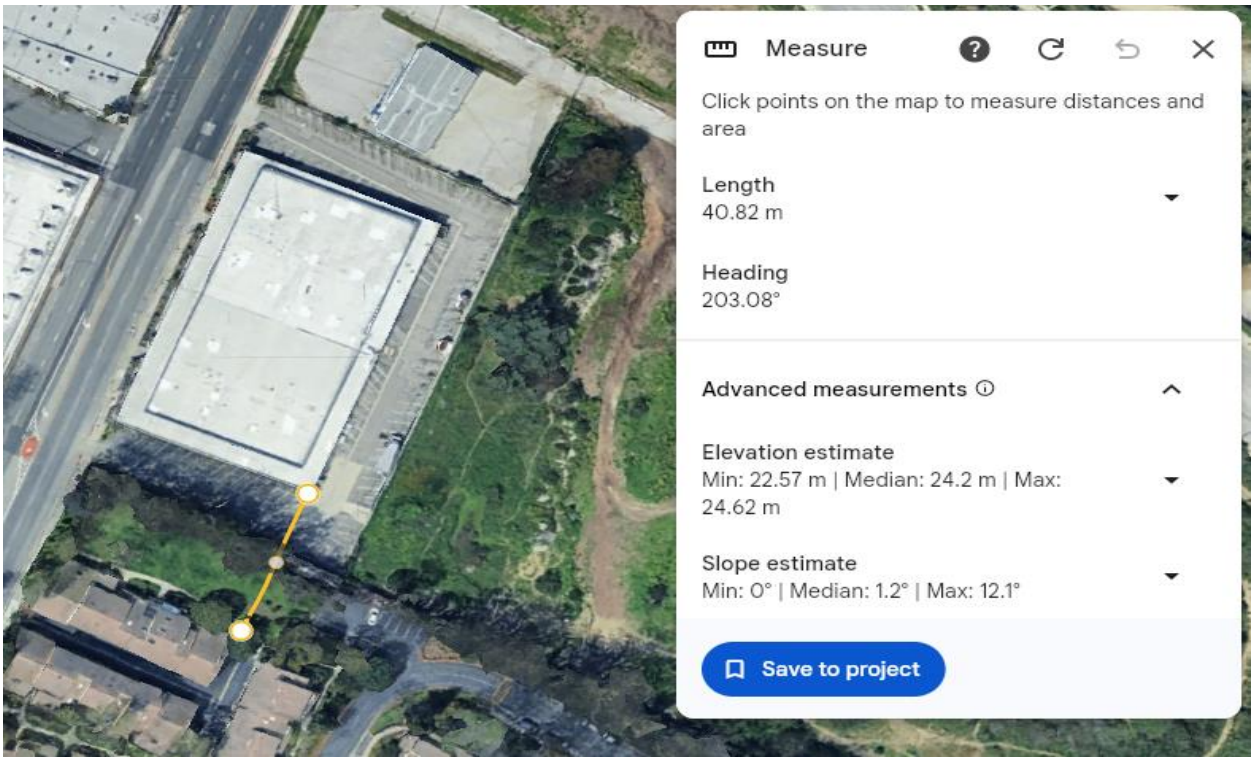


Figure 10 – Proximity Measurement of 10200 Jefferson to Nearest Residential Building

2.7 Life Safety Provisions for Occupants

Beyond fire prevention and control, the life safety of occupants is being rigorously addressed in the facility design. The building will have multiple exits and clearly marked egress pathways designed to accommodate the occupant load per the California Building Code. In the event of a fire or other emergency, occupants will be alerted by audible and visual alarms (automatically triggered by the sprinkler waterflow or smoke detectors if installed in certain areas) and can evacuate safely within the required egress times. Emergency lighting and exit signs with backup power will provide visibility even if power is lost. The sprinkler system plays a dual role by both controlling fire growth and vastly improving tenability; it limits smoke production and heat, giving occupants more time to exit and firefighters easier conditions in which to work. According to the NFPA Research Foundation, sprinklers can reduce the fire death rate by about 87% and greatly reduce injuries,[14] underscoring that sprinklers protect lives as well as property. All staff at the facility will be trained in basic emergency procedures, and evacuation drills will be conducted as needed. In summary, the life safety features are such that even in worst-case scenarios, people can evacuate promptly and safely, and the risk to life is minimized.

3. CONCLUSION

After review of codes, standards, and available research, the proposed vehicle storage and maintenance facility will operate safely with respect to fire and life safety. The combination of a full NFPA 13 sprinkler system, code-compliant ventilation and operations, and modern vehicle/charger safety features addresses credible hazards for both ICE vehicles and EVs.

- Indoor vehicle hazards are controlled by code-compliant design and active fire suppression, and in particular, the NFPA 13 OH-2 sprinkler system (0.20/1,500 + hose stream) that is standard for repair garages. These measures align with how parking/repair garages have been successfully protected for decades.

- EV charging does not pose a significant ignition source when listed equipment (UL 2594/UL 2202 with UL 2231 personnel protection) is installed per code. Available data indicate EVs are not more fire-prone than ICE; in any rare battery or fuel-fed vehicle fire, the sprinkler system and emergency response plan address the event. (Note: The facility services ICE vehicles as well; the same protections apply.)

- Proximity to oil wells is a non-issue from a fire standpoint due to distance and regulatory controls (CalGEM testing/inspection programs and on-site well fire

[14] Ahrens, M., *U.S. Experience with Sprinklers*, National Fire Protection Association Quincy, MA, 2017. (Finding an 87% lower civilian fire death rate per 1,000 reported fires in sprinklered properties vs. properties with no automatic extinguishing systems; and reductions in civilian and firefighter injuries.)

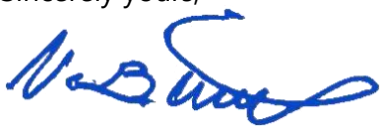
protection requirements). There is no credible fire scenario by which the facility and wells would adversely affect each other.

- Life safety measures are comprehensive, ensuring that occupants are protected and can evacuate in the event of an emergency.

This report references peer reviewed data, industry research, and code provisions to substantiate these points. All evidence indicates that the project's fire safety strategy is sound. Therefore, any claims suggesting unusual or unmanaged fire risks lack technical merit when weighed against the facts and the rigorous safety measures in place.

Please feel free to contact us if you require any further details or clarifications on the fire life safety aspects of this project. We are available to discuss the analysis and can provide additional documentation (such as fire protection engineering reports, sprinkler system design criteria, or code compliance checklists) for the record if needed. Thank you for the opportunity to address these concerns. We remain committed to upholding the highest safety standards for this facility.

Sincerely yours,



Nathan B. Wittasek, P.E., CFEI, CASp
Principal
CA License No. 1534 (Fire Protection)
CASp Certification No. CASp-707
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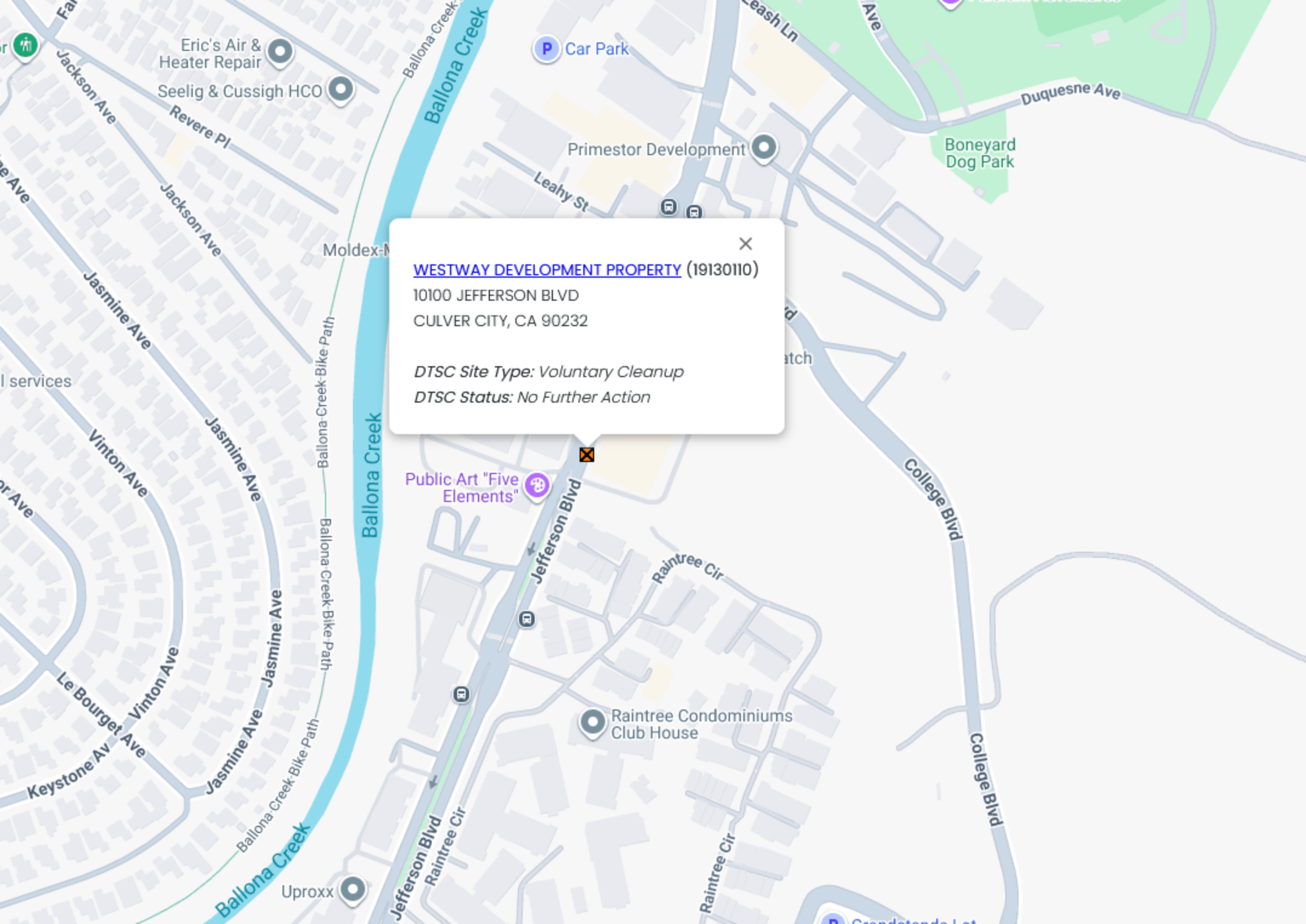
APPENDIX E – RELATED PROJECTS MAP



Related Project Location and Radius Map

Source: Google Maps 2025.

APPENDIX E – ENVIROSTOR INFORMATION


WESTWAY DEVELOPMENT PROPERTY (19130110)
10100 JEFFERSON BLVD
CULVER CITY, CA 90232
DTSC Site Type: Voluntary Cleanup
DTSC Status: No Further Action
Ballona Creek
Jefferson Blvd
College Blvd
Duquesne Ave
Leahy St
Raintree Cir
Public Art "Five Elements"
Raintree Condominiums Club House
Primestor Development
Boneyard Dog Park
Car Park
Eric's Air & Heater Repair
Seelig & Cussigh HCO
Uproxx
Jackson Ave
Revere Pl
Jasmine Ave
Vinton Ave
Le Bourget Ave
Keystone Av
Ballona Creek Bike Path

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
ENVIROSTOR

WESTWAY DEVELOPMENT PROPERTY (19130110)

SIGN UP FOR EMAIL ALERTS

10100 JEFFERSON BLVD
CULVER CITY, CA 90232
LOS ANGELES COUNTY
SITE TYPE: VOLUNTARY AGREEMENT

PROJECT MANAGER: JESSY FIERRO
SUPERVISOR: VU NGUYEN
OFFICE: CLEANUP CHATSWORTH
CENSUS TRACT: 6037702502
CALENVIROSCREEN PERCENTILE SCORE: 50-55%

Summary | Activities | Site/Facility Docs | Map | Related Sites | CalEnviroScreen

Site Information

CLEANUP STATUS
NO FURTHER ACTION AS OF 3/20/2025

SITE TYPE: VOLUNTARY AGREEMENT
NATIONAL PRIORITIES LIST: NO
ACRES: 12 ACRES
APN: 4296-001-011, 4296001274
CLEANUP OVERSIGHT AGENCIES:
DTSC - SITE CLEANUP PROGRAM - LEAD AGENCY

ENVIROSTOR ID: 19130110
SITE CODE: 300991
SPECIAL PROGRAM: VOLUNTARY AGREEMENT - STANDARD VOLUNTARY AGREEMENT
FUNDING: SITE PROPONENT
ASSEMBLY DISTRICT: 55
SENATE DISTRICT: 28

Regulatory Profile

PAST USE(S) THAT CAUSED CONTAMINATION
MANUFACTURING - PETROLEUM

POTENTIAL CONTAMINANTS OF CONCERN
METHANE
TPH-DIESEL
TPH-GAS
TETRACHLOROETHYLENE (PCE)
TRICHLOROETHYLENE (TCE)

POTENTIAL MEDIA AFFECTED
NO MEDIA AFFECTED

Site History

The site consists of three parcels, approximately 12 acres of land, which is currently an active oil field. The southwest portion, nearly a half-acre area, contains two above-ground storage tanks containing crude oil. The site also contains four active wells. A Preliminary Endangerment Assessment (PEA) was conducted in 2001. The PEA was approved with a recommendation for a Land Use Covenant restricting the property to commercial/industrial use. Additional sampling was conducted in 2004. Based on the assessment, DTSC approved the supplemental PEA report with no further action.

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