

the business community by bringing employees and visitors into the area that will patronize local stores, restaurants and hotels.

- d) The Project will encourage by example sustainable design features and environment-friendly green building practices through the use of a number of technological innovations and an effort to obtain certification as a green building Project from the United States Green Building Council (USGBC) through its Leadership in Energy and Environmental Design (LEED) rating system. Culver City has begun the process of developing a Sustainable Community Plan (SCP) in support of strategies that help to improve or mitigate damage to the environment. This Project implements a number of sustainable design features for more efficient energy use and reduction of greenhouse gas emissions.
- e) The Project will provide the City with needed improvements and upgrades to transportation infrastructure, including ATCS upgrades, street widening, restriping, and signal modification at several intersections. In addition, the Project will contribute a pro-rata share of 4.4 percent (\$23,100) for the improvement cost for the La Cienega Boulevard Southbound ramps intersection and 4.6 percent (\$55,200) for the improvement cost for the northbound ramps intersection. A TDM plan flexible enough to encourage innovation serving future developments will be implemented.
- f) The Project will provide the City and the Redevelopment Agency with a significant increase in tax revenue from the use of what is now property underutilized as a parking lot. The Project is estimated to increase annual tax revenue to the City by approximately \$825,000 and annual revenue to the CCRA by approximately \$1,043,000, of which \$261,000 would be dedicated to affordable housing.
- g) The Project will improve the appearance of the Project Site by making significant improvements in landscaping, including a row of trees along the Centinela Boulevard frontage. The Project will also create an architecturally distinctive building that will utilize its location at the intersection of the 405 Freeway and major thoroughfares to create a gateway for the area. The Project will also create a pedestrian scale environment and linkage between the office building and the existing hotel complex through improved walkway and traffic intersections.
- h) The Project will create new construction jobs during a time when many are suggesting that the construction industry is or will be experiencing a slowing rate of growth.

3. The Project benefits outweigh the unavoidable impacts as follows:

- a) Traffic: Although the Project will generate significant and unavoidable long-term traffic impacts during Project operation, these impacts, remaining after imposition of all feasible mitigation measures, are outweighed by the Project benefits discussed above.
 - i) Traffic levels on many of the streets within the Project study area are already high in their existing conditions. The Project Site is located near other major office locations and is near existing transportation infrastructure, including the 405 Freeway, and several bus lines. The

- Project will provide needed roadway improvements, including but not limited to numerous intersection improvements involving restriping, road-widening, median modification, and other improvements and upgrades to the ATCS in the area. Neither the location, nor the physical characteristics of the Project Site, nor the Project's design creates more traffic trips or more traffic congestion than would be created if the Project were proposed in a different location or if several smaller Projects equaling the same rentable area were located in different locations.
- ii) The Project will implement a Transportation Demand Management (TDM) plan that will be flexible enough to encourage innovation from which other Projects can benefit, while making significant gains in trip reduction. The TDM is expected to reduce Project trips by at least 10 percent during peak a.m. and peak p.m. times.
- b) Air Quality: Regional emissions of NOx would exceed the regional threshold and result in a significant impact. This impact, remaining after imposition of all feasible mitigation measures, is outweighed by the Project benefits, listed above.
- i) The design of the building and its orientation are intended to enhance the use of natural light and reduce energy consumption and associated emissions. Furthermore, outdoor areas shall utilize energy efficient light and mechanical, computerized or photo-cell switching devices to reduce unnecessary energy usage.
- ii) The Project implements the South Coast Air Quality Management District's objective of reducing vehicle miles traveled (VMT) and related vehicular air emissions.
- iii) The Project will implement a construction traffic management plan and several effective mitigation measures to reduce or mitigate impacts in the short run from construction.
- iv) While regional emissions of NOx are significant and cannot be fully mitigated, regional emissions resulting from the operation of the Project will not exceed the thresholds for VOC, CO, SOx, PM10, PM2.5. Similarly, the Project will not cause any new or exacerbate any existing CO hotspots; as a result, impacts related to localized mobile-source CO emissions will be less than significant.
- c) Cultural Resources/Archaeological Resources: Given the excavation proposed and the high sensitivity for encountering archaeological resources in the area, the Project has the potential to result in a significant cumulative impact on archaeological resources. These impacts, remaining after imposition of all feasible mitigation measures, are outweighed by the Project benefits, discussed above.
- i) The mitigation measures contained in the Final EIR for the Project appropriately balance the need to preserve and value the archaeological resources with the Project objectives and development within this area. In part, the mitigation measures will provide for the appointment of a qualified archaeologist and a Native American monitor, to prevent accidental destruction of cultural or archaeological resources during

1 ground disturbing activities at the Project Site. All work must stop in the
2 vicinity of any find until that find is evaluated. All cultural resources
3 unearthed must be evaluated by the archaeologist, and if an artifact is
4 prehistoric or Native American in nature, a consultation with the Native
5 American monitor is necessary. The City will also be involved, along
6 with the applicant, with the creation of appropriate treatment plans for
7 any archaeological resources discovered. Likewise, mitigation has been
8 provided in the unlikely event that human remains are found.

9 d) Noise: Although the Project will create short-term Project and cumulative noise
10 impacts during construction, these impacts, remaining after imposition of all
11 feasible mitigation measures, are outweighed by the Project benefits, discussed
12 above.

13 i) The Project's unavoidable significant construction noise impacts will be
14 short-term, and many will be intermittent rather than constant. The
15 Project will comply with the most restrictive of the combined LAMC and
16 CCMC time limitations on construction activity. With compliance with the
17 City's noise ordinances and imposition of mitigation measures,
18 construction noise levels will be reduced to the extent feasible.

19 e) The Project represents an orderly progression of development that will aid in
20 implementing the region's growth policies. The proposed use(s) is compatible
21 with existing uses in the area. The proposed use also implements development
22 anticipated by the Culver City Redevelopment Agency Plan and provides
23 densities appropriate to this area of the City while preserving environmental
24 resources. The Project was proposed in response to demands for office space
25 in the City and in the area, and incorporates all feasible mitigation to reduce its
26 impacts on the environment. If the Project were not approved or were
27 approved at a lower density, the office space that it provides would likely still be
28 needed in some other part of the City and/or the surrounding areas to help
29 meet Projected local and regional growth. Placing an office tower on the
30 Project Site which is currently a parking lot devoted to commercial purposes
31 and adjacent to another tall structure, however, centralizes the office facilities in
32 a location already served by existing transportation infrastructure and located
33 near residential areas, likely preserving other land for open space, affordable
34 housing, and other purposes.

35 4. In compliance with CPRC §21081 and CEQA Guidelines §15093, the Planning
36 Commission has considered the Project benefits as balanced against its unavoidable
37 adverse environmental effects and hereby determines that the benefits outweigh the
38 unavoidable adverse environmental effects; therefore, the Planning Commission
39 determines that the unavoidable adverse environmental effects are considered
40 acceptable.

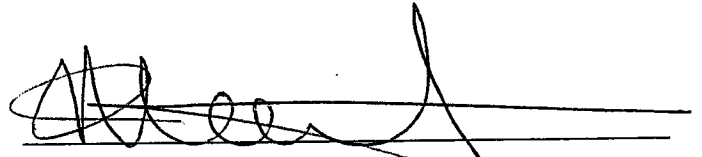
41 5. The Planning Commission hereby adopts the Project MMRP and the Statement of
42 Overriding Considerations (SOC), as set forth in this Resolution No. 2008-P003.

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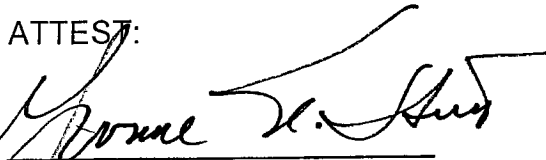
- 2 6. By the adoption of this Resolution No. 2008-P003, the Planning Commission is
3 adopting an SOC that identifies the benefits of the Project as balanced against its
4 unavoidable environmental risks, but has not granted any approval or entitlement on
5 this Project.

6 APPROVED and ADOPTED this 27th day of February, 2008.

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8 

9
10 MARCUS TIGGS, CHAIRPERSON
11 PLANNING COMMISSION
12 CITY OF CULVER CITY, CALIFORNIA

13 ATTEST:

14 
15 YVONNE HUNT
16 ADMINISTRATIVE SECRETARY

17 APPROVED AS TO FORM:

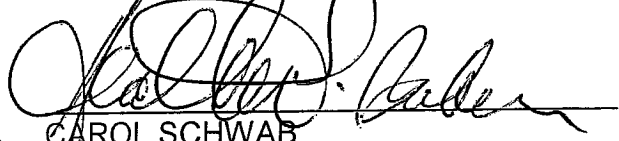
18 
19 CAROL SCHWAB
20 CITY ATTORNEY
21 for

EXHIBIT "A"

FINDINGS REQUIRED BY CEQA

Pursuant to California Public Resources Code (CPRC) §21081 and CEQA Guidelines, Title 14 Cal. Code Regs. ("CEQA Guidelines") §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 avoid or substantially lessen the significant environmental effect as identified in the Final EIR (hereinafter, "CEQA Finding 1").
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 (hereinafter, "CEQA Finding 2").
3. Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the EIR (hereinafter, "CEQA Finding 3").

For those significant effects that cannot be mitigated to a level below significance, the public agency is required to find that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.

All Final EIR mitigation measures, as discussed below and as set forth in the Project Mitigation Monitoring and Reporting Program (MMRP) (Exhibit "B" to this Resolution No. 2008-P003) are incorporated by reference into these findings. In addition, the Project revisions and Statement of Overriding Considerations set forth above in this Resolution are incorporated by reference into these findings. In accordance with the provisions of CEQA (CPRC §§21000, et seq.) and the CEQA Guidelines, the Planning Commission adopts these findings as part of its certification of the Final EIR and adoption of a Statement of Overriding Considerations for the Project.

SECTION 1

UNAVOIDABLE SIGNIFICANT IMPACTS THAT CANNOT BE MITIGATED TO A LESS THAN SIGNIFICANT LEVEL

The Planning Commission has determined that, although Project design, modifications to the Project as originally proposed, EIR mitigation and conditions of approval imposed on the Project will either avoid or provide substantial mitigation of the Project's identified

significant environmental effects, the following environmental effects cannot be feasibly mitigated to a level of insignificance. Consequently, in accordance with CEQA Guidelines §15093, a Statement of Overriding Considerations (SOC) has been prepared to substantiate the City's decision to accept these unavoidable significant effects when balanced against the significant benefits afforded by the Project.

This Section sets forth the significant unavoidable effects of the Project and, with respect to each significant impact, identifies one or more of the required CEQA findings, states facts in support of these findings, and refers to the SOC.

1.1 AIR QUALITY

1.1.1 SIGNIFICANT EFFECTS. Using the South Coast Air Quality Management District's emissions thresholds, the EIR concluded implementation of the Project would generate significant and unavoidable operational emissions of oxides of nitrogen (NOx) that would exceed the regional threshold and result in a significant and unavoidable impact.

1.1.2 FINDINGS. The City adopts CEQA Findings 1 and 3.

1.1.3 FACTS IN SUPPORT OF FINDINGS. The following facts, together with Mitigation Measures B-1 through B-6 and H-7 indicate that the significant effects of the Project have been reduced or avoided to the extent feasible, but that certain significant impacts on air quality remain and are unavoidable.

The Project would not result in operational, regional, or localized emissions of CO, SOx, PM10, and PM2.5 that exceed the SCAQMD significance thresholds. Thus, impacts are concluded to be less than significant for these pollutants. However, regional NOx emissions would exceed the SCAQMD daily emission threshold. The vast majority of NOx emissions are from vehicular exhaust and all feasible traffic mitigation measures are being required to improve traffic circulation and reduce the number of vehicular trips generated by the Project. Specifically, mitigation measure H-7 requires the applicant to implement a Transportation Demand Management (the "TDM") plan that reduces Project trips by at least 10%. With incorporation of this mitigation measure, mobile source emissions would be reduced by approximately 5 pounds per day.

The Project would be designed and built in accordance with the criteria of the Leadership in Energy and Environmental Design ("LEED") program and will obtain LEED Certification. Performance criteria for LEED include improving operational energy efficiency and reducing Vehicle Miles Traveled ("VMT"). While these measures would certainly reduce energy use of the Project Site and would have a proportional decrease and result in stationary source emissions, it is difficult to quantify the actual reduction in emissions.

1 The Project has been designed to implement applicable SCAG land use
2 policies (Culver City has not adopted guidelines specific to air quality). With regard to
3 land use developments, such as the Project, air quality policies focus on the reduction
4 of vehicle trips and VMT. The Project, by virtue of its location and design, exhibits
5 many attributes that have a positive direct and indirect benefit with regard to the
6 reduction of vehicle trips and vehicles miles traveled. Specifically, the Project
7 develops approximately 342,000 square feet of office space in the Culver City and
8 Westchester community areas in an existing urbanized mixed-use district. As an infill
9 development, population to support new jobs created by the Project is expected to be
10 generated to a large degree from existing residents in the Los Angeles, Culver City,
11 and South Bay areas, including the nearby Playa Vista development. Furthermore,
12 the mixed-use nature of the surrounding area would allow for reductions in vehicle
13 miles traveled associated with the Project with employees and visitors having access
14 to nearby restaurants, retail, and entertainment uses such as those located in Howard
15 Hughes Center and the Fox Hills Mall. The Project would also concentrate
16 development in proximity to mass transit and LAX, which would also translate into
17 reductions in vehicle trips and VMT for employees and others visiting the site for
18 business. A TDM is being proposed to address traffic impacts and reduce VMT, as
19 further described in Section III.H of the Draft EIR, Transportation and Circulation. As
20 the Project implements the SCAQMD's objective of reducing VMT and their related
21 vehicular air emissions, it would be consistent with AQMP land use policy.

22 The Project represents an investment in redevelopment of an underutilized
23 property with existing public infrastructure that is in proximity to other services and
24 land uses (e.g., retail, restaurants, and entertainment uses). The Project makes better
25 use of existing facilities (including the existing hotel and conference center), and in so
26 doing supports the sustainability of the community, all of which are desirable
27 relationships from the perspective of promoting air quality policies. Since the Project
28 implements the SCAQMD's objective of reducing VMT and related vehicular air
29 emissions, the Project would be consistent with AQMP land use policy.

30 While development of the Project would result in short-term regional NOx
31 impacts, the development would not have a long-term impact on the region's ability to
32 meet State and federal air quality standards. The Project has been designed to
33 comply with SCAQMD Rule 403 and to implement all feasible mitigation measures for
34 control of PM10 and PM2.5 emissions. In addition, the Project has incorporated the
35 goals and policies of the AQMP for control of fugitive dust. The Project requirement to
36 implement a TDM program that would reduce VMT reduces associated air emissions.
37 The Project's long-term influence would be consistent with the goals and policies of
38 the SCAQMD's AQMP.

39 No feasible mitigation measures beyond those identified above are available to
40 reduce the Project's significant and unavoidable regional operations emissions to a
41 less than significant level. Although emissions are conservatively estimated and
42 expected to be lower in practice, regional NOx impacts are considered significant and
43 unavoidable. For the reasons stated here and in the SOC, the remaining unavoidable

significant impact on air quality is outweighed by the Project benefits and is acceptable when balanced against the specific overriding economic, legal, social, technological, or other considerations.

1.2 NOISE

1.2.1 SIGNIFICANT EFFECTS. As the EIR concluded, implementation of the Project would generate significant and unavoidable temporary Project construction noise impacts.

1.2.2 FINDINGS. The City adopts CEQA Findings 1 and 3.

1.2.3 FACTS IN SUPPORT OF FINDINGS. The following facts, together with Mitigation Measures F-1 through F-5 indicate that the significant effects of the Project have been reduced or avoided to the extent feasible, but that certain significant impacts to temporary construction noise impacts remain and are unavoidable.

Noise impacts from construction activities occurring on the Project Site would be a function of the noise generated by construction equipment, equipment location, and the timing and duration of the noise generating activities. During the construction period, the impact will be significantly greater in the unlikely event that pile-driving equipment is needed.

Compliance with the recommended Mitigation Measures would reduce construction noise levels to the greatest extent feasible. Mitigation Measure F-1 would preclude construction-period noise impacts from occurring during the noise sensitive night time periods, or at any time on Sundays to comply with both Culver City and City of Los Angeles noise ordinances. Noise level reductions attributable to mitigation measures F-2 through F-4, although not easily quantifiable, would ensure the noise impacts associated with construction activities would be reduced to the extent practicable. Nonetheless, Project construction activities would intermittently increase daytime noise levels at the noise sensitive receptors, such as the residential uses west of the Project Site during the site demolition stage and initial stages of site grading/excavation activities above the significance thresholds. In the unlikely event pile-driving is used, Mitigation Measure F-5 would provide a minimum 10 dBA noise reduction, which is a significant decrease and would reduce noise associated with pile-driving at some, but not all, noise receptors to below the Project significant threshold. As such, even with all feasible mitigation, temporary noise impacts associated with construction are considered significant and unavoidable, at the Project level.

No feasible mitigation measures beyond those identified above are available to reduce the Projects significant and unavoidable Project construction noise impacts to less than a significant level. For the reasons stated here and in the SOC, the remaining unavoidable significant impact on noise impacts is outweighed by the

Project benefits and is acceptable when balanced against the specific overriding economic, legal, social, technological, or other considerations.

1.3 TRAFFIC

1.3.1 SIGNIFICANT EFFECTS. As the EIR concluded, construction of the Project would create significant and unavoidable impacts on traffic and implementation of the Project would create significant and unavoidable operational impacts at the intersection of Howard Hughes Parkway and Sepulveda Boulevard.

1.3.2 FINDINGS. The City adopts CEQA Findings 1 and 3.

1.3.3 FACTS IN SUPPORT OF FINDINGS. The following facts, together with Mitigation Measures H-1 through H-6, indicate that the significant Project construction impacts have been reduced or avoided to the extent feasible, but that certain significant impacts remain and are unavoidable. Construction traffic, including haul truck traffic, concrete and other delivery truck traffic, and construction worker trips would result in significant and unavoidable impacts. The Mitigation Measures avoid substantial inconvenience to motorists, pedestrians, and businesses in the vicinity during construction activities. Nevertheless, because construction workers and the importing/exporting of construction materials would increase the amount of trips during peak hours causing congestion, there is a significant temporary construction traffic impact.

The following facts, together with Mitigation Measures H-1 through H-15, indicate that the significant operational traffic impacts on the intersection of Howard Hughes Parkway and Sepulveda Boulevard have been reduced or avoided to the extent feasible, but that certain significant impacts on that intersection remain and are unavoidable.

Mitigation Measure H-7 requires the implementation of a TDM Plan that reduces Project trips by at least 10 percent during the AM and PM peak hours and Mitigation Measure H-15 mandates a traffic signal upgrade to the Adaptive Traffic Control System ("ATCS") in the area, which will allow an approximate three percent increase in capacity to be realized at this intersection.

These mitigation measures reduce the PM peak-hour impact at the intersection of Howard Hughes Parkway and Sepulveda Boulevard to less than significant, but would not reduce the AM peak-hour impact to less than significant. In order to mitigate the AM peak-hour impact, a fourth northbound through travel lane of meaningful length would have to be provided along the Sepulveda Boulevard south leg. Such an improvement cannot be provided by restriping, or by roadway widening, due to right-of-way constraints on the south leg of Sepulveda Boulevard.

1 As the Final EIR concluded, it is infeasible to adopt a TDM Plan that could be
2 implemented that would achieve a trip reduction that would lessen the impacts at this
3 intersection to less than significant.

4 No feasible mitigation measures beyond those identified above are available to
5 reduce the Project's significant and unavoidable to less than a significant level. For
6 the reasons stated here and in the SOC, the remaining unavoidable significant impact
7 on traffic impacts is outweighed by the Project benefits and is acceptable when
8 balanced against the specific overriding economic, legal, social, technological, or other
9 considerations.

10 **SECTION 2**

11 **ENVIRONMENTAL IMPACTS THAT HAVE BEEN MITIGATED**

12 **TO A LEVEL LESS THAN SIGNIFICANT LEVEL**

13 The Planning Commission has determined that, where the EIR found the Project
14 would have potentially significant Project-level effects, Project revisions, mitigation measures
15 and conditions of approval will substantially mitigate those environmental effects, and that, as
16 a result, those effects have been mitigated to a level less than significant, as follows.

17 This section sets forth the Project's potentially significant effects, and with respect to
18 each such impact, identifies one or more of the required CEQA findings and states facts in
19 support of these findings.

20 **2.1 AESTHETICS/VISUAL IMPACTS**

21 **2.1.1 SIGNIFICANT EFFECTS.** As the EIR concluded, construction of the
22 Project would result in significant construction impacts on visual quality, but this impact
23 can be mitigated to a level that is less than significant. During construction, the visual
24 quality of the Project Site would be degraded by the removal of mature landscaping,
25 stored equipment and materials and has the potential to adversely affect view to the
26 Project Site from adjacent and other nearby areas.

27 **2.1.2 FINDINGS.** The City adopts CEQA Finding 1.

28 **2.1.3 FACTS IN SUPPORT OF FINDINGS.** The implementation of Mitigation
29 Measure A-1 will mitigate any potentially significant visual quality impacts caused by
the construction of the Project to a less than significant level.

Construction of the Project would require demolition of the existing surface
parking lot, removal of approximately 69 mature trees, and relocation of the existing
signalized intersection with the Radisson Hotel entrance driveway. The location of
heavy equipment and activities such as excavation, grading, trucking, and other
general construction activity may present an unpleasant appearance to some viewers
and would contrast with the visual character of the area. Construction activities would

1 comply with the Culver City Municipal Code and would be fenced for security
2 purposes. However, during construction the visual quality of the Project Site would be
3 degraded by the removal of mature landscaping, stored equipment and materials and,
4 as such, has the potential to adversely affect views to the Project Site from adjacent
5 and other nearby areas.

6 Mitigation Measure A-1 mandates that the applicant ensure, through
7 appropriate posting and daily visual inspections, that any materials not authorized by
8 the City be promptly removed from temporary construction barriers or temporary
9 pedestrian walkways, and that such temporary barriers and walkways be maintained
10 in a visually attractive manner throughout the construction period.

11 Implementation of this mitigation measure will reduce any potentially significant
12 visual quality impacts, such as possible graffiti, uncollected trash and vandalism to a
13 less than significant level by ensuring that unauthorized materials are removed and
14 construction barriers and walkways are kept aesthetically attractive.

15 **2.2 AIR QUALITY**

16 **2.2.1 SIGNIFICANT EFFECTS.** As the EIR concluded, the regional
17 construction emissions resulting from the Project would result in a significant short-
18 term impact due to NOx emissions, but those impacts will be mitigated to a less than
19 significant level.

20 **2.2.2 FINDINGS.** The City adopts CEQA Finding 1.

21 **2.2.3 FACTS IN SUPPORT OF FINDINGS.** According to information
22 contained in the EIR, construction of the Project has the potential to create air quality
23 impacts through the use of heavy-duty construction equipment, through heavy-duty
24 trucks hauling dirt and debris from the Project Site, and through vehicle trips
25 generated from construction workers traveling to and from the Project Site. In
26 addition, fugitive dust emissions would result from demolition, excavation, and
27 construction activities. Mobile source emissions, primarily NOx, would result from the
28 use of construction equipment such as dozers, loaders, and cranes. During the
29 finishing phase, paving operations and the application of architectural coatings such
as paints and other building materials would release volatile organic compounds.
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.

Construction-related daily maximum regional construction emissions would
exceed the SCAQMD daily significance thresholds for NOx during excavation activities
as a result of heavy use of heavy-duty construction equipment. Therefore, regional
construction emissions resulting from the Project would result in a significant short-
term impact due to NOX emissions.

1 The Project would implement a number of mitigation measures, including
2 Mitigation Measures B-1 through B-5, reducing emissions of all air pollutants analyzed
3 in the EIR. Mitigation Measure B-1 requires general contractors to use diesel
4 oxidation catalysts or equivalent control devices on all on-site heavy-duty construction
5 equipment during excavation activities. Mitigation Measure B-2 requires all
6 construction equipment be properly tuned and maintained in accordance with
7 manufacturer's specifications. Mitigation Measure B-3 requires general contractors to
8 maintain and operate construction equipment so as to minimize exhaust emissions.
9 During construction, trucks and vehicles in loading and unloading queues should turn
10 their engines off when not in use to reduce vehicle emissions. Construction emissions
11 should be phased and scheduled to avoid emissions peaks and discontinued during
12 second-stage smog alerts. Mitigation Measure B-4 requires electricity from power
13 poles rather than temporary diesel- or gasoline-powered generators to be used to the
14 extent feasible. Mitigation Measure B-5 requires the Applicant to utilize coatings and
15 solvents that are consistent with applicable SCAQMD rules and regulations.

16 Implementation of these mitigation measures will reduce any potentially
17 significant regional construction emissions resulting from the Project to a less than
18 significant level.

19 **2.3 TRAFFIC**

20 **2.3.1 SIGNIFICANT EFFECTS.** As the EIR concludes, construction of the
21 Project would generate potentially significant Project parking impacts, but
22 implementation of mitigation measures will mitigate those impacts to a level that is
23 less than significant or not significant. In addition, the Project would result in
24 significant traffic impacts at 12 study intersections, but implementation of mitigation
25 measures will mitigate impacts to the following 11 intersections to less than significant
26 or not significant:

- 27 • Slauson Avenue and Corning Avenue;
- 28 • Slauson Avenue and La Cienega Boulevard Southbound Ramps;
- 29 • Jefferson Boulevard and Mesmer Avenue;
- Jefferson Boulevard and Inglewood Boulevard;
- Centinela Avenue and Sepulveda Boulevard;
- Centinela Avenue and Sherbourne Drive;
- Centinela Avenue and Alvern Street;
- Centinela Avenue and La Tijera Boulevard;
- Centinela Avenue and La Cienega Boulevard;
- 76th Street-77th Street and Sepulveda Boulevard; and
- Manchester Avenue and Sepulveda Boulevard.

30 **2.3.2 FINDINGS.** The City adopts CEQA Finding 1.

31 **2.3.3 FACTS IN SUPPORT OF FINDINGS.** The review and approval of a
32 Construction Replacement Parking Plan will reduce any construction related parking

1 impacts to less than significant, and with implementation of a TDM Plan and
2 intersection specific Mitigation Measures H-8 through H-15, 11 of the 12 intersections
3 significantly impacted by the Project will be reduced to a less than significant level.

4 The parking impacts caused by construction of the Project and identified in the
5 EIR will be mitigated to below a level of significance with adopted Mitigation Measure
6 H-6. The existing hotel and conference center has a variable demand for parking but
7 the peak demand is approximately 386 spaces. It is contemplated that parking for
8 hotel and conference center guests, visitors, and employees would be temporarily
9 relocated off-site during the construction period and it is likely that construction
10 workers would park on-site throughout the construction period. There are an
11 estimated 700 off-site parking spaces, an amount that is more than adequate for the
12 construction parking demand, available within a half-mile radius of the Project that
13 could be leased for temporary parking. While the location and leasing of off-site
14 parking spaces has yet to be finalized, it is likely that a surface lot across the street on
15 the south side of Centinela Avenue, which is controlled by the Applicant, would be
16 used and valet-parked as necessary. Other potential parking facilities include the
17 surface lot one block to the north (Albertson's-CVS Pharmacy lot), Howard Hughes
18 Center, Playa Vista, and/or Fox Hills Mall. A shuttle service to and from the Project
19 Site would be implemented for those parking more than one-fourth mile away.
20 However, while this is the likely scenario, this parking plan has not been finalized and
21 therefore the temporary parking impacts are considered significant.

22 This significant impact is reduced to less than significant by Mitigation Measure
23 H-6, which requires that a Construction Replacement Parking Plan be prepared and
24 submitted to the Culver City Planning Division for review and approval prior to the
25 issuance of any demolition, grading or excavation permit. The purpose of the
26 Construction Replacement Parking Plan is to identify the off-site parking facilities to be
27 used and their parking space allocations that will be used for replacement parking as
28 well as Projects to be followed for safe pedestrian and vehicular movement between
29 the off-site location(s) and the Project Site. The Construction Replacement Parking
30 Plan will include parking lease agreements for the facilities not under the control of the
31 Project owner and a shuttle service plan for transporting persons parking more than
32 one-fourth mile from the Project Site.

33 The EIR indicates that the Project will cause significant impacts to the
34 intersections listed above by 2010 at either, or both, a.m. and p.m. peak hours. The
35 adoption and implementation of Mitigation Measures H-7 through H-15 will reduce
36 these impacts to a less than significant level. Mitigation Measure H-7 requires that a
37 TDM Plan, approved by the City of Culver City, to reduce Project trips by at least 10
38 percent and be implemented prior to receipt of a Certificate of Occupancy. Annual
39 reviews will be conducted to determine whether the Project is in compliance with the
40 TDM Plan and, if the trip counts exceed the trip reduction level, the Applicant will have
41 one year to achieve compliance. The TDM Plan includes a penalty feature if the
42 Project does not meet the TDM Plan's requirements. Mitigation Measures H-8
43 through H-15 contain intersection specific improvements including, but not limited to,

1 restriping, payment of improvement costs, installation of additional turn lanes, and
2 traffic signal upgrades.

3 Implementation of these mitigation measures will reduce the impacts at all 11
4 intersections listed above and construction-related parking impacts to a less than
5 significant level.

6 **2.4 CULTURAL RESOURCES**

7 **2.4.1 SIGNIFICANT EFFECTS.** As the EIR concluded, implementation of the
8 Project would cause potentially significant impacts on cultural (archaeological and
9 paleontological) resources, but that mitigation measures will substantially mitigate
10 those impacts to a level that is less than significant or not significant.

11 **2.4.2 FINDINGS.** The City adopts CEQA Finding 1.

12 **2.4.3 FACTS IN SUPPORT OF FINDINGS.** Because the Project includes
13 ground-disturbing activities extending to approximately 20 feet below the modern
14 ground surface, there is potential to encounter sediments containing vertebrate fossils.
15 Given the sensitivity of the sediments for vertebrate fossils, the Project has the
16 potential to cause a significant impact on cultural resources. Implementation of
17 Mitigation Measures C-1 through C-15 will reduce to Project's potential significant
18 impacts to less than significant.

19 The EIR concludes that results from a paleontological records search indicate
20 that the Project Site is underlain by Quaternary sediments. Uppermost layers of these
21 sediments are unlikely to contain significant vertebrate fossils, but fossil localities have
22 been identified in similar deposits at slightly greater depths in the Project Site's vicinity.
23 Since these finds have occurred at multiple locations near the site, it is considered to
24 be paleontologically sensitive.

25 The proposed paleontological resource mitigation measures identified above,
26 including monitoring and established fossil recovery procedures, would reduce to a
27 less than significant level the direct, indirect, and cumulative adverse environmental
28 impacts on paleontological resources that could result from Project-related
29 construction activities. These include Mitigation Measures C-10 through C-15, which
30 protect findings by requiring a qualified, impartial paleontologist to inspect excavation
31 and grading activity in sediments five feet or more below the original ground surface.
32 The paleontological record search has determined that examination of digs without
33 five feet in depth is unnecessary. Furthermore, in the event that a fossil is found, the
34 Paleontologist will have the power to diver or redirect grading and excavation activities
35 in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage.
36 Additional further mitigation measures are provided for proper documentation of
37 fossils and other activities related to discovery of fossils at the site.

1 Additionally, it should be noted that with proper implementation of
2 paleontological resource mitigation measures, Project construction could result in
3 beneficial effects on paleontological resources through the recovery of fossil remains
4 that would not have been exposed without Project construction and, therefore, would
5 not have been available for study. The recovery of fossil remains as part of Project
6 construction could help answer important questions regarding the geographic
7 distribution, stratigraphic position, and age of fossiliferous sediments in the immediate
8 area.

9 The EIR concludes that results of the cultural resources records search
10 conducted indicate that the Project Site has not been surveyed by a qualified
11 archaeologist and no archaeological resources have been recorded with the Project
12 Site. However, four archaeological sites have been identified less than 0.25 miles
13 from the Project Site. Given the excavation proposed and the Project Site's high
14 sensitivity for encountering archaeological resources, the Proposed Project has the
15 potential to result in a significant impact on archaeological resources.

16 The proposed archaeological resource mitigation measures identified above,
17 including retaining a monitor to observe ground-disturbing activities within the Project
18 Site, would reduce to a less than significant level the direct, indirect, and cumulative
19 adverse environmental impacts on archaeological resources that could result from
20 Project-related construction activities. These include Mitigation Measures C-1 through
21 C-9, which protect findings by requiring a qualified, impartial archaeologist to inspect
22 ground-breaking activities. All cultural resources unearthed by the Project will be
23 evaluated by the archaeologist, and if the archaeologist determines that the resources
24 may be significant, then the archaeologist will notify the Applicant and the City will
25 develop and appropriate treatment plan for the resource. Additional further mitigation
26 measures are provided for proper documentation of fossils and other activities related
27 to discovery of fossils at the site.

28 Implementation of these Mitigation Measures will reduce the potential cultural
29 (archaeological and paleontological) resources impacts to a less than significant level.

30 SECTION 3 31 **CUMULATIVE IMPACTS WHICH CANNOT BE MITIGATED TO A** 32 **LESS THAN SIGNIFICANT LEVEL**

33 The Planning Commission has determined that, although modifications to the Project
34 as originally proposed, EIR mitigation and conditions of approval imposed on the Project will
35 either avoid or provide substantial mitigation of the Project's cumulative contribution to
36 identified significant cumulative environmental effects, the following environmental effects
37 cannot be feasibly mitigated to a level of insignificance. Consequently, in accordance with
38 CEQA Guidelines 15093, the SOC has been prepared to substantiate the City's decision to
39 accept these unavoidable significant cumulative effects when balanced against the
40 significant benefits afforded by the Project.

1 This section sets forth the significant unavoidable cumulative effects of the Project
2 and, with respect to each significant impact, identifies one or more of the required CEQA
3 findings, states facts in support of these findings and refers to the SOC.

3.1 AIR QUALITY

4 **3.1.1 SIGNIFICANT EFFECTS.** As the EIR concluded, Project
5 implementation would generate significant and unavoidable cumulative impacts from
6 regional NOx emissions that would result in a significant and unavoidable impact.

7 **3.1.2 FINDINGS.** The City adopts CEQA Findings 1 and 3.

8 **3.1.3 FACTS IN SUPPORT OF FINDINGS.** Using the SCAQMD's emissions
9 thresholds, the EIR concluded, implementation of the Project would generate
10 significant and unavoidable cumulative emissions of oxides of nitrogen (NOx) that
11 would exceed the regional threshold and result in a significant and unavoidable
12 impact. The determination that the impacts are significant is based on thresholds
13 contained in the SCAQMD's policy and regulatory framework, including the 2007 Air
14 Quality Management Plan (AQMP), the SCAQMD's comprehensive plan for
15 addressing the region's air condition, and the State guidelines for implementing
16 CEQA.

17 The vast majority of NOx emissions are from vehicular exhaust and all feasible
18 traffic mitigation measures are being required to improve traffic circulation and reduce
19 the number of vehicular trips generated by the Project. Specifically, mitigation
20 measure H-7 requires the applicant to implement a TDM Plan that reduces Project
21 trips by at least 10%. With incorporation of this mitigation measure, mobile source
22 emissions would be reduced by approximately 5 pounds per day.

23 The Project would be designed and built in accordance with the criteria of the
24 Leadership in Energy and Environmental Design ("LEED") program and will obtain
25 LEED Certification. Performance criteria for LEED include improving operational
26 energy efficiency and reducing VMT. While these measures would certainly reduce
27 energy use of the Project Site and would have a proportional decrease and result in
28 stationary source emissions, it is difficult to quantify the actual reduction in emissions.

29 The Project has been designed to implement applicable SCAG land use
policies (Culver City has not adopted guidelines specific to air quality). With regard to
land use developments, such as the Project, air quality policies focus on the reduction
of vehicle trips and VMT. The Project, by virtue of its location and design, exhibits
many attributes that have a positive direct and indirect benefit with regard to the
reduction of vehicle trips and vehicles miles traveled. Specifically, the Project
develops approximately 342,000 square feet of office space in the Culver City, and
Westchester community areas in an existing urbanized mixed-use district. As an infill
development, population to support new jobs created by the Project is expected to be
generated to a large degree from existing residents in the Los Angeles, Culver City

1 and South Bay areas, including the nearby Playa Vista development. Furthermore,
2 the mixed-use nature of the surrounding area would allow for reductions in vehicle
3 miles traveled associated with the Project with employees and visitors having access
4 to nearby restaurants, retail, and entertainment uses such as those located in Howard
5 Hughes Center and the Fox Hills Mall. The Project would also concentrate
6 development in proximity to mass transit and LAX, which would also translate into
7 reductions in vehicle trips and VMT for employees and others visiting the site for
8 business. A TDM Plan is being proposed to address traffic impacts and reduce VMT,
9 as further described in Section III.H of the Draft EIR, Transportation and Circulation.
10 As the Project implements the SCAQMD's objective of reducing VMT and their related
11 vehicular air emissions, it would be consistent with AQMP land use policy.

12 The Project represents an investment in redevelopment of an underutilized
13 property with existing public infrastructure that is in proximity to other services and
14 land uses (e.g., retail, restaurants, and entertainment uses). The Project makes better
15 use of existing facilities (including the existing hotel and conference center), and in so
16 doing supports the sustainability of the community, all of which are desirable
17 relationships from the perspective of promoting air quality policies. Since Project
18 implements the SCAQMD's objective of reducing VMT and related vehicular air
19 emissions, the Project would be consistent with AQMP land use policy.

20 For purposes of the cumulative air quality analysis with respect to CEQA
21 Guidelines §15064(h)(3), the Project's incremental contribution to cumulative air
22 quality impacts is determined based on compliance with the SCAQMD's adopted 2007
23 Air Quality Management Plan ("AQMP").

24 The Planning Commission finds that the Project would not conflict with or
25 obstruct implementation of the applicable air quality plan, which in this case is the
26 AQMP. A Project is deemed inconsistent with air quality plans if it results in
27 population and/or employment growth that exceeds growth estimates in the applicable
28 air quality plan. As discussed above, the Project would not result in population and/or
29 employment growth that exceeds growth estimates in the AQMP. Specifically, the
30 Project is Projected to result in an increase of approximately 1,370 full-time equivalent
31 jobs at the Project Site, or approximately 12 percent of the total job growth Projected
32 for the subregion between 2008 and 2010. Such levels of employment are within the
33 employment growth forecasts for the Westside Cities subregion as adopted by SCAG.
34 Because the SCAQMD has incorporated these same Projections into the AQMP, the
35 Project would be consistent with the Projections in the 2007 AQMP. In addition, the
36 Project would comply with all rules and regulations as implemented by the SCAQMD
37 and the CARB. Therefore, it was determined that the Project was consistent with the
38 AQMP. Thus, given the Project's consistency with the AQMP, the Project's
39 incremental contribution to cumulative air quality effects is not cumulatively
40 considerable, per CEQA Section 15064(h)(3).

1 Numerous mitigation measures, including mitigation measures B-1 through B6
2 and H-7, have been put into effect to mitigate this impact the extent feasible. These
include implementation of a traffic development plan and LEED design compliance.

3 No feasible mitigation measures beyond those identified above are available to
4 reduce the significant and unavoidable impacts to less than significant level. Although
5 emissions are conservatively estimated and expected to be lower in practice, regional
6 NOx impacts are considered cumulatively significant and unavoidable. For the
7 reasons stated here and in the SOC, the remaining unavoidable significant impact on
8 air quality is outweighed by the Project benefits and is acceptable when balanced
9 against the specific overriding economic, legal, social, technological, or other
10 considerations.

11 **3.2 CULTURAL RESOURCES**

12 **3.2.1 SIGNIFICANT EFFECTS.** As the EIR concluded, implementation of the
13 Project would cause a significant and unavoidable cumulative impact on cultural
14 resources that would result in a significant and unavoidable impact.

15 **3.2.2 FINDINGS.** The City adopts CEQA Findings 1 and 3.

16 **3.2.3 FACTS IN SUPPORT OF FINDINGS.** Given the excavation proposed
17 and the high sensitivity for encountering archaeological resources in the area, the
18 Project has the potential to result in a significant impact on archaeological resources.
19 The Project Site is currently developed and no archeological resources are known to
20 exist within the Project Site. However, while no archeological resources have been
21 recorded at the Project Site, there is no record demonstrating that any archeological
22 survey of the Project Site has ever been conducted by a qualified archeologist. The
23 Project Site is within less than .25 miles of four identified archeological sites, each of
24 which are prehistoric in age. Cumulative impacts to archeological resources will be
25 mitigated by incorporation of Mitigation Measures C-1 through C-9, but cumulative
26 impacts remain significant and unavoidable.

27 The proposed cultural resource mitigation measures, consisting of
28 archaeological and Native American monitoring and an established set of consultation
29 parties in sequence treatment plan development, would reduce to a less than
significant level the direct and cumulative impacts on cultural resources that may
result from Project related ground disturbing activities. However, in light of potentially
significant impacts associated with related projects, the Project's contribution to
impacts on cultural reserves is considered to be cumulatively considerable and a
significant and unavoidable cumulative impact.

The primary cause of the substantial and unavoidable cumulative impacts is the
location of the Project Site in relation to the 90 related projects described in the EIR.
The Project Site and the related projects are widely distributed and include areas
where archaeological resources are likely to be located.

1 The ground disturbing activities associated with the related projects may result
2 in repeated impacts on and potential loss of cultural resources with the greater Project
3 area. It is anticipated that the related projects will implement mitigation measures on a
4 case-by-case basis as determined by project specific environmental review or would
5 otherwise be required to comply with CPRC § 21084.1 and CEQA Guidelines
6 §15064.5. With implementation of mitigation measures and regulatory compliance,
7 impacts to cultural resources associated with related projects may be reduced to less
8 than significant level on a Project basis. However, collectively these Projects have the
9 potential to significantly impact, damage, or otherwise make available to future study
10 the archaeological resources of this area.

11 There are considerable mitigation measures, including Mitigation Measures C-1
12 through C-9, that reduce these unavoidable impacts to the maximum extent feasible.
13 These include, but are not limited to, retaining a qualified archaeologist and Native
14 American monitor, ceasing construction activity within the vicinity of an archaeological
15 resource after any such resource is found in developing a plan to preserve and protect
16 the resource throughout the construction process. Mitigation measures protecting and
17 preserving the rights of the descendants of occupants of burial sites have also been
18 implemented.

19 No feasible mitigation measures beyond those identified above are available to
20 reduce the cumulative impacts to less than significant level. For the reasons stated
21 here and in the SOC, the remaining unavoidable significant impact on
22 cultural/archeological resources is outweighed by the Project benefits and is
23 acceptable when balanced against the specific overriding economic, legal, social,
24 technological, or other considerations.

25 **3.3 NOISE**

26 **3.3.1 SIGNIFICANT EFFECTS.** As the EIR concluded, implementation of the
27 Project would generate significant and unavoidable cumulative construction noise
28 impacts that would result in a significant and unavoidable impact.

29 **3.3.2 FINDINGS.** The City adopts CEQA Findings 1 and 3.

3.3.3 FACTS IN SUPPORT OF FINDINGS. The following facts, together with
Mitigation Measures F-1 through F-5 indicate that the significant effects of the Project
have been reduced or avoided to the extent feasible, but that certain significant
impacts to temporary construction noise impacts remain and are unavoidable.

Related Projects located near the Project have the potential to produce
construction noise impacts. The cumulative impacts from the construction period
noise for the Project and related projects will result in a cumulatively significant impact,
but would be localized and would only affect the areas immediately adjacent to the
Project Site (within 500 feet from the construction site). Most of the related projects

are a substantial distance from the Project Site and would preclude them from contributing to cumulative construction noise. However, two related projects are within 700 feet of the Project Site.

Because the construction activities for these related projects cannot be defined and are beyond the control of the City and the applicant, any quantitative analysis that assumes multiple, concurrent construction Projects would be entirely speculative. In some instances, cumulative construction noise could exceed ambient noise levels at the nearest residences. However, those noise levels would be intermittent, temporary, and would cease at the end of the construction phase, and would comply with time restrictions and other relevant provisions in the Culver City Municipal Code and the City of Los Angeles Municipal Code. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual Project and compliance with locally adopted and enforced noise ordinances.

No feasible mitigation measures beyond those identified above are available to reduce the cumulative impacts to less than significant. For the reasons stated here and in the SOC, the remaining unavoidable significant cumulative noise impacts is outweighed by the Project benefits and is acceptable when balanced against the specific overriding economic, legal, social, technological, or other considerations.

3.4 TRAFFIC

3.4.1 SIGNIFICANT EFFECTS. As the EIR concluded, Project implementation would generate significant and unavoidable cumulative construction traffic impacts. Further, the Project causes a significant and unavoidable operational cumulative traffic impact at the intersection of Howard Hughes Parkway and Sepulveda Boulevard.

3.4.2 FINDINGS. The City adopts CEQA Findings 1 and 3.

3.4.3 FACTS IN SUPPORT OF FINDINGS. The following facts, together with Mitigation Measures H-1 through H-6, indicate that the significant cumulative construction impacts have been reduced or avoided to the extent feasible, but that certain significant impacts remain and are unavoidable. Construction traffic including haul truck traffic, concrete and other delivery truck traffic, and construction worker trips would result in significant impacts. With the addition of construction associated with the related projects, cumulative construction impacts would be significant. The Mitigation Measures avoid substantial inconvenience to motorists, pedestrians, and businesses in the vicinity during construction activities. Nevertheless, because construction workers and the importing/exporting of construction materials would increase the amount of trips during peak hours causing congestion and, in addition, construction of other related Project may also increase congestion, there is a significant temporary cumulative construction traffic impact.

1 In addition, the following facts, together with Mitigation Measures H-1 through
2 H-15, indicate that the significant cumulative traffic impacts of the Project on Howard
3 Hughes Parkway and Sepulveda Boulevard have been reduced or avoided to the
4 extent feasible, but that certain significant impacts on that intersection remain and are
5 unavoidable.

6 Mitigation Measure H-7 requires the implementation of a Transportation
7 Demand Management (TDM) Plan that reduces Project trips by at least 10 percent
8 during the AM and PM peak hours and Mitigation Measure H-15 mandates a traffic
9 signal upgrade to the Adaptive Traffic Control System (ATCS) in the area, which will
10 allow an approximate three percent increase in capacity to be realized at the
11 intersection of Howard Hughes Parkway and Sepulveda Boulevard.

12 These mitigation measures reduce the PM peak-hour impact at this intersection
13 to less than significant, but would not reduce the AM peak-hour impact to less than
14 significant. In order to mitigate the AM peak-hour impact, a fourth northbound through
15 travel lane of meaningful length would have to be provided along the Sepulveda
16 Boulevard south leg. Such an improvement cannot be provided by restriping, or by
17 roadway widening, due to right-of-way constraints on the south leg of Sepulveda
18 Boulevard.

19 Further, a sensitivity analysis was performed to evaluate the approximate site
20 peak-hour trip reduction due to additional TDM measures required to eliminate the
21 significant traffic impact at this intersection. The results of that analysis show that trip
22 reductions of approximately 60 percent would have to be achieved by the TDM
23 program in order to adequately mitigate this impact. It is infeasible to expect that a
24 TDM Plan could be implemented that would achieve such a considerable trip
25 reduction. Considering these factors, the Final EIR concluded that the Project traffic
26 impact at the intersection of Howard Hughes Parkway and Sepulveda Boulevard
27 would remain significant and unavoidable with the implementation of any feasible TDM
28 program.

29 No feasible mitigation measures beyond those identified above are available to
reduce the cumulative impacts to less than significant. For the reasons stated herein
and in the SOC, the remaining unavoidable significant cumulative impacts are
outweighed by the Project benefits and are acceptable when balanced against the
specific overriding economic, legal, social, technological, or other considerations.

SECTION 4

CUMULATIVE IMPACTS WHICH HAVE BEEN MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

The Planning Commission has determined that, where the EIR found the Project
would have or contribute to potentially significant cumulative effects, Project revisions,

mitigation measures and conditions of approval will substantially mitigate those, and that, as a result, those effects have been mitigated to a level less than significant, as follows. This section sets forth the potentially significant cumulative effects of the Project and, with respect to each such impact, identifies one or more of the required CEQA findings and states facts in support of these findings.

4.1 TRAFFIC

4.1.1 SIGNIFICANT EFFECTS. As the EIR concludes, construction of the Project would generate potentially significant cumulative traffic impacts at 12 study intersections, but implementation of Mitigation Measures H-7 through H-15 will mitigate impacts to 11 of those intersections to less than significant

4.1.2 FINDINGS. The City adopts CEQA Finding 1.

4.1.3 FACTS IN SUPPORT OF FINDINGS. Construction of the Project would generate potentially significant cumulative traffic impacts at 12 study intersections, but implementation of Mitigation Measures H-7 through H-15 will mitigate impacts to 11 of those intersections to less than significant or not significant, including:

- Slauson Avenue and Corning Avenue;
- Slauson Avenue and La Cienega Boulevard Southbound Ramps;
- Jefferson Boulevard and Mesmer Avenue;
- Jefferson Boulevard and Inglewood Boulevard;
- Centinela Avenue and Sepulveda Boulevard;
- Centinela and Sherbourne Drive;
- Centinela Avenue and Alvern Street;
- Centinela Avenue and La Tijera Boulevard;
- Centinela Avenue and La Cienega Boulevard;
- 76th Street-77th Street and Sepulveda Boulevard; and
- Manchester Avenue and Sepulveda Boulevard.

With implementation of a TDM Plan and intersection specific mitigation measures, 11 of the 12 intersections significantly impacted by the Project will be reduced to a less than significant level.

The EIR indicates that the Project will potentially cause significant cumulative impacts to the intersections listed above by 2010 at either, or both, a.m. and p.m. peak hours. The adoption and implementation of Mitigation Measures H-7 through H-13 and H-15 will reduce these impacts to a less than significant level. Mitigation Measure H-7 requires that a TDM Plan, approved by the City of Culver City, to reduce Project trips by at least 10 percent and be implemented prior to receipt of a Certificate of Occupancy. Annual reviews will be conducted to determine whether the Project is in compliance with the TDM Plan and, if the trip counts exceed the trip reduction level, the Project applicant will have one year to achieve compliance. The TDM Plan includes a penalty feature if the Project does not meet the TDM Plan's requirements.

1 Mitigation Measures H-8 through H-13 and H-15 contain intersection specific
2 improvements including, but not limited to, restriping, payment of improvement costs,
3 installation of additional turn lanes and traffic signal upgrades.

4 Implementation of these mitigation measures will reduce the cumulative
5 impacts at all 11 intersections listed above to a less than significant level.

6 **4.2 CULTURAL RESOURCES.**

7 **4.2.1 SIGNIFICANT EFFECTS.** As the EIR concluded, implementation of the
8 Project would cause potentially significant cumulative impacts on paleontological
9 resources, but that mitigation measures will substantially mitigate those impacts to a
10 level that is less than significant or not significant.

11 **4.2.2 FINDINGS.** The City adopts CEQA Finding 1.

12 **4.2.3 FACTS IN SUPPORT OF FINDINGS.** The EIR provided facts
13 establishing that the Project in combination with the related projects could cause
14 significant cumulative impacts to paleontological resources. However, Mitigation
15 Measures C-10 through C-15 mitigate the paleontological impacts to a less than
16 significant level. The results of a paleontological records search indicate that the
17 Project Site is underlain by Quaternary sediments. Uppermost layers of these
18 sediments are unlikely to contain significant vertebrate fossils, but fossils have been
19 identified in similar deposits at slightly greater depths in the Project vicinity. Therefore,
20 the Project Site is considered to be paleontologically sensitive.

21 From a cumulative impact perspective, grading and excavation activities
22 associated with the Project in combination with other related projects in the vicinity of
23 the Project could contribute to the progressive loss of fossil remains, as-yet
24 unrecorded fossil sites, associated geological and geographic site data, and fossil-
25 bearing strata. However, with implementation of the proposed mitigation measures,
26 impacts would be less than significant. It would also be expected that other related
27 projects would implement such mitigation measures on a case-by-case basis if
28 deemed appropriate as part of their environmental review. Thus, with implementation
29 of the mitigation measures listed above, cumulative impacts associated with
paleontological resources would be less than significant.

The mitigation measures effectively turn the Project and the related projects
that implement similar measures into an opportunity for recovery of fossil remains that
could help answer important questions regarding the geographic distribution,
stratigraphic position, and age of fossiliferous sediments in the immediate area.

Implementation of these mitigation measures will reduce the cumulative
paleontological impacts to a less than significant level.

III. MITIGATION MONITORING AND REPORTING PROGRAM

This Mitigation Monitoring and Reporting Program (MMRP), which is provided in Table III-1, has been prepared pursuant to Public Resources Code Section 21081.6, which requires adoption of a MMRP for projects in which the Lead Agency has required changes or adopted mitigation to avoid significant environmental effects. The City of Culver City is the lead agency for the proposed Entrada Office Tower Project located at 6161 Centinela Avenue, therefore, responsible for administering and implementing the MMRP. The decision-makers must define specific reporting and/or monitoring requirements to be enforced during project implementation prior to final approval of the proposed project. The primary purpose of the MMRP is to ensure that the mitigation measures identified in the Draft and Final EIR are implemented thereby minimizing identified environmental effects.

The MMRP for the proposed project will be in place through all phases of the project, including design (preconstruction), construction, and operation (both prior to and post-occupancy). The City of Culver City Planning Division shall be responsible for administering the MMRP. The Planning Division will also ensure that monitoring is documented through periodic reports and that deficiencies are promptly corrected. The designated environmental monitor will track and document compliance with mitigation measures, note any problems that may result, and take appropriate action to remedy problems.

Each mitigation measure is categorized by impact area, with an accompanying identification of:

- The phase of the project during which the measure should be monitored;
 - Pre-Construction
 - Construction
 - Prior to occupancy
 - Post-occupancy
- The enforcement agency; and
- The monitoring agency.

EXHIBIT "B"

III. Mitigation Monitoring and Reporting Program

Table III-1

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification	
				Initial	Date
AESTHETICS					
Mitigation Measure A-1: The Applicant shall ensure, through appropriate postings and daily visual inspections, that any materials not authorized by the City be promptly removed from temporary construction barriers or temporary pedestrian walkways, and that such temporary barriers and walkways be maintained in a visually attractive manner throughout the construction period.	Construction	City Community Development Department	City Building Safety Division		
AIR QUALITY					
Construction					
Mitigation Measure B-1: General contractors shall require the use of diesel oxidation catalysts or equivalent control devices on all on-site heavy-duty construction equipment during excavation activities.	Construction	City Community Development Department	City Building Safety Division		
Mitigation Measure B-2: All construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.	Construction	City Community Development Department	City Building Safety Division		

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification	
				Initial	Date
Mitigation Measure B-3: General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues should turn their engines off when not in use to reduce vehicle emissions. Construction emissions should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.	Construction	City Community Development Department	City Building Safety Division		
Mitigation Measure B-4: Electricity from power poles rather than temporary diesel- or gasoline-powered generators shall be used to the extent feasible.	Construction	City Community Development Department	City Building Safety Division		
Mitigation Measure B-5: The Applicant shall utilize coatings and solvents that are consistent with applicable SCAQMD rules and regulations.	Construction	SCAQMD	City Planning Division /City Building Safety Division		
Operations					
Mitigation Measure B-6: Outdoor areas shall utilize energy efficient light and mechanical, computerized or photo cell switching devices to reduce unnecessary energy usage.	Pre-Construction	City Community Development Department	City Building Safety Division		

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification	
				Initial	Date
CULTURAL RESOURCES					
Mitigation Measure C-1: An archaeologist meeting the Secretary of the Interior's Professional Qualification Standards (the "Archaeologist") shall be retained by the Applicant and approved by the City to oversee and carryout the additional mitigation measures listed below.	Pre-Construction/ Construction	City Community Development Department	City Planning Division		
Mitigation Measure C-2: A qualified archaeological monitor shall be selected by the Archaeologist; retained by the Applicant, and approved by the City to monitor ground-disturbing activities within the Project Site. Ground-disturbing activities are here defined as activities that include digging, grubbing, or excavation into any sediments (fill or native sediments) that have not been previously disturbed for this project. Ground-disturbing activities do not include movement, redistribution, or compaction of sediments excavated during the project. The Archaeologist shall attend a pre-grade meeting with the construction contractor, the Applicant and the City to develop an appropriate monitoring program and schedule.	Pre-Construction/ Construction	City Community Development Department	City Planning Division		

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification		
				Initial	Date	Comments
Mitigation Measure C-3: Due to the sensitivity of the Project Site for Native American resources, a Native American monitor shall be selected by the City and retained by the Applicant to monitor ground-disturbing activities in the Project Site. Selection of the monitor shall take into account guidance provided by the Native American Heritage Commission with respect to Native American groups identified as having affiliation with the Project Site. The Native American monitoring program may include a representative of the Gabrieliño Tongva Indians of California Tribal Council.	Pre-Construction/ Construction	City Community Development Department	City Planning Division			
Mitigation Measure C-4: In the event that cultural resources are unearthed during ground-disturbing activities, the Archaeological or Native American monitor shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of the find so that the find can be evaluated. Work shall be allowed to continue outside of the vicinity of the find.	Construction	City Community Development Department	City Planning Division			
Mitigation Measure C-5: All cultural resources unearthed by Proposed Project-related construction activities shall be evaluated by the Archaeologist. If the	Construction	City Community Development Department	City Planning Division			

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Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification		
				Initial	Date	Comments
Archaeologist determines that the resources may be significant, then the Archaeologist will notify the Applicant and the City and will develop an appropriate treatment plan for the resources. The Archaeologist shall consult with the Native American monitor or other appropriate Native American representatives in determining appropriate treatment for unearthen cultural resources if the resources are prehistoric or Native American in nature.						
Mitigation Measure C-6: Treatment plans developed for any unearthen resources shall consider reasonable measures to allow preservation of the resource or resources in place as a preferred option. If preserving the resource in place or leaving the resource undisturbed is not feasible, other appropriate mitigation measures shall be implemented, such as data recovery following a data recovery plan to allow for recovery of scientifically consequential information and curation of the recovered resources and data in an appropriate facility. Feasibility and means of preservation in place or other mitigation measures shall be determined through consultation between the Archaeologist, the Native American	Construction	City Community Development Department	City Planning Division			

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification	
				Initial	Date
monitor or other appropriate representative, the Applicant, and the City.					
Mitigation Measure C-7: The Archaeologist shall prepare a final report to be reviewed and accepted by the City. The report shall be filed with the Applicant, the City, and the California Historic Resources Information System South Central Coastal Information Center. The report shall include a description of resources unearthed, if any, treatment of the resources, and evaluation of the resources with respect to the California Register of Historic Resources and the National Register of Historic Places. The report shall also include all specialists' reports as appendices, if any. If the resources are found to be significant, a separate report including the results of the recovery and evaluation process shall be required. The City shall designate repositories in the event cultural resources are uncovered.	Construction	City Community Development Department	City Planning Division		
Mitigation Measure C-8: Any accidental discovery of cultural resources during construction will be evaluated by the Archaeologist. If the find is determined to be potentially significant, then the Archaeologist, in consultation with the City and appropriate Native	Construction	City Community Development Department	City Planning Division		

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Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification		
				Initial	Date	Comments
American representatives, will develop a treatment plan. All work adjacent to the unanticipated discovery (estimated at 25 feet) shall cease until the Archaeologist has evaluated the discovery, or the treatment plan has been implemented. The treatment plan shall consider preservation in place as a preferred option as set forth in Mitigation Measure C-6. Feasibility and means of preservation in place shall be determined through consultation between the Archaeologist, the Native American monitor or other appropriate representative, the Applicant, and the City.						
Mitigation Measure C-9: If human remains are encountered unexpectedly during construction excavation and grading activities, then State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, then the coroner has 24 hours to notify the NAHC. The NAHC will then identify the person(s) thought to be the Most Likely Descendent of the	Construction	City Community Development Department	City Planning Division			

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification		
				Initial	Date	Comments
deceased Native American, who will then help determine what course of action should be taken in dealing with the remains. Preservation of the remains in place or project design alternatives shall be considered preferred courses of action to the degree feasible as determined by the Applicant, the City, and the Most Likely Descendent.						
Mitigation Measure C-10: A qualified paleontologist (the "Paleontologist") shall be retained by the Applicant and approved by the City to oversee and carryout the additional mitigation measures presented below. At this time, the City shall also designate an appropriate paleontological curation facility, in the event that fossils are recovered during mitigation. The facility should be a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County.	Pre-Construction/ Construction	City Community Development Department	City Planning Division			
Mitigation Measure C-11: The Paleontologist shall perform inspections of excavation or grading activity in sediments five feet or more below the original ground surface. The frequency of inspections shall be based on consultation with the City and construction personnel and will depend on	Construction	City Community Development Department	City Planning Division			

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification		
				Initial	Date	Comments
the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. Inspections shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. Inspections will not be conducted in areas where grading, excavation, and/or construction activities will not occur or in areas where exposed sediment will be buried, but not otherwise disturbed.						
Mitigation Measure C-12: If a potential fossil is found, the Paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage.	Construction	City Community Development Department	City Planning Division			
Mitigation Measure C-13: At the Paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing.	Construction	City Community Development Department	City Planning Division			

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification	
				Initial	Date
Mitigation Measure C-14: Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are donated to their final repository. Appropriate notes, maps, and photographs shall accompany all fossils.	Construction	City Community Development Department	City Planning Division		
Mitigation Measure C-15: Following the completion of the above tasks, the Paleontologist shall prepare a report for review and approval by the City documenting the absence or discovery of fossil resources on-site. If fossils are found, then the report shall summarize the results of the inspection program, identify those fossils encountered, recovery and curation efforts, and the methods used in these efforts, as well as describe the fossils collected and their significance. A copy of the report shall be provided to the Applicant and to the City of Culver City, and the Natural History Museum of Los Angeles County.	Construction	City Community Development Department	City Planning Division		

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification		
				Initial	Date	Comments
NOISE						
Mitigation Measure F-1: Exterior noise generating construction activities shall be limited to Monday through Friday from 8:00 A.M. to 8:00 P.M. and from 9:00 A.M. to 6:00 P.M. on Saturdays.	Construction	City Community Development Department	City Building Safety Division			
Mitigation Measure F-2: Noise-generating construction equipment operated at the Project Site shall be equipped with effective noise control devices, i.e., mufflers, lagging, and/or motor enclosures. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.	Pre-Construction/ Construction	City Community Development Department	City Building Safety Division			
Mitigation Measure F-3: Stationary source equipment (e.g., compressors) shall be located so as to maintain the greatest distance from sensitive land uses and unnecessary idling of equipment shall be prohibited.	Construction	City Community Development Department	City Building Safety Division			
Mitigation Measure F-4: The construction contractor shall provide at least 72-hour advance notice of the start of construction activities to all noise sensitive uses within approximately 800	Pre-Construction	City Community Development Department	City Building Safety Division			

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification	
				Initial	Date
feet of the construction site. Notification shall be by mail. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints. Notices shall provide tips on reducing noise intrusion, for example, by closing windows facing the planned construction. The name and telephone number of a contact person for filing complaints shall also be posted on-site. In addition, the construction contractor shall coordinate with the Radisson Hotel manager when noisy construction activities occur, such as during site excavation and foundation work (placement of piles), to avoid conflicts with Hotel and conference center activities and to ensure the Hotel's occupants are notified as appropriate.					
Mitigation Measure F-5: While not anticipated to be required during construction, impact pile drivers, if utilized, shall be equipped with standard noise control devices having a minimum sound attenuation factor of 10 dBA.	Construction	City Community Development Department	City Building Safety Division		
Mitigation Measure F-6: The Applicant shall retain the services of a qualified acoustical engineer with expertise in design of building sound isolations, who	Pre-Construction	City Community Development Department	City Building Safety Division		

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification	
				Initial	Date
shall submit a signed report to the City during plan check for review and approval, indicating that the proposed building design achieves an interior sound environment of 50 dBA (CNEL).					
TRAFFIC					
Mitigation Measure H-1: Vehicular and pedestrian access along Centinela Avenue shall be maintained at all times during construction activities.	Construction	City Public Works Department	City Public Works Engineering Division		
Mitigation Measure H-2: A Construction Traffic Management Plan shall be prepared by a traffic or civil engineer registered in the State of California. The Construction Traffic Management Plan shall be submitted to the City's Public Works Department for review and approved by the City Engineer prior to the issuance of any Project demolition, grading, or excavation permit. The Construction Traffic Management Plan shall also be reviewed by the City's Fire and Police Departments. The Construction Traffic Management Plan shall contain but not be limited to the following: The name and telephone number of a contact person who can be reached 24	Pre-Construction	City Public Works Department	City Public Works Engineering Division		

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification		
				Initial	Date	Comments
hours a day regarding construction traffic complaints or emergency situations; - An up-to-date list of local police, fire, and emergency response organizations and procedures for the continuous coordination of construction activity, potential delays, and any alerts related to unanticipated road conditions or delays, with local police, fire, and emergency response agencies. Coordination shall include the assessment of any alternative access routes that might be required through the Project Site, and maps showing access to and within the Project Site and to adjacent properties; - Procedures for the training and certification of the flag persons used in implementation of the Construction Traffic Management Plan; - The location, times, and estimated duration of any roadway closures, traffic detours, use of protective devices, warning signs, and staging or queuing areas; and - The location and travel routes of off-site staging and parking locations. As part of the Construction Traffic Management Plan, an assessment of						

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification		
				Initial	Date	Comments
temporary effects on traffic shall be completed to address off-site parking for the hotel and construction workers while the new parking structure is being completed. This assessment shall include an evaluation of anticipated traffic impacts during the construction phase, taking into account off-site parking facilities, their access routes and patterns, and their related vehicle trips on the roadway system. The objective of the assessment shall be to take all reasonable measures possible to reduce or avoid temporary congestion, potential hazards, and inconvenience due to off-site parking. The assessment shall also include an evaluation of candidate off-site parking locations. The conditions shall be reviewed by the City once the location is in use to refine or institute new measures or protocols as feasible to the satisfaction of the City.						
Mitigation Measure H-3: Flag persons with certified training shall be provided for work site traffic control to minimize impacts to traffic flow and to ensure the safe movement of vehicles into and out of the Project Site.	Construction	City Public Works Department	City Public Works Engineering Division			

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification		
				Initial	Date	Comments
Mitigation Measure H-4: Construction vehicles shall not be permitted to stage or queue where they would interfere with vehicular and pedestrian traffic or block access to adjacent businesses. Off-site staging locations shall be approved by the City and be of sufficient length to accommodate large trucks without being unduly disruptive to traffic operations. The drivers of these trucks shall be in radio or phone communication with on-site personnel who shall advise the drivers when to proceed from the staging location to the site.	Pre-Construction/Construction	City Public Works Department	City Public Works Engineering Division			
Mitigation Measure H-5: Construction-related vehicles shall not be permitted to park on public streets.	Construction	City Public Works Department	City Public Works Engineering Division			
Mitigation Measure H-6: A Construction Replacement Parking Plan shall be prepared and submitted to the Culver City Planning Division for review and approval prior to the issuance of any Project demolition, grading or excavation permit. The Construction Replacement Parking Plan shall identify the off-site parking facilities and their parking space allocations that will be used for replacement parking during Project construction as well as the procedures that	Pre-Construction	City Public Works Department	City Public Works Engineering Division/Planning Division			

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification		
				Initial	Date	Comments
will be followed for safe pedestrian and vehicular movement between the off-site location(s) and the Project Site. The Construction Replacement Parking Plan shall also include parking lease agreements for the facilities not under the control of Project ownership and a shuttle service plan for transporting persons parking more than one-fourth mile from the site.						
Mitigation Measure H-7: Prior to receipt of a Certificate of Occupancy, the Project Applicant shall implement a Transportation Demand Management (TDM) Plan, Preliminary Draft of which is included as Appendix E to the Traffic Impact Study (Appendix G of the Final EIR), that reduces Proposed Project trips by at least 10 percent from 502 to 452 A.M. peak-hour trips and from 462 to 416 P.M. peak-hour trips. The TDM Plan shall be flexible and utilize as many measures as may be necessary to achieve the required trip reductions. Elements of the TDM Plan shall parallel and be consistent with City of Los Angeles TDM Ordinance (Ordinance No. 168,700) to the greatest extent possible. The TDM Plan shall be approved by the City of Culver City.	Prior to Occupancy/ Post-occupancy	City Public Works Department	City Public Works Engineering Division/Planning Division			

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification	
				Initial	Date
To determine whether project trips have been reduced to the required levels, the Project Applicant shall, beginning at initial 85 percent occupancy of the building, conduct an annual monitoring measurement of Project driveway traffic volumes on three normal weekdays during a one-month period. The monitoring measurement shall isolate and separate out trips not associated with the Project, such as the trips associated with the adjacent Pacifica Plaza building. A minimum of five annual monitoring reports shall be submitted. The Project Applicant shall pay all costs associated with the trip monitoring program and procedure, including \$5,000 per year to the City to cover the cost of staff review of the annual reports. If an annual report documents the average A.M. or P.M. peak-hour trips exceed the respective trip reduction level indicated above, then the Project Applicant shall have one year to achieve compliance. If the annual report subsequent to the noncompliant annual report shows that the Project is still not in compliance, the City and Project Applicant shall discuss other additional measures, operating improvements, and/or modifications to the					

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification	
				Initial	Date
TDM Plan as may be necessary to achieve compliance. If the City and Project Applicant reach agreement on such additional measures, operating improvements, and/or modifications, the Project Applicant shall implement them. If the City and Project Applicant are unable to reach agreement on such additional operating improvements and/or modifications, the City shall be able to require the Project Applicant to implement reasonable and feasible measures, operating improvements, and/or modifications that are suitable for achieving compliance, such as requiring the Project Applicant to (i) buy and provide free of charge to on-site tenants/employees an annual bus pass for each excess trip occurring in the peak hour with the most excess trips, up to a maximum of 50 annual bus passes (based on 502 "before" and 452 "after" A.M. trips), (ii) provide other reasonable economic incentives to encourage the use of public transit or increase ridesharing, and/or (iii) increase the number of reserved carpool and vanpool preferential parking spaces in order to further encourage employee carpool usage and ridesharing. Any such measures,					

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification	
				Initial	Date
improvements, and/or modifications shall be required only after consulting with the Project Applicant. The City shall also be able to impose a financial penalty on the Project Applicant for any excess trips. This cost shall be based on the median of the daily trip fees estimated in the Metro Draft Congestion Management Mitigation Fee Feasibility Study Report, January 2008, and adjusted by the highest ratio of the daily trip rate versus the A.M. or P.M. peak-hour trip rate general office uses according to the current 7th Edition of the ITE Trip Generation handbook. The adjustment factor is calculated to be 7.39 which is based on the P.M. trip rate. The range of daily trip fees in the above Draft Report is \$200 to \$1,600 and the median fee is \$900. Applying the 7.39 factor to this median daily fee, the peak-hour penalty fee is calculated to be \$6,651. The City shall be able to apply this peak-hour penalty fee against each excess A.M. and P.M. peak-hour trip as determined from the relevant annual monitoring report. The penalty fee payment in any year shall not exceed \$100,000. Any collected penalty fees shall be used by the City to					

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification		
				Initial	Date	Comments
improve City highway/roadway system. As appropriate, the Project Applicant may submit additional reports or supplemental information for consideration demonstrating that measures that may have been additionally required by the City for noncompliance reasons can be rescinded. When there are at least three consecutive annual reports demonstrating continuous compliance with the trip reduction levels, the Project shall be deemed to have satisfied the TDM mitigation measure requirement and no further action by the Project Applicant regarding this requirement shall be necessary.						
Mitigation Measure H-8: Slauson Avenue & Corning Avenue (I/S 11; County of Los Angeles): The Project Applicant shall restripe the south leg of Corning Avenue to provide one left-turn, one through and one right-turn-only lane in the northbound direction. The Project Applicant shall modify the traffic signal equipment at the intersection, as necessary.	Prior to Occupancy	City Public Works Department	City Public Works Engineering Division			
Mitigation Measure H-9: Slauson Avenue & La Cienega Boulevard	Prior to Occupancy	City Public Works Department	City Public Works Engineering			

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification		
				Initial	Date	Comments
Southbound Ramps and Slauson Avenue & La Cienega Boulevard Northbound Ramps (I/S 12 and 13; County of Los Angeles): The Project Applicant shall pay pro-rata shares of 4.4 percent (\$23,100) for the improvement cost for the southbound ramps intersection and 4.6 percent (\$55,200) for the improvement cost for the northbound ramps intersection.			Division			
Mitigation Measure H-10: Jefferson Boulevard & Mesmer Avenue (I/S 16; Cities of Culver City and Los Angeles): The Project Applicant shall restripe the south and north legs of Mesmer Avenue to allow the installation of a second northbound right-turn lane. The Project Applicant shall modify the traffic signal equipment at the intersection, as necessary.	Prior to Occupancy	City Public Works Department	City Public Works Engineering Division			
Mitigation Measure H-11: Centinela Avenue & Sepulveda Boulevard (I/S 24; Cities of Culver City and Los Angeles): The Project Applicant shall restripe Sepulveda Boulevard to provide a third northbound left-turn lane. The Project Applicant shall modify the raised island at the southeast corner of the intersection as necessary to maintain the third	Prior to Occupancy	City Public Works Department	City Public Works Engineering Division			

City of Culver City
PCR Services Corporation

Entrada Office Tower
February 2008

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification		
				Initial	Date	Comments
northbound through lane and the northbound right-turn-only lane. The Project Applicant shall modify the channelization and raised median island on the west leg of Centinela Avenue and restripe to provide three westbound departure lanes to receive the additional lane of left-turning traffic from Sepulveda Boulevard. The Project Applicant shall modify the traffic signal equipment at this intersection, as necessary, including the reinstallation of system and call loop detectors centered in the new lane channelization configuration with upgraded detector loop cable (DLC). All detectors for all the approaches tied to this intersection shall be functional to realize the operational improvements anticipated in this mitigation.						
Mitigation Measure H-12: Centinela Avenue & La Cienega Boulevard (I/S 25, Cities of Los Angeles and Inglewood). The Project Applicant shall install a second northbound left-turn lane on the south leg of La Cienega Boulevard. Based on the conceptual plan (A-2062) provided by the Los Angeles Department of Transportation on February 1, 2008, this improvement will be constructed within the existing roadway		City Public Works Department	City Public Works Engineering Division			

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification		
				Initial	Date	Comments
width of the south leg with the raised median being removed. The Project Applicant shall also modify the traffic signal equipment at the intersection as necessary.						
Mitigation Measure H-13: Centinela Avenue & Sherbourne Drive (I/S 26; County and City of Los Angeles); Centinela Avenue & Alvern Street (I/S 27; County and City of Los Angeles): The Project Applicant shall restripe Centinela Avenue from approximately 200 feet east of Alvern Street to approximately 200 feet west of Sherbourne Drive to provide a third westbound through lane. The Project Applicant shall widen by four feet along the east side of the south leg of Alvern Street between Centinela Avenue and Alvern Circle and modify the striping as necessary to provide additional width for northbound traffic movements. The Project Applicant shall modify the traffic signal equipment at both intersections, as necessary.	Prior to Occupancy	City Public Works Department	City Public Works Engineering Division			
Mitigation Measure H-14: Howard Hughes Parkway & Sepulveda Boulevard (I/S 31; City of Los Angeles): The Project Applicant shall provide traffic signal upgrades to the Adaptive Traffic	Prior to Occupancy	City Public Works Department	City Public Works Engineering Division			

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification		
				Initial	Date	Comments
Control System (ATCS) in the area, which will allow an approximate three percent increase in capacity to be realized at this intersection.						
Mitigation Measure H-15: Manchester Avenue & Sepulveda Boulevard (I/S 33; City of Los Angeles): The Project Applicant shall provide traffic signal upgrades to the ATCS in the area, which will allow an approximate three percent increase in capacity to be realized at this intersection. The traffic signal system upgrades required to realize the three percent capacity credit due to ATCS at the above two intersections are as follows: - 83rd Street & Lincoln Boulevard: Install three northbound and three southbound system detectors. - Manchester Avenue & Emerson Avenue: Install two eastbound and two westbound system detectors. - 78th Street-79th Street & La Tijera Boulevard: Install three northbound and three southbound system detectors. - Knowlton Street & La Tijera Boulevard: Install three northbound	Prior to Occupancy	City Public Works Department	City Public Works Engineering Division			

Table III-1 (Continued)

Mitigation Monitoring and Reporting

Mitigation Measure	Implementation Phase	Enforcement Agency	Monitoring/ Reporting Agency	Compliance Verification		
				Initial	Date	Comments
and three southbound system detectors. - Centinela Avenue & Alvern Street: Install three westbound system detector loops. - Center Drive & Sepulveda Boulevard: Install a closed-circuit television camera (CCTV) and appropriate interconnect cabling.						
WATER SUPPLY						
Mitigation Measure I.1-1: Irrigation systems shall be properly designed, installed, operated, and maintained to prevent the waste of water. "Drip" irrigation and other water application techniques which conserve water such as soil moisture sensors and automatic irrigation systems shall be incorporated in the landscape areas.	Prior to Occupancy	Parks, Recreation and Community Services Department	Parks, Recreation and Community Services Department			
Mitigation Measure I.1-2: Landscaping shall emphasize drought-tolerant vegetation. Plants of similar water use shall be grouped to reduce over-irrigation of low-water-using plants. Those areas not designed with drought-tolerant vegetation shall be gauged to receive irrigation using the minimal requirements.	Pre-Construction/ Prior to Occupancy	Parks, Recreation and Community Services Department	Parks, Recreation and Community Services Department			

EXHIBIT "C"

ALTERNATIVES FINDINGS

1. Project Objectives. The Project objectives, as specified in the Final EIR, are:

a. Development Objectives

- (i) Implement the City of Culver City redevelopment goal to stimulate development, contribute toward needed public improvements, improve economic and physical conditions of the Redevelopment Project areas, and increase employment opportunities in the City..
- (ii) Build upon the existing vitality and diversity in the designated City of Culver City Regional Center and the adjacent City of Los Angeles Regional Center by providing additional office space to complement the increase in residential densities and retail growth occurring in the area.
- (iii) Create an employment-generating land use in close proximity to existing and proposed residential uses.
- (iv) Increase land use intensity in an area served by existing infrastructure.
- (v) Incorporate "Green Building" or environmentally sustainable design practices where feasible (e.g., solar energy, water efficient landscaping, alternative transportation), and consider qualification for a Leadership in Energy and Environmental Design (LEED) certification.

b. Design Objectives

- (i) Create a landmark building and unified site design that complements the aesthetic character of new and existing development within the area.
- (ii) Develop an architecturally distinctive building that will utilize its location at the intersection of the 405 Freeway and major thoroughfares to create a gateway for the area.
- (iii) Enhance vehicular access and internal circulation through a redesigned site entrance and integrated drive court that provides a cohesive development with the existing hotel complex.
- (iv) Create an interface between the existing hotel complex and proposed office tower through the use of shared facilities, such as parking, meeting rooms, a restaurant, and an exercise club.
- (v) Create a pedestrian scale environment and linkage between the office tower and hotel complex through the use of landscaping, art, and walkways in a garden-like setting to encourage and increase pedestrian activity.
- (vi) Enhance the visual quality of the site through tree planting and other landscaping, including a row of trees along the Centinela Boulevard frontage.
- (vii) Improve the appearance of the street frontage to enhance pedestrian activity.

1 c. Economic Objectives

- 2 (i) Maximize the value of the Project Site through the replacement of a
3 surface parking lot with a landmark commercial office building consistent
4 with anticipated market demands.
5 (ii) Contribute to the expansion of the City's economic base through the
6 development of underutilized property, thereby providing additional tax
7 revenue to the City and CCRA.
8 (iii) Provide approximately 342,000 square feet of new office space to meet
9 the market demand for new office space and to accommodate expected
10 economic growth.
11 (iv) Create new construction jobs and expand the economy.
12 (v) Support the business community by bringing employees and visitors into
13 the area that will frequent local stores, restaurants, and hotels.
14 (vi) Maintain and enhance the economic vitality of the region by providing
15 job opportunities associated with the construction and operation of the
16 project.
17 (vii) Enhance a major employment center in the region, while retaining,
18 expanding and attracting businesses that enhance the City.

19 2. Alternative 1, the No Project Alternative. This Alternative is required by the CEQA
20 Guidelines. It compares the impacts that might occur if the site were left in its present
21 condition with those that would be generated by the project as proposed. The No Project
22 Alternative assumes existing conditions would be generally maintained on the Project Site.
23 The existing 5.63-acre parcel would not be subdivided into two parcels. The existing parcel
24 would continue to operate as the Radisson Hotel and Conference Center, and the Project
25 Site would continue to be used as a surface parking lot for 265 spaces serving the hotel and
26 conference center.

27 The No Project Alternative would avoid all of the Project's potentially significant
28 impacts, including potential cumulative impacts on archaeological resources, project and
29 cumulative construction noise, operational air quality (NO_x emissions), and project and
cumulative construction and operational traffic. The No Project Alternative would also avoid
the project's less than significant impacts associated with view blockage, light and glare, air
quality (CO, VOC, SO_x, PM₁₀, and PM_{2.5}), land use, operational noise, construction air
quality, cultural resources, public services, and utilities. However, the No Project Alternative
would be less beneficial than the Project with respect to visual quality and improvements in
water quality.

Although the No Project Alternative would reduce or avoid the project's environmental
impacts, and would not result in any significant environmental impacts, it would not achieve
the project's objectives. Specifically, the No Project Alternative would not implement Culver
City's redevelopment goal to stimulate development, contribute toward needed public
improvements, improve economic and physical conditions of the Redevelopment Project
Area, increase employment opportunities in the City, or maximize the Project Site's economic
potential. The No Project Alternative would not create an employment-generating land use.

1 The No Project Alternative would not implement the objective to create a landmark,
2 architecturally distinctive building and unified site design that would complement the
3 aesthetic character of new and existing development within the area and the adjacent
4 Radisson Hotel. The No Project Alternative would not enhance the visual quality of the
5 Project Site through tree planting and other landscaping, improve the appearance of the
6 street frontage to enhance pedestrian activity, or utilize the proximity of the Project Site at the
7 intersection of the 405 Freeway and major thoroughfares to concentrate development at the
8 City's interface with the Howard Hughes Center.

9 The No Project Alternative would not contribute to the expansion of the City's
10 economic base through the development of an underutilized parking lot, or provide an
11 approximately 342,000-square-foot office building to meet the market demand for new office
12 space in the area. The No Project Alternative would not generate the tax revenues
13 anticipated from the project. Based on an estimated incremental increase in valuation equal
14 to \$123 million, the project would increase annual revenue for City by approximately
15 \$825,000 and annual revenue to the CCRA by approximately \$1,043,000, of which \$261,000
16 would be dedicated to the Redevelopment Agency's Affordable Housing Trust Fund. Under
17 the No Project Alternative, these revenues would not be available to the City or the CCRA.
18 The No Project Alternative would not contribute to economic growth, provide employment-
19 generating land use in close proximity to existing and proposed residential uses, or provide
20 additional tax revenue to Culver City and CCRA. The No Project Alternative would not create
21 high-quality employment opportunities or new construction jobs or support the business
22 community by bringing employees and visitors into the area who will frequent local stores,
23 restaurants and hotels.

24 3. Alternative 2, the Low-Rise Office Alternative. The Low-Rise Office Alternative would
25 consist of a low-rise office building of approximately 100,000 square feet, with a height of 56
26 feet to the roof level. In accordance with Culver City Municipal Code ("CCMC") requirements,
27 the Low-Rise Office alternative would replace the existing 265 on-site spaces used by the
28 Radisson Hotel/Conference Center and provide an additional 286 parking spaces (1 space
29 per 350 square feet of floor area), for a total of 551 parking spaces. Parking would be
located in a four-level structure, including two below-grade and two above-grade levels. The
parking structure would be approximately 24 feet above grade and would include rooftop
parking. The configuration of the low-rise office building and adjoining parking structure
would be the same as under the project and, as such, the open space and building setback
would not change.

30 The Low-Rise Office Alternative would avoid the project's potentially significant and
31 unavoidable impact associated with traffic at the one significantly impacted intersection.
32 Although the Low-Rise Office Alternative would result in the same significant construction
33 noise impact (noise level) as the project, overall construction noise levels would occur over a
34 shorter period and construction noise impacts would therefore be less. The Low-Rise Office
35 Alternative would have similar construction air quality and construction traffic impacts
36 compared to the project during the site preparation and excavation period, the period of
37 greatest emissions and construction activity. The Low-Rise Office Alternative would reduce
38 the project's potentially significant operational air quality impact to a less than significant level

1 and reduce the project's less than significant impacts associated with view blockage, light
2 and glare, air quality, operational noise, public services, and utilities. The Low-Rise Office
3 Alternative would have the same level of impact as the project on cultural resources and
4 hydrology. However, the Low-Rise Office Alternative would have less visual benefit than the
5 project with respect to the landmark quality of a taller structure and would not implement the
6 applicable General Plan policies and Redevelopment Project goals to the same extent as the
7 project.

8 Although the Low-Rise Office Alternative would reduce or avoid the project's
9 environmental impacts, and would not result in any significant environmental impacts, it
10 would not achieve several of the project's objectives. Specifically, the Low-Rise Office
11 Alternative would not implement the City's redevelopment goal to stimulate development,
12 contribute toward needed public improvements, improve economic and physical conditions of
13 the Redevelopment Project Area, increase employment opportunities in the City,, or
14 maximize the Project Site's economic potential. Due to reduced building height, the Low-
15 Rise Office Alternative might not meet the project's design objective to create an
16 architecturally distinctive, landmark building that would complement the aesthetic character
17 of new and existing development within the area, or fully utilize its location at the intersection
18 of the 405 Freeway and major thoroughfares to create a distinctive gateway development at
19 the City's edge. The Low-Rise Office Alternative would enhance the visual quality of the
20 street frontage through unified site design, tree planting and other landscaping to enhance
21 pedestrian activity. The Low-Rise Office Alternative would also implement the objective to
22 provide development in an area served by existing infrastructure, although not to the same
23 extent as the project. As with the project, the Low-Rise Office Alternative could meet the
24 objective to incorporate "Green Building" or environmentally sustainable design practices
25 where feasible.

26 The Low-Rise Office Alternative would not meet the economic objectives of the project
27 to maximize the value of the Project Site through the replacement of a surface parking lot
28 with an approximately 342,000-square-foot office building consistent with the market demand
29 for new office space. Although the Low-Rise Office Alternative would provide incremental
growth and additional tax revenue to the City and CCRA, economic growth and revenues
would not occur to the same extent as under the project. The project would increase annual
revenue for City by approximately \$825,000 and annual revenue to the CCRA by
approximately \$1,043,000, of which \$261,000 will be dedicated to Redevelopment Agency's
Affordable Housing Trust Fund. Based on its substantially reduced leasable area, the Low-
Rise Office Alternative would be expected to provide substantially less (by approximately
more than two-thirds) additional tax revenue than the project. Respectively, job opportunities
associated with the construction and operation of the Low-Rise Office Alternative would not
contribute to the economy to the same extent as under the project. Unlike the project, the
Low-Rise Office Alternative would substantially reduce the objective of supporting the
business community through greater activity of employees and visitors WHO would frequent
local stores, restaurants and hotels.

4. Alternative 3, the Mid-Rise Office Alternative. The Mid-Rise Office Alternative would
consist of approximately 210,000 square feet of office space and a 112-foot building to the

1 roof level. In accordance with CCMC requirements the Mid-Rise Office Alternative would
2 replace the existing 265 on-site parking spaces used by the Radisson/Conference facility and
3 provide an additional 600 parking spaces (1 space per 350 square feet of floor area), for a
4 total of 865 parking spaces. Parking would be located in a six-level structure, including four
5 below-grade and two above-grade levels. The parking structure would be approximately 24
6 feet above grade and include rooftop parking. The configuration (footprint) of the Mid-Rise
7 Office Alternative would be the same as under the project and, as such, the open space and
8 building setback would not change.

9 The Mid-Rise Office Alternative would not avoid the project's potentially significant
10 impacts associated with traffic at the one significantly impacted intersection. The Mid-Rise
11 Office Alternative would result in a greater construction noise impact than the project since
12 high construction noise levels associated with excavation activities would occur over a
13 somewhat longer period. The Mid-Rise Office Alternative would have greater construction air
14 quality impacts than the project, since the duration of excavation activities would be longer.
15 Since the intensity of construction activities would be similar to the project on a daily basis,
16 construction traffic impacts would remain significant and unavoidable. The Mid-Rise Office
17 Alternative would reduce the project's potentially significant operational air quality impact to a
18 less than significant level and reduce the project's less than significant impacts associated
19 with view blockage, light and glare, construction air quality, land use, operational noise,
20 public services, and utilities. The Mid-Rise Office Alternative would have the same level of
21 impact as the project on hydrology and an incrementally greater impact on cultural resources
22 (due to deeper excavation). The Mid-Rise Office Alternative would have less visual benefit
23 than the project with respect to the landmark quality of a taller structure.

24 Although the Mid-Rise Office Alternative would reduce or avoid the project's
25 environmental impacts, it would not achieve several objectives to the same degree as the
26 project. The Mid-Rise Office Alternative would not implement the City's redevelopment goal
27 to stimulate development, contribute toward needed public improvements, improve economic
28 and physical conditions of the Redevelopment Project Area, increase employment
29 opportunities in the City, or maximize the Project Site's economic potential to the same
30 degree as the project. Due to reduced building height, the Mid-Rise Office Alternative would
31 not meet to the same degree the project's design objective to create an architecturally
32 distinctive, landmark building that would complement the aesthetic character of new and
33 existing development within the area. The Mid-Rise Office Alternative would enhance the
34 visual quality of the street frontage through unified site design, tree planting and other
35 landscaping to enhance pedestrian activity. The Mid-Rise Office Alternative would also
36 implement the objective to provide development in an area served by existing infrastructure,
37 although not to the same degree as the project. As with the project, the Mid-Rise Office
38 Alternative would meet the objective to incorporate "Green Building" or environmentally
39 sustainable design practices where feasible.

40 The Mid-Rise Office Alternative would not meet the economic objectives of the project
41 to maximize the value of the Project Site through the replacement of a surface parking lot
42 with an approximately 342,000-square-foot office building consistent with the market demand
43 for new office space. Although the Mid-Rise Office Alternative would provide incremental

growth and additional tax revenue to the City and CCRA, economic growth and revenues would not occur to the same extent as under the project. Based on an estimated incremental increase in valuation equal to \$123 million, the project would increase annual revenue to the City by approximately \$825,000 and annual revenue to the CCRA by approximately \$1,043,000, of which \$261,000 would be dedicated to the Redevelopment Agency's Affordable Housing Trust Fund. Based on its reduced leasable area, the Mid-Rise Office Alternative would be expected to provide substantially less (by approximately 30 percent) additional tax revenue than the project. Respectively, job opportunities associated with the construction and operation of the Mid-Rise Office Alternative would be incrementally reduced and not contribute to the economy to the same extent as the project.

5. Alternative 4, the Low-Rise Residential Alternative. The Low-Rise Residential Alternative would consist of a low-rise multi-family apartment building containing 300 two-bedroom residential dwelling units. Building height would be 56 feet to the roof level. In accordance with CCMC requirements, the Low-Rise Residential Alternative would replace the existing 265 on-site parking spaces used by the Radisson Hotel/Conference Center and provide an additional 675 parking spaces (2 space per residential unit, plus 1 space for every 20 spaces for visitor parking), for a total of 940 parking spaces. The parking structure would be 3½ floors below grade and ½ floor (in height) above grade. The residential units would be located in five levels above the parking structure and fill the same building footprint as the proposed office tower and parking structure, combined. The configuration of the low-rise multi-family building and adjoining parking structure would be the same as under the project and, as such, the open space and building setback would not change.

The Low-Rise Residential Alternative would avoid the project's significant unavoidable impacts associated with traffic at the one significantly impacted study intersection. The Low-Rise Residential Alternative would result in a greater construction noise impact than the project, since high noise levels associated with the excavation phase, would occur over a somewhat longer period. The Residential Alternative would have greater construction air quality impacts than the project since the duration of the construction activities would be longer. Since the intensity of construction activities would be similar to the project on a daily basis, construction traffic impacts would remain significant and unavoidable under this Alternative. The Low-Rise Residential Alternative would reduce the project's potentially significant operational air quality impact to a less than significant level and reduce the project's less than significant impacts associated with view blockage, light and glare, construction air quality, operational noise, fire and police services, and utilities. Impacts on schools, libraries and public parks were determined to be less than significant in the Initial Study prepared for the project. However, since residential populations generally impact schools, libraries and public parks, the Low-Rise Residential Alternative is expected to have a greater impact on these facilities, compared to the project. The Low-Rise Residential Alternative would have the same level of impact as the project on hydrology and an incrementally greater impact on cultural resources, due to a deeper excavation. The Low-Rise Residential Alternative would have less visual benefit than the project with respect to the landmark quality of a taller structure. The Low-Rise Residential Alternative would not be consistent with the Project Site's exiting General Plan Regional Commercial designation or existing CRB Zone in that it would not provide a retail or commercial office use.