

CROSSINGS CAMPUS

Addendum to Draft Environmental Impact Report State Clearinghouse No. 2021110079

**Prepared for
City of Culver City
Culver City Case Nos:
P2022-0144 CP/ZCMA
P2021-0272-EIR**

November 2023



ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT FOR THE CROSSINGS CAMPUS PROJECT

1. Introduction

This document is an Addendum to the Environmental Impact Report (EIR) prepared for the Crossings Campus Project (State Clearinghouse No. 2021110079), which was certified by the City of Culver City in December 2022 (Certified EIR). In accordance with the California Environmental Quality Act (CEQA), this Addendum analyzes impacts associated with the removal of five (5) trees within the median along Venice Boulevard adjacent to the Project Site as part of the approved Project's off-site traffic improvements and demonstrates that all of the potential environmental impacts associated with the would be within the envelope of impacts already evaluated in the Certified EIR.

2. CEQA Authority for Addendum

CEQA establishes the type of environmental documentation required when changes to a project occur after an EIR is certified. Specifically, Section 15164(a) of the CEQA Guidelines states that:

The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

Section 15162 of the CEQA Guidelines requires a Subsequent EIR when an MND has already been adopted or an EIR has been certified and one or more of the following circumstances exist:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

- b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
- c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Likewise, California Public Resources Code (PRC) Section 21166 states that unless one or more of the following events occur, no subsequent or supplemental environmental impact report shall be required by the lead agency or by any responsible agency:

- Substantial changes are proposed in the project which will require major revisions of the environmental impact report;
- Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report; or
- New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

As demonstrated by the analysis herein, the removal of five (5) trees within the Venice Boulevard median would not result in any new additional significant impacts, nor would it substantially increase the severity of previously anticipated significant impacts. Rather, all of the impacts associated with the tree removal activities are within the envelope of impacts addressed in the Certified EIR and do not constitute a new or substantially increased significant impact. Based on this determination, the tree removal activities do not meet the requirements for preparation of a Subsequent or Supplemental EIR pursuant to Section 15162 of the CEQA Guidelines.

A. Overview of Approved Project

The Certified EIR evaluated the development of the Crossing Campus on an approximately 4.46-acre (194,334-square-foot [sf]) site at 8833 and 8825 National Boulevard and 8771 Washington in Culver City, California, 90232 (Culver City Parcel); and 8876, 8884, 8886, and 8888 Venice Boulevard and 8827 and 8829 National Boulevard in Los Angeles, California, 90232 (Los Angeles Parcel). The Project Site is bounded by Venice Boulevard to the north, Washington Boulevard to the south, National Boulevard to the west, and existing commercial uses to the east. The Project would remove all on-site buildings to construct an office complex totaling 536,000 sf. The Project would also include pedestrian-facing landscaping at the ground floor on National Boulevard and Venice Boulevard, a 7,120 sf publicly accessible, privately maintained amenity area along Washington Boulevard, as well as a 51,600 sf internal courtyard for the use of employees and occasional private tenant events.

Vehicular access to the new below-grade parking, as well as loading docks and trash areas, would be provided via two driveways that would be part of existing driveways and curb cuts along National and Washington Boulevards and a new driveway and curb cut adjacent to the existing Helms Alley driveway along Venice Boulevard. Both driveways would provide right-turn only ingress and right-turn only egress. A third, secondary driveway from Washington Boulevard would provide right-turn ingress for employee vehicles and emergency vehicles to the Culver City and Los Angeles Parcels.

As part of the Draft EIR, an Alternate Project Access Alternative (Alternative 4) was included that retained the same design, use programming and building configurations as the Project. However, the difference in Alternative 4 compared to the Project is the addition of a traffic signal at the intersection of Venice Boulevard and the proposed driveway along Venice Boulevard, located at the eastern edge the northern Project Site boundary, and the removal of office-related vehicular access on Washington Boulevard (the Washington Boulevard driveway would continue to serve as emergency access). As the required demolition, building sf, heights, land use uses, amenity areas, and proposed subterranean parking would be the same under Alternative 4 and the Project, it was assumed that the overall duration and intensity of construction under Alternative 4 would be similar to that of the Project.

Given that the on-site Project characteristics would be essentially the same under both Alternative 4 and the Project, it was concluded that impacts related to aesthetics, air quality, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, public services, tribal cultural resources, and utilities and service systems would be similar to those of the Project and no further analysis was required. The Draft EIR concluded that the proposed signal along Venice Boulevard would not materially impact the analysis and conclusions of these issue areas. However, the proposed signal would affect trip distribution and intersection volumes, which may impact noise and transportation impacts. As such, analyses related to noise and transportation were provided in the Draft EIR. It was determined that the impacts to noise and transportation would be similar to the approved Project.

Ultimately, the Project approved by the City of Culver City and the City of Los Angeles included the traffic signal at the intersection of Venice Boulevard and the Project's proposed driveway along Venice Boulevard.

The Initial Study prepared for the Project evaluated the removal of seven (7) street trees along Venice Boulevard within the Street Report, dated October 2021, and included as Appendix A of the Initial Study. As discussed therein, for any street tree removal in the City of Los Angeles, Project landscaping would comply with applicable Los Angeles Municipal Code (LAMC) and Urban Forestry Division requirements, which currently require street tree replacement on a 2:1 basis and approval by the Board of Public Works. Thus, the approved Project was required to provide fourteen (14) replacement street trees. In addition, during the final design phase of the Project, and prior to the start of the demolition/construction phase, the Project would submit a final landscape plan to the City of Los Angeles for approval by the City's Chief Forester and the Director of the Bureau of Street Services. The final landscape plan would include provisions to either protect in place the existing protected trees in or adjacent to the Project Site, per the requirements of the City of Los Angeles Tree Preservation Ordinance, or replace the removed non-protected street trees at a 2:1 ratio

or pay in-lieu fees to the City of Los Angeles. Through compliance with applicable street tree removal and replacement provisions of the LAMC, impacts on street trees/tree removal would be less than significant, and this biological resource issue was appropriately not evaluated further in the EIR. This analysis applied to the Project evaluated in the EIR, including Alternative 4, which included the off-site traffic improvements. The EIR did not specifically include or evaluate removal of any trees within the Venice Boulevard median.

B. Proposed Tree Removal Activities

The approved design of the traffic signal improvements along Venice Boulevard adjacent to the Project Site would require the removal of five (5) additional trees within the median of Venice Boulevard as set forth in the November 2023 Tree Report (Attachment A). Four (4) of the median trees are sweetgum (*liquidambar styraciflua*) of at least 25 feet in height in fair/poor condition and the other tree is a smaller 8-foot tall median tree. See attached Tree Report (November 2023), prepared by The Trees Resources, for additional details of the median trees to be removed by the Project.

C. Analysis of Proposed Modifications

As with the seven (7) street trees along Venice Boulevard evaluated within the Street Tree Report (October 2021) included within the Project's Initial Study, the five (5) median trees would require removal and replacement in a similar manner as the street trees evaluated in the Initial Study (and confirmed in the November 2023 Tree Report). That is, the removed median trees would be replaced at 2:1 ratio, subject to approval by the City of Los Angeles Board of Public Works, as well as depicted on a final landscape plan for approval by the City's Chief Forester and the Director of the Bureau of Street Services. The replacement trees could be provided at off-site locations, or the Project Applicant would pay in-lieu fees in accordance with LAMC requirements, as applicable. The removal and replacement of these 5 additional trees would increase the overall number of removed trees from seven (7) to twelve (12), and would increase the number of replacement trees for the Project from 14 to 24.

The removal of these additional five (5) street trees would not in any way substantially affect or materially change the analysis of impacts for the Project or Alternative 4 in the Draft EIR, including the analysis of impacts regarding aesthetics or biological resources in the Project's Initial Study. As stated above, the Project would continue to comply with applicable City of Los Angeles tree replacement requirements to ensure it does not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. As confirmed by the November 2023 Tree Report, none of the removed median trees are considered protected trees per the City of Los Angeles Native Tree Protection Ordinance. Construction activities and associated equipment use needed for the tree removal activities as part of a maximum intensity construction day would be similar to that evaluated in the Draft EIR. The Project's Construction Management Plan, included as Project Design Feature TRAF-PDF-1 in the Draft EIR, would be prepared in a similar manner as evaluated in the Draft EIR. Also, the overall construction schedule would not be affected by these nominal construction activities in consideration of the Project's 3-year construction schedule. In the long-term, the net increase in trees would be greater since the

number of replacement trees would increase from 14 to 24. The increase in replacement trees would result in long-term benefits to biological resources as compared to those associated with the previously approved Project.

Based on the above, the proposed additional street tree removal activities would not result in any new additional significant impacts, nor would it substantially increase the severity of previously anticipated significant impacts. Thus, a new or substantially greater significant impact would not result from the proposed removal of 5 (five) additional street trees in the Venice Blvd median. In addition, all of the mitigation measures included as part of the EIR would continue to be implemented, specifically MM-BIO-1, implementation of mitigation to reduce impacts to migratory and/or nesting bird species. As all of the impacts would be within the envelope of impacts identified in the Certified EIR, no additional environmental analysis pursuant to Section 15162 of the CEQA Guidelines is necessary.

ATTACHMENTS

- Tree Report, prepared by The Tree Resource, dated November 2023.