

# ATTACHMENT NO. 2



## Culver City Tier Density and Community Benefit Density Bonuses

### Finding of Consistency

*prepared for*

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# 1 Introduction

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This document is a Finding of Consistency that evaluates the consistency between the proposed Culver City Affordable Housing Density Bonus (hereafter referred to as “Revised Density Bonus”) and the findings of the Final Culver City General Plan 2045 and Zoning Code Update Project Draft Environmental Impact Report (State Clearinghouse No. 2022030144), which was certified in July 2024 (hereafter referred to as the “Certified EIR” or “General Plan EIR”).

According to CEQA Guidelines Section 15183(a) under the California Environmental Quality Act (CEQA), additional environmental review is not required for projects “which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified,” except as might be necessary to determine whether there are project-specific significant effects.

This Finding of Consistency has been prepared pursuant to the applicable provisions of CEQA Guidelines Section 15183. It describes the Revised Density Bonus Program and compares its impacts to those identified in the Certified EIR to determine whether the Revised Density Bonus would have new or increased significant environmental impacts beyond those identified in the Certified EIR. This analysis demonstrates that the Revised Density Bonus is consistent with the Culver City General Plan 2045 and Zoning Code Update (General Plan) and with the Certified EIR.

## 1.1 Project Description

The Revised Density Bonus is a proposed amendment to the Culver City Municipal Code to update and increase the affordable housing density bonuses within the City. To achieve the goal of increasing housing supply, as directed by General Plan Housing Element Objectives 2, 3, and 4, and Land Use Element Goals LU-2, LU-2, LU-11.1, and others (see Appendix A, Applicable General Plan Programs), the City has developed a Revised Density Bonus Ordinance (Revised Density Bonus), which would improve upon and supersede the City’s existing density bonus by enhancing local incentives to encourage the production of affordable housing. The Revised Density Bonus has two components:

1. Tier Density Bonuses, which would allow increases in four tiers in the intensity of existing State bonuses based on the project’s proximity to high-quality transit corridors. This bonus is in response to General Plan Land Use Element goals LU-1.1 through 1.3, LU-1.8, LU-10.1, and Housing Element Policy 3.D. Figure 1 shows what areas in Culver City will be eligible for Tier 1, 2, 3, and 4 Density Bonuses.
2. Community Benefit Density Bonuses, which would incentivize projects to provide middle-income housing for households that are ineligible for low-income housing but cannot afford market-rate rents. These bonuses would also address the needs of multi-generational households and aim to improve the overall quality of life for residents. This bonus is in response to General Plan Land Use Element Goals LU-11.4 and Housing Element Goal 1, Policy 4.A, 4.B, 5.H, and 6.J.

In addition, the Revised Density Bonus would allow any housing development that proposes five or more units and incorporates at least one of the density bonus categories described in detail below would be eligible for a density bonus.

The Certified EIR comprehensively analyzes the potential impacts of all programs under the General Plan, concluding that impacts would be less than significant in all environmental categories except for those listed in Section 2, *Environmental Impacts*. This Finding of

Consistency (FOC) concludes that the Revised Density Bonus, as it is encompassed within the scope of the Certified EIR, is adequately addressed by the Certified EIR. Therefore, the program is consistent with the findings of the Certified EIR, and no further environmental review is required.

## 1.2 Certified EIR Background

The General Plan 2045 and Zoning Code Update Project analyzed in the Culver City General Plan and Zoning Code Update EIR (Certified EIR) applies to the entire geographic area within the boundaries of the City of Culver City.

The Culver City General Plan included an update to the City's Housing Element for the 2021-2029 planning period (hereafter referred to as the "Housing Element Update"). The Housing Element Update provides a framework for accommodating new housing at all levels of affordability in areas with access to transit, jobs, services, and open spaces during the eight-year planning period between October 2021 and October 2029. New housing units may be developed anywhere in the City where residential uses are permitted, as well as in areas that may be rezoned in the future to allow for multi-family residential and mixed-use developments of adequate density to meet State-required housing production and affordability targets.

The City originally reviewed the Culver City Housing and Safety Element Update in 2024 and prepared a Draft EIR that assessed necessary zoning changes to increase the zoned residential capacity of Culver City to accommodate the Regional Housing Needs Allocation (RHNA) of 3,341 units and meet the City's projected population growth of 21,600 residents and 11,310 households.

The public comment period for the Draft EIR was open from March 28, 2024, through May 13, 2024. During this period, the City received comment letters from public agencies and the public, addressing potential impacts on various environmental resources, including transportation (transit, walkability, access, and Vehicle Miles Traveled [VMT]), air quality, greenhouse gas emissions, biological resources, cultural and tribal cultural resources, and public utilities and services.

The Final EIR was prepared in July 2024 and consisted of:

- Comments and Responses to Comments received during the 43-day public comment period;
- Corrections or additions to the Draft EIR; and
- The Mitigation Monitoring and Reporting Program, which is included as Appendix A to this Finding of Consistency.
- The Final EIR, as referenced in this Finding of Consistency, was certified in July 2024 and is available online at: [<https://www.pictureculvercity.com/environmental-review>].
- Comparison of Existing Land Use to Proposed Land Use Evaluated in the EIR

The General Plan anticipated population growth beyond what the existing land use regulations allowed at the time. As shown in the Certified EIR, under the previous General Plan, available capacity was insufficient to accommodate the 6th cycle RHNA based on the selection of available sites using objective criteria and known conditions. The adoption of the 2045 General Plan significantly expanded opportunities for housing development in Culver City and called specifically for changes to the City's Density Bonuses to increase the supply of income-restricted housing which is addressed in the Revised Density Bonus. The Certified EIR included analysis of the impacts of this increased population growth.

## 1.3 Statement of Reasons for Exemption from Additional Environmental Review

According to CEQA guidelines, a Finding of Consistency may be prepared if a project is determined to be within the scope of the certified EIR, exempt from the conditions described in CEQA Guidelines Section 15162(a), and does not result in an addendum to the certified General Plan EIR. By adopting the Finding of Consistency, the City would be able to move a project forward without the need to conduct additional environmental analysis of potential impacts.

CEQA Guidelines Section 15162 states that “no subsequent EIR shall be prepared for that project unless the lead agency determines, on a basis of substantial evidence, that substantial changes will require major revisions of the previous EIR due to involvement of new significant environmental effects, a substantial increase in the severity of previously identified significant effects, or new information of substantial importance shows that the project will have one or more significant effects not discussed in the previous EIR.” If no additional mitigation measures are required to reduce project-specific impacts to a less than significant level, other than those required in the prior EIR, then the Section 15162 exemption applies.

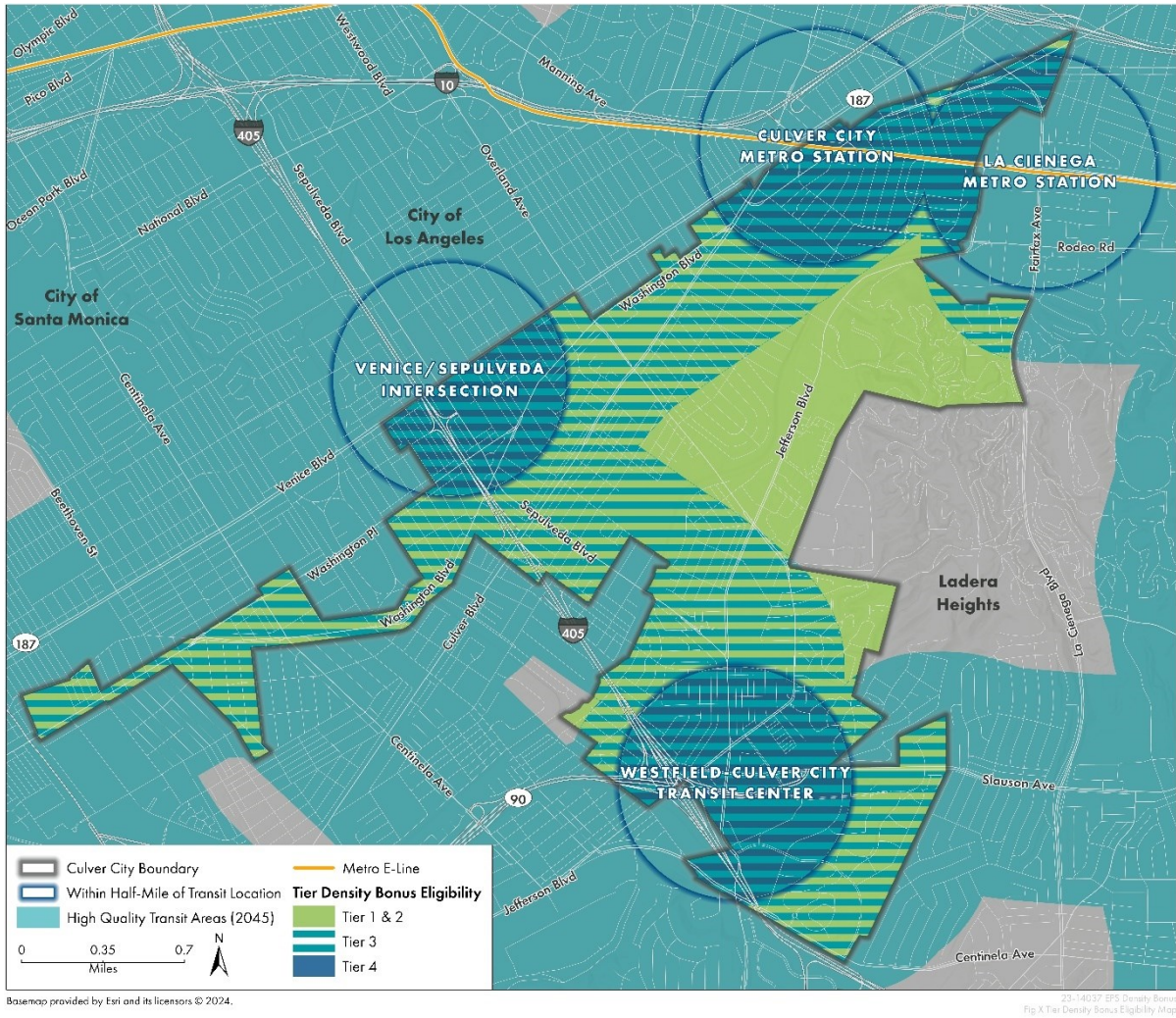
CEQA Guidelines Sections 15168 further states that if the lead agency finds a project pursuant to Section 15162 and is “consistent with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR,” then an exemption from additional environmental review can be provided (CEQA Guidelines, § 15168 [c]). The Certified EIR identified a need to adjust the zoning code to accommodate higher densities of housing, which was analyzed in the Certified EIR. Therefore, the Revised Density Bonus would be within the scope that was analyzed in the Certified EIR.

As demonstrated in Section 2, *Environmental Impacts*, of this document, there is no substantial new evidence that the Revised Density Bonus may have additional significant impacts that were not previously analyzed as significant adverse effects in the Certified EIR. Additionally, there is no substantial new evidence of potentially significant impacts or cumulative impacts not discussed in the Certified EIR. Finally, there are no previously identified significant effects, which as a result of substantial new information that were not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the Certified EIR. Therefore, a Finding of Consistency is the appropriate document to review the Revised Density Bonus’s consistency with the Certified EIR.





Figure 1 Map of Tier Density Bonuses





## 1.4 CEQA Guidelines Applicability

According to Section 15183(a), *Projects Consistent with a Community Plan or Zoning*, of the CEQA Guidelines, additional environmental review is not required for projects “which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified,” except as might be necessary to determine whether there are project-specific significant effects. Therefore, the following discussion evaluates the proposed Revised Density Bonus’s consistency with the certified General Plan 2045 and Zoning Code Update Project EIR to determine whether the Revised Density Bonus would have new or increased severity significant environmental effects beyond those identified in the Certified EIR.

## 2 Environmental Impacts

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The following discussion addresses each of the environmental issues studied in the Certified EIR to determine whether the Revised Density Bonus has the potential to create new significant impacts or a substantial increase in the significance of an identified impact as identified in the Certified EIR.

As determined in the Initial Study for the General Plan 2045 and Zoning Code Update Project (Page 4-1 of the General Plan 2045 and Zoning Code Update Project Draft EIR), the General Plan 2045 and Zoning Code Update would not result in impacts related to Agriculture and Forestry Resources. Additionally, the Certified EIR found that impacts would be Less Than Significant for Aesthetics, Energy, Greenhouse Gas, Hazards and Hazardous Materials, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, and Wildfire. As such, and because the components of the Revised Density Bonus are unchanged when compared to those previously analyzed as part of the Certified EIR, these environmental issue areas are not analyzed further in this Finding of Consistency.

The analysis in this Finding of Consistency, therefore, focuses on impacts related to Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Noise, Transportation, and Utilities and Service Systems.

The conclusions of the Certified EIR are provided as a reference to further describe how the Revised Density Bonus would not result in any new significant impacts and would not increase the severity of the significant impacts identified in the Certified EIR.

In addition, there is no substantial new evidence of potential significant impacts or cumulative impacts not discussed in the Certified EIR. In compliance with the applicable provisions of *CEQA Guidelines* Section 15183, the analysis herein demonstrates that the Revised Density Bonus and its impacts remain consistent with the Culver City General Plan 2045 and Zoning Code Update Project and with the Certified EIR. Therefore, no additional environmental documentation is required under CEQA.

### 2.1 Air Quality

#### 2.1.1 Air Quality Management Plan

Culver City coordinates with South Coast Air Quality Management District (SCAQMD) and Southern California Association of Governments (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. Growth projections for population, housing, and jobs under the General Plan and Zoning Code Update are presented in Chapter 2, Section 2.4 of the General Plan, which projects a population of 62,400 persons in 2045. This would be an increase of 21,600 persons from the 2020 population and would exceed the SCAG growth forecast of a total population of 41,600 persons in 2045.

The General Plan and Zoning Code Update also projects 28,310 households in 2045, for an increase of 11,310 households compared to the 2019 household count, which would exceed the SCAG growth forecast of a total of 18,000 households in 2045. Additionally, implementation of the General Plan and Zoning Code Update is anticipated to result in a net increase of 12,706 residential units, 2,682,400 square feet of commercial uses, and 625,700 square feet of industrial uses. The Zoning Code Update also established new zoning districts and associated development standards to correspond with and implement the General Plan within the City.

Future development would be required to comply with applicable emissions control strategies and regulations. Therefore, the operation of future development under the General Plan and Zoning Code Update would not conflict with or obstruct the implementation of the applicable air quality plan. However, the Certified EIR determined that while some of the General Plan programs would reduce emissions by implementing more efficient land use policies, the growth projections would exceed the current SCAG growth forecasts for Culver City; therefore, the Certified EIR found that impacts would be significant and mitigation measures would be required.

The Revised Density Bonus would provide additional density bonus options, but the associated population growth would not exceed the growth that was analyzed as part of the Certified EIR. Because the Proposed Program could allow for high-density development generating high construction and operation air pollutant emissions, the following Mitigation Measures (MMs) which are identified in the Certified EIR would continue to apply under the Proposed Program:

- AQ-1, which requires project construction contractor to use equipment that meets stringent emission standards set by the U.S. Environmental Protection Agency (EPA) and California Air Resources Board (CARB).
- AQ-2, which requires applicants for new development projects subject to CEQA review and exceeding SCAQMD VOC thresholds to use low-VOC or super compliant coatings.
- AQ-3, which requires applicants for new development projects exceeding SCAQMD thresholds to ensure all major appliances are Energy Star-certified or equivalent.
- AQ-4, which requires applicants for new residential development projects exceeding SCAQMD thresholds to ensure that electric vehicle charging is included.
- AQ-5, which requires applicants for new non-residential development projects exceeding SCAQMD thresholds to ensure that preferential parking for low-emitting vehicles and facilities for future electric vehicle charging are included.
- AQ-6, which requires applicants for new development projects within 1,320 feet of sensitive land uses to submit a construction-related air quality study for review.

However, potential impacts would remain significant and unavoidable. Development under the Revised Density Bonus would not result in new significant impacts related to air pollutant emissions beyond that identified in the Certified EIR nor would it increase the significance of impacts already identified in the Certified EIR. Therefore, the Revised Density Bonus would be consistent with the Certified EIR.

## 2.1.2 Air Pollutant Emissions

The Certified EIR found that the General Plan would result in a potentially significant impact related to a cumulatively considerable net increase of criteria pollutants 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 would serve to reduce the severity of the effects, the Certified EIR determined that impacts would remain significant and unavoidable.

Applicants for future projects developed under the Density Bonus would be required to comply with SCAQMD rules and regulations, and conduct CEQA analyses, if necessary, to determine significance based on individual project specifics. Additionally, future construction activities would need to comply with the California Air Resources Board (CARB) Air Toxics Control Measure. Mandatory compliance with these CARB and SCAQMD regulations would help reduce emissions during construction and operation activities.

Nonetheless, even with mandatory compliance, some future development projects may be large enough in scale and intensity that construction or operations could exceed SCAQMD significance thresholds. Therefore, construction and operation activities associated with development under the General Plan would result in a significant regional air quality impact, and mitigation measures would be necessary.

The Revised Density Bonus would provide additional density bonus options that were analyzed in the Certified EIR, so the associated population growth would not exceed the growth that was analyzed as part of the Certified EIR. Nonetheless, the Proposed Program could allow for high-density development generating high construction and operation air pollutant emissions which would also require implementation of MMs AQ-1 through AQ-3 identified in the Certified EIR would continue to apply under the Proposed Program. Potential impacts would remain significant and unavoidable; therefore, development under the Revised Density Bonus would not result in new significant impacts related to air pollutant emissions beyond that identified in the Certified EIR nor would it increase the significance of impacts already identified in the Certified EIR. Therefore, the Revised Density Bonus would be consistent with the Certified EIR.

### 2.1.3 Health Impacts and Sensitive Receptors

The Certified EIR found that development under the General Plan, which analyzed the potential impacts of additional density under the Revised Density Bonus, would result in a significant impact related to exposure of sensitive receptors to substantial pollutant concentrations during construction and operation due to localized emissions and toxic air contaminant emissions that could exceed the applicable significance thresholds. While implementation of mitigation would help to reduce the severity of the effects, the impacts would remain significant and unavoidable.

Regional emissions from future development under the Revised Density Bonus, also accounted for in the Certified EIR's analysis of additional density, may also exceed SCAQMD regulatory thresholds during construction and/or operational activities. There is also a potential for these emissions to exceed California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS), resulting in health impacts. Without knowing the exact specifications of all projects that may be developed under the Revised Density Bonus, it is not possible to accurately calculate the potential health impacts of the overall Project. As applicable, individual projects would be required to conduct their own environmental assessments to determine health impacts from their construction and operation. Since it is not possible to determine the potential for these projects to affect the health of sensitive receptors within Culver City, the Revised Density Bonus would result in a potentially significant health impact. Because of this, MMs AQ-6 and AQ-7 identified in the Certified EIR would continue to apply under the Revised Density Bonus, but potential impacts would remain significant and unavoidable. Therefore, development under the Revised Density Bonus would not result in new significant impacts related to air pollutant emissions beyond that identified in the Certified EIR nor would it increase the significance of impacts already identified in the Certified EIR. Therefore, the Revised Density Bonus would be consistent with the Certified EIR.

## 2.2 Biological Resources

### 2.2.1 Adversely Affect Candidate, Sensitive, or Special Status Species

As discussed in the Certified EIR, the vast majority of the area where development under the General Plan would occur (including the additional population analyzed under the Revised Density Bonus) is heavily developed and contains minimal biological resources. However,

fragmented, isolated swaths of coastal scrub and chaparral vegetation are present throughout portions of the Inglewood Oil Field (IOF) and Kenneth Hahn State Recreation Area. New development and improvements anticipated under the General Plan would occur within or adjacent to these areas may harm special-status species.

Additionally, the Certified EIR determined that operation of some future land uses under the General Plan could impact special-status plants and wildlife due to routine landscaping, maintenance, and habitat changes near suitable areas. Although compliance with the proposed goals and policies of the General Plan and applicable laws and regulations help to minimize impacts to special-status species, the Certified EIR recommends MM BIO-1, which requires applicants for projects near natural habitats to provide a biological assessment, and MM BIO-2: Nesting Bird Survey, which requires a biologist to survey for nests before work begins and establish buffers if needed for construction activities which take place during nesting season. These measures to ensure that impacts from the implementation of the General Plan are reduced to a less than significant level.

The Revised Density Bonus would provide additional density bonus options, the impacts of which were analyzed in the Certified EIR as part of the additional density under the Revised Density Bonus. The impacts on candidate, sensitive, or special status species would not exceed the impacts that were analyzed as part of the Certified EIR. Because of this, MM BIO-1 and BIO-2 identified in the Certified EIR would continue to apply under the Revised Density Bonus, reducing potential impacts to be less than significant. Development under the Revised Density Bonus would not result in new significant impacts related to candidate, sensitive, or special status species beyond that identified in the Certified EIR nor would it increase the significance of impacts already identified. Therefore, the Revised Density Bonus would be consistent with the Certified EIR.

### 2.2.2 Interfere with Wildlife Corridors or Wildlife Nursery Sites

As discussed in the Certified EIR, nesting birds and their habitats have been recorded within the City where the General Plan (including the additional population analyzed under the Revised Density Bonus) would be implemented. Therefore, foreseeable projects could directly or indirectly impact these biological resources. Although the highly urbanized and developed nature of the City reduces the likelihood of nesting bird occurrences, future development could still impact them if active nests are removed or birds are harassed during construction.

To mitigate these potential impacts, the Certified EIR requires implementation of MM BIO-2 and additional protective measures, such as pre-construction surveys and the avoidance of nesting birds and their habitats. This measure, along with compliance with the General Plan's goals, Zoning Code Update, and the Migratory Bird Treaty Act (MBTA), would ensure that impacts to nesting birds are reduced to a less than significant level on a project-by-project basis.

The Revised Density Bonus would provide additional density bonus options, with population impacts which were analyzed in the Certified EIR as part of the additional density under the proposed General Plan. The impacts on wildlife Corridors or wildlife nursery sites would not exceed the impacts that were analyzed as part of the Certified EIR. Because of this, MM BIO-2 identified in the Certified EIR would continue to apply under the Revised Density Bonus, reducing potential impacts to be less than significant. Development under the Revised Density Bonus would not result in new significant impacts related to wildlife corridors or wildlife nursery sites beyond that identified in the Certified EIR nor would it increase the significance of impacts already identified. Therefore, the Revised Density Bonus would be consistent with the Certified EIR.

## 2.3 Cultural Resources/Tribal Cultural Resources

### 2.3.1 Historic and Cultural Resources

Results of archival research performed for the Certified EIR determined that 204 historic resources have been previously identified from a variety of sources within the City. Culver City also has three designated historic districts and three "Landmark" structures which are also included in the National Register of Historic Resources. There are also a number of historic resources not included in the California Historical Resources Information System - South Central Coastal Information Center (CHRIS-SCCIC) or local City listings are identified in the Certified EIR.

New construction under the General Plan (including the additional population analyzed under the Revised Density Bonus) could result in adverse indirect impacts to historical resources due to substantial changes in scale within the surrounding proximity of historic properties and landscapes. These changes may cause adverse physical or visual effects on the historic setting or views of the historical resources.

However, for historic properties over 45 years in age, future development would be required to comply with all applicable requirements of the Zoning Ordinance. Additionally, the Certified EIR requires implementation of applicable MM CUL-1, which requires a qualified architectural historian to conduct a historic resources assessment prior to development in areas with properties older than 45 years old, to avoid damage and promote the preservation of historic resources. However, potential impacts would remain significant and unavoidable.

The Revised Density Bonus would provide additional density bonus options, the impacts of which were analyzed as part of the growth and development evaluated in the Certified EIR, but the associated impact on cultural resources would not exceed the growth that was analyzed as part of the Certified EIR. MM CUL-1 identified in the Certified EIR would continue to apply under the Proposed Program, but potential impacts would remain significant and unavoidable. Development under the Revised Density Bonus would not result in new significant impacts related to cultural resources beyond that identified in the Certified EIR nor would it increase the significance of impacts already identified in the Certified EIR. Therefore, the Revised Density Bonus would be consistent with the Certified EIR.

### 2.3.2 Archeological Resources

Results of the archival research conducted for the Certified EIR indicate that 18 archaeological resources have been previously identified within the City. Future development under the Revised Density Bonus (including the additional population analyzed in the Certified EIR) includes construction-related ground disturbance that have the potential to impact or cause a substantial adverse change to archaeological resources. Additionally, activities such as infill development on vacant property and through redevelopment could also result in damage to prehistoric and historic archaeological resources. Furthermore, infrastructure improvements and other activities that require ground disturbance could result in damage to or destruction of archaeological resources buried below the ground surface. Because of this, the Certified EIR requires implementation of MM CUL-2, which requires a qualified archaeologist to conduct an archaeological resources assessment, including a records search, Sacred Lands File search, and field survey, prior to development of projects subject to CEQA review involving ground disturbance. With this mitigation measure, impacts are reduced to less than significant.

The Revised Density Bonus would provide additional density bonus options, the impacts of which were evaluated as part of the growth and development analyzed in the Certified EIR, but the impacts on archaeological resources would not exceed the impacts that were analyzed as part of



the Certified EIR. Because of this, MM CUL-2 identified in the Certified EIR would continue to apply under the Revised Density Bonus, reducing potential impacts to be less than significant. Development under the Revised Density Bonus would not result in new significant impacts related to archeological resources beyond those identified in the Certified EIR nor would it increase the significance of impacts already identified. Therefore, the Revised Density Bonus would be consistent with the Certified EIR.

## 2.4 Geology and Soils

### 2.4.1 Paleontological Resources

As discussed in the Certified EIR, a records search from the Los Angeles County Museum of Natural History (LACM) indicated that four fossil localities have been recorded within Culver City, while eight other localities are located either immediately adjacent or within several miles of the city. Additional fossil localities have been identified recently within the City that were discovered during construction of private redevelopment projects. Additional paleontological resources may be present within the City that have yet to be discovered.

Future development implemented under the General Plan (including the additional population analyzed in the Certified EIR) that includes construction-related ground disturbance into previously undisturbed sediments may directly or indirectly destroy paleontological resources. However, the City would require and specify steps to be taken to avoid damage and promote preservation if unknown paleontological resources were uncovered during construction. General Plan Conservation Element Policies C-1.15 and C-1.21 would promote public knowledge and protection of paleontological resources. Furthermore, the Certified EIR requires implementation of MM GEO-1, which requires a Qualified Paleontologist to assess paleontological resources on CEQA-reviewed projects with ground disturbance. This mitigation measure serves to reduce the impacts to paleontological resources to a less-than-significant level.

The Revised Density Bonus would provide additional density bonus options, but the impacts on paleontological resources would not exceed the impacts that were analyzed as part of the Certified EIR. Because of this, MM GEO-1 identified in the Certified EIR would continue to apply under the Revised Density Bonus, reducing potential impacts to less than significant. Development under the Revised Density Bonus would not result in new significant impacts related to paleontological resources beyond those identified in the Certified EIR nor would it increase the significance of impacts already identified. Therefore, the Revised Density Bonus would be consistent with the Certified EIR.

## 2.5 Noise

As discussed in the Certified EIR, construction of future development under the General Plan (including the additional population analyzed in the Certified EIR) would require the use of heavy equipment during the demolition, grading, excavation, and other construction activities within the City.

While the details of these factors are not available for future projects, individual projects would be required to comply with the restrictions of the Culver City Municipal Code. Additionally, future development projects may be required to conduct a project-specific noise analysis in accordance with CEQA. However, even with mandatory compliance with Municipal Code requirements, some large future development projects could require heavy-duty equipment leading to noise levels that exceed significant thresholds. Because of this, two mitigation measures are required by the Certified EIR: MM NOI-1, which requires applicants for new development projects within 500 feet

of noise-sensitive receptors to submit a noise study, and MM NOI-4.12-2, which requires applicants for projects within 300 feet of vibration-sensitive receptors and utilizing vibration-intensive equipment to submit a vibration impact evaluation and implement impact-reduction measures. These mitigation measures would continue to apply under the Proposed Program. However, potential impacts would remain significant and unavoidable.

The Revised Density Bonus would provide additional density bonus options, but the associated noise impacts would not exceed the impacts analyzed as part of the Certified EIR. MM NOI-1 and MM NOI-4.12-2 identified in the Certified EIR would continue to apply under the Proposed Program, but potential impacts would remain significant and unavoidable. Therefore, development under the Revised Density Bonus would not result in new significant impacts related to noise beyond that identified in the Certified EIR nor would it increase the significance of impacts already identified in the Certified EIR. Therefore, the Revised Density Bonus would be consistent with the Certified EIR.

## 2.6 Transportation

Fehr & Peers conducted a Vehicle Miles Traveled (VMT) assessment of the entirety of Culver City including additional population analyzed for the Certified EIR. The study determined that development under the General Plan would result in a significant VMT impact if the average daily VMT per capita, daily VMT per employee, and total VMT per service population exceeds 15 percent below the corresponding City Baseline.

The Culver City General Plan includes policies to reduce traffic increases by promoting alternative transportation. These strategies aim to reduce VMT and ease traffic congestion by offering alternatives to driving, helping to limit the impact of new development on traffic levels. However, even with implementation of all goals and policies contained in the Mobility Element that would promote transit priority lanes, multimodal connectivity, integrated public transportation services, and prioritize public transit and mobility services, the proposed General Plan would not meet the 15 percent VMT reduction threshold. The Certified EIR found that there are no feasible mitigation measures available.

The Revised Density Bonus would provide additional density bonus options, the impacts of which are analyzed in the Certified EIR. The associated potential VMT impacts would not exceed the impacts analyzed as part of the Certified EIR nor would it increase the significance of impacts already identified in the Certified EIR. Therefore, the Revised Density Bonus would be consistent with the Certified EIR.

## 2.7 Utilities and Service Systems

### 2.7.1 Water Supply

The Certified EIR projects that Culver City would need to accommodate 21,612 new residents, 12,760 new housing units, 16,804 new jobs, and 3,696,800 new square feet of nonresidential building space through the 2045 horizon year. This increase in development would result in an increased demand for potable water.

The water demand projections in Golden State Water Company's (GSWC's) 2020 Urban Water Management Plan (UWMP) and Los Angeles Department of Public Work's (LADWP's) water supply projections are sufficient to meet the water demand for projects that are determined by the CEQA lead agency to be consistent with the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) by SCAG. However, the Certified EIR determined that the General Plan would result in growth and an increase in intensity above these projections and

growth under the General Plan was not specifically accounted for in LADWP's UWMP for each local water provider. Therefore, impacts would be significant, and the Certified EIR determined there were no feasible mitigation measures.

The Revised Density Bonus would provide additional density bonus options, the impacts of which are analyzed under the Certified EIR, but the associated impact on water supply would not exceed the impacts analyzed as part of the Certified EIR nor would it increase the significance of impacts already identified in the Certified EIR. Therefore, the Revised Density Bonus would be consistent with the Certified EIR.

## 2.8 Conclusion

The Revised Density Bonus Program aligns with the findings and analyses conducted in the Certified EIR. This Finding of Consistency has demonstrated that the Revised Density Bonus is consistent with the goals, policies, and mitigation measures outlined in the Certified EIR and does not introduce any new or substantially increased significant environmental impacts. As such, the project complies with CEQA Guidelines Section 15183, which exempts projects consistent with existing zoning or general plan policies from additional environmental review.

The environmental effects associated with the Revised Density Bonus, including impacts to air quality, biological resources, cultural resources, noise, and transportation, are within the scope of impacts already assessed in the Certified EIR. Moreover, the project would adhere to the mitigation measures identified in the Certified EIR to minimize potential adverse effects. Given the comprehensive nature of the environmental review undertaken in the Certified EIR, no new information or substantial changes to the project have been identified that would require further analysis under CEQA.

Therefore, it is concluded that the Revised Density Bonus is consistent with the Culver City General Plan 2045 and Zoning Code Update EIR, and no further environmental review is required for this project.

## **3 References**

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Culver City, City of. 2024. General Plan 2045. Accessed October 22, 2024:  
<https://www.culvercity.org/files/content/public/v/20/have-your-say/a.-picture-culver-city-general-plan-2045/final-general-plan-2045.pdf>

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### **List of Preparers**

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## Appendix A: Applicable General Plan Programs

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## **Applicable Housing Element Goals, Objectives, and Policies**

**Goal 1.** A city that proactively provides equitable access to safe, healthy, and affordable housing for all income levels to create a balanced jobs-to-housing ratio and commits to addressing the housing needs of persons experiencing homelessness and special needs populations.

**Goal 4.** A city that affirmatively furthers fair housing to reverse the legacy of segregation and provide housing and opportunity for historically disenfranchised groups.

**Objective 2.** Housing Supply. Expand opportunities for developing a variety of housing types.

**Policy 2.D.** Encourage the incremental infilling of residential neighborhoods to enhance housing affordability and supply through the provision of smaller units.

**Policy 2.E.** Promote programs that seek to provide housing opportunities to meet the needs of people who work in the city.

**Objective 3.** Housing Affordability. Encourage a diverse range of rental and ownership housing opportunities that are compatible with the needs of all socioeconomic segments of the community.

**Policy 3.A.** Encourage the inclusion of affordable housing units in new housing developments by granting incentives as called for by the Zoning Code and the State Density Bonus law.

**Policy 3.B.** Actively support affordable housing development by private and non-profit housing developers.

**Policy 3.D.** Explore strategies to Incentivize and reduce the costs of affordable housing production like a 100% affordable housing overlay zone, transit-oriented communities programs, and partnership funding opportunities.

**Objective 4.** Housing Access. Improve access to quality housing for all members of the community by eliminating discrimination, reducing governmental and non-governmental constraints, increasing the number of affordable housing units, and supporting access to emergency shelters.

**Policy 4.A.** Promote efforts aimed at the development of housing available to all income and age levels.

**Policy 4.B.** Promote housing opportunities for households of all income levels to help maintain the family-oriented character of the city into the future.

**Policy 5.H.** Encourage a regional fair share approach to providing housing opportunities and assistance to households with special needs, those experiencing homelessness, and extremely low-, very low-, and low-income households.

**Objective 6.** Housing Production Accountability. Monitor rental and ownership housing production effectiveness throughout the planning period and adjust as necessary to meet projected needs.

**Policy 6.D.** Facilitate a balanced jobs to housing ratio citywide.

**Policy 6.J.** Develop objective design standards for residential and mixed use projects to add certainty to the permitting process, promote quality development that maximizes the benefit of nearby amenities and minimizes exposure to features that may result in negative health or environmental impacts, apply universal design principles, promote complete neighborhoods with amenities like open space, and ensure seamless transitions between single-family and multi-family development, commercial and residential development, and industrial and residential development.

## **Applicable Land Use Element Goals, Objectives, and Policies**

**Goal LU-1.** Transit-oriented communities. Transit-oriented communities within a half mile of high-quality transit mix well-designed development, affordable housing, community services, and improved mobility options.

**LU-1.1.** Higher densities near transit. Allow higher residential density and intensity in mixed use developments to support walkability and transit use.

**LU-1.2.** Mix of uses. Encourage more mixed use and affordable housing to support a regional jobs and housing balance, to promote walk-to-work options, and to incorporate public- and neighborhood-serving uses.

**LU-1.3.** Development near transit stations. Incentivize jobs and housing growth around high-quality transit stops and along transit corridors to reduce reliance on personal automobiles. Incentivize affordable housing as standalone projects and mixed-income projects within transit-oriented communities.

**LU-1.8.** Development standards near transit stations. Allow relaxed development standards within half mile of high-quality transit, such as reduced setbacks and greater building height.

**Goal LU-2.** Housing opportunity and equality. A diverse range of housing options create equitable opportunity for people of all ages, races/ethnicities, abilities, socio-economic status, genders, and family types to live in Culver City.

**LU-2.1.** Inclusionary housing provisions. Expand the City's Mixed Use Ordinance incentive program to all mixed use and multifamily residential General Plan Land Use Designations and Zoning Districts.

**LU-2.3.** Workforce housing program. Partner with large employers, residential developers, and/or the Culver City Unified School District to create housing opportunities via the development of housing units, contribution of land, or provision of funding for workforce housing.

**LU-4.1.** Height limitations. Study increasing the height limit in certain areas of the city to support housing, affordable housing, and publicly accessible open space provision. Study the introduction of additional development standards that provide clear guidance of bulk and massing controls. Standards could include floor plate limits, maximum façade lengths, step backs, or similar.

**LU-10.1.** La Cienega and Jefferson transit-oriented community. Encourage connected, high-density, mixed use development within a half mile of the La Cienega and Jefferson Metro Station.

**LU-11.1.** Affordable and workforce housing. Actively facilitate adding affordable and workforce housing in all Culver City neighborhoods equitably.

**LU-11.4.** Multi-generational housing. Encourage development of housing that supports multi-generational households and opportunities to age in place.

**LU-11.5.** Housing for all needs. Facilitate housing for seniors, special needs groups, including the developmentally disabled, and non-traditional family groups by requiring a diverse range of housing configurations that are Americans with Disabilities Act compliant and flexible.

**LU-11.6.** Commercial uses in residential neighborhoods. Allow limited neighborhood-supportive retail and service uses in existing residential neighborhoods on collector and arterial street types to promote complete, walkable neighborhoods.

**Goal LU-13.** Neighborhood multifamily areas. Well-designed neighborhood multifamily areas that provide opportunities for social gathering and amenities for residents in Tellefson Park, Downtown, and West Washington.

**LU-13.1.** Multifamily housing. Encourage multifamily housing development within neighborhoods designated for higher-density residential.

**LU-13.4.** Housing for all needs. Facilitate housing for seniors, special needs groups, including the developmentally disabled, and non-traditional family groups by requiring a diverse range of housing configurations that are Americans with Disabilities Act compliant and flexible.