

1 RESOLUTION NO. 2024-P009

2 A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF CULVER CITY,
3 RECOMMENDING THE CITY COUNCIL (1) CERTIFY THE FINAL ENVIRONMENTAL
4 IMPACT REPORT SCH NO. 2022030144; (2) ADOPT A MITIGATION MONITORING
5 PROGRAM; AND (3) ADOPT A STATEMENT OF OVERRIDING CONSIDERATIONS
6 BASED ON AN ASSESSMENT OF PROJECT BENEFITS AGAINST THE PROJECT'S
7 SIGNIFICANT AND UNAVOIDABLE IMPACTS, IN COMPLIANCE WITH THE
8 CALIFORNIA ENVIRONMENTAL QUALITY ACT, FOR THE GENERAL PLAN 2045 AND
9 ZONING CODE UPDATE

10 (Environmental Impact Report, P2022-0053-EIR)

11 WHEREAS, on January 28, 2019, the City Council initiated a comprehensive update to the
12 General Plan, and on March 27, 2023 initiated an update to the Zoning Code and Zoning Code Map to
13 implement the proposed Land Use Element of the General Plan 2045 and previously adopted 2021-
14 2029 Housing Element; and

15 **Project Description**

16 The Project is the adoption and implementation of a comprehensive update to the Culver City
17 General Plan and amendments to the City's Zoning Code to implement the General Plan 2045. The
18 General Plan 2045 would provide a framework and vision to guide growth and development within the
19 Planning Area through 2045. The General Plan 2045, along with the Zoning Code Update, would serve
20 as the basis for planning-related decisions made by City staff, the Planning Commission, and the City
21 Council.

22 By law, a general plan must be an integrated, internally consistent statement of City policies.
23 The General Plan 2045 includes the seven required elements under Government Code Section 65302
24 as well as optional elements. The General Plan 2045 will include the following elements: Land Use and
25 Community Design; Housing; Mobility; Conservation; Noise; Safety; Parks, Recreation, and Public
26 Facilities; Greenhouse Gas Reduction; Infrastructure; Community Health and Environmental Justice;
27 Economic Development; Arts, Culture, and Creative Economy; and Governance and Leadership. (The
28 2021-2029 Housing Element was adopted in August 2022.)
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2 WHEREAS, to implement the proposed Project, approval of the following applications is
3 required:

4 1. General Plan Amendment P2022-0053-GP: to comprehensively update the City's
5 General Plan, covering the area within the City boundary and its Sphere of Influence; and

6 2. Zoning Code Amendment P2024-0186-ZCA: to update the Zoning Code to implement
7 the proposed Land Use Element of the General Plan 2045 and previously adopted 2021-2029 Housing
8 Element; and

9 3. Zoning Code Map Amendment P2024-0186-ZCMA: to update the Zoning Code map to
10 implement the proposed Land Use Map of the General Plan 2045; and

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12 WHEREAS, the California Environmental Quality Act of 1970, as amended (California Public
13 Resources Code 21000, et.seq.; and California Code of Regulations, Title 14, Ch. 3 15000, et.seq.;
14 collectively, "CEQA"), gives to the lead agency the responsibility for considering the effects of a project,
15 both individual and collective, of all physical development activities involved when action is taken by a
16 lead agency to approve a Project; and

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18 WHEREAS, the City prepared an Initial Environmental Study (Initial Study) for the Project, which
19 determined that the Project may have a significant effect on the environment and that an Environmental
20 Impact Report must be prepared. The Initial Study determined that the following areas must be
21 addressed in the Project EIR: Aesthetics, Air Quality (all but odors), Biological Resources, Cultural
22 Resources (historical and archaeological resources), Energy, Geology and Soils, Greenhouse Gas
23 Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning,
24 Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal
25 Cultural Resources, and Utilities and Service Systems; and

26
27 WHEREAS, the City prepared a Notice of Preparation ("NOP") of the Draft EIR, which was
28 circulated to the affected agencies and the public, pursuant to CEQA for 30 days beginning on March
29 3, 2022, and numerous comments from agencies and the public were received in response. The City

1 held a public scoping meeting on March 24, 2022, to obtain information from the public as to issues that
2 should be addressed in the Draft EIR; and

3 WHEREAS, the City prepared an additional Notice of Preparation of the Draft EIR after adding
4 the Zoning Code Update to the project scope, which was circulated to the affected agencies and the
5 public, pursuant to CEQA for 30 days beginning on February 15, 2024, and numerous comments from
6 agencies and the public were received in response. The City held a second public scoping meeting on
7 March 7, 2024, to obtain information from the public as to issues that should be addressed in the Draft
8 EIR; and

9 WHEREAS, the City in accordance with provisions of CEQA Guidelines Sections 15085(a) and
10 15087(a), the City, serving as the Lead Agency: (1) prepared and transmitted a Notice of Completion
11 (NOC) to the State Clearinghouse; (2) published a Notice of Availability (NOA) of a Draft EIR which
12 indicated that the Draft EIR was available for public review at the City's Current Planning Division; (3)
13 provided copies of the NOA and Draft EIR to the Culver City Julian Dixon Library; (4) posted the NOA
14 and the Draft EIR on the General Plan project website and the City's Planning Division website:

15 <https://www.pictureculvercity.com/environmental-review>

16 <https://www.culvercity.org/Services/Building-Development/K-CEQA-Information-Documents;>

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19 (5) sent an NOA to the last known name and address of all organizations and individuals who previously
20 requested such notice in writing or attended public meetings about the Project; and (5) filed the NOA
21 with the County Clerk. The public review period commenced on March 28, 2024, and ended on May
22 13, 2024, for a total of 46 days.

23 WHEREAS, the City received numerous written and oral comments to the Draft EIR, prepared
24 responses to those comments and determined no revisions to the Draft EIR are necessary. The
25 proposed written responses to comments from public agencies received during the 46-day review
26 period were provided to such agencies and the Final EIR was made available on July 17, 2024; and

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28 WHEREAS, the Final Environmental Impact Report (EIR), dated July 2024, includes the Draft
29 EIR, dated March 2024, responses to written comments on the Draft EIR, responses to public testimony

1 regarding the Draft EIR, issues raised during the public comment period, and the Mitigation Monitoring
2 Program (MMP). The Final EIR was prepared and circulated in compliance with CEQA; and

3 WHEREAS, on August 14, 2024, the Planning Commission held a duly noticed public meeting
4 to receive public comment on the Final EIR and consider the proposed Final EIR. During the course of
5 the public hearing, the Planning Commission considered staff and consultant presentations, written
6 comments received from public agencies and the public, staff reports, Applicant presentations,
7 information presented to the Planning Commission to assist its understanding of the Project, the Final
8 EIR, CEQA Findings of Fact and Statement of Overriding Considerations and public comments and
9 testimony on the Project. In addition, the Planning Commission considered the Final EIR prepared for
10 the Project, including information provided in staff reports, information presented from experts and in
11 public testimony, including letters submitted to the Planning Commission following the close of the public
12 hearing before the Planning Commission, and other matters in the public record; and

14 WHEREAS, following conclusion of the public discussion and thorough deliberation of the
15 subject matter, the Planning Commission by a vote of ____ to ____ adopted Resolution 2024-P009
16 recommending to the City Council (1) certification of the Final Impact Report SCH No. 2022030144;
17 (2) adoption of CEQA findings and a mitigation monitoring program; and (3) adoption of a statement of
18 overriding considerations based on an assessment of Project benefits against the Project's significant
19 and unavoidable impacts, in compliance with the California Environmental Quality Act, for General Plan
20 Amendment P2022-0053-GP, Zoning Code Amendment, and Zoning Code Map Amendment P2024-
21 0186-ZCA; -ZCMA, for the Project; and

23 NOW, THEREFORE, THE PLANNING COMMISSION OF THE CITY OF CULVER CITY,
24 CALIFORNIA, DOES HEREBY RESOLVE AS FOLLOWS:

25 SECTION 1. GENERAL FINDINGS. Pursuant to the foregoing recitations, the Planning
26 Commission recommends the City Council make the following findings:
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1. Based on the findings contained in the Initial Study prepared by the City, it was determined that the proposed Project may have a significant effect on the environment and an EIR is required.
2. The Draft and Final EIRs, including the technical appendices and responses to comments, were prepared, circulated, and completed in compliance with CEQA.
3. Revisions to the Draft EIR and responses to comments, and other documents related to the Draft EIR have been made a part of or incorporated into the Final EIR.
4. The revisions made to the Draft EIR and incorporated into the Final EIR do not require recirculation of the Draft EIR based on the following:
 - a. No significant new information has been added that would deprive the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the project, a feasible way to mitigate or avoid such an impact that the Applicant has declined to implement, or a feasible project alternative;
 - b. The comment period did not result in new information that would have required corrections, changes, and/or clarification to points and information included in the Draft EIR;
 - c. There are not significant new environmental impacts resulting from the Project from a new mitigation measure proposed to be implemented;
 - d. There is no substantial increase in the severity of an environmental impact that has not been mitigated to a level of insignificance;
 - e. The City has not declined to adopt any feasible project alternatives or mitigation measures, considerably different from others previously analyzed, that clearly lessen the environmental impacts of the Project; and
 - f. The Draft EIR is not fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment precluded.

1 5. The Final EIR accurately describes the Project and identifies the discretionary approvals
2 necessary for the project as listed in the recitations above.

3 6. The Final EIR adequately analyzes all of the potentially significant environmental impacts
4 of approval of the Project, mitigation measures, environmental impacts and cumulative
5 impacts which have been mitigated to a less than significant level, alternatives to the Project
6 on the Project site, short-term and long-term impacts, growth inducing impacts, and
7 significant and unavoidable impacts.

8 SECTION 2. CERTIFICATION FINDINGS. Based upon the above recitals and the entire record,
9 including, without limitation, the General Plan 2045 and Zoning Code Update Project Draft and Final
10 EIR, Attachment 4 to the August 14, 2024 Planning Commission Staff Report, oral and written testimony
11 and other evidence received, at the public hearings held on the Project and the Final EIR, the Planning
12 Commission further finds:
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14 1. That the EIR for the Project is adequate, complete, and has been prepared in accordance
15 with the California Environmental Quality Act (CEQA).

16 2. That the Planning Commission has independently reviewed and considered the EIR in
17 reaching its conclusions.

18 3. The Planning Commission, as the recommending body to the City Council, has reviewed
19 and considered in the EIR as well as the whole of the administrative record and the
20 evidence and testimony presented in this matter, prior to making its recommendation on
21 the Project.
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23 4. The Planning Commission recommends the City Council find that the Final EIR reflects the
24 decision-maker's independent judgment and analysis.

25 5. The Planning Commission recommends the City Council make the findings attached as
26 Exhibit A to this resolution.
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1 6. The Planning Commission recommends the City Council find that a mitigation monitoring
2 program (MMP) has been prepared and is adopted to enforce the mitigation measures
3 required by the Final EIR and Project approvals (Exhibit B).

4 7. The Planning Commission recommends the City Council adoption of a statement of
5 overriding considerations based on an assessment of Project benefits against the Project's
6 significant and unavoidable impacts.

7 APPROVED and ADOPTED this 14th day of August, 2024.
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10 _____
11 ANDREW REILMAN - CHAIRPERSON
12 PLANNING COMMISSION
13 CITY OF CULVER CITY, CALIFORNIA

14 Attested by:

15 _____
16 RUTH MARTIN DEL CAMPO, SECRETARY
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CEQA Findings of Fact and Statement of Overriding Considerations

Findings Required by CEQA

Pursuant to Public Resources Code Section 21081 and CEQA Guidelines Section 15091 (Title 14 Cal. Code Regs. § 15091), no public agency shall approve or carry out a project where an EIR has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out, unless the public agency makes one or more findings for each of those significant effects, accompanied by a brief explanation of the rationale of each finding. The possible findings, which must be supported by substantial evidence in the record, are:

- (1) Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
- (2) Changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
- (3) Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the EIR.

These findings do not attempt to describe the full analysis contained in the Draft Program EIR (PEIR) and Final PEIR, collectively referred to as the PEIR. Instead, a full explanation of these environmental findings and conclusions can be found in the PEIR, and these findings hereby incorporate by reference the discussion and analyses in the PEIR supporting the PEIR's determination regarding the Project's impacts and mitigation measures designed to address those impacts.

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. Project modification or alternatives are not required, however, where such changes are infeasible or where the responsibility for modifying the project lies with some other agency (CEQA Guidelines, §15091(a), (b)). With respect to a project for which significant impacts are not avoided or substantially lessened either through the adoption of feasible mitigation measures or feasible environmentally superior alternative, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's "benefits" rendered "acceptable" its "unavoidable adverse environmental effects." (CEQA Guidelines, §§15093, 15043(b); see also Pub. Resources Code, §21081(b)).

Final PEIR and City Proceedings

Pursuant to CEQA Guidelines Section 15088, the City reviewed all comments received during the Draft PEIR review period and provided a written response to each comment in the Final PEIR. The Final PEIR dated July 2024, consists of the following documents:

- Draft PEIR and Technical Appendices dated March 2024
- Final PEIR dated July 2024, which includes:
 - A list of persons, organizations, and public agencies that commented on the Draft PEIR, as well as the verbatim comments received on the Draft PEIR;
 - Written responses to comments;
 - Corrections and additions to the Draft PEIR; and
 - Mitigation Monitoring Program (MMP).

The Final PEIR document was posted for viewing and download with the previously posted Draft PEIR prior to the City's consideration of the Final PEIR and Project recommendations at <https://www.pictureculvercity.com/environmental-review> . In addition, a hard copy can be viewed at City Hall by appointment during normal business hours. In addition, pursuant to CEQA Guidelines Section 15088(b), responses were sent to all public agencies that made comments on the Draft PEIR at least 10 days prior to certification of the Final PEIR. All individuals that commented on the Draft PEIR and provided a physical or email address were notified of completion of the Final PEIR.

Record of Proceedings and Custodian of Documents

For purposes of CEQA and these Findings, the Administrative Record of Proceedings for the Project includes, but is not limited to, the following documents:

- The Draft General Plan 2045 and Zoning Code Update and all related documents;
- NOPs, NOA for the Draft EIR, and all other public notices issued by the City in conjunction with the Project;
- All written comments submitted by agencies and members of the public during the Draft EIR public review comment period;
- All responses to written comments submitted by agencies and members of the public during the Draft EIR public review comment period;
- All documents, studies, EIRs, or other materials incorporated by reference in the Draft EIR, and Final EIR, including the MMP;
- Matters of common knowledge to the City, including, but not limited to, federal, State, and local laws and regulations;
- All staff reports and related documents prepared by the City and written testimony or documents submitted by any person relevant to any findings or statement of overriding considerations adopted by the City pursuant to CEQA;

- Any documents expressly cited in these Findings of Fact; and
- Any and all other materials required for the record of proceedings by PRC Section 21167.6(e).

The documents and other materials that constitute the record of proceedings on which the Project Findings are based are located at the City in the Advance Planning Division Community Development Department, Planning Division located at: Culver City Hall, 9770 Culver Boulevard, 2nd Floor, Culver City, CA 90232. The custodian for these documents is the City's Advance Planning Director. This information is provided in compliance with PRC Section 21081.6(a)(2) and CEQA Guidelines Section 15091(e).

Project Objectives

CEQA Guidelines Section 15124(b) states that a project description shall contain “a statement of the objectives sought by the proposed project.” In addition, CEQA Guidelines Section 15124(b) further states that “the statement of objectives should include the underlying purpose of the project.” The underlying purpose of the Project is to comprehensively update the General Plan to establish a long-range vision that reflects the unique needs of the City and provides clear direction to improve the quality of life for residents, businesses, and visitors. In addition, the purpose of the Project, which includes updates to portions of the City's Municipal Code, is to provide the amendments necessary to the Zoning Code to implement the General Plan 2045.

Core values include equity and inclusion; sustainability; innovation and creativity; and compassion and community. At the outset of the General Plan 2045 process, the following Guiding Principles were developed, which are specific and objective benchmarks that guided the development of the General Plan 2045:

- Provide high-quality public services through an equitable, adaptive, transparent, accessible, and fiscally sustainable governing structure with intentional investments and regulatory measures;
- Advance racial, demographic, and socioeconomic diversity by supporting a range of housing types for different income levels, household compositions, stages of life, and disadvantaged populations, including persons experiencing homelessness, the elderly, and persons with disabilities;
- Create more opportunities to broaden and deepen civic engagement that bring more of Culver City's diverse voices to the decision-making table;
- Adopt innovative and equitable policies to eliminate greenhouse gas emissions (decarbonize buildings and industry), reduce energy and water use, encourage the purchase of 100 percent renewable, carbon-free electricity, foster the transition to zero-emission vehicles, and adapt to climate disruption, ensuring all residents, are resilient to climate hazards;
- Foster harmony between people and the environment through continued sustainability efforts, urban ecology, and stewardship of natural resources, like the Ballona Creek and Baldwin Hills, for the benefit of future generations;

- Cultivate social connections between residents, workers, businesses, and visitors through urban design that sustains and revitalizes the public realm, creates great places to gather, adapts to a changing climate, and promotes public safety;
- Be a creative and proactive leader in solving regional, state, and national challenges around issues like housing, mobility, public safety, equity, climate change, and environmental pollution and disruption;
- Elevate community health and health equity through new, improved, and well-maintained public amenities that are accessible to all—like parks, sport courts and fields, gathering places, healthy and affordable food, natural resources, and community services—that allow people of all ages and abilities to thrive physically, socially, and mentally;
- Sustain arts and culture in Culver City, including visual, performing, literary, and culinary arts. Support the continued preservation of historic and cultural resources in Culver City;
- Support the continued growth of creative industries as the cornerstone of the renowned arts and cultural identity and unique regional economic role of Culver City, including digital media, architecture and interior design, and visual and performing arts;
- Practice resilient and sustainable solutions to maintain and improve infrastructure, including water, road infrastructure, and broadband. Ensure these solutions are implemented equitably throughout the city. Embrace innovative and responsible use of technology to improve City operations, enhance public participation, and build smart, secure, and adaptable infrastructure systems;
- Build more active and shared modes of getting to, from, and through Culver City by providing more reliable, safe, affordable, clean, and connected carbon-free transportation and mobility options for people of all ages and abilities;
- Support a diversified, adaptable, and sustainable economy with a balance of small and large businesses across a range of industries that provide employment, commercial, and experiential opportunities. Ensure the economy is resilient to shocks and stresses, like pandemics, seismic events, flooding, wildfires and other natural and human made disasters.

Project Description

Culver City (City) is located in the western area of Los Angeles County in Southern California and comprises about 5 square miles. The City is bounded by the City of Los Angeles to the north, west, and south, and by unincorporated areas of Los Angeles County along its eastern boundary.

The Project includes a comprehensive update to the General Plan, Picture Culver City: General Plan 2045 (General Plan 2045) and amendments to the City's Zoning Code that are necessary to implement the General Plan 2045. These collectively are referred to as the Project. The General Plan Planning Area includes the city of Culver City and its unincorporated Sphere of Influence (SOI). The Planning Area The SOI is located to the east of the City Boundary in the Baldwin Hills area of Los Angeles County (see Draft PEIR Figure 2-2).

By law, a general plan must be an integrated, internally consistent statement of City policies. Government Code Section 65302 requires that a general plan include the following seven elements: Land Use, Circulation, Housing, Conservation, Open Space, Noise, and Safety.

Senate Bill (SB) 1000 and Government Code Section 65302 require that since disadvantaged communities have been identified within the City, the Plan must also address Environmental Justice either as a standalone element or integrating related goals, policies, and objectives throughout other elements. The General Plan 2045 includes a Community Health and Environmental Justice element. Additional elements may be included as well, at the discretion of the City. The General Plan 2045 includes the following elements: Land Use and Community Design; Mobility; Conservation; Noise; Safety; Parks, Recreation, and Public Facilities; Greenhouse Gas Reduction, Infrastructure, Community Health and Environmental Justice; Economic Development; Arts, Culture, and Creative Economy; and Governance and Leadership. The City adopted the 2021-2029 Housing Element in August 2022. The Project would serve to implement the adopted Housing Element through the amendments to the Land Use Map and the Zoning Code Update.

The General Plan 2045 would provide a framework and vision to guide growth and development within the Planning Area. Together with the Zoning Code Update, the 2045 General Plan would serve as the basis for planning-related decisions made by City staff, the Planning Commission, and the City Council. Growth projections associated with the Project include an increase of 11,310 households with an associated increase of 21,600 persons and an increase of 16,260 jobs (see Draft PEIR Table 2-3).

Land uses within the Planning Area can be broken down into four main categories of development: activity centers, commercial corridors, residential neighborhoods, and parks/open space. New development within the city would primarily occur on parcels that already contain some existing homes or businesses. The City's primary approach to accommodating growth is to provide strategies for thoughtful infill development and redevelopment that range from modest additions of individual housing units to the redevelopment of large, aggregated properties within opportunity sites located in activity centers and along commercial corridors. The Project seeks to intensify and mix land uses on key segments of the commercial corridors, and to improve pedestrian experiences along the City's commercial corridors through parking management strategies, active street frontage guidelines, and public realm improvements. To support the community's housing vision, the land use vision allows for new residential and mixed-use development within the City's industrial areas.

California Government Code Section 65860(a) requires that a jurisdiction's zoning ordinance be consistent with its General Plan or any updates to its General Plan. In light of the proposed changes in the General Plan 2045, updates to the Zoning Code are necessary for consistency with the land use designations in the General Plan 2045. The proposed Zoning Code Update would implement the new vision in the General Plan 2045, changing from single-use commercial and industrial districts to mixed-use zones.

Findings Regarding the Potential Environmental Effects of the Project

The following sections set forth the City Council's Findings regarding significant environmental impacts and identifies the mitigation measures proposed to address the significant impacts. The

mitigation measures are provided in their entirety in the Mitigation Monitoring Program (MMP) that is provided as an attachment to these Findings and Statement of Overriding Considerations.

The PEIR addresses at a program level the direct, indirect, and cumulative environmental effects of construction and operation activities associated with development that will occur under the Project. These findings provide the written analysis and conclusions of the City Council regarding the environmental impacts of the Project, the mitigation measures included as part of the PEIR and adopted by the City Council as part of the Project, and the alternatives that have been rejected as infeasible. These findings refer to the analyses contained in the PEIR to avoid duplication and redundancy.

Findings of No Impact

The environmental effects listed below were identified as not potentially significant in the Draft PEIR as well as the Initial Study contained in Draft PEIR Appendix A. Refer to Draft PEIR Section 6.6, *Effects Found Not to Be Significant* and Section 4.3, Impact BIO-2. The City Council finds that the PEIR and the record of proceedings in this matter do not identify or contain substantial evidence identifying significant environmental effects of the Project with respect to the areas listed below.

1. Aesthetics (substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway)
2. Agricultural and Forest Resources
3. Air Quality (other emissions, such as those leading to odors)
4. Biological Resources (riparian habitat or sensitive natural habitat; conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other such approved plan)
5. Cultural Resources (human remains)
6. Geology and Soils (soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems)
7. Hazards and Hazardous Materials (within an airport land use plan or within two miles of public airport or public use airport)
8. Noise (within the vicinity of a private air strip or airport land use plan or if no adopted plan within two miles of public airport or public use airport)

Findings of Less than Significant Prior to Mitigation

This section sets forth the environmental impacts determined to have less-than-significant impact in the Draft PEIR prior to mitigation. The section provides reference to the relevant impact statement in the Draft PEIR and includes a summary of the relevant cumulative analysis for the specific impact statements. The City Council finds that although the following environmental effects were identified in the Initial significant, the PEIR and the record of

proceedings do not identify or contain substantial evidence identifying significant environmental effects of the Project with respect to the areas listed below.

Aesthetics

Draft PEIR Section 4.1 evaluates the potential aesthetics impacts that could result from implementation of the Project.

Scenic Vistas (Impact AES-1)

Facts/Effects: While the Planning Area does not have any designated scenic vistas, the Blair Hills/Baldwin Hills area, including the Baldwin Hills Scenic Overlook, offers expansive, long-range views. In addition, there are view corridors from Playa Street traveling northeast towards Overland Avenue; Elenda Street traveling northwest towards Culver Boulevard; and Jefferson Boulevard traveling south along Ballona Creek. The Planning Area is mainly characterized by urban environments, and as a result, scenic vistas are mostly limited to open space, vacant natural areas, and parks.

Due to the highly urbanized nature of the Planning Area, the majority of the future development under the General Plan 2045 will primarily occur on parcels that already contain existing development. General Plan 2045 policies are intended to complement and improve the existing scenic quality and resources in the City as well as to implement the City's vision for the future character of the City. While the Zoning Code Update will result in increases in height in some areas of the City, future development projects that occur under the Project will be subject to development and planning review and will be required to comply with other applicable regulations regarding aesthetic qualities that are established to protect visual resources, such as building heights, building setbacks, lighting, landscaping, and signage. Thus, compliance with the applicable policies and development standards designed to minimize effects to scenic vistas will ensure that impacts will be less than significant.

Conflict with Applicable Regulations Governing Scenic Quality (Impact AES-2)

Facts/Effects: While the General Plan 2045 would increase densities and intensities of land uses, the majority of the proposed changes would occur within Culver City with limited land use changes occurring within the SOI. General Plan 2045 policies are intended to complement and improve the existing scenic quality and resources in the City as well as to implement the City's vision for the future character of the City. The Zoning Code Update provides development standards, including setbacks, floor area ratio, building heights and lot coverage that establish the form and mass of future buildings that will occur under the Project. While some increase in building height would occur in certain areas of the city, the maximum building heights throughout the city would be 56 feet, consistent with the initiative approved by City Council in 1990. Future development would be reviewed by the City for compliance with applicable requirements prior to project approval and issuance of a building permit. Therefore, impacts will be less than significant.

Light and Glare (Impact AES-3)

Facts/Effects: Future development under the Project will create new sources of light and glare. New development will primarily occur on parcels that already contain some development since the primary approach to accommodating growth is through infill development and redevelopment that range from modest additions of individual housing units to the redevelopment of large, aggregated properties within opportunity sites located in activity centers and along commercial corridors. The General Plan 2045 includes policies requiring the use of low intensity and shielded lighting to reduce the amount of light reaching sensitive habitat, ensure neighborhood compatibility and reduce light and glare impacts in and around the Planning Area. In addition, future development will be required to comply with applicable lighting regulations and standards, that include directing light to be oriented downward and to avoid any light spillover to adjacent properties; requiring that permanently installed lighting shall not blink, flash, or be of unusually high intensity or brightness; landscaping and pedestrian walkway lights shall be low profile; and that limiting the height of freestanding light poles and luminaires. Therefore, the Project will result in less than significant light and glare impacts.

Cumulative Aesthetics Impacts

Facts/Effects: No state scenic highway is located within the southern region of Los Angeles County, including Culver City, and thus reasonably foreseeable growth within the central southern region of Los Angeles County, including Culver City, will not substantially damage scenic resources within the corridor of a state scenic highway. The area is generally urban in character. Development to accommodate future residents and jobs may impact scenic vistas if it were to encroach on open hillsides. Various proposed policies including those that address open space preservation and sensitive transitions between new and existing development would ensure that scenic quality is maintained in the City. Development in surrounding jurisdictions will be required to comply with General Plan policies and development standards addressing scenic resources. With regard to light and glare, the Project will not contribute to a cumulative significant impact since applicable policies and standards regarding lighting will reduce impacts to less than significant. Therefore, the Project will result in less-than-significant cumulative aesthetics impacts.

Biological Resources

Draft PEIR Section 4.3 evaluates the potential impacts to biological resources that could result from implementation of the Project.

Adversely Affect State or Federally Protected Wetlands (Impact BIO-3)

Facts/Effects: Based on the habitats present within the Planning Area and review of the National Wetlands Inventory, there are no wetlands present within the Planning Area. Therefore, the General Plan 2045 and Zoning Code Update will have no effect on these resources. However, Ballona Creek traverses the City and the planned Ballona Creek Revitalization Project will enhance the restoration and use of Ballona Creek. Restoration/enhancement activities and/or the proposed upgrades to recreational facilities along Ballona Creek could result in the removal or disturbance of the concrete-lined channel or the channel banks. These activities may require Clean Water Act permits from the U.S. Army Corps of Engineers and the Regional

Water Quality Control Board (RWQCB) and/or a streambed alteration agreement from the California Department of Fish and Wildlife (CDFW), which would be obtained from the City prior to any work, and permit conditions would be implemented. Therefore, impacts regarding state or federally protected wetlands will be less than significant.

Conflict with Tree Preservation Policy or Ordinance (Impact BIO-5)

Facts/Effects: Future development that will occur under the Project will be subject to the City and County's tree preservation ordinances, and the County's oak woodland management policies, as applicable, which includes adherence to tree management and trimming procedures. In addition, the General Plan 2045 contains policies that promotes a strong urban forest and the maintenance of landscaping. Therefore, impacts will be less than significant.

Cumulative Biological Resource Impacts

Facts/Effects: The Project will result in less than significant impacts with regard to adverse effects to state or federally protected wetlands and will not conflict with tree preservation policies or ordinances. Cumulative development will comply with applicable requirements regarding these biological resources. Therefore, the Project will result in less than significant cumulative impacts related to biological resources.

Energy

Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources (Impact ENG-1)

Facts/Effects: During construction energy will be used only for necessary on-site activities and to transport construction materials and demolition debris to, from, and within the city. Idling restrictions and the use of cleaner, energy-efficient equipment and fuels will result in less fuel combustion and energy consumption, and thus minimize construction-related energy use. Therefore, construction of new developments that could occur under the Project will not result in the wasteful, inefficient, and unnecessary consumption of energy, and this impact will be less than significant.

The net increase in energy that will occur from new development under the Project will be served by existing infrastructure capacity for electricity, natural gas, and transportation energy. Therefore, new developments will not result in the wasteful, inefficient, and unnecessary consumption of energy, and this impact will be less than significant.

Conflict with State or Local Renewable Energy Plan (Impact ENG-2)

Facts/Effects: The construction of new development that could occur under the Project will utilize construction contractors who must demonstrate compliance with applicable regulations, such as the U.S. Environmental Protection Agency (USEPA) and National Highway Traffic Safety Administration fuel-efficiency standards for medium- and heavy-duty trucks, and California Air Resource Board (CARB) regulations regarding heavy-duty truck idling limits and replacing older, less efficient equipment with newer, more efficient models. Operation of new development under the Project will be consistent with the relevant goals and policies from the General Plan 2045 that are designed to encourage development that results in the efficient use

of energy resources. Additionally, new development will comply with Title 24 requirements and CALGreen to reduce energy consumption. Therefore, future development under the Project will result in a less than significant impact related to conflicting or obstructing a state or local plan for renewable energy or energy efficiency during construction and/or operation.

Cumulative Energy Impacts

Facts/Effects: All cumulative development projects and development under the Project will be required to comply with CALGreen and Title 24 energy efficiency requirements and other regulations, which will reduce energy consumption by promoting energy efficiency and the use of renewable energy, and incorporate mitigation measures, if applicable. As such, the Project will not result in the wasteful, inefficient, and unnecessary consumption of energy nor will it result in a cumulatively considerable contribution to energy use and impacts will be less than significant.

The Project, as well as other cumulative development projects will be required to demonstrate consistency with federal and state fuel efficiency goals and incorporate, if applicable, any mitigation measures as required under CEQA. The Project will be consistent with the guidance provided in the Southern California Association of Government (SCAG) 2020-2045 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) to reduce transportation fuel and vehicle miles travelled (VMT). As the Project will incorporate land use characteristics consistent with state goals for reducing VMT, the Project will not have a cumulatively considerable impact related to transportation energy, and impacts will be less than significant.

Geology and Soils

Draft PEIR Section 4.6 evaluates the potential impacts to geology and soils that could result from implementation of the Project.

Geologic Hazards: Earthquake Fault; Seismic Ground Shaking; Seismic-Related Ground Failure; Landslide (Impact GEO-1)

Facts/Effects: The Project will accommodate growth and development within areas potentially subject to surface rupture within an Alquist-Priolo fault zone, strong seismic shaking, seismic-related ground failure and landslides. However, future development that occurs under the Project will be consistent with applicable goals and policies as well as applicable laws, regulations, and standards related to seismic hazards. In addition, site-specific geotechnical investigations will address localized geologic hazards. Therefore, impacts will be less than significant.

Soil Erosion or Loss of Topsoil (Impact GEO-2)

Facts/Effects: Construction activities that disturb one or more acres of land surface are subject to the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2022-0057-DWQ) adopted by the State Water Resources Control Board (SWRCB). Permit compliance includes implementation of a storm water pollution prevention plan. In addition, the General Plan 2045 includes goals and policies that require the use of best management

practices (BMPs) to control soil erosion during and after ground-disturbing activities and geotechnical reports for projects requiring grading permits. Therefore, impacts related to soil erosion and topsoil loss will be less than significant.

Unstable Soils (Impact GEO-3)

Facts/Effects: Certain geologic units present in the Planning Area have the potential for landslides, slope instability, liquefaction, and liquefaction-induced lateral spreading. Development allowed under the Project could be located on geologic units or soils that are unstable, or that could become unstable, and result in geologic hazards if not addressed appropriately. The potential hazards of unstable soil or geologic units will be addressed largely through the integration of geotechnical information in the planning and design process for future development to determine the local soil suitability for specific projects in accordance with standard industry practices and state-provided requirements. In addition, future projects will comply with applicable requirements related to unstable geologic units or soils. As such, implementation of the Project will result in a less than significant impact related to unstable geologic units or soils.

Expansive Soils (Impact GEO-4)

Facts/Effects: Expansive soils within the Planning Area are generally located around Baldwin Hills due to the high clay content. Future development under the Project will be required to comply with all applicable design, engineering, and construction standards and requirements of the California Building Code (CBC) within the Culver City Municipal Code (CMC), including the Grading Ordinance. Therefore, future development under the Project will not result in geologic hazards associated with expansive soils. As such, implementation of the Project will result in a less than significant impact related to unstable expansive soils.

Cumulative Geology and Soils Impacts

Facts/Effects: Each development site has unique geologic considerations that would be subject to site development and construction standards. Potential cumulative impacts relating to geology and soils would be minimized through preparation of geotechnical reports, compliance with code requirements, and implementation of appropriate construction methods. Therefore, future development including growth anticipated under the General Plan 2045, will not result in a significant cumulative impact with respect to geology and soils.

Hazards and Hazardous Materials

Draft PEIR Section 4.8 evaluates the potential impacts relative to hazards and hazardous materials that could result from implementation of the Project.

Routine Use, Transportation, and Disposal of Hazardous Materials (Impact HAZ-1)

Facts/Effects: Future development that will occur under the Project could involve demolition of older buildings that contain asbestos containing materials and lead based paint. In addition, operation of future development could increase the amount of hazardous materials being transported, used, and stored in the city. However, the construction and operation of future development will comply with applicable regulations set forth by Culver City, USEPA,

Occupational Safety and Health Administration (OSHA), Department of Toxic Substances Control (DTSC), Caltrans, SCQAMD, and other agencies. The City will review development applications for subsequent development under the Project for compliance with the applicable regulations, policies of the General Plan 2045, the City's Municipal code, and the mitigation measures referenced in other sections of the PEIR. Therefore, the Project will result in a less than significant impact related to the routine use, transport, or disposal of hazardous materials.

Accident and Upset Conditions (Impact HAZ-2)

Facts/Effects: Future development under the Project will be required to comply with applicable regulations and General Plan 2045 policies during construction activities, which will ensure that future development will not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving release of hazardous materials into the environment. In addition, all new development will be required to comply with applicable regulations for hazardous materials adopted by USEPA, OSHA, DTSC, Caltrans, CHP, SCAQMD, and other agencies. Therefore, the Project will result in a less than significant impact related to accident and upset conditions.

Emit Hazardous Materials within 0.25 Mile of a School (Impact HAZ-3)

Facts/Effects: The Project will be required to comply with existing federal, State, and local regulations related to hazardous materials, which will ensure that future development allowed under the Project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Future development (including redevelopment of existing developed sites) allowed under the General Plan 2045 will be required to store, manage, and dispose of the materials in accordance with applicable requirements. Therefore, the Project will result in a less than significant impact related to emitting hazardous materials within one-quarter mile of a school.

Hazardous Materials Sites (Impact HAZ-4)

Facts/Effects: There are known contaminated properties, some of which have been remediated and some that are undergoing remediation, and other properties could be added if contamination is discovered. Thus, future development allowed under the Project could occur on a contaminated site. As discussed above in Impact HAZ-1, HAZ-2, and HAZ-3, any development on a contaminated site will be required to comply with applicable regulations that will ensure that the development does not create a significant hazard to the public or the environment. Therefore, the Project will result in a less than significant impact related to hazardous materials sites.

Impairment or Interference with Emergency Response Plan (Impact HAZ-5)

Facts/Effects: Continued growth and development associated with implementation of the Project has the potential to strain the emergency response and recovery capabilities of federal, State, and local governments. However, the Los Angeles County Operational Area Emergency Response Plan provides the framework for responding to major emergencies or disasters. In addition, the City's Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) provides a strategy for reducing the City's vulnerability to the impacts of natural hazard events such as earthquakes,

flood, and wildfire. The General Plan 2045 contains policies that aim to continually strengthen emergency response. The Project would not interfere with implementation of the MJHMP or of agencies that respond in the event of a disaster or major emergency in Culver City. Therefore, the Project will result in a less than significant impact related to impairment or interference with an emergency response plan.

Wildland Fire Hazards (Impact HAZ-6)

Facts/Effects: The eastern portion of the Planning Area, including the Culver Crest and Blair Hills neighborhoods and areas within West Los Angeles College and the Inglewood Oil Field (IOF), as a Very High Fire Hazard Severity Zone (VHFHSZ). Future development that will occur under the Project will be required to adhere to building and fire codes and review by Culver City Fire Department (CCFD) to reduce fire hazards. Compliance with applicable requirements and review by CCFD will ensure that people or structures are not exposed, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore, the Project will result in a less than significant impact related to wildland fire hazards.

Cumulative Hazards and Hazardous Materials Analysis

Facts/Effects: As with the Project, cumulative projects in the surrounding area will be subject to the requirements and regulations addressing hazardous materials, emergency response, and wildland fires. The Project will not contribute to a significant cumulative impact relative to these issue areas.

Hydrology and Water Quality

Draft PEIR Section 4.9 evaluates the potential impacts to hydrology and water quality that could result from implementation of the Project.

Violate Water Quality Standards or Waste Discharge Requirements (Impact HYD-1)

Facts/Effects: The Planning Area is generally a developed, urban environment with limited vacant parcels, where the sources and types of stormwater pollutants are typical of an urban setting. Under the Project an increase in impervious surfaces could occur, which could increase the amount of urban pollution in storm water runoff. In addition, other pollutant sources from past uses and disposal practices as well as chemicals and fertilizers applied to landscaping could result. Construction and operation of future development that will occur under the Project will comply with all applicable laws, regulations, and standards related to water quality and waste discharge, including the General NPDES Permit for Discharges of Groundwater from Construction and Project Dewatering Permit No. CAG994004, the Permit Order No. R4-2018-0125 issued by LARWQCB, and the Los Angeles MS4 Permit No. Order No. R4-2021-0105/ NPDES Permit No. CAS004004, as may be updated over time. In addition, future projects will comply with policies in the General Plan 2045 and requirements related to water quality of the CCMC. Therefore, the Project will result in less than significant impacts related to violating water quality standards or waste discharge requirements.

Groundwater Supplies and Groundwater Recharge (Impact HYD-2)

Facts/Effects: The groundwater supplies used by the Los Angeles Department of Water and Power (LADWP) and the Golden State Water Company (GSWC), water providers for the City, are regulated. Since there are limits on the amount of groundwater each provider can pump for potable use, the potential for overdraft is limited. With regard to recharge, while an increase in impervious surfaces will likely occur, the General Plan 2045 will maintain and expand parks and open space resources. In addition, future development under the Project will not preclude established groundwater recharge processes for the three underlying groundwater basins within the Planning Area. Lastly, an engineering geology report required by the California Building Code (CBC) regulates development that requires grading to submit an engineering geology report, which would include information about existing groundwater supplies and potential impacts to groundwater supplies. Therefore, the Project will result in less than significant impacts related to groundwater supplies and groundwater recharge.

Drainage Patterns (Impact HYD-3)

Facts/Effects: Ballona Creek is a major drainage that flows through the Planning Area. Implementation of the General Plan 2045 will not directly alter the course of Ballona Creek, or any other streams or rivers. Future development will be required to comply with all applicable construction and operational laws, regulations, and permits related to hydromodification and discharging into the City's sewer system, such as the Los Angeles County MS4 Permit (Order No. R4-2021-0105, NPDES Permit No. CAS004004), Los Angeles County LID Ordinance, the CCMC (Sections 5.05.010 and 5.05.040), and the City's SUSMP and SWQMP. Adherence to the regional and City's permits, regulations, and ordinances will limit surface runoff from development under the General Plan 2045, reducing siltation and erosion. The Project will not substantially alter the existing drainage pattern of the Planning Area in a manner that would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows. Future development under the Project would be required to comply with the requirements related to stormwater runoff of CCMC and the City's SUSMP. Therefore, impacts related to drainage patterns will be less than significant.

Release of Pollutant from Inundation by Flood, Tsunami, or Seiche (Impact HYD-4)

Facts/Effects: The Planning Area, which is located approximately 1.5 miles inland from nearby coastal areas, is located outside of tsunami inundation zones. In addition, there are no enclosed large water bodies within the Planning Area with potential for seiche effects or waves generated by failure of retaining structures. Furthermore, the majority of the Planning Area is located outside of a flood hazard zone. Future development facilitated under the Project will be required to comply with all applicable laws, regulations, and permits related to drainage and flooding hazards, which will reduce the risk of onsite flooding and release of pollutants. Therefore, impacts associated with release of pollutants from inundation by flood, tsunami, or seiche will be less than significant.

Conflict with Water Quality Control Plan or Sustainable Groundwater Management Plan (Impact HYD-5)

Facts/Effects: Implementation of the Project will not degrade water quality due to compliance with all applicable federal, state, regional and local water quality laws, regulations, and permits. The General Plan 2045 contains goals and policies that promote improved water quality and groundwater sustainability in the Planning Area, as well as continued compliance with state and local water quality regulations, which is intended to ensure that water quality and groundwater sustainability is managed to the maximum extent practicable. Implementation of the General Plan 2045 will not interfere with or conflict with the Groundwater Sustainability Plan since the City is a member of Santa Monica Basin Groundwater Sustainability Agency and the Project includes various implementation actions that support the Groundwater Sustainability Plan, including incentivizing and mandating stormwater infiltration where feasible and participating in regional coordination regarding aquifer recharge and sustainable ground water supply. Thus, the Project will not conflict with the Santa Monica Subbasin Groundwater Sustainability Plan and impacts will be less than significant.

Cumulative Hydrology and Water Quality Impacts

Facts/Effects: Future development in Ballona Creek and Marina Del Rey Watersheds, including development anticipated under the Project, will be subject to the requirements of the NPDES program and other federal, State, and regional regulations such as pollution control ordinances. Adherence to these regulations will minimize degradation of water quality associated with the construction and operation of individual projects. As such, the cumulative impact with respect to water quality will be considered less than significant.

The Santa Monica Subbasin, West Coast Basin, and Central Basin are regulated, and thus have limits on the amount of groundwater that is pumped for potable use. Therefore, the cumulative impact with respect to depletion of groundwater supplies and groundwater recharge will be less than significant.

As the Planning Area and much of the County is heavily urbanized, future development will not involve the direct alteration of existing streams, rivers, or other drainage patterns. All future development will be subject to floodplain management and stormwater and urban runoff pollution control ordinances for each jurisdiction that will prevent flood damage resulting from hydromodification. Therefore, the cumulative impact with respect to storm drainage will be considered less than significant.

Cumulative growth and development throughout the area has resulted in the introduction of new structures and impervious surfaces that increased stormwater runoff, leading to increased flood hazards associated with the water levels in Ballona Creek. Future development in the area, including growth anticipated under the Project, will be subject to floodplain management and stormwater and urban runoff pollution control ordinances for each jurisdiction that will prevent flooding. Therefore, the cumulative impact with respect to flooding will be considered less than significant.

Land Use and Planning

Draft PEIR Section 4.10 evaluates the potential impacts relative to land use and planning that could result from implementation of the Project.

Physically Divide an Established Community (Impact LU-1)

Facts/Effects: Implementation of the Project will improve connectivity and land use patterns within and between existing neighborhoods, thereby providing more linkages within the city and the region. The overall land use pattern will not change under the General Plan 2045 and the changes focus density in areas that will not result in a division of a community. The Project will not physically divide an established community. Therefore, the Project will result in a less than significant impact.

Consistency with Applicable Land Use Plans (Impact LU-2)

Facts/Effects: The Project will not conflict with California Government Code Section 65302, SCAG's 2020 RTP/SCS, the Complete Streets Act (AB 1358), the 6th cycle RHNA, Culver City and Culver City Unified School District Multi-Jurisdictional Hazard Mitigation Plan, the Culver City Bicycle & Pedestrian Action Plan, or the Culver City Urban Forest Master Plan. The Project will not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the Project will result in a less than significant impact.

Cumulative Land Use Impacts

Facts/Effects: Future development in the area, including growth anticipated under the proposed General Plan 2045, will not physically divide an established community or conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, as future development in each jurisdiction will be required to be consistent with each jurisdiction's General Plan and zoning code. In addition, future development in the western area of Los Angeles County will be required to be consistent with regional plans such as SCAG's Connect SoCal Plan and the RHNA. Therefore, future development in the western area of Los Angeles County, including growth anticipated under the General Plan 2045, will have a less-than-significant cumulative impact with respect to land use and planning.

Mineral Resources

Draft PEIR Section 4.11 evaluates the potential impacts relative to mineral resources that could result from implementation of the Project.

Loss of Known Mineral Resources (Impact MIN-1) and Loss of Mineral Resources Recovery Site (Impact MIN-2)

Facts/Effects: Since the Planning Area is not within an identified Mineral Resource Zone (MRZ) for significant mineral resources, future growth resulting from implementation of the Project will not impact regionally important aggregate material resources. No impact to aggregate mineral resources would occur. With regard to the IOF, while there is ongoing oil and gas production within the City's portion of the IOF, the City adopted the Oil Termination Ordinance, which

requires the closure of the City's portion of the IOF. The General Plan 2045 will not change the existing open space land use designation for the IOF that lies within the Planning Area. This designation, which allows open space, recreational, and/or park development, will ensure the presence and access to the existing oil and gas deposits will remain. Therefore, the Project will not result in the loss of the regionally or locally important oil and gas resources and impacts to mineral resources will be less than significant.

Cumulative Mineral Resources Analysis

Facts/Effects: The Project will have no impact related to non-fuel mineral resources. With regard to the IOF, the Project will preserve access to the existing oil and gas resources and will not contribute to a cumulatively considerable impact related to the loss of availability of mineral resources.

Population and Housing

Draft PEIR Section 4.13 evaluates the potential impacts relative to population and housing that could result from implementation of the Project.

Induce Unplanned Population Growth (Impact POP-1)

Facts/Effects: The projected growth that would occur as a result of the Project both in housing and employment is considered planned growth. The Project will accommodate the 6th cycle Regional Housing Needs Assessment (RHNA) allocation of 3,341 new units as well as future cycles through 2045. The Project is intended to accommodate planned regional growth requirements for the next 25 years with the densities allowed for across various land uses and with the provision of infrastructure and public services to accommodate such growth. New residential opportunities will be a result of targeted residential and mixed-use development in activity centers and along commercial corridors to provide housing near jobs, neighborhood amenities, and health care facilities. This type of infill development focuses on redevelopment and revitalization of areas already served by infrastructure and will not require extensions of roads or other infrastructure. While an increase in employment opportunities within the Planning Area is expected during the 2045 planning horizon, the Project will ensure that housing needs, including future housing needs for the projected increase in employment, will be met. Therefore, the Project will not induce substantial unplanned population growth, either directly or indirectly and impacts will be less than significant.

Require Construction of New Housing (Impact POP-2)

Facts/Effects: The Project will provide infill development opportunities in vacant and underutilized areas in the city, while seeking to preserve existing neighborhoods. The Project will increase the overall number of dwelling units in the city as well as include policies that seek to ensure equity and protect diversity in the city's communities. Therefore, the Project will not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere and impacts will be less than significant.

Cumulative Population and Housing Analysis

Facts/Effects: Future development in westside region of Los Angeles County, including growth anticipated under the Project, will not induce substantial unplanned population growth in the area as future development will have to be consistent with the general plans and zoning codes of local jurisdictions in the area, and therefore will not be unplanned. In addition, future development in the westside region will be required to follow existing state law governing relocation of residents. Therefore, the Project will not contribute to cumulative impacts related to population and housing, and cumulative impacts will be less than significant.

Public Services

Draft PEIR Section 4.14 evaluates the potential impacts relative to public services that could result from implementation of the Project.

Fire Protection (Impact PS-1.i)

Facts/Effects: Growth anticipated as a result of the Project will increase the demand for fire protection services. However, the increase in population is anticipated to occur incrementally over the next 25 years. While Culver City Fire Department (CCFD) is not currently meeting their emergency response time goals, CCFD has plans to augment their existing staff by seven staff members.

The 2019 Standards of Cover and Community Risk Assessment and the CCFD Strategic Plan outline recommendations to increase CCFD performance regarding deployment, response time, data collection, and mutual aid. While no additional fire stations are currently proposed, the Standards of Cover and Community Risk Assessment will be updated by CCFD during implementation of the General Plan 2045 to identify what new and/or expanded fire stations may be needed through the 2045 planning horizon. If a new station were to be needed in the future, the necessary environmental review would be conducted at that time.

Public safety in Culver City, including fire protection and emergency services provided by CCFD, is funded from the City's general fund. Revenue sources that contribute to the general fund, including property and sales taxes, are anticipated to grow in rough proportion to the projected growth that will occur as a result of the Project. In addition, future development that occurs as a result of the Project will be reviewed by the City and CCFD and will be required to comply with applicable requirements in effect at the time building permits are issued. With compliance with applicable regulations and consistency with General Plan policies, the Project will not require the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts. Therefore, impacts will be less than significant.

Police Protection (Impact PS-1.ii)

Facts/Effects: Growth anticipated as a result of the Project will likely increase the number of police responses in the city, which could increase the need for equipment and personnel. In addition, the redistribution and increase of population and traffic density into areas proposed for growth could necessitate the reassignment of certain resources pertaining to police services.

While the projected growth could result in a need for additional personnel, the growth would occur incrementally over the next 25 years. If a new police station were to be needed in the future, the necessary environmental review would be conducted at that time. The revenues and fees generated by future development are anticipated to offset the costs of additional personnel and materials. In addition, future development that occurs as a result of the Project will be reviewed by the City and CCFD and will be required to comply with applicable requirements in effect at the time building permits are issued. With compliance with applicable regulations and consistency with General Plan policies, the Project will not require the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts. Therefore, impacts will be less than significant.

Schools (Impact PS-1.iii)

Facts/Effects: Growth anticipated as a result of the Project will generate 3,556 elementary school students, 1,016 middle school students and 2,032 high school students in Culver City public school enrollment. Projected enrollment in 2045 with project-generated students will exceed the elementary, middle, and high school capacities. The General Plan 2045 contains policies related to schools, including continued coordination with the City Unified School District (CCUSD) to inform the CCUSD on impacts of major developments and population growth trends that may impact school enrollment. CCUSD will collect development impact fees for future development prior to issuance of building permits, which will incrementally pay for any needed facility upgrades and expansions. The payment of statutory fees fully mitigates the impacts of development on school facilities for purposes of CEQA under Senate Bill 50. Therefore, impacts related to school facilities will be less than significant.

Other Public Facilities (Impact PS-1.iv)

Facts/Effects: As demand for other public facilities increases as a result of anticipated growth as a result of the Project, there may be a need to increase staffing and facilities (i.e., libraries) to maintain acceptable service ratios and other performance objectives. However, no expansions are proposed at this time. If the expansion of an existing facility or a new facility were to be needed in the future, the necessary environmental review would be conducted at that time. The City will review plans for consistency with the Project. Therefore, the Project will not require the provision of other public facilities, the construction of which could cause significant environmental impacts, in order to maintain sufficient capacity and impact will be less than significant.

Cumulative Public Services Analysis

Facts/Effects: The Project and other development in areas served by CCFD, including those with mutual aid agreements, will increase the population of the service area, thereby increasing fire protection demand. Revenue sources that contribute to the Cities' and the County's general funds, including property and sales taxes, will be expected to grow in rough proportion to the increase in growth in areas served by CCFD. Furthermore, CCFD has established mutual aid agreements with the City of Los Angeles and Los Angeles County to increase response levels of service to residents of the city as well as surrounding areas. Therefore, the cumulative impact

will be less than significant, and the Project will not contribute to a cumulatively significant impact.

As the CCPD does not provide police protection services outside of the City boundary, development and growth associated with other nearby jurisdictions will not result in cumulative impact on CCPD resources and their service commitments. The costs of additional police personnel and materials are anticipated to be offset through the increased revenues and fees, including property and sales taxes, generated by future development. As a result, the Project will not contribute to a cumulatively significant impact regarding police protection services.

CCUSD will continue to collect development impact fees throughout implementation of the Project that will fund needed facility upgrades and expansions to ensure that there is sufficient capacity to accommodate future public-school students. The payment of statutory fees fully mitigates the impacts of development on school facilities for purposes of CEQA under Senate Bill 50. Therefore, the cumulative school impact will be less than significant, and the Project will not contribute to a cumulatively significant impact regarding schools.

Population growth anticipated under the Project may result in the need for new public facilities such as libraries. However, if new facilities are proposed, compliance with applicable requirements, including environmental review, would be necessary. In addition, if a facility were to be needed in another jurisdiction, the same would apply. Therefore, the contribution of the Project to potential cumulative impact relative to other public facilities will be less than significant.

Recreation

Draft PEIR Section 4.15 evaluates the potential impacts relative to recreation that could result from implementation of the Project.

Deterioration of Existing Recreational Facilities (Impact REC-1)

Facts/Effects: The current park service ratio for the City is 8.9 acres of parkland per 1,000 residents, inclusive of regional parks and joint use facilities. However, the current service ratio for City-parkland is 2.2 acres per 1,000 residents, which does not meet the standard of 3 acres per 1,000 residents. The City has identified locations for planned or proposed trails and recreational facilities throughout Culver City, including joint-use facilities proposed throughout the City.

While no new parks are currently proposed within the Planning Area, approximately 90 percent of Culver City residences are within one half-mile walking distance of an existing park, trail, or open space, including facilities just outside City limits. The service ratio provides an understanding of population relative to park acreage, and therefore a measure of the availability of park space to serve residents, but this ratio alone does not determine the quality of park service available to residents. In addition to improving the amount of park space and access to parks, enhancement of park amenities that improve park usability allow for a greater variety of uses and programming. Accessibility and the quality of the pedestrian environment leading to/from a green space is also an important factor. Policies in the General Plan 2045 will reduce

the likelihood that any existing neighborhood, community, or regional parks, or other recreational facilities would experience overuse resulting in the physical deterioration of those facilities. Therefore, the Project will not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility will occur or be accelerated. Impacts will be less than significant.

Require Construction or Expansion of Recreational Facilities (Impact REC-2)

Facts/Effects: The Project encourages the development of future recreational facilities in order to meet demand associated with anticipated population growth under the Project. General Plan 2045 policies are designed to minimize environmental impacts associated with the construction of new parks or expanded recreational facilities. Environmental impacts associated with construction of new and/or expanded parks and recreational facilities will be subject to applicable requirements and additional environmental review under CEQA, as needed. The Project will not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, the Project will result in a less than significant impact.

Cumulative Recreation Analysis

Facts/Effects: Future development and population growth anticipated by the Project will generate additional demand for parks and recreational facilities. All new and expanded facilities will be subject to applicable General Plan land use designations and policies as well as applicable regulations related to construction and operational impacts. The Project includes policies and standards to minimize potentially cumulatively considerable environmental impacts of new development, including sustainable park and recreational facility design, development, and planning standards. Therefore, the Project will not contribute to a cumulatively significant impact related to the construction or expansion of recreational facilities, the construction of which might have adverse physical effects on the environment. Cumulative impacts regarding recreation will be less than significant.

Transportation

Draft PEIR Section 4.16 evaluates the potential impacts relative to transportation that could result from implementation of the Project.

Conflict with Adopted Circulation Program, Plan, Ordinance, or Policy (Impact TR-1)

Facts/Effects: The Project will not preclude the implementation of the Culver City Short Range Mobility Plan, and provides complimentary goals, policies, and implementation actions that address transit improvements. In addition, the Mobility Element supports and complements the measures, objectives, and policies in the City's Bicycle and Pedestrian Action Plan. Further, the Mobility Element places an emphasis on Complete Streets and a layered transportation network consistent with the City's Complete Streets Policy. The Mobility Element establishes the goal of providing a transportation network that is safe and accessible for all travel modes consistent with the City's Local Road Safety Plan. The Project will enable the City to improve bicycling programs and infrastructure throughout the City, providing connections to the existing and proposed bicycle network. The goals and policies in the Mobility Element will be consistent with

the applicable plans and therefore, the Project will not conflict with any applicable program, plan, or ordinance on the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts will be less than significant.

Introduce Incompatible Uses (Impact TR-3)

Facts/Effects: The land use diagram and policies contained in the General Plan 2045 emphasize transition areas and buffers between land uses of varying intensity, which will serve to reduce potential conflicts between users of the transportation system connected with each land use, including commercial and industrial truck traffic, commute traffic, pedestrians, and cyclists. Access locations for development allowed under the Project will be designed to the City's standards and will provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls to meet the City's requirements to protect pedestrian safety. The various goals and policies contained within the Mobility Element are designed to address transportation safety, improve circulation, implement transportation projects, and advance current City plans, policies, programs, and ordinances. The transportation projects included in the Mobility Element are envisioned to improve mobility, safety, and access, and thus will be designed to applicable federal, state, and City Engineering Design Standards or other applicable roadway standards. As a result, the Project will not substantially increase hazards due to a geometric design feature or incompatible use, and impacts will be less than significant.

Result in Inadequate Emergency Access (Impact TR-4)

Facts/Effects: Project-level review required by the City includes site access review for emergency vehicles and traffic control plans that account for emergency vehicles. The City's development review process will ensure that future development under the Project will be consistent with applicable policies and will not hinder emergency access for individual sites. Therefore, the Project will not result in inadequate emergency access, and impacts will be less than significant.

Cumulative Transportation Analysis

Facts/Effects: Cumulative impacts are determined through consistency with the SCAG RTP/SCS, in that a Plan must demonstrate compliance with air quality conformity requirements and GHG reduction targets. The Project would have a cumulative impact if average daily VMT per capita and VMT per employee at buildout would exceed the corresponding VMT metrics, and if total VMT would exceed the total VMT for the existing conditions. At buildout the Project will represent a 4.26 percent decrease in residential VMT per capita compared to the existing conditions, a 4.59 percent decrease in work VMT per employee compared to the existing conditions, and a 6.39 percent decrease in total daily VMT per service population. Therefore, the resulting cumulative VMT impact will be less than significant.

With regard to conflicting with applicable plans, policies, and ordinances, the Project will not conflict with the various local, regional, and state regulatory frameworks. Therefore, the Project will not contribute to a cumulative significant impact relative to conflicting with applicable plans, policies, and ordinances. Impacts regarding this cumulative impact will be less than significant.

While traffic generated by future development in the region could substantially increase hazards due to a geometric design feature or incompatible use, the General Plan 2045 includes policies which emphasize transition areas and buffers between land uses of varying intensity, which would serve to reduce potential conflicts between users of the transportation system connected with each land use. The Project includes an emphasis on multi-modal street networks which would improve compatibility between different transportation modes and address potential safety concerns. Future development under the Project would be compliant with applicable City design guidelines. Therefore, the Project will not contribute to a cumulative impact relative to hazards due to geometric design features or incompatible uses.

Tribal Cultural Resources

Draft PEIR Section 4.17 evaluates the potential impacts relative to tribal cultural resources that could result from implementation of the Project.

Tribal Cultural Resource Significance (TCR-1)

Facts/Effects: The Planning Area was a highly suitable area for the inhabitation of indigenous people. In addition, the current or prior existence of development throughout the city does not preclude the presence of tribal cultural resources located underneath this development since existing improvements within the city (e.g., roads, buildings, structures, etc.) were constructed prior to the existence of cultural resources protection laws. The NAHC identified one resource in their database and recommended that the City contact the Gabrielino Tongva Indians of California Tribal Council for more information on this particular resource. The City submitted notification and request to consult letters pursuant to AB 52 and SB 18 to seven Native American individuals and organizations on March 2, 2022 and February 15, 2024. The City received one response from the Kizh Nation indicating that they are in agreement with the Project and requesting consultation if there would be ground disturbance occurring with future projects.

Future projects will be required to comply with the provisions of SB 18 and AB 52, as necessary, to incorporate tribal consultation into the review process to ensure that tribal cultural resources are properly identified and that mitigation measures are identified to reduce impacts on these resources, as necessary. In addition, the City will continue to implement standard conditions of approval that require and specify the steps to be taken to avoid damage and promote preservation if tribal cultural resources are uncovered during construction in support of the City's goals for protection of cultural resources. Adherence to the regulations and consistency with General Plan policies and implementation actions will ensure that the impacts with respect to tribal cultural resources will be less than significant.

Cumulative Tribal Analysis

Facts/Effects: Future development in the Planning Area and surrounding region, will be required to comply with SB 18 and AB 52 consultation, which will ensure that tribal cultural resources are properly identified and that mitigation measures are identified to reduce impacts on these resources. Potential cumulative impacts relating to tribal cultural resources will be minimized on a site-by-site basis to the extent that appropriate consultation is conducted.

Therefore, the Project's contribution to this potentially significant cumulative impact will not be cumulatively considerable. Cumulative impacts to tribal cultural resources will be less than significant.

Utilities and Service Systems

Draft PEIR Section 4.18 evaluates the potential impacts relative utilities and service systems that could result from implementation of the Project.

New or Expanded Water, Wastewater Treatment, Stormwater Drainage, Electric Power, Natural Gas, or Telecommunications Facilities (Impact UTL-1)

Facts/Effects: Future development that will occur under the Project will result in an increased demand for water, wastewater treatment, storm drainage, electric power, natural gas, and telecommunication services.

With regard to water, while growth under the Project was not specifically accounted for in the 2020 Urban Water Management Plan (UWMP) for each local water provider, Golden State Water Company (GSWC) and Los Angeles Department of Water and Power (LADWP) will account for the projected growth during the next UWMP update cycle in 2025. Water is also further discussed in 12.b, Impact UTL-2, below. Future projects will be required to demonstrate availability of water, as required and applicable, in the form of will-serve letters and for larger projects preparation of a Water Supply Assessment (WSA).

With regard to wastewater, new development allowed under the Project will be subject to the latest adopted edition of the California Plumbing Code and CALGreen Code, which will reduce the amount of effluent entering the wastewater system. In addition, as discussed under 12.c, Impact UTL-3, there is sufficient capacity at the Hyperion Water Reclamation Plan (HWRP) and Joint Water Pollution Control Plant (JWPCP) to accommodate wastewater collection and treatment generated by the growth that will occur under the Project.

With regard to stormwater drainage, future development will be required to comply with all applicable construction and operational laws, regulations, and permits related to hydromodification and discharging into the City's system. City requirements and policies will ensure that runoff will not inundate existing storm drainage facilities such that new or expanded facilities will be required.

With regard to electric power and natural gas, all new development will be subject to energy efficiency standards contained in the latest adopted edition of the CALGreen Code, thus reducing the need for new infrastructure. Future development could result in a demand for and/or the provision of new telecommunication facilities. As with other public services, applicable requirements relative to electric power, natural gas, and telecommunications, including environmental analysis if needed and the implementation of mitigation measures, will ensure that impacts are less than significant.

In summary, the Project will result in less-than-significant impacts related to new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities.

Water Supplies (Impact UTL-2)

Facts/Effects: The Project's projected increase development will result in an increased demand for potable water. Culver City is served by two water service providers: GSWC and LADWP. GSWC and LADWP will account for this growth during the next UWMP update cycle in 2025 and thus, will account for future development in the Planning Area prior to the General Plan Update's horizon year of 2045. Individual development proposals that meet the definition of a project under CEQA will be required to address water supply as part of the CEQA process, and for qualifying projects, a WSA will be required pursuant to SB 610 for inclusion in the project's CEQA analysis. In the event of a water shortage, GSWC and LADWP will rely on their Water Shortage Contingency Plans (WSCPs), which are to be engaged in the case of a water shortage event, such as a drought or supply interruption. In addition, future development will be required to comply with Chapter 5.03 of the City's Municipal Code, the City's Water Conservation Plan, and General Plan 2045 policies aimed at reducing demand over time. Therefore, implementation of the Project will result in less than significant impacts to water supply.

Wastewater Treatment (Impact UTL-3)

Facts/Effects: No new major sewer upgrades are anticipated or proposed as part of the Project. All new development in the City will be subject to sewer capacity considerations as part of the City review process. Improvements and upgrades to sewer lines are prioritized based on need. Development fees are collected from each project and used to fund the highest priority improvements. The proposed land use changes associated with the Project and the projected increase in wastewater flows associated with the anticipated growth will not exceed the treatment capacity at the HWRP or the JWPCP. Therefore, impacts related to wastewater will be less than significant.

Solid Waste Generation (Impact UTL-4)

Facts/Effects: The generation of solid waste (both construction and operation waste) will increase with future development that will occur under the Project. Construction waste will be required to be diverted from landfills in accordance with Municipal Code Section 15.02.1140. As required, a minimum of 75 percent of the nonhazardous construction and demolition debris from new development or redevelopment will be recycled and/or salvaged for reuse. There is adequate capacity in the inert landfills to accommodate the projected volume of waste that could occur. Based on the projected growth that will occur, operationally, the 10 Class III landfills in the county have adequate capacity to accept the projected volume of waste. In addition, all future development projects proposed in the City will be required to comply with applicable federal, state, and local statutes and regulations related to solid waste that are intended to reduce the disposal of waste in landfills. Therefore, the Project will not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or

otherwise impair the attainment of solid waste reduction goals. Impacts will be less than significant.

Solid Waste Regulations (Impact UTL-5)

Facts/Effects: As indicated above, development and growth in the Planning Area will increase the generation of solid waste. In accordance with City requirements, future development allowed under the Project will be served with solid waste and recycling services provided by the City or its authorized agents (Municipal Code Section 5.01.01). Future development allowed under the Project will be required to comply with statewide and local requirements, including AB 341, AB 939, SB 1016, and SB 1383, which require waste reduction, recycling, and diversion. In addition, projects will be required to be consistent with policies in the General Plan 2045 and applicable requirements in the Zoning Code Update related to solid waste. Therefore, future development allowed under the Project will comply with federal, state, and local management and reduction statutes and regulations related to solid waste, and the impact will be less than significant.

Cumulative Utilities and Service Systems Analysis

Facts/Effects: Construction and installation of new water transmission and distribution infrastructure will be the responsibility of Metropolitan, LADWP and GSWC. Metropolitan continues to improve regional water supplies through its IRP planning process and its 26 member agencies continue to improve local water supplies. The GSWC and LADWP have the ability to implement a WSCP in the case of supply shortages and demonstrated its effectiveness during the historic 2013–2017 drought. In addition, with these efforts and the increasing efficiency and drought planning requirements from the State, sufficient water supply is estimated to be available within the region to meet all future demands within the service area. Thus, sufficient water supplies will be available to serve the Project and reasonably foreseeable future development during normal, single dry and multiple dry years. Cumulative water supply impacts will be less than significant.

With regard to wastewater conveyance and treatment, all cumulative projects will be required to comply with applicable requirements and policies related to wastewater collection and treatment. The Project's contribution to cumulative impacts will be less than significant.

As with growth that will occur under the Project, future development in the region will be required to comply with applicable federal, state, and local laws and policies, including AB 341, AB 939, SB 1016, and SB 1383, which require waste reduction, recycling, and diversion. As with the City, all jurisdictions within the region will be required to comply with existing as well as new federal, state, and local statutes and regulations aimed at reducing solid waste. Therefore, cumulative impacts related to solid waste capacity and compliance with regulatory requirements will be less than significant.

Cumulative development contributes to an incremental increase in impervious surfaces that could increase stormwater runoff and impact existing storm drain facilities requiring relocated or new facilities. All cumulative projects will be required to comply with applicable requirements

and policies that minimize stormwater runoff. Therefore, cumulative impacts to storm drainage will be less than significant.

Wildfire

Draft PEIR Section 4.19 evaluates the potential impacts relative to wildfires that could result from implementation of the Project.

Emergency Response or Evacuation Plans (Impact WF-1)

Facts/Effects: The continued growth and development associated with implementation of the Project could have the potential to interfere with an adopted emergency response or evacuation plan if the emergency response services and/or evacuation routes were to become overburdened by the increase in residents or intensity of new development associated with implementation of the Project. Evacuation routes in the city have been designed to accommodate future development through the Project's horizon year (2045). In the event of an evacuation, major freeways including I-10 and I-405 will be used as the main evacuation routes outside of the city. The City's MJHMP also provides a strategy for reducing the City's and CCUSD's vulnerability to the impacts of natural hazard events such as earthquakes, flood, and wildfire. In addition to the City's emergency response systems, the Los Angeles County Operational Area Emergency Response Plan provides the framework for responding to major emergencies or disasters. New development associated with implementation of the Project will be reviewed and approved by CCFD for compliance with applicable Fire Code requirements that pertain to emergency access during the development review process. Therefore, compliance with local and regional emergency response, evacuation plans, building regulations and requirements established in the CMCC, as well as consistency with applicable General Plan policies will ensure that the Project will not impede an adopted emergency or evacuation plan. Thus, impacts will be less than significant.

Exacerbate Wildfire Risk (Impact WF-2)

Facts/Effects: Future development associated with implementation of the Project will primarily occur as redevelopment on parcels that already contain some existing residences or businesses, which are less susceptible to wildland fires than open areas containing vegetation. The Planning Area is generally built-out and existing structures have been built in accordance with fire prevention and protection measures required by the CFC and CBC. Compliance with CFC, CBC, and consistency with General Plan 2045 policies, as well as review of all new structures and private and public improvements by CCFD, will ensure that fire risks are not exacerbated. Therefore, the Project will result in a less than significant impact related to exacerbating wildfire risk.

Installation or Maintenance of Associated Infrastructure Which Exacerbate Fire Risk (Impact WF-3)

Facts/Effects: The Planning Area is generally built-out and existing structures have been built in accordance with fire prevention and protection measures required by the CFC and CBC. Future development allowed under the Project, including private and public improvements throughout the city, will generally occur in urban and developed areas that contain existing

defensible space, roadways, fuel breaks, water sources, power lines, and other utilities. The City will review future development applications for compliance with the relevant policies in the General Plan 2045. Furthermore, CCFD or LACFD will review the development plans for any City utilities or fire prevention and protection equipment, such as the installation and maintenance of fire access roadways, access walkways to and around buildings, and hydrant quantity and placement, to ensure compliance with the CFC and CBC. Therefore, the Project will result in a less than significant impact related to the installation or maintenance of associated infrastructure that could exacerbate fire risk or result in temporary or ongoing impacts to the environment.

Expose People or Structures to Significant Risks (Impact WF-4)

Facts/Effects: The eastern portion of the Planning Area, including the Culver Crest and Blair Hills neighborhoods and areas within the IOF, is designated as a VHFHSZ and is adjacent to land designated as a VHFHSZ outside of the Planning Area. The Blair Hills (located near the Baldwin Hills) and Culver Crest neighborhoods contain sloping hillsides that are susceptible to landslides and flooding after fire has removed protective vegetative cover. Future development allowed under the Project will be required to comply with all applicable requirements related to soil instability and water quality, including the regulations of the CCMC and policies in the General Plan 2045 regarding development on unstable geologic soils and controlling stormwater runoff during and after construction. The General Plan 2045 contains specific policies related to the prevention of flooding, landslides, and drainage changes, including policies that require ensuring prudent development and redevelopment within areas with high landslide potential during environmental and development review processes. Combined with the continued implementation of the City's MJHMP, as well as review of development plans by CCFD, these policies provide additional proactive measures to refine and enhance the resiliency of the area, as well as strengthening the City's review of new applications for development to ensure that the Project will not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. As such, impacts will be less than significant.

Cumulative Wildfire Analysis

Facts/Effects: Cumulative projects in surrounding jurisdictions will be required to comply with the CBC, CFC, and local municipal codes which will reduce impacts associated with wildfires. Pursuant to the Fire Code of the jurisdictions, all development will be required to comply with requirements relating to emergency planning and preparedness, emergency access, water supply, defensible space and vegetation management, and specific requirements for specialized uses involving flammable and hazardous materials. The implementation of these standard requirements will reduce impacts associated with accidental ignitions emanating from project sites and will not exacerbate wildfire risks. Therefore, the Project will not contribute to a cumulatively significant impact and the cumulative impact would be less than significant.

Findings of Less than Significant With Mitigation

This section sets forth the environmental impacts determined to have less than significant impact in the Draft PEIR with implementation of mitigation measures. Applicable mitigation

measures are identified below and the mitigation measures are provided in their entirety in the Mitigation Monitoring Program (MMP) that is provided as an attachment to these Findings and Statement of Overriding Considerations. Based on that analysis and other evidence in the administrative record relating to the project, the City Council finds and determines that mitigation measures described in the Final EIR reduce the potentially significant impacts identified for the following environmental impact categories to below the level of significance. Pursuant to PRC Section 21081, the City Council finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid each of the following significant effects on the environment.

Biological Resources

Draft PEIR Section 4.3 evaluates the potential impacts to biological resources that could result from implementation of the Project.

Adversely Affect Candidate, Sensitive, or Special Status Species (Impact BIO-1)

Facts/Effects: The vast majority of the Planning Area is heavily developed and contains minimal biological resources; however, fragmented, isolated swathes of coastal scrub and chaparral vegetation remain throughout portions of the IOF and Kenneth Hahn State Recreation Area. Construction of some projects could result in direct removal of suitable wildlife habitat for special-status species (which may include nesting avian species), resulting in the potential mortality of wildlife species existing within the habitat as well as the displacement of more mobile wildlife species to other habitat areas nearby. While the majority of special-status biological resources have a low potential to occur within the Planning Area as result of the largely developed nature of the Planning Area, new development projects could significantly impact these resources, when analyzed on a project-by-project basis due to specific onsite conditions.

Although compliance with the goals and policies of the General Plan 2045 and the applicable laws and regulations would help to minimize impacts to special-status species, MM BIO-1 (Baseline Biological Assessment) and MM BIO-2 (Nesting Bird Surveys) are recommended to ensure that impacts to special-status species from implementation of the General Plan 2045 would be reduced to a less than significant level. These mitigation measures require development under the General Plan 2045 to implement procedures and processes related to protecting special-status species, such as preconstruction surveys, compensatory mitigation for loss of designated habitats, and protection and/or avoidance of special-status species. Implementation of the mitigation measures would ensure that construction impacts to special-status species with implementation of the General Plan 2045 would be less than significant.

Interfere with Wildlife Corridors or Wildlife Nursery Sites (Impact BIO-4)

Facts/Effects: The Project would not substantially interfere with movement of native resident or migratory fish or wildlife species or with established wildlife corridors due to the lack of wildlife movement corridors within the Planning Area. However, nesting birds and/or nesting bird habitat have been recorded within the Planning Area, where Project could directly or indirectly impact these biological resources. There are areas that consist of trees, shrubs, and ground cover,

including non-native/ornamental vegetation dispersed throughout developed land uses that could be used by breeding raptors and songbirds. Disturbing or destroying active nests is a violation of the Migratory Bird Treaty Act (MBTA) and nests and eggs are protected by Fish and Game Code, Section 3503. While these biological resources have a low potential to occur due to the heavily developed nature of the Planning Area, future development could impact these resources if removal of active nests or harassment of a breeding bird occur during construction, resulting in a potentially significant impact.

Compliance with the Project and the MBTA would help to minimize impacts to nesting birds and their associated habitat. However, impacts could be potentially significant. MM BIO-2 (Nesting Bird Surveys), which requires procedures and processes related to protecting nesting birds and their associated habitat, such as pre-construction surveys and protection and/or avoidance of nesting birds and their associated habitats, will reduce impacts to a less-than-significant level on a project-by-project basis.

Cumulative Biological Resources Impacts

Facts/Effects: There are limited biological resources and habitats within the Planning Area due to its largely developed nature. The General Plan 2045 includes policies that aim to protect and enhance the biological resources within the Planning Area. With implementation of these policies of MM BIO-1 and MM BIO-2, potential impacts to special-status biological resources, including protected habitats, will be reduced to a less than significant level. Therefore, the Project would result in less than significant cumulative impacts related to biological resources.

Cultural Resources

Draft PEIR Section 4.4 evaluates the potential impacts to cultural resources that could result from implementation of the Project.

Archaeological Resources (Impact CUL-2)

Facts/Effects: The archival research conducted for the Project indicates that 18 known archaeological resources have been previously identified within the city. Current or prior existence of development throughout the City does not preclude the presence of archaeological resources located underneath this development. In addition, the city would have been a highly suitable area for the inhabitation of indigenous people in light of Ballona Creek flowing through the area. Project-related demolition, construction, maintenance, and/or improvement activities have the potential to cause a potentially significant impact to archaeological resources. Implementation of Mitigation Measure (MM) CUL-2, along with the City's standard conditions of approval, and applicable policies in the General Plan 2045 will reduce impacts to archaeological resources to a less than significant level.

Cumulative Archaeological Resources Impacts

Facts/Effects: Future development in the Planning Area, including growth anticipated under the proposed General Plan 2045, and larger Los Angeles County region throughout the 2045 planning horizon, could result in a substantial adverse change in the significance of archaeological resources, thus resulting in a potentially significant cumulative impact. However,

with implementation of MM CUL-2, the Project's contribution to this potentially significant cumulative impact will not be cumulatively considerable.

Geology and Soils

Draft PEIR Section 4.6 evaluates the potential impacts to geology and soils, including paleontological resources, that could result from implementation of the Project.

Paleontological Resources (Impact GEO-5)

Facts/Effects: Based on the records search conducted for the Project four fossil localities have been recorded within the city boundaries and eight other localities located outside the city but from the same sedimentary deposits (older Quaternary alluvium deposits and the San Pedro Sand) that occur within and throughout the city. Specific project-related demolition, construction, maintenance, and/or improvement activities have the potential to result in a potentially significant impact to paleontological resources. Implementation of MM GEO-1 and applicable policies in the General Plan 2045 will reduce impacts to paleontological resources to a less than significant level.

Cumulative Paleontological Resources Impacts

Facts/Effects: Future development in the Planning Area, including growth anticipated under the proposed General Plan 2045, and larger Los Angeles County region throughout the 2045 planning horizon, could result in a substantial adverse change in the significance of paleontological resources, thus resulting in a potentially significant cumulative impact. However, with implementation of MM GEO-1, the Project's contribution to this potentially significant cumulative impact will not be cumulatively considerable.

Impacts Found to Be Significant after Mitigation (Significant and Unavoidable)

This section sets forth the environmental impacts determined to be significant and unavoidable even with implementation of all feasible mitigation measures. The City Council finds that the following environmental effects were identified in the Draft PEIR as potentially significant and that even with the implementation of all feasible mitigation measures the PEIR and the record of proceedings in this matter identify or contain substantial evidence identifying significant and unavoidable environmental effects as listed below.

Air Quality

Draft PEIR Section 4.2 evaluates the potential air quality impacts that could result from implementation of the Project.

Conflict with or Obstruct Applicable Air Quality Plan (Impact AIR-1)

Facts/Effects: The Air Basin is designated nonattainment for O₃ and PM_{2.5} under the CAAQS and NAAQS, nonattainment for lead (Los Angeles County only) under the NAAQS, and nonattainment for PM₁₀ under the CAAQS. Long-term growth associated with buildout under

the Project could result in the emissions of criteria pollutants that exceed SCAQMD thresholds for criteria pollutants.

Development activities under the Project will primarily occur on parcels that already contain some existing residential or non-residential uses. The City's primary approach to accommodating growth is to provide strategies for thoughtful infill development and redevelopment that range from modest additions of individual housing units to the redevelopment of large, aggregated properties within opportunity sites located in activity centers and along commercial corridors. The Project will not conflict with Air Quality Management Plan (AQMP) land use and transportation strategies that are intended to reduce VMT and resulting regional mobile source emissions and will result in a less than significant impact associated with the first indicator in the AQMP.

However, future development that will occur under the Project will increase vehicle trips and VMT that will result in emissions of ozone precursors and particulate matter. A project might be in conflict with the AQMP if the development is greater than that anticipated in the local general plan and SCAG's growth projections. The AQMP is based on population, employment and VMT forecasts by SCAG. The Project projects a population of 62,400 persons in 2045, which will exceed the SCAG growth forecast of 41,600 persons in 2045; the Project projects 28,310 households in 2045, which will exceed the SCAG growth forecast of 18,000 households in 2045; and the Project projects 84,300 jobs in 2045, which will exceed the SCAG growth forecast of 64,100 jobs in 2045.

Culver City continues to coordinate with SCAQMD and SCAG to ensure city-wide growth projections, land use planning efforts, and local development patterns are accounted for in the regional planning and air quality planning processes. The General Plan 2045 policies will reduce emissions, which would address potential impacts related to conflicts with an applicable air quality plan. In addition, Mitigation Measures MM AQ-1 through MM AQ-5 will serve to reduce the severity of the impacts to emissions of criteria pollutants associated with future development and projected growth from future development under the Project. However, even with implementation of Mitigation Measures MM AQ-1 through MM AQ-5, impacts will remain significant and unavoidable.

Result in Cumulatively Considerable Net Increase in Criteria Pollutants (Impact AIR-2)

Facts/Effects: During construction, the use of heavy-duty construction equipment and vehicle trips generated by construction workers and haul trips traveling to and from each specific project site has the potential to create regional air quality impacts. In addition, fugitive dust emissions will result from construction activities. During the finishing phase, the application of architectural coatings (i.e., paints) and other building materials will release VOCs. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. Since there are no specific developments currently proposed under the Project and there is no knowledge as to timing of construction, location or the exact nature of future projects, modeling of construction emissions would be speculative. Mandatory compliance with CARB and SCAQMD rules and regulations will reduce emissions, particularly for NOX, PM10, and PM2.5, during future construction

activities under the Project. However, even with mandatory compliance with CARB and SCAQMD rules regulations, it is possible that some future development projects could be large enough in scale and/or intensity such that many pieces of heavy-duty construction equipment and/or heavy-duty trucks may be required and that construction period emissions could exceed the SCAQMD significance thresholds. Therefore, project-related construction activities could result in significant regional air quality impacts. Even with implementation of recommended mitigation measures that will reduce emissions, construction impacts will remain significant and unavoidable.

Operation of future development under the Project will generate criteria pollutant emissions from vehicle trips traveling within the City, energy sources such as natural gas combustion, and area sources such as landscaping equipment and consumer products usage. The net change in operational emissions between existing conditions and under the Project will not exceed the SCAQMD regional significance thresholds, with the exception of VOC emissions that would exceed the threshold (Draft PEIR Table 4.2-7). The net change in emissions at 2045 buildout will be negative for NOX, CO, and SOX compared to existing conditions primarily due to the focus of the Project on infill development and revitalization to help Culver City achieve an integrated land use mix that accommodates growth while reducing VMT and associated emissions, improvements in vehicle emissions standards and, to a lesser extent, improvements in building energy efficiency standards. The increase in VOC emissions is primarily the result of growth in building floor area and residential units, which results in population growth and associated use of consumer products. The increase in PM10 and PM2.5 emissions, while below the threshold, is primarily the result of growth in building floor area and residential units, which results in population growth and associated growth in total VMT, which generates a net increase in re-entrained roadway fugitive dust emissions.

Policies in the Community Health and Environmental Justice Element and Conservation Element will potentially reduce emissions, which could potentially address impacts. As required by SB 1000, the Community Health and Environmental Justice Element includes a number of policies relevant to air quality, focusing on reducing emissions and reducing exposure to pollution at sensitive land uses.

Because regional emissions from future development under the Project may exceed the SCAQMD regulatory thresholds during construction and/or operational activities, there is the potential that these emissions will exceed the CAAQS and NAAQS thus resulting in a health impact. Without knowing the exact specifications for all projects that may be developed, there is no way to accurately calculate the potential for health impacts from the overall Project. As applicable, individual projects will be required to provide environmental assessments to determine health impacts from the construction and operation of the projects. Because there is no way to determine the potential for these projects to affect the health of sensitive receptors within the city, the Project will result in a potentially significant health impact.

The Project will result in a potentially significant impact related to a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment during construction and operation due to regional emissions that could exceed the SCAQMD

significance thresholds. While implementation of Mitigation Measures MM AQ-1 through MM AQ-5 will serve to reduce the severity of the impacts, the Project will result in a significant and unavoidable impact.

Expose Sensitive Receptors to Substantial Pollutant Concentrations (Impact AIR-3)

Facts/Effects: Potential new development that will occur as a result of the Project will likely occur close to existing sensitive receptors and thus, the development has the potential to expose sensitive receptors to substantial pollutant concentrations. Future projects may require project-specific dispersion modeling to evaluate potential health risk impacts associated with construction. However, there is no information regarding specific development projects, such as specific building information, construction schedules, quantities of grading, and other information that would be required in order to provide a meaningful estimate of emissions. While the General Plan policies could reduce emissions, construction equipment exhaust combined with fugitive particulate matter emissions has the potential to expose sensitive receptors to substantial concentrations of criteria air pollutant emissions or diesel particulate matter and result in a potentially significant impact. Under the Project, industrial-type land uses may be permitted within the City Planning Area. As operation of some these future developments may occur within proximity to sensitive receptors, there is the potential for localized emissions to exceed the significance thresholds and result in a result in a potentially significant impact.

With regard to CO hotspots, no exceedances of CO have been recorded at monitoring stations in the Air Basin since 2003 and the Air Basin is currently designated as a CO attainment area for both the CAAQS and NAAQS. Intersection volumes were evaluated and based on roadway segment volumes under the buildout horizon, the volume of traffic will be below the threshold of vehicles per day modeled in SCAQMD's 20003 AQMP CO attainment demonstration. Thus, the Project will result in a less than significant impact with response to CO hotspots.

Construction and operation of future development will result in emission of toxic air contaminants (TAC). As indicated above, because specifics of a project are unknown and because health risk impacts from TACs are cumulative over the life of the nearby receptors, quantification of potential health risks would be speculative. Therefore, health risk with respect to the development anticipated by the Project is considered potentially significant.

In summary, the Project will result in a potentially significant impact related to exposure of sensitive receptors to substantial pollutant concentrations during construction and operation due to localized emissions and TAC emissions that could exceed the applicable significance thresholds. Implementation of MM AQ-1, MM AQ-3, MM AQ-6, and MM AQ-7 will serve to reduce the severity of the impacts to exposure of sensitive receptors to substantial pollutant concentrations. However, even with implementation of these measures, impacts could exceed the significance thresholds and impacts will be significant and unavoidable.

Cumulative Air Quality Impacts

Facts/Effects: The Project will not conflict with AQMP construction, land use, and transportation strategies that are intended to reduce construction emissions, VMT, and resulting regional mobile source emissions. In addition, construction and operation would not conflict with

growth projections as Culver City continues to coordinate with SCAQMD and SCAG to ensure city-wide growth projections, land use planning efforts, and local development patterns are accounted for in the regional planning and air quality planning processes. As such, a cumulative impact would be less than significant under this criterion.

However, the Project will result in a potentially significant impact related to a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment during construction and operation due to regional emissions that could exceed the SCAQMD significance thresholds (Impact AQ-2). While implementation of MM AQ-1 through MM AQ-5 would serve to reduce the severity of the effects, impacts will remain significant and unavoidable.

Cultural Resources

Draft PEIR Section 4.4 evaluates the potential impacts to cultural resources that could result from implementation of the Project.

Historical Resources (Impact CUL-1)

Facts/Effects: Future development facilitated under the Project may include construction, demolition, or alteration of historic buildings/structures/objects/landscape features that have the potential to cause a substantial adverse change to historical resources as defined by CEQA Guidelines Section 15064.5. A total of 204 historic resources have been previously identified within the Planning Area; Culver City also has three designated historic districts: 11027 - 11047 Braddock Drive, 4052 - 4070 Lafayette Place, and 4128 - 4181 McConnell Boulevard. While General Plan 2045 goals and policies will help promote the preservation of historic resources, these policies do not require the identification and evaluation of historic-age properties to determine if there are historical resources within or nearby a proposed project site that could be adversely impacted by a future development, nor do they require the retention or rehabilitation of historical resources. Therefore, future development implemented as a result of the Project could result in a potentially significant impact related to historical resources during construction. Implementation of MM CUL-1 will help to reduce the severity of the impacts. However, even with implementation of this mitigation measure, impacts will remain significant and unavoidable.

Cumulative Historical Resources Impacts

Facts/Effects: Future development in the Planning Area, including growth anticipated under the Project, and larger Los Angeles County region throughout the 2045 planning horizon, could result in a substantial adverse change in the significance of historical resources, thus resulting in a potentially significant cumulative impact. Even with implementation of the General Plan 2045 policies, as well as applicable local, state, and federal laws and MM CUL-1, the Project's contribution to this potentially significant cumulative impact will be cumulatively considerable. Cumulative impacts to historic resources are considered significant and unavoidable.

Noise

Draft PEIR Section 4.12 evaluates the potential noise impacts that could result from implementation of the Project.

Temporary or Permanent Increase in Ambient Noise Levels (Impact NOI-1)

Facts/Effects: Construction activity noise levels will fluctuate depending on the particular type, number, and duration of use of the various pieces of construction equipment. The exact locations of future projects and construction that will occur under the Project are not known at this time, though it is assumed that some of the activities will take place in close proximity to sensitive receptors given that the City is generally built out. Even with mandatory compliance with Municipal Code requirements, it is possible that some future development projects could include construction in which multiple pieces of heavy-duty construction equipment and/or heavy-duty trucks may be required and that construction period noise levels could exceed the significance thresholds. Therefore, project-related construction activities could result in a significant impact.

With regard to operational noise, future development that will occur as a result of the Project will generate traffic that will increase noise levels along roadways. Future traffic noise levels were evaluated along 62 roadway segments within the city. Traffic noise along the analyzed roadway segments will not be discernably different for the majority of the segments when future no project levels are compared to future roadway noise levels with project levels (Table 4.12-10). However, since noise levels could increase at the property line above the threshold along Washington Boulevard between Inglewood Boulevard and S Centinela Avenue, the impact from traffic noise will be significant and unavoidable. There are no feasible mitigation measures to reduce traffic noise levels.

With regard to railway noise, the Metro E Line passes through the northeast portion of the City with the Culver City Station located just east of the intersection of Venice Boulevard and S. Robertson Boulevard. New or renovated noise-sensitive uses along the Metro E Line route in Culver City will be required to evaluate potential train noise levels at the individual site and, if required, incorporate building designs or mitigation measures to meet applicable exterior and/or interior noise standards. Stationary noise, such as rooftop heating, ventilation, and air conditioning units, will be required to comply with applicable regulations. Therefore, the impact from railway noise and stationary equipment will be less than significant.

Implementation of MM NOI-1 will help to reduce the potentially significant construction-related impacts resulting from a substantial temporary increase in ambient noise levels in the vicinity of future development projects in excess of the threshold. However, even with implementation of MM NOI-1, impacts could exceed the significance thresholds and impacts will be significant and unavoidable.

Excessive Groundborne Vibration or Groundborne Noise (Impact NOI-2)

Facts/Effects: As indicated above, the locations of future projects and construction methods for the future projects are not known at this time. However, it is assumed that some of the activities will take place in close proximity to sensitive receptors given that the City is generally built out. With regard to structural damage and human annoyance during construction, activities could generate excessive ground vibration and potentially exceed damage criteria for surrounding existing structures. In addition, multiple pieces of equipment or other sources of groundborne

vibration and/or groundborne noise could cause levels to exceed the threshold. Therefore, future development projects that will occur under the Project could result in a significant impact.

During operation, future projects could generate groundborne vibration and groundborne noise from vehicle and truck traffic on roadways and from stationary mechanical equipment such as pumps and compressors. However, groundborne vibration from traffic and the operation of mechanical equipment is not expected to generate excessive vibration or noise. Therefore, impacts during operation relative to groundborne vibration and groundborne will be less than significant.

Implementation of MM NOI-2 will reduce the severity of the impacts to excessive groundborne vibration or groundborne noise during construction. However, even with implementation of MM NOI-2, impacts during construction could exceed the significance thresholds and construction impacts will be significant and unavoidable.

Cumulative Noise and Vibration Impacts

Facts/Effects: Noise is a localized phenomenon, and because the City is predominately developed with urban uses, it is possible that multiple construction projects could occur simultaneously and in close enough proximity to create significant combined noise and vibration impacts. Therefore, the contribution of the Project to any potential cumulative construction noise impact would be cumulatively considerable. Cumulative noise during construction could be significant and unavoidable.

The City is predominately developed with urban uses; thus, infill development or redevelopment of existing uses in various areas of the City is expected to occur. Through compliance with the CCMC noise control ordinance, the impact from stationary noise would not be cumulatively considerable. Cumulative impacts from stationary equipment will be less than significant.

However, the increase in traffic noise from the future development in conjunction with ambient growth in the region could result in a significant cumulative impact. The Project will result in a significant and unavoidable impact along one roadway segment. The Project buildout traffic volumes, which includes increases in traffic due to ambient growth in surrounding areas, was compared to existing traffic volumes. Sensitive receptors located near roadway segments will experience cumulative noise level increases above the threshold along two roadway segments (Slauson Avenue between Jefferson Boulevard and Sepulveda Boulevard and Slauson Avenue between W Jefferson Boulevard and Washington Boulevard) (Table 4.12-12). Therefore, the Project will contribute to cumulative traffic noise and cumulative impacts will be significant and unavoidable.

With regard to vibration, during construction it is possible that multiple construction projects could occur simultaneously and in close enough proximity to create a significant combined vibration impact. Therefore, the Project could contribute to a potential cumulative construction vibration impact. Cumulative vibration during construction could be significant and unavoidable.

During operation, vibration from vehicles will be temporary and intermittent. Vibration levels from traffic generated by growth anticipated by the Project will be well below the thresholds for human annoyance and structural damage. Therefore, the contribution of the Project to any potential cumulative operational (traffic) vibration impact will not be cumulatively considerable. Cumulative vibration impacts during operation will be less than significant.

Transportation

Draft PEIR Section 4.16 evaluates the potential transportation impacts that could result from implementation of the Project.

Conflict with CEQA Guideline Section 15064.3, Subdivision (b) (Impact TR-2)

Facts/Effects: Fehr & Peers conducted a VMT assessment of the entire Culver City, using the Culver City Citywide Travel Demand Forecasting Model to obtain daily vehicle trips, daily VMT, and VMT per capita metrics. At buildout, the Project will result in a 0.95 percent decrease in residential VMT per capita compared to the existing conditions, a 7.26 percent decrease in work VMT per employee compared to existing conditions, and a 3.60 percent increase in total daily VMT per service population (Table 4.16-1). While there would be a resulting reduction in VMT compared with existing conditions, the Project will result in an average daily VMT per capita, VMT per employee, and total VMT per service population above the 15 percent reduction threshold. Even with implementation of all goals and policies contained in the Mobility Element that promote transit priority lanes, multimodal connectivity, integrated public transportation services, and prioritize public transit and mobility service, the Project will not meet the 15 percent VMT reduction threshold. Thus, the Project will result in significant VMT impacts. There are no feasible mitigation measures to reduce the severity of this impact.

Cumulative Transportation Impacts

Facts/Effects: The Project will have a cumulative impact if average daily VMT per capita and VMT per employee at buildout would exceed the corresponding VMT metrics, and if total VMT would exceed the total VMT for the existing conditions. The daily VMT per capita, per employee, and per service population for the existing conditions and buildout of the Project demonstrate that all the VMT metrics are lower in the Project buildout scenario than the existing conditions, indicating that the Project buildout scenario has no cumulative impact on VMT (Table 4.16-2). Cumulative impacts relative to VMT will be less than significant.

Mitigation Monitoring Program

CEQA requires the Lead Agency approving a project to adopt a Mitigation Monitoring Program (MMP) or the changes to the project which it has adopted or made a condition of project approval to ensure compliance with the mitigation measures during project implementation (see the attachment to these Findings and Statement of Overriding Considerations). The mitigation measures included in the PEIR as certified by the City serve that function. The MMP includes all the mitigation measures adopted by the City in connection with the approval of the Project and has been designed to ensure compliance with such measures during implementation of the Project. In accordance with CEQA, the MMP provides the means to ensure that the mitigation

measures are fully enforceable. In accordance with the requirements of PRC Section 21081.6, the City hereby adopts the MMP.

Evaluation of Alternatives

In accordance with CEQA Guidelines Section 15126.6(a), an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. The Project's objectives are provided above in the section entitled *Project Objectives*. In addition, CEQA Guidelines Section 15126.6(b) states that the selection of project alternatives "shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."

Because the Project would result in significant and unavoidable environmental impacts after implementation of the mitigation measures with regard to air quality, cultural resources, noise, and transportation. The City considered alternatives to the Project specifically to reduce those impacts. CEQA Guidelines Section 15126.6(f) further direct that "the range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." CEQA Guidelines Section 15126.6(f) goes on to say that the "range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making."

The EIR considers a total of four alternatives to the Project. Two alternatives were considered but were not selected for further analysis due to a failure to meet most of the basic Project Objectives, infeasibility, and/or an inability to avoid significant environmental impacts. Two alternatives were comprehensively evaluated in the Draft EIR, including the "no project" alternative and a corridors alternative, which clusters new development around major thoroughfares throughout the city. CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR, and that if the "no project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. In general, the environmentally superior alternative is the alternative with the least adverse impacts on the environment.

The alternatives considered or evaluated in the Draft PEIR include:

- Alternative 1 – No Project Alternative
- Alternative 2 – Concentrated Growth Alternative
- Alternative 3 – Modified Mixed Use High Designation

The impacts of each of alternative evaluated in detail in the Draft EIR are compared to the Project's impacts in Draft PEIR Chapter 5, Alternatives, with a summary of comparative impacts provided in Draft PEIR Table 5-2.

Alternatives Considered and Rejected

As set forth in CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis, but rejected as infeasible, and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts.

As identified in PRC Section 21081(a)(3) and CEQA Guidelines Section 15091(a)(3), findings are required only for "alternatives identified in the environmental impact report." Alternatives that are not reviewed in detail in the EIR because they have been determined to be infeasible need not be discussed in the findings (*Crenshaw Subway Coalition v Los Angeles County Metro. Transp. Auth.* (CD Cal, Sept. 23, 2015, No. CV 11-9603 FMO [JCx]) 2015 US Dist Lexis 143642, 2015 WL 6150847). Therefore, findings are not provided for alternatives considered in the Draft EIR and rejected from detailed analysis.

Dispersed Densification Alternative

The Dispersed Densification Alternative would distribute new growth across the city but at higher densities than the Project. Under this alternative, identified opportunity sites would accommodate high-density mixed-use development. While the focus would be commercial uses, there would also be residential infill. Development along the commercial corridors would be allowed a greater mix and intensity of uses compared to the Project. In addition, under this alternative, incremental and moderate densification would occur in the single-family and low-density residential areas.

The increased residential densities proposed for low- to medium-density residential areas was considered to be too intense for the existing character of these areas. In addition, this alternative was considered to conflict with the Project's objective of guiding future development that would preserve and enhance community character and environmental resources. Since this alternative would be in conflict with the goal of the City's General Plan to provide a long-range vision for the city which balances growth and development with community needs and desires, the Dispersed Densification alternative was eliminated from further consideration.

Reduced Buildout Alternative

The Reduced Buildout Alternative would result in reduced residential and non-residential intensities/densities compared to the Project. The Reduced Buildout Alternative would not fully achieve the Project's objectives, as the City may not be able to accommodate its Regional Housing Needs Assessment allocations through the 2045 planning horizon and would not be able to support the anticipated growth within the Planning Area or the region over the next few decades. Specifically, this alternative would not achieve the following objectives to the same extent as the Project due to its reduced development potential: 1) support a diversified, adaptable, and sustainable economy with a balance of small and large businesses across a range of industries that provide employment, commercial, and experiential opportunities; 2) be a

creative and proactive leader in solving regional, state, and national challenges around issues like housing, mobility, public safety, equity, and climate pollution and disruption; and 3) advance continued racial, demographic, and socioeconomic diversity by supporting a range of housing types for different income levels, household compositions, stages of life, and marginalized populations, including persons experiencing homelessness, the elderly, and persons with disabilities. Therefore, the City eliminated the Reduced Buildout Alternative from further consideration.

Alternatives Analyzed in the PEIR

Alternative 1 – No Project Alternative

Under the No Project Alternative, future development would be subject to current land use designations in the City's adopted 1996 General Plan as amended to date and the current Zoning Code. Future development in the Planning Area would continue to be subject to existing policies, regulations, development standards, and land use designations of the adopted General Plan and Zoning Code. No amendments would occur to areas identified for change under the Project and no new land use or zoning designations would be created. The City would not comprehensively update its Land Use Element or Land Use Map to increase densities or intensities across the city.

Finding. The City rejects the No Project Alternative and finds that the alternative is infeasible because, although it is environmentally superior to the Project, it would not meet most of the Project objectives and would not meet the underlying purpose of the Project since it would not result in the adoption and implementation of a comprehensive update to the Culver City General Plan and amendments to the City's Municipal Code to implement the General Plan 2045.

Basis for Finding. The No Project Alternative would reduce some of the significant impacts associated with the Project but significant and unavoidable impacts would remain. In addition, some impacts under the No Project Alternative, such as Aesthetics, Greenhouse Gas Emissions, Land Use, and Recreation would be greater. Under the No Project Alternative, the City would not adopt and implement a comprehensive update to the Culver City General Plan and amendments to the City's Municipal Code to implement the General Plan 2045. Under Alternative 1, none of the land use designations and policies in the General Plan 2045 designed to foster a vibrant and sustainable community, respond to an increasingly diverse and aging population, and address a myriad of physical, environmental, and other challenges that the city faces would be implemented. There would not be sufficient land capacity to fully meet the City's allocation under the 6th cycle of the RHNA in a comprehensive, thoughtful manner. Alternative 1 would not meet the key goals of the Project to promote mixed-use development, better integrate land uses, improve alternate modes of transportation, equity (housing and health), and sustainability. Alternative 1 would not provide high-quality public services through an equitable, adaptive, transparent, accessible, and fiscally sustainable governing structure with intentional investments and regulatory measures; advance racial, demographic, and socioeconomic diversity by supporting a range of housing types for different income levels, household compositions, stages of life, and disadvantaged populations; adopt innovative and equitable policies to eliminate greenhouse gas emissions, reduce energy and water use, encourage the

purchase of 100 percent renewable, carbon-free electricity, foster the transition to zero-emission vehicles, and adapt to climate disruption; and practice resilient and sustainable solutions to maintain and improve infrastructure, including water, road infrastructure, and broadband.

Alternative 2 – Concentrated Growth Alternative

The Concentrated Growth Alternative would be similar to the Project but would result in a different land use distribution strategy and reduced growth. Under Alternative 2, all of the proposed elements except the Land Use Element of the General Plan 2045 would remain the same as under the Project. Alternative 2 would result in 2,870 fewer residents compared to the Project, 1,110 fewer housing units, and 1,100 fewer jobs than the Project. Alternative 2 would result in the activation and concentration of new mixed-use growth along commercial corridors and in existing non-residential districts in combination with moderate densification across the Planning Area. Commercial corridors such as Washington Boulevard and Sepulveda Boulevard would be upzoned to allow for higher densities. More area in Fox Hills would be designated as Mixed Use High (MUH) thereby allowing more density in the area. In addition, areas along Sepulveda Boulevard would be designated Mixed Use Medium (MUM) thereby allowing greater density along the corridor than the Project. Areas along Jefferson under Alternative 2 would have less Industrial Mixed Use compared with the Project. Under Alternative 2 along Washington Boulevard in the southern portion of the city would be Mixed Use Corridor 2, allowing greater density compared with the Project. Similar to the Project, Alternative 2 identified opportunity sites. Most properties fronting major corridors, such as Jefferson, Sepulveda, Washington, and Culver Boulevards, as well as all non-residential portions of Fox Hills were considered as opportunity sites. However, compared to the Project, the opportunity sites under the Concentrated Growth Alternative would result in greater residential densities and non-residential intensities along the corridors. Implementation of this alternative could result in greater amounts of mixed-use development throughout the city on corridors compared to the Project.

Finding. The City rejects the Concentrated Growth Alternative because while it would achieve all of the Project objectives, Alternative 2 would not meet future needs based on the projected population and job growth to the same degree as the Project.

Basis for Finding. The Concentrated Growth Alternative would reduce environmental impacts related to air quality, noise, public services, recreation, transportation, and utilities and service systems, primarily as a result of its reduction of growth in comparison to the Project, but significant and unavoidable impacts would remain. Under the Concentrated Growth Alternative, the City would result in a different land use distribution strategy than the Project. The Concentrated Growth Alternative would adopt and implement a comprehensive update to the Culver City General Plan and amendments to the City's Municipal Code to implement the General Plan 2045. Alternative 2 would be similar to the Project but would result in greater amounts of mixed-use development throughout the city on corridors compared to the Project. While Alternative 2 would achieve all of the objectives for the Project, Alternative 2 would not meet future needs based on the projected population and job growth to the same degree as the Project.

Alternative 3 – Modified Mixed Use High Designation

The Modified Mixed Use High Designation Alternative would be similar to the Project but would result in a reduction of residential units and commercial uses in the areas designated as Mixed Use High compared with the Project. Under Alternative 3, all of the proposed elements except the Land Use Element of the General Plan 2045 would remain the same as under the Project. The Modified Mixed Use High Designation Alternative is projected to result in 1,230 fewer residents compared to the Project, 970 fewer housing units, and 210 fewer jobs than the Project.

Alternative 3 would differ from the Project in that the residential densities in the Mixed Use High designation would be reduced from 100 units per acre to 80 units per acre, and the maximum floor area ratio (FAR) would decrease from 4.0 to 3.5. The areas that would have a reduced density include areas designated Mixed Use High in Fox Hills, along Sepulveda Boulevard, on Washington Boulevard in the vicinity of the Metro Station, and at Washington Boulevard and Overland Avenue. In addition, with the reduction of residences there would be a reduction in the amount of incidental commercial floor area compared with the Project.

Finding. The City rejects the Modified Mixed Use High Designation Alternative because while it would achieve all of the Project objectives, Alternative 3 would not meet future needs based on the projected population and job growth to the same degree as the Project.

Basis for Finding. The Modified Mixed Use High Designation Alternative would reduce environmental impacts related to air quality, noise, public services, recreation, transportation, and utilities and service systems, primarily as a result of its reduction of growth in comparison to the Project, but significant and unavoidable impacts would remain. The Modified Mixed Use High Designation would adopt and implement a comprehensive update to the Culver City General Plan and amendments to the City's Municipal Code to implement the General Plan 2045. Alternative 3 would be similar to the Project but would result in a reduction of residential units and commercial uses in the areas designated as Mixed Use High compared with the Project. Alternative 3 would achieve all of the objectives for the Project. However, Alternative 3 would not meet future needs based on the projected population and job growth to the same degree as the Project.

Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the "no project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. Selection of an environmentally superior alternative is based on comparison of the alternatives to determine which among the alternatives would reduce or eliminate the impacts associated with the Project to the greatest degree. The comparative impacts of the Project and the Project alternatives are summarized in Draft PEIR Table 5-2, Comparison of the Impacts of the Project and Alternatives.

Alternative 2, the Concentrated Growth Alternative, is considered the environmentally superior alternative since it would reduce the magnitude of overall impacts compared to the Project to a greater extent than Alternative 3, as it would result in less development and associated physical impacts. However, as noted above, Alternative 2 would not meet future needs based on the projected population and job growth to the same degree as the Project.

Statement of Overriding Considerations

The City Council finds on the basis of the Final PEIR and the record of proceedings in this matter that the significant and unavoidable impacts of the Project are acceptable when balanced against the benefits of the Project. This determination is based on the following factors and the substantial public, social, economic, and environmental benefits flowing from the Project as identified in the Final PEIR and the record of proceedings in the matter. Based on the analysis provided in Draft PEIR Chapter 4, Environmental Impact Analysis, implementation of the Project will result in significant impacts that cannot be feasibly mitigated with respect to air quality, cultural resources (historic), noise, and transportation.

Considering the information contained in and related to the Final PEIR, and pursuant to CEQA Guidelines Section 15092, the City Council finds that in approving the Project, it has eliminated or substantially lessened all significant and potentially significant effects of the Project on the environment where feasible as shown in these Findings. The City Council further finds that it has balanced the economic, social, technological and other benefits of the Project against the remaining unavoidable environmental risks in determining whether to approve the Project and has determined that those benefits outweigh the unavoidable risks and that those risks are acceptable. The City Council makes this statement of overriding considerations in accordance with CEQA Guidelines Section 15093 in support of approval of the Project. Specifically, in the City Council's judgment, the benefits of the Project, as proposed, outweigh the significant and unavoidable impacts, and the Project should be approved. The following provides the City Council's rationale:

California Government Code Section 65300 et seq. mandates that all counties and incorporated cities prepare a general plan that establishes policies and standards for future development, housing affordability, and resource protection. State law encourages cities to keep general plans current through regular updates. The Project includes the first comprehensive update of the Culver City General Plan. Previously, the City's various General Plan elements have been updated between 1968 and 2014. In addition, the Project includes the Zoning Code Update necessary to implement the General Plan 2045, including the 2021-2029 Housing Element that was adopted in August 2022.

The Project will result in a comprehensive General Plan consisting of 13 elements that each focus on particular issues and provide strategies for sustainable future growth and a Zoning Code that provides the mechanism to implement the General Plan 2045. The Project will guide the evolution of the land use pattern to accommodate growth through thoughtful infill development and redevelopment. The Project provides the roadmap for the city to increase the housing supply consistent with the 6th cycle Regional Housing Needs Assessment allocation and allocations through the 2045 planning horizon with a mix of housing types in an equitable manner. In addition, the Project will foster harmony between people and the environment

through continued sustainability efforts in compliance with state requirements. The General Plan 2045 establishes the course for the next two decades for the city to foster a vibrant, unique, and diverse community with a strong social and economic fabric stitched together by its arts and cultural assets, creative enterprises, high-quality services, and inclusiveness. Core values include equity and inclusion; sustainability; innovation and creativity; and compassion and community. The Project will achieve the following benefits:

- Establish a long-range vision that reflects the aspirations of the community and outlines steps to achieve this vision through its policies;
- Guide decision-making related to future development, housing, transportation, environmental quality, public services, parks, open space, and environmental justice;
- Help the City achieve compliance with applicable state and regional policies, including housing production and environmental regulations;
- Allow City departments, other public agencies, and private developers to design projects that will enhance the character of the community, preserve environmental resources, and minimize hazards; and
- Provide the basis for establishing and setting priorities for detailed plans and implementing programs, such as the zoning ordinance and future specific plans.

Attachment

Mitigation Monitoring Program

CHAPTER 4

Mitigation Monitoring Program

This Mitigation Monitoring Program (MMP), which is provided in **Table 4-1, *Mitigation Monitoring Program***, below, has been prepared pursuant to Public Resources Code (PRC) Section 21081.6, which requires a Lead Agency to adopt a “reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” In addition, Section 15097(a) of the State California Environmental Quality Act (CEQA) Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. The City of Culver City is the Lead Agency for the General Plan 2045 and Zoning Code Update. Collectively referred to as the Project.

The MMP provides the mitigation measures for the Project and the monitoring implementation responsibility for each measure. The MMP for the Project will be in place through all phases of implementation of the Project, including design, construction, and operation.

**TABLE 4-1
MITIGATION MONITORING PROGRAM FOR THE GENERAL PLAN 2045 AND ZONING CODE UPDATE**

| Mitigation Measures | Implementing Party | Monitoring Phase | Responsible Monitoring Agency |
|--|--------------------|----------------------------------|---|
| Air Quality | | | |
| <p>MM AQ-1: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District (SCAQMD) significance thresholds during construction for emissions of NOX, CO, PM10 and/or PM2.5 shall require the construction contractor to use equipment that meets the US Environmental Protection Agency (USEPA) and/or California Air Resources Board (CARB) Tier 4 Final or better Off-Road New Diesel Engine Emission Standards for construction equipment with more than 50 horsepower, unless it can be demonstrated to the Culver City Department of Building and Safety that such equipment is not available. Project sponsors should also consider including zero emissions (ZE) or zero net emissions (ZNE) technologies where appropriate and feasible or higher tier standard diesel equipment as it becomes developed and feasible. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine, as defined by CARB regulations. Prior to construction, the project engineer shall ensure that all plans for construction phases (e.g., demolition, grading) that would exceed the SCAQMD significance thresholds clearly show the requirement for USEPA and/or CARB Tier 4 or higher emissions standards for construction equipment over 50 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by the Culver City Department of Building and Safety. The construction equipment list shall state the makes, models, and numbers of construction equipment on-site. Equipment shall be properly serviced and maintained in accordance with the manufacturer’s recommendations. Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to five minutes or less in compliance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9.</p> | Project Applicant | Prior to and during construction | Culver City Planning and Development Department |
| <p>MM AQ-2: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District (SCAQMD) significance thresholds during construction for emissions of volatile organic compounds (VOCs) as a result of VOC off-gassing emissions from architectural coatings and industrial maintenance coatings shall require the construction contractor to use SCAQMD Low-VOC and/or Super Compliant VOC architectural coatings and industrial maintenance coatings such that daily volume of coatings applied would not result in emissions that exceed the SCAQMD significance threshold for VOC, unless it can be demonstrated to the City Department of Building and Safety that such coatings for a required application are not available. During construction, the construction contractor shall maintain a list of all architectural coatings and industrial maintenance coatings in use on the construction site and the daily volumes of coatings applied for verification by the Culver City Department of Building and Safety.</p> | Project Applicant | Prior to and during construction | Culver City Planning and Development Department |

| Mitigation Measures | Implementing Party | Monitoring Phase | Responsible Monitoring Agency |
|--|--------------------|--|---|
| <p>MM AQ-3: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District significance thresholds during operations shall, prior to issuance of a building permit, show on the building plans that all major appliances (dishwashers, refrigerators, clothes washers, and dryers) to be provided/installed are Energy Star– certified appliances or appliances of equivalent energy efficiency. Installation of Energy Star or equivalent appliances shall be verified by the City Department of Building and Safety prior to issuance of a certificate of occupancy.</p> | Project Applicant | Prior to issuance of a building permit | Culver City Planning and Development Department |
| <p>MM AQ-4: Applicants for new residential development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District significance thresholds during operations shall, prior to issuance of a building permit, indicate on the building plans that the feature below has been incorporated into the design of the building(s). Proper installation of these features shall be verified by the City Department of Building and Safety prior to issuance of a certificate of occupancy.</p> <ul style="list-style-type: none"> For multifamily dwellings, electric vehicle charging shall be provided as specified in Section A4.106.8.2 (Residential Voluntary Measures) of the CALGreen Code (or its successor code). | Project Applicant | Prior to issuance of a building permit | Culver City Planning and Development Department |
| <p>MM AQ-5: Applicants for new non-residential development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that exceed the South Coast Air Quality Management District significance thresholds during operations shall, prior to issuance of a building permit, indicate on the building plans that the features below have been incorporated into the design of the building(s). Proper installation of these features shall be verified by the City Department of Building and Safety prior to issuance of a certificate of occupancy.</p> <ul style="list-style-type: none"> Preferential parking for low-emitting, fuel-efficient, and carpool/van vehicles shall be provided as specified in Section A5.106.5.1 (Nonresidential Voluntary Measures) of the CALGreen Code (or its successor code). Facilities shall be installed to support future electric vehicle charging at each nonresidential building with 30 or more parking spaces. Installation shall be consistent with Section A5.106.5.3 (Nonresidential Voluntary Measures) of the CALGreen Code (or its successor code). | Project Applicant | Prior to issuance of a building permit | Culver City Planning and Development Department |

| Mitigation Measures | Implementing Party | Monitoring Phase | Responsible Monitoring Agency |
|--|--------------------|--|---|
| <p>MM AQ-6: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and are within one-quarter mile (1,320 feet) of a sensitive land use shall, prior to issuance of a building permit, submit a construction-related air quality study that evaluates potential localized project construction-related air quality impacts to the City Planning Department for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing localized significance thresholds (LST) air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the Planning Department.</p> | Project Applicant | Prior to issuance of a building permit | Culver City Planning and Development Department |
| <p>MM AQ-7: Applicants for new development projects within the City Planning Area that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and are within one-quarter mile (1,320 feet) of a sensitive land use shall, prior to issuance of a building permit, submit a construction-related air quality study that evaluates potential health risk impacts to the City Planning Department for review and approval. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing health risk impacts. If health risk impacts are determined to have the potential to exceed the SCAQMD-adopted thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning Department.</p> | Project Applicant | Prior to issuance of a building permit | Culver City Planning and Development Department |
| Biological Resources | | | |
| <p>MM BIO-1: Baseline Biological Assessment. The City shall require that applicants of proposed projects located within or adjacent to natural plant or wildlife habitat (see Figure 34, Vegetation, of the Conservation Element) provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the project area, with emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats. The impact analysis will aid in determining any direct, indirect, and cumulative biological impacts from construction and operations, as well as specific mitigation or avoidance measures necessary to offset significant impacts associated with future projects. The Biological Assessment shall include the following information:</p> <ol style="list-style-type: none"> a. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [State CEQA Guidelines, § 15125(c)]. b. A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW 2018); | Project Applicant | Prior to construction | Culver City Planning and Development Department |

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| <p>c. Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the project site and within the neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al, 2008). Adjoining habitat areas shall be included in this assessment where site activities could lead to direct or indirect impacts off-site. Habitat mapping at the alliance level will help establish baseline vegetation conditions;</p> <p>d. A complete, recent assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & Game Code, §§ 3511, 4700, 5050 and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare or threatened species (State CEQA Guidelines, § 15380); and,</p> <p>e. Identification of focused surveys for special-status plants and/or wildlife that could be directly or indirectly impacted by the project, which shall be conducted in the appropriate season prior to any habitat disturbance.</p> <p>f. Identification of any aquatic habitats such as rivers, streams, and lakes and their associated natural plant communities/habitats. This includes any culverts, ditches, storm channels that may transport water, sediment, pollutants, and discharge into rivers, streams, and lakes.</p> <p>g. Avoidance and minimization measures (such as preconstruction wildlife clearance surveys) to fully avoid and otherwise protect sensitive biological resources from Project- related construction and operational impacts shall be identified and implemented. If impacts cannot be avoided, appropriate mitigation measures to offset potential special-status species and habitat impacts shall be identified and implemented.</p> | | | |
| <p>MM BIO-2: Nesting Bird Surveys. Construction activity for individual projects occurring within the Planning Area shall take place outside of the nesting season, if feasible. If not feasible, for future development occurring between January 1 through September 15, a nesting bird and raptor survey shall be conducted within a 500-foot radius of the construction site, prior to any ground-disturbing activities (e.g., staging, mobilization, grading) as well as prior to any tree and/or vegetation removal within the Project site. The nesting bird surveys shall be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. Pre-construction surveys shall be conducted by a qualified biologist no more than 7 days prior to the beginning of any Project-related activity likely to impact raptors and migratory songbirds. If construction activities are delayed or suspended for more than 7 days during the breeding season, the surveys shall be repeated. If nesting raptors and migratory songbirds are identified, the following minimum no disturbance buffers shall be implemented: 100 feet around active passerine (perching birds and songbirds) nests, 300 feet around active raptor nests. These buffers should be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.</p> | Project Applicant | Prior to and during construction | Culver City Planning and Development Department |

| Mitigation Measures | Implementing Party | Monitoring Phase | Responsible Monitoring Agency |
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| Cultural Resources | | | |
| <p>MM CUL-1: Prior to development of individual projects that are subject to CEQA within areas that contain properties more than 45 years old, the project proponent shall retain a qualified architectural historian, defined as meeting the Secretary of the Interior’s Professional Qualification Standards for architectural history, to conduct a historic resources assessment including: a records search at the South Central Coastal Information Center or Built Environment Resources Directory (BERD) search; a review of pertinent archives, databases, and sources; a pedestrian field survey; recordation of all identified historic resources on California Department of Parks and Recreation 523 forms; and preparation of a technical report documenting the methods and results of the assessment. All identified potentially eligible historic resources will be assessed for the project’s potential to result in direct and/or indirect effects on those resources and any historic resource that may be affected shall be fully evaluated for its potential significance under national and state criteria prior to the City’s approval of project plans and publication of subsequent CEQA documents. The qualified architectural historian shall provide recommendations regarding additional work, treatment, or mitigation for affected historical resources to be implemented prior to their demolition or alteration. Impacts on historical resources shall be analyzed using CEQA thresholds to determine if a project would result in a substantial adverse change in the significance of a historical resource. If a potentially significant impact would occur, the City shall require appropriate mitigation to lessen the impact to the degree feasible.</p> | Project Applicant | Prior to construction | Culver City Planning and Development Department |
| <p>MM CUL-2: Prior to development of individual projects that are subject to CEQA review and involve ground disturbance, the project proponent shall retain a qualified archaeologist, defined as an individual meeting the Secretary of the Interior’s Professional Qualification Standards for archaeology, to conduct an archaeological resources assessment. This assessment shall include a records search at the South Central Coastal Information Center; a Sacred Lands File search at the Native American Heritage Commission; and a pedestrian field survey of the project site. If resources are identified during the assessment, then their boundaries shall be determined and they shall be evaluated for eligibility in the California Register and local register. If a resource is determined to be eligible and the Project would cause a potentially significant impact to the resource, then mitigation measures shall be prescribed to reduce impacts from the Project to that resource. An analysis regarding the Project’s potential to encounter buried resources during construction shall be conducted. If there is potential to encounter resources during construction of the Project, archaeological construction monitoring shall be prescribed as a mitigation measure. The methods and results of the archaeological assessment shall be included in a technical report that is prepared prior to the city’s approval of project plans and publication of subsequent CEQA documents.</p> | Project Applicant | Prior to construction | Culver City Planning and Development Department |

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| Geology and Soils | | | |
| <p>MM GEO-1: Prior to development of individual projects that are subject to CEQA review and involve ground disturbance, the project proponent shall retain a Qualified Paleontologist, defined as an individual meeting the Society of Vertebrate Paleontology (SVP) Standard, to conduct a site-specific paleontological resources assessment. This assessment shall include a records search at the Natural History Museum of Los Angeles County and/or other appropriate facilities, geologic map and scientific literature review, and a pedestrian field survey (if deemed appropriate by the Qualified Paleontologist). If resources are identified during the assessment, then their boundaries shall be determined and they shall be evaluated for significance pursuant to CEQA, SVP, and/or a local register. If a resource is determined to be significant and the Project would cause a potentially significant impact to the resource, then mitigation measures shall be prescribed to reduce impacts from the Project to that resource. An analysis regarding the Project's potential to encounter buried resources during construction shall be conducted. If there is potential to encounter resources during construction of the Project, paleontological construction monitoring shall be prescribed as a mitigation measure. The methods and results of the paleontological assessment shall be included in a technical report that is prepared prior to the city's approval of project plans and publication of subsequent CEQA documents.</p> | Project Applicant | Prior to and during construction | Culver City Planning and Development Department |
| Noise | | | |
| <p>MM NOI-1: Construction Noise. Applicants for new development projects within the City that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that are located within 500 feet of noise-sensitive receptors (e.g., residences, hospitals, schools) shall submit a noise study to the City Planning Department for review and approval prior to issuance of a grading or building permit. The study shall include noise-reduction measures, if necessary, to ensure project construction noise will be in compliance with the City's Noise Ordinance standards as applicable to construction (i.e., CCMC Chapter 9.07). All noise-reduction measures approved by City Planning Department shall be incorporated into appropriate construction-related plans (e.g., demolition plans, grading plans and building plans) and implemented during construction activities. Potential noise-reduction measures may include, but are not limited to, one or more of the following, as applicable to the project:</p> <ul style="list-style-type: none"> • Install temporary sound barriers for construction activities that occur adjacent to occupied noise-sensitive receptors. • Equip construction equipment with effective mufflers, soundinsulating hoods or enclosures, vibration dampers, and other Best Available Control Technology (BACT). • Limit non-essential idling of construction equipment to no more than five minutes per hour. <p>This mitigation measure shall not apply and is superseded once a Citywide noise ordinance goes into effect that establishes construction noise standards for noise-reduction measures that ensures project construction noise compliance with the Culver City Noise Ordinance standards for development projects within the City.</p> | Project Applicant | Prior to issuance of a grading or building permit | Culver City Planning and Development Department |

| Mitigation Measures | Implementing Party | Monitoring Phase | Responsible Monitoring Agency |
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| <p>MM NOI-2: Construction Vibration. Applicants for new development projects within the City that are subject to CEQA (California Environmental Quality Act) review (i.e., non-exempt projects) and that are located within 300 feet of groundborne vibration receptors and that utilize vibration-intensive construction equipment (e.g., pile drivers, jack hammers, large dozer, or vibratory rollers) shall submit a vibration impact evaluation to the City Planning Department for review and approval prior to issuance of a grading or building permit. The evaluation shall include a list of project construction equipment and the associated vibration levels and a predictive analysis of potential project vibration impacts. If construction-related vibration is determined to exceed applicable standards, project-specific measures shall be required to ensure project compliance with vibration standards. All project-specific measures approved by the City Planning Department shall be incorporated into appropriate construction-related plans (e.g., demolition plans, grading plans and building plans) and implemented during project construction. Examples of equipment vibration source-to-receptor distances at which impact evaluation should occur vary with equipment type (based on FTA reference vibration information) and are as follows:</p> <ul style="list-style-type: none"> • Jackhammer: 23 feet. • Dozer, hoe-ram, drill rig, front-end loader, tractor, or backhoe: 43 feet. • Roller (for site ground compaction or paving): 75 feet. • Impact pile-driving: 280 feet. <p>This mitigation measure shall not apply and is superseded once a Citywide groundborne vibration ordinance goes into effect that establishes construction groundborne vibration standards for vibration-reduction measures that ensures project construction groundborne vibration compliance with applicable standards for development projects within the City Planning Area.</p> | Project Applicant | Prior to issuance of a grading or building permit | Culver City Planning and Development Department |