NOTICE OF EXEMPTION

To: Los Angeles Clerk/Recorder
12400 Imperial Highway
Norwalk, CA 90650

Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento CA 95812-3044

From: City of Culver City
9770 Culver Boulevard
Culver City, CA 90232

Project Title:

Move Culver City Tactical Mobility Lane Pilot Project

Project Location:

The Project is in the City of Culver City, Los Angeles County on Culver Boulevard from Duquesne Avenue to Canfield Avenue, and on Washington Boulevard between Ince Boulevard and Fairfax Avenue near the City boundary.

Description of Nature, Purpose, and Beneficiaries of Project:

The MOVE Culver City Tactical Mobility Lane Pilot Project (Original Project) was installed in November 2021. As part of the Original Project, the number of traffic lanes was reduced from two or three to one in each direction, dedicated bus and dedicated bicycle lanes were added where there was sufficient street width to allow for the separate bus and bicycle lanes, and shared bus/bicycle lanes were added where there was not, along Culver Boulevard between Duquesne Avenue and Canfield Avenue and on Washington Boulevard between Ince Boulevard and La Cienega Avenue. The Original Project was a temporary pilot project, which was intended to be installed temporarily for evaluation for up to 24 months.

The intent of a pilot project is to implement temporary lower-cost improvements as a way to test and evaluate whether more expensive permanent treatments should be installed. Pilot projects often lead to two general outcomes: (1) the conclusion or cancellation of the pilot project, whereby conditions return to what they were before the pilot project, or (2) to long-term permanent improvements. While the pilot project is active, monitoring is done and, based on the results of the monitoring, the improvements can be withdrawn/removed or modified. It is common for pilot projects to evolve or be modified to study the potential for long-term transportation benefits.

In this case, the City installed temporary, low cost, quick-build improvements using paint and plastic bollards rather than more permanent treatments to separate the bus and bicycle lanes from regular traffic lanes and from each other. The City has been monitoring and evaluating the temporary pilot improvements implemented as part of the Original Project and is determining whether to move forward with a modified version of the project (Modified Project) as the next phase of the project.

The proposed Modified Project changes to the permanent pre-pilot lane configurations to incorporate shared bus and bike lanes in both directions on Culver Boulevard from Duquesne Ave to Washington Canfield Avenue, and on Washington Boulevard between Ince Boulevard and Fairfax Avenue near the City boundary. These modifications will be constructed using similar quick-build materials to the Original Project. These modifications will extend the duration of the pilot program for evaluation for up

to 24 months. The addition of these shared bus-bike lanes is achieved through reallocating on-street parking and/or one of two general purpose automobile lanes from the permanent pre-pilot configuration that existed prior to the pandemic. The permanent pre-pilot configuration through the corridor was generally two automobile through lanes in each direction, with additional features such as on-street parking or turn lanes varying block to block. The details of the lane configurations for the pre-pilot conditions, Original Project, and Modified Project are shown in the table at the end of Attachment 2 to this Notice of Exemption (NOE).

As stated in the staff report dated February 1, 2021, for the Original Project, "through repurposing travel lanes for multi-modal transportation, the City aims to facilitate the efficient movement of people and to raise public awareness and acceptance of dedicated transit lanes, improve transit travel times and reliability, and improve access for cyclists and scooter riders."

As stated in the staff reports dated April 24, 2023, and July 10, 2023, for the Modified Project, "the main goal of the MOVE Culver City Project is to improve the infrastructure and services for alternative modes of traffic and to offer the community equitable, convenient, and sustainable mobility options (walking, riding, and taking transit)," aligning with "the City's draft General Plan, Short Range Mobility Plan, Bicycle and Pedestrian Master Plan and Action Plan, City Council's Strategic Plan, and the Transit-Oriented Development Visioning Report in developing an integrated multi-modal transportation system to provide transportation access to all residents and visitors and leveraging mass transit and other alternative modes to accommodate the growth of and maintain the long-term vitality of the Culver City community." Both the Original Project and the Modified Project continue to accomplish these goals.

See the Attachments 1 and 2 to this Notice of Exemption for further details.

Public Agency Approving Project:	**Entity Carrying Out Project:**
City of Culver City	City of Culver City, Transportation Planning

Exempt Status (check one):

____ Ministerial (Public Resources Code [PRC] Section 21080(b)(1); State CEQA Guidelines [Guidelines] Section 15268)

____ Declared Emergency (PRC Section 21080(b)(3); Guidelines Section 15269(a))

____Emergency Project (PRC Section 21080(b)(4); Guidelines Section 15269(b)(c))

__X__ Categorical Exemption. Type and Section number: Class 1, CEQA Guidelines Section 15301, Existing Facilities; (c) Existing highways and streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities (this includes road grading for the purpose of public safety, and other alterations such as the addition of bicycle facilities, including but not limited to bicycle parking, bicycle-share facilities and bicycle lanes, transit improvements such as bus lanes, pedestrian crossings, street trees, and other similar alterations that do not create additional automobile lanes).

__X__ Statutory Exemptions, Code number: PRC Section 21080.25

Reasons why project is exempt:

The Project has been environmentally reviewed pursuant to the provisions of the California Environmental Quality Act (Public Resources Code Sections 21000, et seq. ("CEQA") *and* the State CEQA Guidelines (California Code of Regulations, Title 14, Sections 15000, et seq.).

CEQA Guidelines section 15301(c) (Class 1 categorical exemption).

Because the Modified Project is limited to the installation of shared bus and bike lanes and does not involve an expansion of use the Project meets the criteria under the existing facilities Categorical Exemption in CEQA Guidelines section 15301(c) (Class 1 categorical exemption).

> "Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The types of "existing facilities" itemized below are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of use.
>
> Examples include but are not limited to:
>
> > (c) Existing highways and streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities (this includes road grading for the purpose of public safety), and other alterations such as the addition of bicycle facilities, including but not limited to bicycle parking, bicycle-share facilities and bicycle lanes, transit improvements such as bus lanes, pedestrian crossings, street trees, and other similar alterations that do not create additional automobile lanes)"

Notably, the Class 1 categorical exemption looks to the "existing or former use" for an evaluation of whether there has been an expansion of use. The project meets the criteria of the Class 1 categorical exemption as it includes transportation improvements along existing roadways involving the conversion of existing general-purpose lanes and on-street parking to shared bus-bike lanes and does not create additional automobile lanes beyond those that existed in the pre-pilot condition.

Public Resources Code Section 21080.25 Statutory Exemption

In addition, the Modified Project meets the statutory exemption criteria under PRC Section 21080.25. Pursuant to PRC Section 21080.25(b)(8), exempt projects include those that consist of a combination of any of the components of a project identified in paragraphs (1) to (7) of Section 21080.25(b). The Modified Project converts automobile lanes and on-street parking into new bicycle facilities (meaning a marked lane shared between bicycles and vehicles)[1] and transit facilities that will improve access and mobility within public rights-of way, which are components of paragraphs (1) to (7) of Section 21080.25(b). Also, PRC Section 21080.25(b)(3) exempts "transit prioritization projects." The Project's conversion of general purpose lanes to shared bus-bike lanes qualifies it as a transit prioritization project.

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[1] As defined by PRC section 21080.25 (a)(2), "bicycle facilities" include "bikeways" as defined by Streets and Highways Code section 890.4. That section in turn includes "[b]ike routes, also referred to as "Class III bikeways," which provide a right-of-way designated by signs or permanent markings and shared with pedestrians and motorists.

The Project meets the criteria under PRC Section 21080.25 (c):

PRC Section 21080.25(c)(2) requires that a project eligible for CEQA categorical exemption under Section 21080.25 meet the following criterion:

> *"*The project does not induce single-occupancy vehicle trips, add additional highway lanes, widen highways, or add physical infrastructure or striping to highways except for minor modifications needed for the efficient and safe movement of transit vehicles, bicycles, or high-occupancy vehicles, such as extended merging lanes, shoulder improvements, or improvements to the roadway within the existing right of way. The project shall not include the addition of any auxiliary lanes.*"*

Neither the temporary Original Project nor the Modified Project add additional highway lanes beyond the pre-pilot permanent condition and the physical infrastructure and striping that is added is for the efficient and safe movement of transit vehicles and bicycles. As is discussed in Attachment 2, the Modified Project does not materially induce an increase in VMT and in turn it would also not induce single-occupancy vehicle trips since single-occupancy vehicle trips would be an element of any increase in VMT.

The Project also meets the additional criteria required to assert the exemption under PRC Section 21080.25 (c)(1) and (c)(3), as a local agency (the City of Culver City) is carrying out the Project and is the lead agency for the Project, and the Project does not require demolition of affordable housing units.

Based on the above, the Project has been examined in the context of CEQA Guidelines Section 15301(c) and PRC Section 21080.25 and has been found consistent with the criteria for a categorical exemption.

<u>No Exceptions Apply</u>

Further, the application CEQA Guidelines Section 15301(c) is not barred by any exceptions set forth in Section 15300.2. Attachment 1 to this Notice of Exemption provides additional detail in support of this finding.

In addition, Section 15061(b) provides further guidance in the determination of whether an action is exempt from CEQA stating, "CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect the environment, the activity is not subject to CEQA." The Project is minor in scope involving the conversion of general purpose lanes to shared bus and bike lanes. These transportation improvements would involve limited construction within existing public road rights-of-way with the main goal of the Project to improve the infrastructure and services for alternative modes of traffic and to offer the community equitable, convenient, and sustainable mobility options (walking, riding, and taking transit). Construction of the Project would comply with all applicable City of Culver City code requirements. Therefore, the Project would not result in a significant effect on the environment. Attachments to this Notice of Exemption provide additional detail in support of this finding.

CEQA Contact Person:	**Telephone:**
Mike Harden, ESA	949-870-1510

If filed by applicant:

1. Attach certified document of exemption findings.
2. Has a Notice of Exemption been filed by the public agency approving the project? __ Yes ___ No

Date Received for Filing at OPR _____

Signature Diana Chang Title Chief Transportation Officer

ATTACHMENT 1

NOTICE OF EXEMPTION
MOVE CULVER CITY TACTICAL MOBILITY LANE PILOT PROJECT: MODIFIED PROJECT
CULVER CITY, CALIFORNIA
SUPPLEMENTAL INFORMATION

1. Background of the Existing Setting of the Transportation Improvements Areas: As the Modified Project is part of a pilot project, the following provides a brief history of the MOVE Culver City Downtown Corridor Mobility Lane Project and roadway configurations along Culver Boulevard and Washington Boulevard:

- Pre-Pandemic (Pre-March 2020) – Two lanes of traffic in each direction along Culver and Washington Boulevards. No dedicated bus or bicycle lanes.
- March through June 2020 – Reduced use of the roadways during early days of the COVID-19 pandemic due to shelter in place orders.
- June 2020 through November 2021 – Westbound Culver Boulevard temporarily closed to general-purpose traffic between Canfield Avenue and Duquesne Avenue with one lane of traffic repurposed for temporary outdoor dining and another lane of traffic temporarily converted to a shared bus/bicycle lane.
- November 20, 2021 – Current configuration of the Original Project was installed following six weeks of construction. The current configuration is one dedicated bus lane and one dedicated bicycle lane in each direction on Culver Boulevard between Duquesne Avenue and Canfield Avenue and on Washington Boulevard between Robertson Boulevard and Helms Avenue, and one vehicle lane and one shared bus/bicycle lane in each direction on Washington Boulevard between Ince Boulevard and Robertson Boulevard and on Washington Boulevard between Helms Avenue and La Cienega Avenue.
- January 2022 through April 2023 – Post-pilot evaluation study conducted. The intent of the City when the Original Project was implemented was that as a pilot project the Original Project would be installed for up to 24 months[2] and that an evaluation study would be conducted in support of determining the next phase of the project.
- April 24, 2023 – City Council directed staff to develop a modified design that would create shared bus and bike lanes throughout the Project corridor, include a second general-purpose lane where feasible, and extend the Project's boundary eastward by 0.6 miles along Washington Boulevard from La Cienega Avenue to Fairfax Avenue.
- July 10, 2023 – City Council provided input on the conceptual plans prepared by staff in response to the April 2023 direction. The project that is being analyzed (the Modified Project) is described in the NOE and the staff report dated September 11, 2023.

2. VMT Screening: Culver City's *Transportation Study Criteria and Guidelines* (TSCG) states that "a project that increases vehicular roadway capacity has the potential to induce vehicle travel" and that

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[2] Planning Division/City of Culver City, Notice of Exemption, Move Culver City Tactical Mobility Lane Pilot Project, April 2021.

"transportation projects that do not add capacity are screened from induced demand VMT analysis", and provides a list of transportation projects that typically do not add capacity. This guidance was adopted from guidance provided by the Governor's Office of Planning and Research in its *Technical Advisory on Evaluating Transportation Impacts in CEQA*. OPR provides a list of "projects that would not likely lead to a substantial or measurable increase in vehicle travel, and therefore generally should not require an induced travel analysis" and defines "project types that would likely lead to a measurable and substantial increase in vehicle travel" as "addition of through lanes on existing or new highways, including general purpose lanes, HOV lanes, peak period lanes, auxiliary lanes, or lanes through grade-separated interchanges."

Included in the lists of projects that do not increase capacity and are not likely lead to a substantial increase in vehicle travel in both documents are projects that convert existing general purpose lanes to transit lanes and projects that add new or enhanced bicycle facilities on existing streets within existing public rights-of-way because transit lanes and bicycle lanes do not provide new general purpose vehicular capacity, do provide alternatives mode of travel, and are presumed to not lead to a substantial increase in VMT.

The Original Project was approved at a time when westbound Culver Boulevard was closed to general-purpose traffic in downtown Culver City to allow for temporary outdoor dining during the COVID-19 pandemic. Because the road closure was a temporary condition, the appropriate pre-project roadway configuration for consideration in the environmental assessment for the Original Project was the permanent two lanes in each direction that existed prior to the pandemic. The Modified Project is a continuation of the Original Project and the pre-pandemic roadway configuration continues to be the appropriate baseline condition for the environmental assessment for the Modified Project.

As such, both the Original Project and the Modified Project convert existing general-purpose lanes and on-street parking to shared bus and bicycle lanes and do not increase vehicular roadway capacity beyond the capacity that existed in the pre-pilot condition. The Modified Project is therefore screened from VMT analysis as a project that would not substantially increase VMT.

3. Review of Possible Exceptions to the Categorical Exemption: The Project has been reviewed under Guidelines Section 15300.2 and, for the reasons explained below, none of the relevant exceptions to the Class 1 categorical exemption in section 15300.2 apply here.

a. Cumulative Impacts: The Project is not related to any other "successive projects of the same kind in the same place over time," thus, no significant cumulative impacts would occur.

b. Significant Effects: Neither the Original Project nor the Modified Project will have a significant effect on the environment due to unusual circumstances. As stated above, the proposed transportation improvements are located in an urbanized area within existing public roadway rights-of way. There are no sensitive natural resources of any kind within the boundaries of the transportation improvement areas or in the surrounding area, as the transportation improvement areas and surrounding area are fully developed with buildings, parking lots or other supporting urban infrastructure and there are no "unusual circumstances" that would indicate a potential for any significant environmental effects. Construction of the Project would comply with all City of Culver City code requirements as applicable. The size, location, and configuration of both the Original Project and the Modified Project are in line with other similar mobility projects. The Original Project was previously determined to be exempt and covered by the Class 1 categorical

exemption.[3] The Original Project and the Modified Project are similar to the Venice Boulevard Mobility Improvements (Lincoln – National) which removed an automobile lane on Venice Boulevard, moved the street parking, and added in bus and bicycle lanes between December 2022 – May 2023 approximately 1-2 city blocks away from the Project.[4] As discussed above, the Project is screened from VMT analysis per City and OPR VMT guidance documents. Furthermore, it can be presumed that a project such as the Modified Project that does not materially induce an increase in VMT would also not induce single-occupancy vehicle trips since single-occupancy vehicle trips would be an element of any increase in VMT. Accordingly, it follows that the Modified Project would not result in corresponding increases in traffic-related noise levels or air quality emissions. Therefore, there is no reasonable possibility that the Project would have a significant effect on the environment due to unusual circumstances.

c. Scenic Highways: According to the General Plan, there are no State Scenic Highways within the City of Culver City, nor are there any Culver City designated scenic highways or view corridors that would be affected by the Modified Project. Therefore, the Modified Project would not damage any scenic resources.

d. Hazardous Waste Sites: According to the Department of Toxic Substances Control EnviroStor database and the California State Water Resources Control Board Geotracker database, the areas proposed for the transportation improvements are not on any list of hazardous waste sites.

e. Historical Resources: According to the General Plan, the Project corridor is not a historical resource. As a result no historical resources would be impacted by implementation of the Modified Project, which involves transportation improvements on Culver Boulevard from Duquesne Avenue to Washington Boulevard, and continuing east on Washington to Fairfax Avenue near the City boundary.

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[3] See April 21, 2021 Notice of Exemption for Move Culver City Tactical Mobility Lane Pilot Project: https://ceqanet.opr.ca.gov/2021040471.

[4] See Los Angeles Department of Transportation Venice Boulevard Mobility Improvements (Lincoln – National): https://ladotlivablestreets.org/projects/venice.

ATTACHMENT 2

FEHR PEERS

Memorandum

Date: August 28, 2023

To: Diana Chang, City of Culver City

From: Tom Gaul

Subject: VMT Screening for Modified MOVE Culver City Tactical Mobility Lane Pilot Project

LA23-3484

The MOVE Culver City Tactical Mobility Lane Pilot Project (Original Project) was installed in November 2021. As part of the Original Project, the number of traffic lanes was reduced from two to one in each direction, dedicated bus and dedicated bicycle lanes were added where there was sufficient street width to allow for the separate bus and bicycle lanes, and shared bus/bicycle lanes were added where there was not, on Culver Boulevard between Duquesne Avenue and Canfield Avenue and on Washington Boulevard between Ince Boulevard and La Cienega Avenue.

The Original Project was a pilot project. The intent of a pilot project is to implement temporary lower-cost improvements as a way to test and evaluate whether more expensive permanent treatments should be installed. Pilot projects often lead to long-term permanent improvements. Monitoring is done and, based on the results of the monitoring, the improvements can be withdrawn or modified. In this case, the City installed temporary, low cost, quick-build improvements using paint and plastic bollards rather than more permanent treatments to separate the bus and bicycle lanes from regular traffic lanes and from each other. The City has been monitoring and evaluating the temporary pilot improvements implemented as part of the Original Project and is determining whether to move forward with a modified version of the project (Modified Project) as the next phase of the project. The proposed Modified Project would revise the design of the Original Project to provide two traffic lanes in each direction along portions of the corridor, to provide shared bus/bicycle lanes throughout the corridor, and to extend the project corridor eastward to Fairfax Avenue. Further detail regarding the pre-pilot, Original Project, and Modified Project roadway configurations is provided below in the Project Description section.

Both the City of Culver City and the State of California Governor's Office of Planning and Research (OPR) provide screening criteria clearing projects that do not add capacity from analysis of vehicle

miles traveled (VMT) because projects meeting the screening criteria are presumed to result in less than significant VMT impacts. Both the Original Project and the Modified Project meet the screening criteria provided by both the City and the State and thus VMT analysis is not necessary. The purpose of this memorandum is to provide the supporting documentation for that conclusion.

History

The following provides a brief history of the MOVE Culver City Tactical Mobility Lane Pilot Project and roadway configurations along Culver Boulevard and Washington Boulevard:

- Pre-Pandemic (Pre-March 2020) – Two lanes of traffic in each direction along Culver and Washington Boulevards. No dedicated bus or bicycle lanes.
- March through June 2020 – Reduced use of the roadways during early days of the COVID-19 pandemic due to shelter in place orders.
- June 2020 through November 2021 – Westbound Culver Boulevard temporarily closed to general-purpose traffic between Canfield Avenue and Duquesne Avenue with one lane of traffic repurposed for temporary outdoor dining and another lane of traffic temporarily converted to a shared bus/bicycle lane.
- November 20, 2021 – Current configuration of the Original Project was installed following six weeks of construction. The current configuration is one dedicated bus lane and one dedicated bicycle lane in each direction on Culver Boulevard between Duquesne Avenue and Canfield Avenue and on Washington Boulevard between Robertson Boulevard and Helms Avenue, and one vehicle lane and one shared bus/bicycle lane in each direction on Washington Boulevard between Ince Boulevard and Robertson Boulevard and on Washington Boulevard between Helms Avenue and La Cienega Avenue.
- January 2022 through April 2023 – Post-pilot evaluation study conducted. The intent of the City when the Original Project was implemented was that as a pilot project the Original Project would be installed for up to 24 months[1] and that an evaluation study would be conducted in support of determining the next phase of the project.
- April 24, 2023 – City Council directed staff to develop a modified design that would create shared bus and bike lanes throughout the Project corridor, include a second general-purpose lane where feasible, and extend the Project's boundary eastward by 0.6 miles along Washington Boulevard from La Cienega Avenue to Fairfax Avenue.

[1] Planning Division/City of Culver City, *Notice of Exemption, Move Culver City Tactical Mobility Lane Pilot Project*, April 2021

- July 10, 2023 – City Council provided input on the conceptual plans prepared by staff in response to the April 2023 direction. The project that is being analyzed (the Modified Project) is described in the Project Description section below.

Project Objectives

As stated in the staff report dated February 1, 2021, for the Original Project, "through repurposing travel lanes for multi-modal transportation, the City aims to facilitate the efficient movement of people and to raise public awareness and acceptance of dedicated transit lanes, improve transit travel times and reliability, and improve access for cyclists and scooter riders."

As stated in the staff reports dated April 24, 2023, and July 10, 2023, for the Modified Project, "the main goal of the MOVE Culver City Project is to improve the infrastructure and services for alternative modes of traffic and to offer the community equitable, convenient, and sustainable mobility options (walking, riding, and taking transit)," aligning with "the City's draft General Plan, Short Range Mobility Plan, Bicycle and Pedestrian Master Plan and Action Plan, City Council's Strategic Plan, and the Transit-Oriented Development Visioning Report in developing an integrated multi-modal transportation system to provide transportation access to all residents and visitors and leveraging mass transit and other alternative modes to accommodate the growth of and maintain the long-term vitality of the Culver City community."

Both the Original Project and the Modified Project accomplish these goals.

Project Description

The proposed Modified Project configuration changes the pre-pilot lane configurations to incorporate shared bus and bike lanes in both directions on Culver Boulevard from Duquesne Ave to Washington Boulevard, and continuing east on Washington to Fairfax Avenue near the City boundary. The addition of these shared bus-bike lanes is achieved through reallocating on-street parking and/or one of two general purpose vehicle lanes from the permanent pre-pilot configuration that existed prior to the pandemic. The permanent pre-pilot configuration through the corridor was generally two vehicle through lanes in each direction, with additional features such as on-street parking or turn lanes varying block to block. The details of the lane configurations for the pre-pilot conditions, Original Project, and Modified Project are shown in the table at the end of this memo.

VMT Screening

VMT Screening Criteria

Culver City's *Transportation Study Criteria and Guidelines* (TSCG) states that "a project that increases vehicular roadway capacity has the potential to induce vehicle travel" and that "transportation projects that do not add capacity are screened from induced demand VMT analysis", and provides a list of transportation projects that typically do not add capacity. [2] This guidance was adopted from guidance provided by the Governor's Office of Planning and Research in its *Technical Advisory on Evaluating Transportation Impacts in CEQA*. OPR provides a list of "projects that would not likely lead to a substantial or measurable increase in vehicle travel, and therefore generally should not require an induced travel analysis" and defines "project types that would likely lead to a measurable and substantial increase in vehicle travel" as "addition of through lanes on existing or new highways, including general purpose lanes, HOV lanes, peak period lanes, auxiliary lanes, or lanes through grade-separated interchanges." [3]

Included in the lists of projects that do not increase capacity and are not likely to lead to a substantial increase in vehicle travel in both documents are projects that convert existing general purpose lanes to transit lanes and projects that add new or enhanced bicycle facilities on existing streets within existing public rights-of-way because transit lanes and bicycle lanes do not provide new general purpose vehicular capacity, do provide alternatives mode of travel, and are presumed to not lead to a substantial increase in VMT.

VMT Screening Analysis

The Original Project was approved at a time when westbound Culver Boulevard was closed to general-purpose traffic in downtown Culver City to allow for temporary outdoor dining during the COVID-19 pandemic. Because the road closure was a temporary condition, the appropriate pre-project roadway configuration for consideration in the environmental assessment for the Original Project was the permanent two lanes in each direction that existed prior to the pandemic. The Modified Project is a continuation of the Original Project and the pre-pandemic roadway configuration continues to be the appropriate baseline condition for the environmental assessment for the Modified Project.

Using the existing conditions (the road configurations of the Original Project) as a baseline would be misleading because as a pilot project the Original Project is temporary in nature.

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[2] City of Culver City, *Culver City Transportation Study Criteria and Guidelines*, July 2020, page 10 and Attachment D.

[3] State of California, Governor's Office of Planning and Research, *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018, pages 20 and 21.

As such, both the Original Project and the Modified Project convert existing general-purpose lanes to transit lanes and bicycle lanes and do not increase vehicular roadway capacity beyond the capacity that existed in the pre-pilot condition. The Modified Project is therefore screened from VMT analysis as a project that would not substantially increase VMT.

Public Resources Code Section 21080

California Public Resources Code Section 21080.25(c)(2) requires that a project eligible for CEQA categorical exemption under Section 21080.25 meet the following criterion:

> The project does not induce single-occupancy vehicle trips, add additional highway lanes, widen highways, or add physical infrastructure or striping to highways except for minor modifications needed for the efficient and safe movement of transit vehicles, bicycles, or high-occupancy vehicles, such as extended merging lanes, shoulder improvements, or improvements to the roadway within the existing right of way. The project shall not include the addition of any auxiliary lanes.[4]

Neither the Original Project nor the Modified Project add additional highway lanes beyond the pre-pilot permanent condition and the physical infrastructure and striping that is added is for the efficient and safe movement of transit vehicles and bicycles. Furthermore, it can be presumed that a project such as the Modified Project that does not materially induce an increase in VMT and in turn would also not induce single-occupancy vehicle trips since single-occupancy vehicle trips would be an element of any increase in VMT.

[4] Source: California Public Resources Code, Section 21080.25(c)(2), accessed August 4, 2023.

Table of Travel Lane Configurations: Pre-Pilot, Current Pilot, and Proposed

Term/Acronym	Definition
EB	Eastbound
WB	Westbound
RTL	Right Turn Lane
bi-dir	bi-directional

Segment	Lane Type	Pre-pilot	Pilot	Proposed
Culver Blvd - Duquesne Ave. to Lafayette Pl.	WB Parking	yes	no	no
	WB Bus/Bike Lane	none	separate	shared
	WB Vehicle Through Lanes	2	1	1
	Left-Turn Lane	WB	WB	WB
	EB Vehicle Through Lanes	2	1	2
	EB Bus/Bike Lane	none	separate	shared
	EB Parking	yes	yes	no
Culver Blvd – Lafayette Pl. to Main St.	WB Parking	yes	no	no
	WB Bus/Bike Lane	None	separate	shared
	WB Vehicle Through Lanes	2	1	1
	Left-Turn Lane	WB	WB	WB
	EB Vehicle Through Lanes	3	1	2
	EB Bus/Bike Lane	none	separate	shared
	EB Parking	yes	yes	no
Culver Blvd - Main St. to Washington Blvd.	WB Parking	yes	no	no
	WB Bus/Bike Lane	none	separate	shared
	WB Vehicle Through Lanes	3	1	2
	Left-Turn Lane	bi-dir	bi-dir	bi-dir
	EB Vehicle Through Lanes	2+ 2 RTL	2	2
	EB Bus/Bike Lane	none	separate	shared
	EB Parking	no	no	no

Segment	Lane Type	Pre-pilot	Pilot	Proposed
Washington Blvd. - Culver Blvd. to Ince Blvd.	WB Parking	loading zone	loading zone	loading zone
	WB Bus/Bike Lane	none	none	none
	WB Vehicle Through Lanes	1 + 1 RTL	1	1
	Left-Turn Lane	1 WB + 2 EB	1 WB + 1 EB	1 WB + 1 EB
	EB Vehicle Through Lanes	1	1	1
	EB Bus/Bike Lane	none	shared	shared
	EB Parking	no	no	no
Washington Blvd. - Ince Blvd. to Robertson Blvd.	WB Parking	yes	no	no
	WB Bus/Bike Lane	none	shared	shared
	WB Vehicle Through Lanes	2	1	1
	Left-Turn Lane	bi-dir	bi-dir	bi-dir
	EB Vehicle Through Lanes	2	1	2
	EB Bus/Bike Lane	none	shared	shared
	EB Parking	no	no	no
Washington Blvd - Roberston Blvd. to Wesley St.	WB Parking	no	no	no
	WB Bus/Bike Lane	none	separate	shared
	WB Vehicle Through Lanes	2	1	2
	Left-Turn Lane	bi-dir	bi-dir	bi-dir
	EB Vehicle Through Lanes	2	1	2
	EB Bus/Bike Lane	none	separate	shared
	EB Parking	yes	no	no
Washington Blvd - Wesley St. to Helms Ave.	WB Parking	yes	no	no
	WB Bus/Bike Lane	none	separate	shared
	WB Vehicle Through Lanes	2	1	2
	Left-Turn Lane	WB	WB	WB
	EB Vehicle Through Lanes	2	1	2
	EB Bus/Bike Lane	none	separate	shared
	EB Parking	yes	no	no

Segment	Lane Type	Pre-pilot	Pilot	Proposed
Washington Blvd - Helms Ave. to La Cienega Ave.	WB Parking	yes	yes	yes
	WB Bus/Bike Lane	none	shared	shared
	WB Vehicle Through Lanes	2	1	1
	Left-Turn Lane	raised median	raised median	raised median
	EB Vehicle Through Lanes	2	1	1
	EB Bus/Bike Lane	none	shared	shared
	EB Parking	yes	yes	yes
Washington Blvd - La Cienega Ave. to Hargis St.	WB Parking	yes	yes	yes
	WB Bus/Bike Lane	none	bike	shared
	WB Vehicle Through Lanes	2	1	1
	Left-Turn Lane	raised median	raised median	raised median
	EB Vehicle Through Lanes	2	2	1
	EB Bus/Bike Lane	none	none	shared
	EB Parking	yes	yes	yes
Washington Blvd - Hargis St. to Ballona Creek / La Cienega Blvd.	WB Parking	yes	yes	yes
	WB Bus/Bike Lane	none	none	shared
	WB Vehicle Through Lanes	2	2	1
	Left-Turn Lane	raised median	raised median	raised median
	EB Vehicle Through Lanes	2	2	1
	EB Bus/Bike Lane	none	none	shared
	EB Parking	yes	yes	yes
Washington Blvd - Ballona Creek / La Cienega Blvd. to Fairfax Ave.	WB Parking	yes	yes	no
	WB Bus/Bike Lane	none	none	shared
	WB Vehicle Through Lanes	2	2	2
	Left-Turn Lane	bi-dir	bi-dir	bi-dir
	EB Vehicle Through Lanes	2	2	2
	EB Bus/Bike Lane	none	none	shared
	EB Parking	yes	yes	no