

Culver CITY

PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

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FINAL MITIGATED NEGATIVE DECLARATION

Project Title and Culver City File No.: Ivy Station Transit Oriented Mixed Use Development
P2015-0141-CP - Comprehensive Plan
P2015-0141-HTEX – Height Exception
P2015-0141-TTM – Tentative Tract Map

City of Los Angeles Case Nos: CPC-2015-4478-GPA-ZC-HD-CU-CUB-ZAD-SPR; VTTM 73977

Project Location: Cities of Culver City and Los Angeles (8824 National Boulevard, Culver City, CA 90232)

Project Sponsor: Culver Station, LLC

Project Description: The project would include a stand-alone 5-story (~72 feet tall) Office Building with retail and restaurant uses on Level 1 (Ground Level) and office uses on Levels 1 to 5. In addition, two interconnected 5 to 6-story buildings atop a single-level podium are proposed that would include a 200-unit Residential Building (up to ~79 feet tall) and a 148-room Hotel Building (up to ~77 feet tall), both of which would have retail and restaurant uses on the Ground Level. The three buildings would be built over a 3-level subterranean parking structure. The buildings would be connected through a series of landscaped courtyards and open spaces at both the pedestrian and podium levels. Overall, the project would provide a total of 148 hotel rooms, 200 residential units, approximately 185,000 square feet of office use, 36,200 square feet of retail use, and 16,100 square feet of restaurant use. Only the Office Building has uses in both jurisdictions, with the Residential and Hotel Buildings being located entirely within Culver City.

Environmental Determination:

This is to advise that the City of Culver City, acting as the lead agency, has conducted an Initial Study to determine if the project may have a significant effect on the environment and is proposing to adopt this FINAL MITIGATED NEGATIVE DECLARATION based on the following finding:

- ☐ The Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
- ☒ The Initial Study identified potentially significant effects, but:
1. Revisions in the project plans or proposals made by, or agreed to by the applicant before this MITIGATED NEGATIVE DECLARATION AND INITIAL STUDY was released for public review would avoid the effects or mitigate the effects or mitigate the effects to a point where clearly no significant effects would occur, and
 2. There is no substantial evidence before the agency that the project as revised may have a significant effect on the environment.

A copy of the Initial Study, and any applicable mitigation measures, and any other material which constitute the record of proceedings upon which the City based its decision to adopt this FINAL MITIGATED NEGATIVE DECLARATION may be obtained at:

City of Culver City, Planning Division
9770 Culver Boulevard, Culver City, CA 90232

www.culvercity.org

Contact: Susan Yun, Senior Planner (310) 253-5755 or susan.yun@culvercity.org

February 1, 2016
March 9, 2016 (revised)



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ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL DETERMINATION



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PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM AND ENVIRONMENTAL DETERMINATION

Project Title:	Ivy Station Transit Oriented Mixed Use Development		
City of Culver City Case Nos:	P2015-0141-CP - Comprehensive Plan P2015-0141-HTEX – Height Exception P2015-0141-TTM – Tentative Tract Map		
City of Los Angeles Case Nos.	CPC-2015-4478-GPA-ZC-HD-CU-CUB-ZAD-SPR; VTTM 73977		
Lead Agency Name & Address:	City of Culver City, Planning Division 9770 Culver Blvd., Culver City, CA 90232		
Contact Person & Phone No.:	Susan Yun, Senior Planner (310) 253-5755		
Project Location/Address:	Cities of Culver City and Los Angeles (8824 National Boulevard, Culver City, CA 90232)		
Nearest Cross Street:	Venice Boulevard, National Boulevard, and Washington Boulevard	APN:	4312-014-270 thru 4312-014-281; 4213-014-900 thru 4213-014-920; and 4213-031-900 and 4213-031-901
Project Sponsor's Name & Address:	Culver Station, LLC (the Applicant) 11777 San Vicente Boulevard, Suite 900 Los Angeles, CA 90049		
General Plan Designation (Culver City portion):	Commercial – General Corridor Studio	Zoning (Culver City):	Planned Development 11 (PD-11)
General Plan Designation (City of Los Angeles portion)	Limited Manufacturing	Zoning (City of Los Angeles):	Manufacturing (M1-1)
Overlay Zone/Special District:	Redevelopment Project Component Area No. 3 and No. 4		
Project Description and Requested Action: <i>(Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary)</i> The project would include a stand-alone 5-story (~72 feet tall) Office Building with mostly retail and restaurant uses on Level 1 (Ground Level) and office uses on Levels 1 to 5. In addition, two interconnected 5 to 6-story buildings atop a single-level podium are proposed that would include a 200-unit Residential Building (up to ~79 feet tall) and a 148-room boutique Hotel Building (up to ~77 feet tall), both of which would have retail and restaurant uses on the Ground Level. The three buildings would be built over a 3-level subterranean parking structure. The buildings would be connected through a series of landscaped courtyards and open spaces at both the pedestrian and podium levels. Overall, the project would provide a total of 148 hotel rooms, 200 residential units, 185,229 square feet of office use, 36,635 square feet of retail use, and 16,645 square feet of restaurant use. Only the Office			

Building has uses in both jurisdictions, with the Residential and Hotel Buildings being located entirely within Culver City.

Please refer to Attachment A, Project Description, for a detailed discussion of the proposed project.

Existing Conditions of the Project Site:

The project site is currently improved with various 1- and 2-story light industrial and commercial uses along Venice Boulevard and associated surface parking for these uses. The remainder of the site includes paved surface parking areas consisting of approximately 600 parking spaces for the adjacent Metro Station. Metro recently completed the first phase of the 15.2-mile Expo Line which terminates at the Culver City Metro Station. Construction of the first phase of the line, from Downtown Los Angeles to Culver City, began in 2006 and opened to the public in 2012. The first phase of the Expo line required the temporary 600 Metro parking spaces currently located on the project site. The second phase of the Expo Line project, which will extend the line out to Santa Monica, is currently underway and construction is expected to be completed in 2016. Phase 2 will provide seven new stations along the Westside of Los Angeles area. Because the Expo Line will no longer terminate in Culver City, riders originating from the Westside will have additional station options west of the Culver City to park, which will reduce the current parking demand at the Culver City Metro Station. Once the second phase is completed, the Culver City Metro Station will require only 300 spaces on-site, as opposed to the current 600 spaces. These requirements are as prescribed by Metro; not by the local agencies.

Surrounding Land Uses and Setting: *(Briefly describe the project's surrounding)*

Locally, the project site is within a Transit Oriented Development area, approximately 0.5 miles northeast of Downtown Culver City, approximately 0.1 miles southwest of the Helms District, and approximately 0.3 miles west of the Hayden Tract. Downtown Los Angeles is approximately seven (7) miles east of the project site. The project site includes 4.15 acres within Culver City and 1.38 acres within the City of Los Angeles, for a total of approximately 5.53 acres. The Metro right-of-way comprises approximately 1.67 acres of the 5.53 acre project site. The project site is bounded by Venice Boulevard and commercial uses to the northwest; National Boulevard and commercial uses to the northeast, Washington Boulevard and commercial and light industrial uses to the southeast, and the Metro right-of-way and Metro Station to the south. Interstate 10 (I-10) is located approximately 0.2 miles north of the project site.

Other public agencies whose approval is required: *(e.g., permits, financing approval, or participation agreement)*

- City of Culver City (MND Approval; Height Exception, Comprehensive Plan Approval, Tentative Tract Map, Construction-related permits (i.e., demolition permit, haul route permit, building permit, grading permit, etc.))
- City of Los Angeles (General Plan Amendment, Height District Change, Major Development Conditional Use Permit, Two Conditional Use Beverage, Zoning Administrator Determination, Vesting Tentative Tract Map, Construction-related permits (i.e., demolition permit, haul route permit, building permit, grading permit, etc.))
- Los Angeles Regional Water Quality Control Board
- South Coast Air Quality Management District
- California Department of Transportation (Caltrans)
- Los Angeles Metropolitan Transportation Authority (Metro)
- Other agencies as needed.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

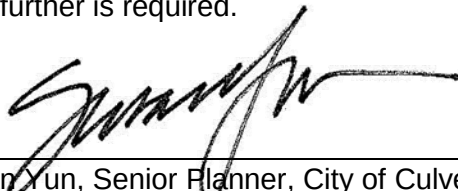
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a 'Potentially Significant Impact' as indicated by the checklist on the following pages:

- | | |
|---|--|
| ☐ Aesthetics | ☐ Land Use / Planning |
| ☐ Agriculture and Forestry Resources | ☐ Mineral Resources |
| ☐ Air Quality | ☒ Noise |
| ☒ Biological Resources | ☐ Population / Housing |
| ☒ Cultural Resources | ☒ Public Services |
| ☒ Geology / Soils | ☐ Recreation |
| ☐ Greenhouse Gas Emissions | ☒ Transportation/Traffic |
| ☒ Hazards & Hazardous Materials | ☐ Utilities / Service Systems |
| ☒ Hydrology / Water Quality | ☒ Mandatory Findings of Significance |

ENVIRONMENTAL DETERMINATION:

On the basis of this initial evaluation:

- ☐ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- ☐ I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- ☐ I find that the proposed project **MAY** have a 'potentially significant impact' or 'potentially significant unless mitigated' impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.


Susan Yun, Senior Planner, City of Culver City

February 1, 2016

Date

PURPOSE OF THE INITIAL STUDY

The project is analyzed in this Initial Study, in accordance with the California Environmental Quality Act (CEQA), to determine if approval of the project would have a significant impact on the environment. This Initial Study has been prepared pursuant to the requirements of CEQA, under Public Resources Code 21000-21177, of the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387) and under the guidance of the City of Culver City. The City of Culver City is the Lead Agency under CEQA and is responsible for preparing the Initial Study for the proposed project. The City of Los Angeles, as a responsible agency, will consider this Initial Study and will certify that it has reviewed and considered the information contained in this Initial Study prior to making any decisions on the proposed project pursuant to 14 Cal Code Regs 15050(b).

Environmental Review Process

The Draft MND was circulated for public review from December 21, 2015 to January 19, 2016. A "Notice of Availability & Intent to Adopt a Mitigated Negative Declaration" for the project was mailed at the commencement of the public review period to: owners and occupants within a 1,000 feet of the TOD boundary (which includes the project site), potentially interested agencies and organizations, as well as individuals who have previously requested to receive notices and information on the project. The Notice was also sent to Governor's Office of Planning and Research (OPR) State Clearinghouse and Planning Unit, who distributed the MND documentation to selected state agencies for review. Copies of the Draft MND were made available to the public within the City's Planning Division Office at City Hall and on the City's website at www.culvercity.org.

As a result of public review on the Draft MND, the City received five letters from public agencies and/or organizations with comments regarding the Draft MND, including letters from Caltrans, Metro, OPR, the Los Angeles County Bicycle Coalition and the Soboba Band of Luiseño Indians. In addition, 17 comment letters were received members of the public. Copies of the letters are available for review at the City's Planning Division Office at City Hall.

Where necessary, this Final MND, includes "corrections and additions" to the Draft MND that have been made to clarify, correct, or add to the information provided in the Draft MND document as a result of comments received on the Draft MND. These changes do not add significant new information to the Draft MND, nor do they result in new or more severe significant environmental impacts from the project. As such, recirculation of the MND document or further environmental review per CEQA is not necessary.

Also, it is acknowledged that the CEQA Guidelines do not require formal responses to comments received on a Draft MND document. Thus, the focus of the "corrections and additions" in this Final MND is on the disposition of significant environmental issues raised. Deletions are shown with ~~strike through~~ and additions are shown with a double underline.

EVALUATION OF ENVIRONMENTAL IMPACTS:

The impact columns heading definitions in the table below are as follows:

- “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- “Less Than Significant Impact With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The mitigation measures must be described, along with a brief explanation of how they reduce the effect to a less than significant level.
- “Less Than Significant Impact” applies where the project creates no significant impacts, only Less Than Significant impacts. An impact may be considered “less than significant” if “project design features” would be implemented by the project or if compliance with applicable regulatory requirements or standard conditions of approval would ensure impacts are less than significant.
- “No Impact” applies where a project does not create an impact in that category. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one proposed (e.g., the project would not displace existing residences). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to toxic pollutants, based on a project-specific screening analysis).

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
---------	--------------------------------------	--	------------------------------------	--------------

I. AESTHETICS – Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Have a substantial adverse effect on a scenic vista? | ☐ | ☐ | ☒ | ☐ |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | ☐ | ☐ | ☐ | ☒ |
| c) Substantially degrade the existing visual character or quality of the site and its surroundings? | ☐ | ☐ | ☒ | ☐ |
| d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | ☐ | ☐ | ☒ | ☐ |

II. AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire protection regarding the state's inventory of forest land, including the Forest and Range Assessment of and the Forest Legacy Assessment Project; and forest carbon measurements methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | ☐ | ☐ | ☐ | ☒ |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | ☐ | ☐ | ☐ | ☒ |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? | ☐ | ☐ | ☐ | ☒ |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | ☐ | ☐ | ☐ | ☒ |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | ☐ | ☐ | ☐ | ☒ |

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.				
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

V. CULTURAL RESOURCES – Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

VI. GEOLOGY AND SOILS – Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☒	☐	☐

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

VII. GREENHOUSE GAS EMISSIONS – Would the Project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance?	☐	☐	☒	☐
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are	☐	☐	☐	☒

Issues:

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	--------------

intermixed with wildlands?

IX. HYDROLOGY AND WATER QUALITY – Would the project:

- | | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a) Violate any water quality standards or waste discharge requirements? | ☐ | ☒ | ☐ | ☐ |
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | ☐ | ☐ | ☒ | ☐ |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? | ☐ | ☐ | ☒ | ☐ |
| d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? | ☐ | ☐ | ☒ | ☐ |
| e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? | ☐ | ☐ | ☒ | ☐ |
| f) Otherwise substantially degrade water quality? | ☐ | ☐ | ☒ | ☐ |
| g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? | ☐ | ☐ | ☐ | ☒ |
| h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows? | ☐ | ☐ | ☐ | ☒ |
| i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? | ☐ | ☐ | ☒ | ☐ |
| j) Inundation by seiche, tsunami, or mudflow? | ☐ | ☐ | ☒ | ☐ |

X. LAND USE AND PLANNING – Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Physically divide an established community? | ☐ | ☐ | ☒ | ☐ |
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, | ☐ | ☐ | ☒ | ☐ |

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

XI. MINERAL RESOURCES – Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | ☐ | ☐ | ☐ | ☒ |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | ☐ | ☐ | ☐ | ☒ |

XII. NOISE – Would the project result in:

- | | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a) Exposure of persons to or generation of noise level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | ☐ | ☒ | ☐ | ☐ |
| b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? | ☐ | ☐ | ☒ | ☐ |
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | ☐ | ☐ | ☒ | ☐ |
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | ☐ | ☐ | ☒ | ☐ |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | ☐ | ☐ | ☐ | ☒ |
| f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? | ☐ | ☐ | ☐ | ☒ |

XIII. POPULATION AND HOUSING – Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | ☐ | ☐ | ☒ | ☐ |
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☐ | ☒ |

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

XIV. PUBLIC SERVICES

- a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire protection?	☐	☒	☐	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

XV. RECREATION

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? ☐ ☐ ☒ ☐
- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? ☐ ☐ ☒ ☐

XVI. TRANSPORTATION/TRAFFIC – Would the project:

- a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? ☐ ☒ ☐ ☐
- b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? ☐ ☐ ☒ ☐
- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? ☐ ☐ ☐ ☒
- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? ☐ ☒ ☐ ☐

Issues:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Result in inadequate emergency access?	☐	☐	☒	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐

XVII. UTILITIES AND SERVICE SYSTEMS – Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐

Issues:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

ATTACHMENT A
PROJECT DESCRIPTION



ATTACHMENT A PROJECT DESCRIPTION

A. INTRODUCTION

Culver Station, LLC (the Applicant) proposes to redevelop a 5.53-acre triangular-shaped property located south of the intersection at Venice Boulevard and National Boulevard, with portions of the site located in Culver City and the City of Los Angeles. The site is located immediately adjacent to the Los Angeles Metropolitan Transportation Authority (Metro) Exposition (Expo) Line and Culver City Station (Culver City Metro Station or Metro Station). The proposed transit oriented development (TOD) project (Ivy Station or the project) would include a mix of office, retail, restaurant, residential and hotel uses. Existing uses on the project site include light industrial and commercial uses along Venice Boulevard and surface parking for the Metro Station throughout the remainder of the project site, all of which would be demolished and removed to support development of the project.

The project would include a stand-alone 5-story office building (the Office Building) with retail and restaurant uses on the ground floor. In addition, two interconnected 5 and 6-story buildings would be developed atop a single podium. The buildings would include, a 200-unit residential building (the Residential Building) and a 148-room boutique hotel (the Hotel Building). A mix of retail and restaurant uses would also be provided on the ground level within these buildings. Parking for all of the proposed uses would be provided on-site within the ground-level podium and subterranean parking structure, which would also provide parking for users of the adjacent Metro Station. All three proposed buildings would be connected through a series of landscaped courtyards and open spaces at both the pedestrian and podium levels. A detailed discussion of the project is provided below.

B. PROJECT LOCATION AND SURROUNDING USES

Locally, the project site is within a Transit Oriented Development area, approximately 0.5 miles northeast of Downtown Culver City, approximately 0.1 miles southwest of the Helms District, and approximately 0.3 miles west of the Hayden Tract. Downtown Los Angeles is approximately seven (7) miles east of the project site. The project site includes 4.15 acres within Culver City and 1.38 acres within the City of Los Angeles, for a total of approximately 5.53 acres. The Metro right-of-way comprises approximately 1.67 acres of the 5.53 acre project site. **Figure A-1, Regional and Project Vicinity Locations**, illustrates the location of the project site from a regional and local perspective. The project site is bounded by Venice Boulevard and commercial uses to the northwest; National Boulevard and commercial uses to the northeast, Washington Boulevard and commercial and light industrial uses to the southeast, and the Metro right-of-way¹ and Metro Station to the south. Interstate 10 (I-10) is located approximately 0.2 miles north of the project site. **Figure A-2, Aerial Photograph with Surrounding Land Uses**, illustrates the surrounding uses.

¹ Metro right-of-way is reserved for the purposes of maintenance or expansion of existing services with the right-of-way.

C. SITE BACKGROUND

The project site has been under study by Culver City staff and City of Los Angeles for a TOD project for over 10 years and the currently proposed project is a direct outgrowth of the extensive efforts and coordination between Culver City, Metro, the City of Los Angeles and other parties. During that time numerous development and scenarios have been studied by the agencies to ensure that a transit oriented mixed use development to service the Metro Station would be feasible and reflect good planning practice. Beginning with the former Culver City Redevelopment Agency (RDA) in 2005, Culver City began to acquire property/parcels on the project site and worked with Metro to incorporate the Metro right-of-way with the intent of developing a TOD project consistent with the *Redevelopment Plan for the Culver City Redevelopment Project*, Component Area 3.²

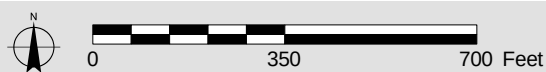
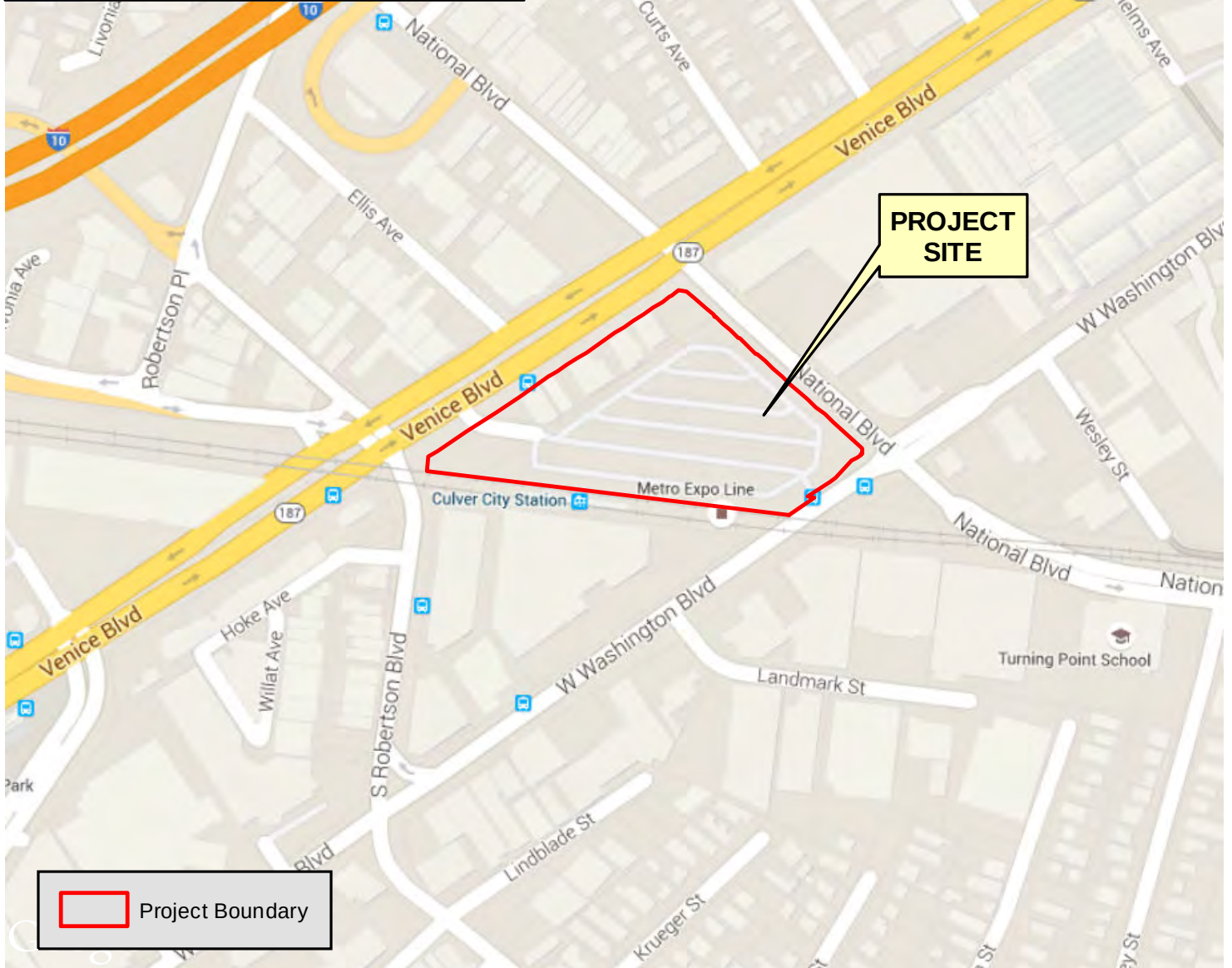
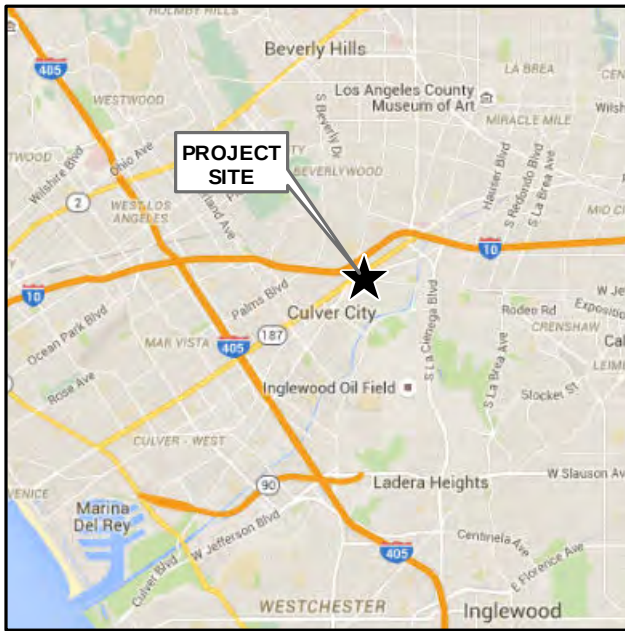
To facilitate development of a TOD on the site, in addition to purchasing the numerous parcels on the site, planning efforts since 2005 related to the TOD have included: re-zoning the Culver City portion of the site to the current Planned Development 11 (PD-11) zoning designation; securing an elevated Expo Line station and planning for pedestrian and bicycle improvements; executing a lease agreement with Metro to provide subterranean parking and related development on the Metro right of way; Culver City and City of Los Angeles working together to harmonize zoning and development requirements; funding improvements to the Metro Station to permit use of the Metro right of way for parking and related development; and analyzing a several development scenarios and conceptual plans in order to identify a preferred project that would be feasible to the cities while promoting a sustainable design that adheres with parking and building requirements.

The TOD goals and objectives for the site include: bringing shopping, housing, and employment together to advance the goals of enhanced regional air quality and multi-modal mobility for Culver City, City of Los Angeles and the region; promoting the Expo Line connection to USC, Staples Center and Downtown Los Angeles, Westside cities, and Downtown Culver City; and connecting the project with Culver City's Hayden Tract, and Arts District, with enhanced streetscape improvements including new bike lanes, new bus stops and shelters, wider sidewalks for pedestrians with new street trees, benches, bicycle racks, and wayfinding signs. With these goals and objectives established, the City of Culver City produced a development program for the project site, which is reflected in the site's PD-11 zoning designation. The PD development program envisions a mixed use transit oriented development adjacent to the Metro Station, with both EXPO Line and project parking. The TOD project is envisioned to be pedestrian oriented with permitted uses that are intended to draw locally from the surrounding neighborhoods and regionally through the Expo Line.

In January 2012, Culver City executed a Commitment Letter Agreement (Purchase Agreement) with the project Applicant to purchase the entire project site.

Under the Purchase Agreement, the Applicant is responsible for obtaining all of the funds for, and constructing the TOD project, including the design, plan and construction document preparation, bidding and construction of all parking. The Purchase Agreement also includes provision of 300 dedicated parking spaces to Metro as part of the project. Furthermore, under the Purchase Agreement the Applicant must obtain approval of a

² *Redevelopment Plan for the Culver City Redevelopment Project As amended by City Council Ordinance No. 2005-006 on September 12, 2005.*



Regional and Project Vicinity Locations

Ivy Station
Source: Google Maps Pro, 2015; PCR Services Corporation, 2015.

FIGURE

A-1



Comprehensive Plan that is consistent with the property's PD zoning and must comply with all of the other conditions precedent to sale. Also, various entitlements/approvals for the project will also be required for Culver City and City of Los Angeles (see list below).

D. PLANNING AND ZONING

As discussed above, the project site includes areas within Culver City, the City of Los Angeles, and within the Metro right-of-way. As such, there are multiple planning and zoning classifications for the property reflecting these jurisdictions.

Within Culver City, the southern portion of the site (59-feet wide strip) including the Metro's Expo Line platform and station is designated for Transportation (T) uses. The remainder of the site, including 91 feet within the Metro right-of-way, is zoned Planned Development 11 (PD-11). The Culver City general plan land use designation for the entire site is Commercial – General Corridor. No changes to the existing Culver City zoning or general plan designations are being proposed by the project. However, per the Culver City Municipal Code (CCMC), Chapter 17.240: Planned Development Zoning Districts, Section 17.240.015, Planned Development District Requirements, no building or structure within a PD Zone may exceed 56 feet in height unless a height exception is granted pursuant to Section 17.300.025, Height Measurement and Height Limit Exceptions. With a proposed building height of up to 79 feet, the project is requesting approval of a height exception within Culver City.

The portion of the project site within the City of Los Angeles is zoned Manufacturing (M1-1) and has a General Plan land use designation of Limited Manufacturing. This portion of the project site is proposed to be zoned M1-2D, with a change to the height district being proposed for additional FAR. The Height District "2" designation would allow for a 6:1 FAR. The project is only proposing up to 3.12 FAR and a building height of up to 75 feet on the City of Los Angeles portion of the project site. The project is not proposing a change to the Limited Manufacturing land use designation. **Figure A-3, *Project Zoning/Jurisdictions***, illustrates the existing and proposed zoning designations within the project site. However, the project would require three general plan amendments. The first is to exempt the project from PALMS footnote 1 because the project is requesting a height district change from 1 to 2 for FAR purposes. The second is to reclassify Exposition Boulevard from collector street to local street and then to Limited Manufacturing as Exposition Boulevard is being vacated as part of the project. The third is to remove the Open Space designation for 8900 and 8906 Venice Boulevard. 8900 and 8906 Venice Boulevard are currently dual designated as Limited Manufacturing and Open Space.

In addition, pursuant to Section 12.24.U.14 of Los Angeles Municipal Code (LAMC) a Major Development Project Conditional Use Permit (CUP) is being requested because the project includes over 100,000 square feet of floor area in nonresidential or non-warehouse uses in the M1 zone. Two Conditional Use Beverage (CUBs) permits are being requested to permit alcohol uses within two restaurants in the portion of the project in the City of Los Angeles. Further, pursuant to Section 12.24.x.22 of the LAMC, a Zoning Administrator Determination to deviate from the transitional height requirements would be required for the project.

E. EXISTING CONDITIONS

The project site is currently improved with various 1- and 2-story light industrial and commercial uses along Venice Boulevard and associated surface parking for these uses. The remainder of the site includes paved

surface parking areas consisting of approximately 600 parking spaces for the adjacent Metro Station. Metro recently completed the first phase of the 15.2-mile Expo Line which terminates at the Culver City Metro Station. Construction of the first phase of the line, from Downtown Los Angeles to Culver City, began in 2006 and opened to the public in 2012. The first phase of the Expo line required the temporary 600 Metro parking spaces currently located on the project site. The second phase of the Expo Line project, which will extend the line out to Santa Monica, is currently underway and construction is expected to be completed in late 2016. Phase 2 will provide seven new stations along the Westside of Los Angeles area. Because the Expo Line will no longer terminate in Culver City, riders originating from the Westside will have additional station options west of the Culver City to park, which will reduce the current parking demand at the Culver City Metro Station. Once the second phase is completed, the Culver City Metro Station will require only 300 spaces on-site, as opposed to the current 600 spaces. These requirements are as prescribed by Metro; not by the local agencies.

F. DESCRIPTION OF PROPOSED PROJECT

As discussed above in subsection C, *Site Background*, the development program reflected in the project is a direct outgrowth of the collaborative planning efforts between the City of Culver City, Metro and the City of Los Angeles, which incorporates TOD uses consistent with the site's PD-11 zoning designation. Below is a description of the key project characteristics.

1. Project Characteristics

The project would include a stand-alone 5-story (~72 feet tall³) Office Building with mostly retail and restaurant uses on Level 1 (Ground Level) and office uses on Levels 1 to 5. In addition, two interconnected 5 to 6-story buildings atop a single-level podium are proposed that would include a 200-unit Residential Building (up to ~79 feet tall) and a 148-room boutique Hotel Building (up to ~77 feet tall), both of which would have retail and restaurant uses on the Ground Level.⁴ **Figure A-4, *Building Concept Design***, illustrates the three proposed buildings. The three buildings would be built over a 3 level subterranean parking structure. The buildings would be connected through a series of landscaped courtyards and open spaces at both the pedestrian and podium levels. Adjacent to the Metro Station would be the Transit Plaza, which would be a transitional area to the site's centrally located Great Lawn and Central Plaza, which would offer a wide variety of entertainment and programs to serve the project residents and local community. The project's open space and amenity features are described below.

The uses proposed by the project are described in detail below and a summary of the project is provided in **Table A-1, *Proposed Project Land Use Summary***. As shown in Table A-1, the project would provide a total of 148 hotel rooms, 200 residential units, 185,229 square feet of office use, 36,635 square feet of retail use, and 16,645 square feet of restaurant use. Table A-1 further breaks the proposed mix of uses by Culver City and City of Los Angeles jurisdiction. Only the Office Building has uses in both jurisdictions, with the Residential and Hotel Buildings being located entirely within Culver City.

³ The height to the Office Building rooftop would be up to approximately 72 feet. Mechanical screening of equipment on some areas of the rooftop would be up to approximately 8 feet, or 80 feet from ground level.

⁴ The height to the Hotel and Residential Building rooftops would be up to approximately 77 feet. Mechanical screening of equipment on some areas of the rooftops would be up to approximately 8 feet, or 85 feet from ground level.

Zoning Program

CULVER CITY

Existing (No change)

Planned Development 11 (PD)

Transportation (T)

CITY OF LOS ANGELES

Existing

Proposed

Manufacturing (M1-1) → Commercial (M1-2D)

———— Metro Right of Way

- - - - - Project Boundary

- - - - - City Boundary

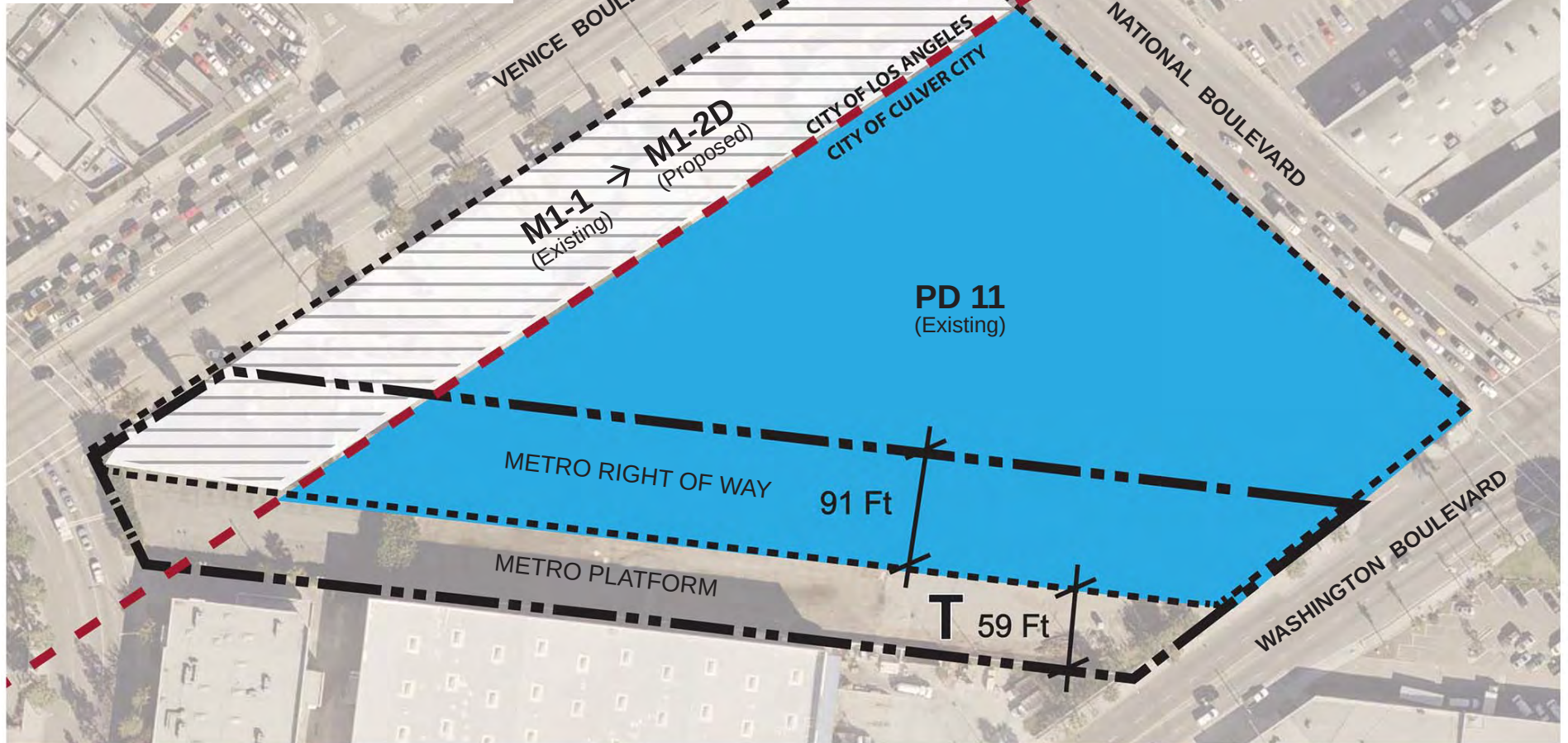




Table A-1
Proposed Project Land Use Summary^a

Use	Culver City	City of Los Angeles	Total Area
Site Area	4.15	1.38	5.53 Acres
Hotel Rooms	148	--	148
Residential Units	200	--	200
Office Area	16,895 SF	168,334 SF	185,229 SF
Retail Area	22,252 SF	14,383 SF	36,635 SF
Restaurant Area	13,074 SF	3,571 SF	16,645 SF

SF = square feet for purposes of floor area ratio calculations.

^a *Square footage numbers in table below represent approximate amounts for planning purposes.*

Source: IVY Station Comprehensive Plan Submittal, prepared by Lowe Enterprises, July 2015.

The site plan, included in **Figure A-5, Site Plan**, and **Figure A-6, Ground Level Plan**, illustrate the project's proposed ground level uses within each building and parking. The open space areas on the ground level are shown below in Figure A-10.

(a) Office Building

The Office Building would be five (5) stories (~72 feet) and include a total of approximately 185,229 square feet of office uses on Levels 1 to 5. On the Ground Level, the Office Building would contain approximately 17,700 square feet of retail uses and 7,550 square feet of restaurant uses with frontages along Venice Boulevard, National Boulevard, or situated internally along the Transit Plaza and landscaped courtyards/open space areas facing the Metro Station and/or the Residential Building. The Office Building would be located within both Culver City and City of Los Angeles jurisdictions. Within the City of Los Angeles, the Office Building would include: 14,383 square feet of retail use, 3,571 square feet of restaurant use, and 168,334 square feet of office use. Within Culver City, the Office Building would include: 3,284 square feet of retail use, 3,978 square feet of restaurant use, and 16,895 square feet of office use. Building elevations of the Office Building from the north (Venice Boulevard) are illustrated in **Figure A-7, Office Building: North Elevation (Venice Boulevard)**.

Office parking would be located on Garage Levels P1, P2 and P3 with primary access from National Boulevard and secondary access from Venice Boulevard. This would be controlled access parking with assigned and guest parking. A total of 490 stalls, including up to 24 tandem stalls would be provided for the office uses. Additional details regarding the project's proposed parking is provided below.

Within the Office Building, an atrium outdoor amenity space would provide external access to office tenant spaces on Levels 2 to 5 with a roof deck on Level 5 providing the opportunity for office gatherings.

(b) Residential Building

The Residential Building would be five (5) and six (6) stories (up to ~79 feet) and include 200 residential units, with approximately 155,700 square feet of residential tenant space located within Levels 2 through 6. Building elevations from the east (National Boulevard) and from the project's interior (Office Building) are illustrated in

Figure A-8, Residential Building: East and Interior Elevations (National Boulevard and Office Building). Located on the Ground Level, the Residential Building would contain approximately 17,200 square feet of retail space and 4,700 square feet of restaurant space situated along the paseo and landscaped courtyards/open space areas facing the Metro Station and the Office Building. Three residential lobbies would be provided on the Ground Level. The primary approximate 2,300 square-foot lobby and adjoining 800 square feet of leasing office space would be located near the hotel port-o-cochere and valet services. The remaining two residential lobbies would be located within the northern and southern portions of the Residential Building.

The Residential Building would include 20 studio units, 30 junior one-bedroom/one-bathroom units, 80 one-bedroom/one-bathroom units, 20 one-bedroom/one-bath/one-den units, and 50 two-bedroom/two-bath units. The residential units would be serviced with on-site staff inclusive of valet, doorman and resident manager, as well as resident security and service staff.

Secured and assigned parking for the residences would be located on Garage Level P1 with access and egress off National Boulevard. There would be a total of 250 assigned spaces, with 26 tandem that are assigned for 26 of the 50 2-bedroom apartments, and 50 unassigned guest parking located within one common garage. Seven (7) accessible spaces, 4 for residents and 3 for guests would be provided.

Located on Level 2 within the Residential Building, residential only amenities would include approximately 10,949 square feet of residential pool courtyard space; 6,678 square feet of secondary residential courtyard; 1,100 square feet of residential gym space; and 2,732 square feet of residential club room space with an outdoor terrace (1,066 square feet).

(c) Hotel Building

The Hotel Building would be five (5) to six (6) stories (up to ~77 feet) and include a 148-room boutique hotel representing approximately 55,900 square feet of hotel rooms located within Levels 2 through 6. Building elevations from the east (National Boulevard) and from the south (Washington Boulevard) are illustrated in **Figure A-9, Hotel Building: East and South Elevations (National Boulevard and Washington Boulevard).**

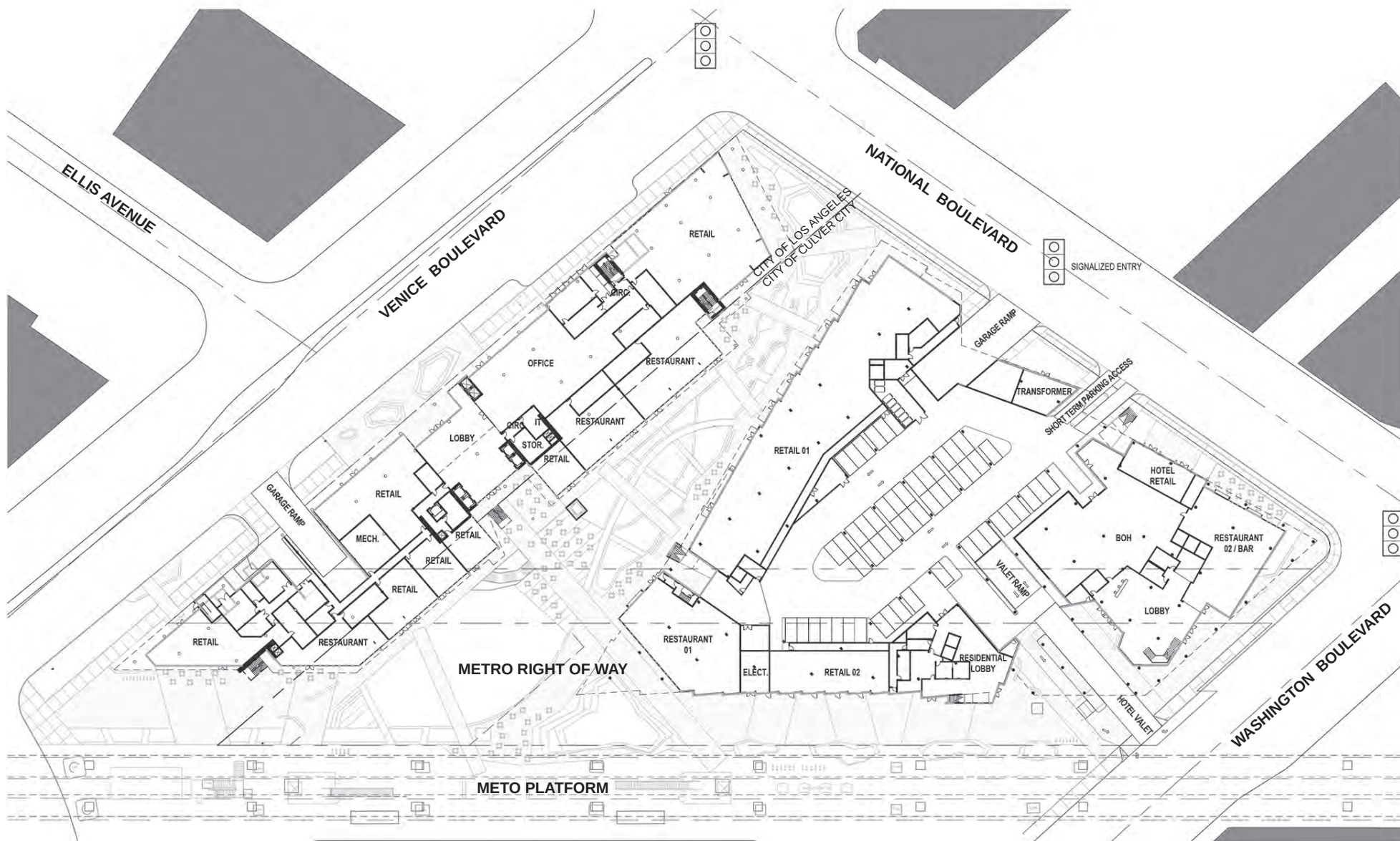
The hotel would include 72 standard king rooms, 49 double queen rooms, 11 Jr. suites, 15 king suites, and one penthouse suite.

Hotel and guest access would be provided via the port-o-cochere/grand entry which connects to approximate 4,250 square feet of hotel lobby space located on the Ground Level along Washington Boulevard. The Ground Level of the Hotel Building would include approximately 1,200 square feet of retail space with frontage along National Boulevard, and 4,000 square feet of the signature restaurant/bar space with frontage along the corner of National Boulevard and Washington Boulevard.

Hotel parking would be full valet service only and located on Garage Level P2, with a direct access/exit ramp off of Washington Boulevard. There would be a total of 223 spaces provided for the hotel rooms, meeting rooms, and a total of 50 stalls required for the Hotel's restaurant and retail uses.

Located on Level 2 within the Hotel Building, hotel only amenities would include approximately 9,790 square feet of hotel courtyard space; 1,450 square feet of hotel gym with terrace space; 1,305 square feet of hotel outdoor terrace; 4,000 square feet of ballroom space; 1,900 square feet of meeting space with an outdoor







MATERIAL LEGEND

1. Aluminum Storefront System: Charcoal Gray
2. Operable Window
3. Overhead Glass Roll-up Door
4. Low "E" Insulated Glazing
5. CMU Block: Dark Gray
6. Painted Smooth-Troweled Cement Plaster: Red
7. Painted Smooth-Troweled Cement Plaster: Charcoal Gray
8. Integral Color Elastomeric Decking: Red
9. Integral Color Elastomeric Decking: Light Gray
10. Natural Gray Concrete Column, Sacked and Smoothed
11. Natural Gray Board-Formed Concrete Shear Wall
12. Painted Steel Trellis: Charcoal Gray
13. Painted Metal Panel: Red
14. Painted Metal Guardrail
15. Accent Wood Slats
16. Roof Screen: Charcoal Gray
17. Metal Louvers: Charcoal Gray
18. Photovoltaic Panels
19. Folding Aluminum Glazed Wall System
20. Overhead Stainless Steel Coiling Door



Office Building: North Elevation (Venice Boulevard)

Ivy Station

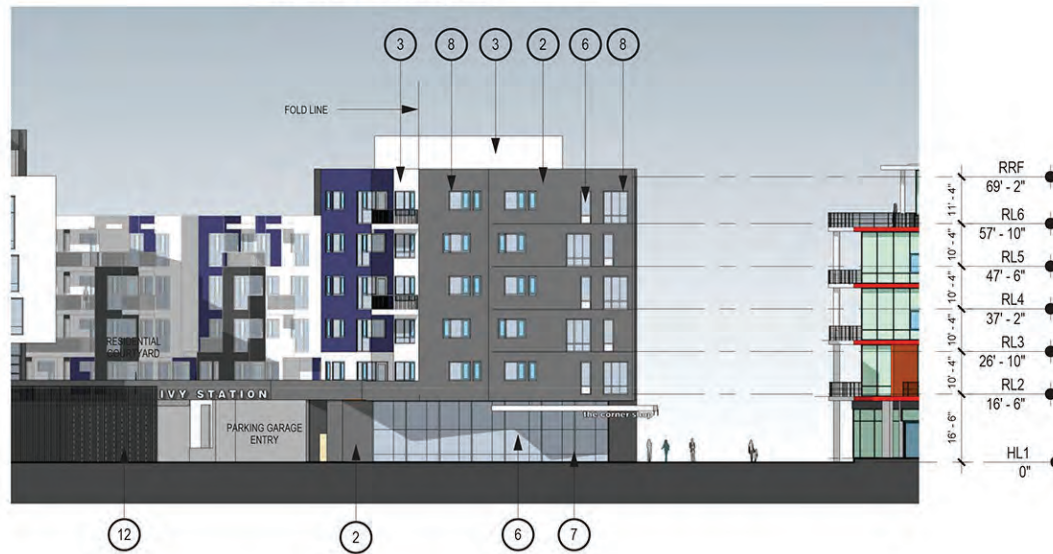
Source: Lowe Enterprises, 2015.

FIGURE

A-7



NATIONAL BLVD. ELEVATION



MATERIAL LEGEND

1. Composite Metal Panel - Hotel
2. Roll Fab - Metal Shingle Siding - Residential
3. Cement Plaster - White
4. Cement Plaster - Purple
5. Cement Plaster - Grey
6. Low 'E' Insulated Glazing
7. Anodized Alum. Storefront System - Hotel
8. Vinyl Window System - Residential
9. Ornamental metal railing
10. IPE Wood Siding
11. Bi-Fold Aluminum glazed door system (NanaWall)
12. Ornamental Metal Screen
13. Aluminum Glazed Roll-Up Door - Hotel
14. Cement Plaster - Green
15. Painted Steel Guardrail Panel



"BIG NATURE" ELEVATION



Residential Building: East and Interior Elevations (National Boulevard and Office Building)

Ivy Station

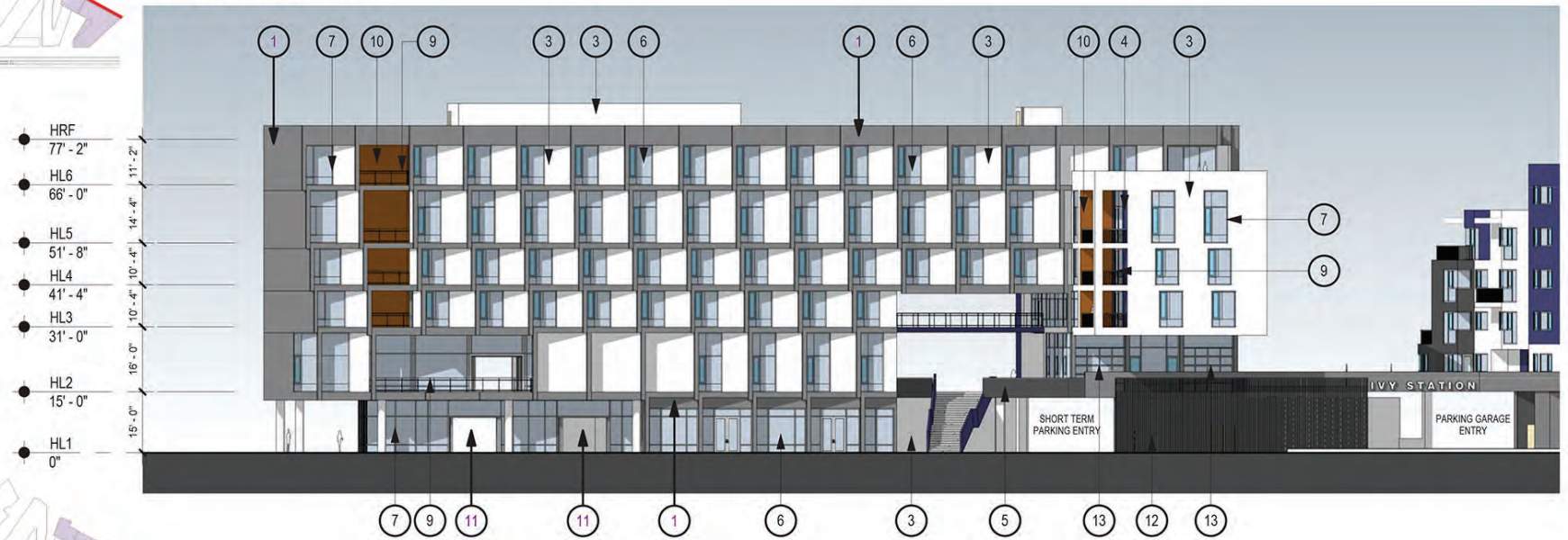
Source: Lowe Enterprises, 2015.

FIGURE

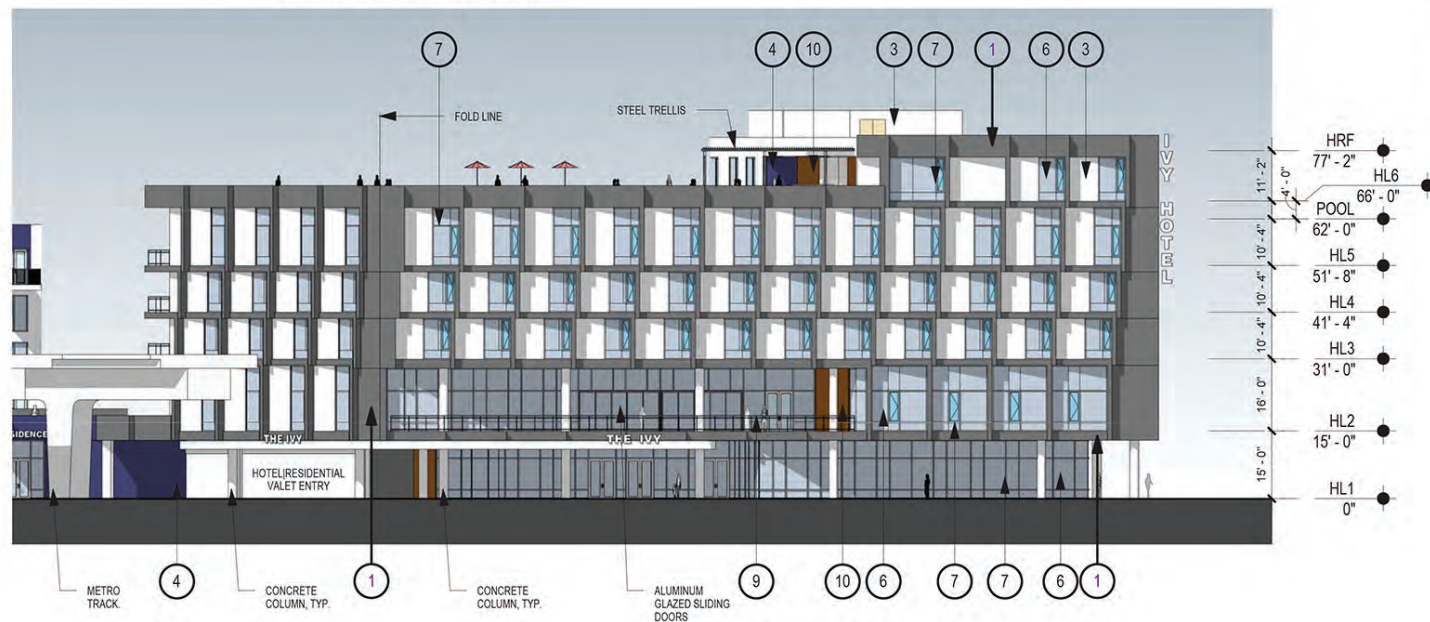
A-8



NATIONAL BLVD. ELEVATION



WASHINGTON BLVD. ELEVATION



MATERIAL LEGEND

1. Composite Metal Panel - Hotel
2. Roll Fab - Metal Shingle Siding - Residential
3. Cement Plaster - White
4. Cement Plaster - Purple
5. Cement Plaster - Grey
6. Low 'E' Insulated Glazing
7. Anodized Alum. Storefront System - Hotel
8. Vinyl Window System - Residential
9. Ornamental metal railing
10. IPE Wood Siding
11. Bi-Fold Aluminum glazed door system (NanaWall)
12. Ornamental Metal Screen
13. Aluminum Glazed Roll-Up Door - Hotel
14. Cement Plaster - Green
15. Painted Steel Guardrail Panel

Hotel Building: East and South Elevations (National Boulevard and Washington Boulevard)

Ivy Station

Source: Lowe Enterprises, 2015.

FIGURE

A-9

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terrace space; and 750 square feet of board room space. Located on Level 6, the hotel would provide 7,259 square feet of rooftop pool/spa deck and bar space.

2. Parking and Access

(a) Parking Overview

The project would include 1,555 vehicular parking spaces (300 residential spaces; 268 spaces for the hotel uses; 490 office spaces; 197 retail/restaurant spaces; and the 300 required Metro spaces) distributed over the Ground Level parking and 2.5-half levels of subterranean parking (Garage Levels P1, P2, and P3). All required 300 Metro spaces would be provided in Garage Level P3 and primarily accessed at National Boulevard. The parking assignment for Residential, Hotel, and Metro uses would be clearly segregated with access control. The CCMC and PD-11 requirements for vehicular parking are summarized below in **Table A-2, Project Vehicular Parking Code Requirements**. As shown in Table A-2, the project would meet the minimum number of vehicular parking spaces required by the CCMC.

Table A-2
Project Vehicular Parking Code Requirements

Residential	Unit Count	Area (SF)	Required/ Unit^a	Required	Provided
Studio	20	-	1	20	20
1 Bedroom – 1 Bath	80	-	1	80	80
Jr. 1 Bedroom – 1 Bath	30	-	1	30	30
1 Bedroom – 1 Bath + Den	20	-	1	20	20
2 Bedroom – 2 Bath	50	-	2	100	100
Guest	-	-	1/4 units	50	50
Total Residential Parking Required					300
Total Residential Parking Provided					300
Hotel	Unit Count	Areas (SF)^b	Required/ Factor^{a,c}	Required	Provided
			1/room + 1/20		
Guestroom	148	-		155	155
Meeting Room	-	6,835	1/100 SF	68	68
Hotel Restaurant	-	4,081	1/100 SF	41	41
Hotel Retail	-	1,286	1/350 SF	4	4
Total Hotel Parking Required					268
Total Hotel Parking Provided					268
Office	Unit Count	Areas (SF)^b	Required/ Factor^{a,c}	Required	Provided
Office Space	-	171,617	1/350 SF	490	490
Total Office Parking Required					490
Total Office Parking Provided					490

Table A-2 (Continued)
Project Vehicular Parking Code Requirements

Retail/Restaurant	Unit Count	Areas (SF) ^b	Required/ Factor ^a	Required	Provided
Retail 01	-	14,920	-	-	-
Retail 02	-	3,120	-	-	-
Office Retail	-	18,859	-	-	-
Restaurant 01	-	4,832	-	-	-
Office Restaurant	-	7,352	-	-	-
Total Retail/Restaurant Area	-	49,173	1/250 SF ^e	197	197
Total Retail/Restaurant Parking Required					197
Total Retail/Restaurant Parking Provided					197
TOTAL REQUIRED METRO PARKING SPACES^d					300
TOTAL REQUIRED OFF-STREET PARKING^f					1,555
TOTAL PROVIDED OFF-STREET PARKING					1,555

Notes: SF = square feet

^a Parking requirements based on CCMC, Chapter 17.320: Off-Street Parking and Loading, Section 17.320.020 – Number of Parking Spaces Required.

^b The floor area provided herein includes only the floor space counted towards parking requirements as defined by the CCMC. For example, storage rooms, janitor's closets, trash rooms, and IT rooms are not counted toward the applicable square footage.

^c The Culver City requirement of 1 space/350 square feet of office space is higher than that required by LAMC Section 12.21.A.4(c), which requires 1 space/500 square feet of office space. Thus, the number of office parking spaces provided by the project is greater than that which would otherwise be required by the City of Los Angeles for the project.

^d The required number of Metro spaces are prescribed by Metro; not the local agencies.

^e Retail/Restaurant Parking is pursuant to Culver City Municipal Code section 17.320.020.C.1: The parking is calculated based on a shopping center criteria which allows for 1 space per 250 sq.ft. so long as the portion of restaurant space does not exceed 25% of overall (Retail + Restaurant) area.

^f Required retail/restaurant and office parking spaces within the Office Building have been calculated per Culver City parking requirements. When accounting for all three combined uses, the combined required parking spaces in the Office Building within the City of LA jurisdiction is higher under Culver City requirements compared to LAMC Sec. 12.21.A.4 parking requirements. Under the LAMC, total required Office Building parking for portion in the City of LA would be: (Office 154,851 sf x 1 space/500 sf = 310 spaces) + (Office Restaurant 3,571 sf x 1 space/100 sf = 36 spaces) + (Office Retail 14,383 sf x 1 space/250 sf = 58 spaces) = 403 total spaces. Per Culver City parking requirements, the required Office Building parking spaces for portion within the City of LA jurisdiction would be: (Office 154,851 sf x 1 space/350 sf = 443 spaces) + (Office Restaurant 3,571 sf x 1 space/250 sf = 15 spaces) + (Office Retail 14,383 sf x 1 space/250 sf = 58 spaces) = 516 total spaces. The total number of spaces required for the portion of the Office Building within Culver City per Culver City parking requirements is 48 spaces. Thus, by providing 594 parking spaces for the Office Building, the Project would exceed the amount of parking spaces required by the LAMC for a portion of the Office Building.

Source: Lowe Enterprises, July 2015.

As shown in Figure A-6, vehicular access to the project site would be provided via Venice Boulevard, National Boulevard, and Washington Boulevard. Parking access for the office, residential and hotel uses are described above under the respective building discussions. Access and egress to the designated Metro parking spaces would be provided primarily via National Boulevard at the proposed signalized intersection.

(b) Bicycle Parking

As shown in **Table A-3, *Project Bicycle Parking Requirements***, the project would be required to prove a total of 156 bicycle spaces based on applicable Culver City and City of Los Angeles Municipal Code requirements. The project would provide 211 bicycle parking spaces, which would be well above the required number of bicycle spaces. The Ground Level would include all short term bicycle parking spaces, which would also provide convenient access to the Metro Station. One bank of bicycle racks would be located in close proximity to the bus stop on Venice Boulevard. A second bank of bicycle racks would be located near Washington Boulevard.

(c) Pedestrian Access

Pedestrian access to office, retail, restaurant, residential, and hotel uses would be provided from various at-grade sidewalks along Venice Boulevard, National Boulevard, and Washington Boulevard, as well as from the Metro Station (Figure A-5 illustrates the project site plan and access points). Access to retail and restaurant uses along Venice Boulevard, National Boulevard, and Washington Boulevard would be unrestricted during business hours, with public access discontinued after businesses have closed. The project would provide unrestricted access to the Metro Station during Station hours of operation, with public access discontinued after the Station is closed. Public access to public amenities and open space areas within the project site would be concurrent with the Metro Station facility hours of operation. Employee access to the office uses would be restricted through the use of an electronically access controlled lobby within the Office Building on the Ground Level. Pedestrian access to residential uses would be restricted through the use of three electronically access controlled residential lobbies within the Residential Building on the Ground Level. Hotel and guest access would be provided via the port-o-cochere/grand entry plaza restricted through the use of a staffed hotel lobby on the Ground Level along Washington Boulevard and through the use of hotel key cards.

3. Open Space, Landscaping and Amenities

The project would include a total of approximately 139,400 square feet of outdoor open spaces, gateways, landscape treatments, and amenity spaces. Of this total, approximately 24,917 square feet would be private open space, while approximately 104,693 square feet would be public space, as discussed below. The remaining 9,790 square foot hotel courtyard space (2nd level podium) would be public/private open space. Open space and amenity features for the office, residential and hotel uses are described above under the respective building discussions.

Figure A-10, *Ground Level Open Space Programming*, illustrates the locations of the project's proposed key ground level open space features. On the ground level, the exterior boundaries of the project site along Venice Boulevard, National Boulevard, and Washington Boulevard would include a streetscape design that would allow pedestrians, terraces, café tables, seating, public art, and parkway planters as well as access to the port-o-cochere. Each building would be positioned at grade to create connectivity with the courtyards enclosed by housing and the Hotel Building, and to link the ground level open space with entry of the Office Building. Connectivity would further be achieved through the use of pathways between areas of landscape, providing pedestrian pathways linking retail and restaurant uses around the ground level open space. All of the open spaces areas would have extensive landscaping and well-detailed hardscape.

Table A-3
Project Bicycle Parking Requirements

Parking by Type in Culver City^a	Area SF	BPMP/Discretionary Approval Bicycle Parking Required	Culver City Spaces Req. ST/LT	Provided
Retail and Restaurant	35,326	ST = 1/12k sf LT = 1/5k sf	3 7	10
Residential	200 DUs	ST = 1/20 DUs LT = 1/4 DUs	10 50	100
Office	16,895	ST = 1/20k sf LT = 1/10k sf	1 2	3
Metro	300 Parking spaces	None	None	15
Hotel	148 rms	ST = 1/20 rooms LT = 1/20 rooms	7 7	14
Total Bicycle Parking Required and Provided (Culver City)		142	21 ST + 66 LT = 87	

Parking by Type in City of Los Angeles^b	Area SF	Bicycle Parking Required^a	City of LA Spaces Req. ST/LT	Provided
Retail	14,383	ST: 1/2k SF LT: 1/2k SF	7 7	7 7
Restaurant	3,571	ST: 1/2k SF LT: 1/2k SF	2 2	2 2
Office	168,334	ST: 1/10k SF LT: 1/5k SF	17 34	17 34
Total Bicycle Parking Required and Provided (City of Los Angeles)		69	69	

**TOTAL BICYCLE PARKING (CULVER AND CITY OF LOS ANGELES) REQUIRED: 156
PROVIDED: 211**

^a The number of bicycle spaces is based on the requirements set forth in the City's Bicycle and Pedestrian Master Plan, approved per the Bicycle Transportation Account (BTA) criteria in 2012.

^b The number of bicycle spaces is based on LAMC Table 12.21 A.16.(a)(2) Required Bicycle Parking Spaces per Building Floor Area as Defined under Section 12.03.

ST = Short-Term LT = Long-Term k = 1,000 factor

Source: PCR Services Corporation, 2015.

As shown in Figure A-10, some of the project's key open space features include the Transit Plaza area (approx. 2,600 square feet), adjacent to the Metro Station, which would serve as a transitional area to the site's centrally located Great Lawn (11,300 square feet)/Great Lawn Terrace (3,500 square feet) and Central Plaza (5,600 square feet). In addition, to these areas, the two Pedestrian Paseos (14,200 square feet) along the site's southern boundary would provide additional space next to the Expo Line platform to support outdoor gatherings and activities. The open space areas within the project site would incorporate seating and would support a wide variety of entertainment and programs to serve the project residents, visitors, and the local community. Potential programs contemplated for the project's landscaped courtyards/open space areas

- Pedestrian Paseos
- Transit plaza
- Great lawn
- Great lawn terrace
- Restaurant spill out
- Central plaza
- Hotel and Residential drop off
- Washington & National corner plaza



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include design/craft/art markets, farmers markets, musical concerts, beer gardens/outdoor food, live theater (including community theater), dance performances, dance lessons, movies, discovery playground, business-oriented talks, author readings, storytelling, and aerobic classes/training. These programs are intended to be internally oriented with restricted hours of operation in accordance with applicable City event and noise regulations. Overall, the ground level would include a total of approximately 97,434 square feet of public open space area. No private open space areas would be provided on the ground level.

On the 2nd level podium, the residential and hotel buildings would include the following private open space areas: residential pool courtyard (10,949 square feet); residential courtyard (6,678 square feet); club room terrace (1,066 square feet); gym deck (480 square feet); and hotel terrace (1,305 square feet). Thus, the total private open space areas on the 2nd level podium total 20,478 square feet. In addition, an approximate 9,790 hotel courtyard space would be provided on the 2nd level podium, which is assumed to be public/private open space since it could potentially be used for private events related to the hotel use. Overall, the 2nd level podium would include a total of approximately 30,268 square feet of open space area.

On the 3rd level of the Residential Building the project would include an approximate 4,439 square foot roof terrace (private open space) on Level 3 next to the residential pool courtyard that would be accessible to only an individual unit or units, similar to one's balcony in an apartment.

On the 6th level of the Hotel Building, the project would include an approximate 7,259 square foot roof top pool deck (public open space).

In addition to the project's proposed 139,400 square feet of opens space area described above, the project's proposed balconies would include approximately 8,084 square feet of private use area for project residents.⁵

4. Lighting and Signage

New site signage would be used for project identity, building identification, office, retail, restaurant, and hotel tenant advertising/branding, pedestrian wayfinding, and Metro informational signage, parking, and security markings while incorporating the Metro Station as part of its identity. It would be designed and located to be compatible with the architecture and landscaping of the project. No off-site signage is proposed. Pedestrian areas would be well lit for security. The proposed buildings would include accent lighting to complement the building architecture.

5. Sustainability Features

The Applicant has committed to measuring the sustainable performance of the project using two independent, internationally recognized tools: Leadership in Energy & Environmental Design (LEED) for New Construction and LEED for Neighborhood Development.⁶ In addition to LEED, the Applicant has committed to meeting or exceeding Culver City Green Building Program's Design to the Equivalent Standards of LEED Certification

⁵ Balcony square footage calculated by: 109 Units x Avg. 74 SF balcony = 8,084 square feet.

⁶ LEED, or Leadership in Energy & Environmental Design, is a green building certification program that recognizes best-in-class building strategies and practices. To receive LEED certification, building projects satisfy prerequisites and earn points to achieve different levels of certification.

requirements; the City of Los Angeles Green Building Code (LAGBC) requirements; and the California Green Building Code's requirements. Some of the sustainability features to be implemented by the project include:

1. Water saving fixtures in all locations including waterless urinals in public restrooms and water saving landscaping. Installation of efficient fixtures and flush technology will reduce indoor water use over the LEED baseline, which will exceed the California Green Building Code's mandatory 20 percent reduction, and reduce wastewater generation over the LEED baseline.
2. Water meter installation for irrigation as well as monitoring for tenants, food service/restaurants, and other occupants that consume more than 1,000 gallons of water per day;
3. Incorporation of low-water and drought tolerant plants in the landscape plan, which will use less potable water from irrigation than the LEED baseline.
4. Building massing design to maximize access to sunlight and views, as well as control harmful heat gain and glare through shading devices and placement of trees;
5. Installation of a photovoltaic system, which meets or exceeds the Culver City requirements;
6. Mixed-mode ventilation strategies to shut down mechanical cooling systems when windows are open;
7. High efficiency mechanical systems;
8. Improvements in energy use/efficiency/loss so as to beat the Title 24 energy efficiency by 15 percent to qualify for Tier 1 under the California Green Building Code;
9. A clean interior environment with zero volatile organic compound (VOC) paints, glues, and sealants;
10. Operable windows in all residential and hotel rooms;
11. Operable windows in the Office Building;
12. Occupancy sensor lighting in all common areas;
13. Reliance on fluorescent, LED or other type of high efficiency systems for all interior and exterior lighting. New lighting installed in parking structures and all common areas shall be motion sensor controlled;
14. Site water control, cleaning, retention and flow;
15. On-site recycling collection facilities; and
16. Building product disclosures, targeting the use of materials with environmental product declarations (EPDs) to reduce the overall environmental impact of the building.

6. Mobility Features

The project's central location within Los Angeles County and proximity to the Culver City Metro Station presents an opportunity to enhance mobility. Some specific initiatives include:

1. Integrated application (app) for project guests to coordinate train and bus times, and review restaurant and hotel availability, bike & car share programs, an event calendar, and retail locations.
2. Interactive digital display screens located at the ground floor that will provide useful information to visitors about Ivy Station such as a site map with the list of stores, calendar of events, community information and hotel availability. The displays will also provide transport related information such as the train and bus times, car share programs, and bike rentals.
3. Access to multi-modal transit with connecting bike, bus, and train routes. The property borders the Culver City Metro Station, which is the approximate center of the EXPO line, connecting Downtown Los Angeles to Santa Monica. There is also direct access to 18 bus routes and bicycle lanes/routes.
4. Bike friendly design with bicycle parking for visitors and occupants as well as flexibility to add bicycle parking for bike-share services.
5. Designated parking for low-emission/zero-emission vehicles, carpools/shared-ride vehicles, and car sharing services such as ZipCar and/or Car2Go;
6. Printed materials on how to use the Metro for apartment residents and hotel guests; free tap cards with a month free of ridership for residents with a new lease and discounted tap cards for hotel guests during the initial twelve months of operations to encourage and promote more frequent use of public transportation.
7. A new bike lane both north and southbound along the property on National Blvd for easier access to/from Metro by bicycle as well as connections to the EXPO bike path and Culver City and City of Los Angeles bike paths.
8. Promotion of walking through a "walk to work" program in coordination with the onsite office employees and a posted neighborhood map with approximate walking distances and times to local neighborhood amenities.
9. The functional plan of the property provides view corridors and linkages from the transit station to the surrounding community and neighborhood to further encourage pedestrian activity and the use of efficient public transportation. The perimeter of the site area will incorporate the City's approved Streetscape plan which will create an attractive and inviting walkable environment.
10. On-site vehicle parking is provided for each of the proposed uses on the site and also includes 300-stalls for Metro transit rider usage. Real-time availability signage will be provided at the entry to the garage and will be coordinated with the City's parking availability system

7. Site Security

The project would incorporate a 24-hour/seven-day security program to ensure the safety of its residents and site visitors. Site security operations would include staff training and building access/design to assist in crime prevention efforts and to reduce the demand for police protection services. The project design would include

lighting of entry-ways and public areas for site security purposes. The buildings would include controlled access to residential units, the hotel, and office uses in order to ensure the safety of site residents and guests. Site security would include provisions of 24-hour video surveillance and full-time security personnel. Duties of the security personnel would include, but would not be limited to, assisting residents and visitors with site access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and patrolling the property. The site security would regularly interface and collaborate with Metro Transit Police as part of the site's security program, as well as with the Culver City Police Department and Los Angeles Police Department, as necessary.

8. Loading and Trash Removal

Loading for large deliveries for office, retail, and restaurants uses would occur in two designated areas off Venice Boulevard. The westerly loading area, located within the Office Building on the Ground Level, would provide a truck turnaround for larger deliveries. The easterly loading area, located adjacent to the Office Building, would provide curbside temporary loading.

Three designated loading areas would be located within the podium of the Residential and Hotel Buildings. Accessed from National Boulevard, in the Ground Level parking, one loading area would be designated for residents as they move in/out, a separate loading area reserved hotel uses, and the third for restaurant and retail deliveries.

A series of trash rooms would be provided within the Office Building, Residential Building, and Hotel Building. Two trash rooms would be located within the Office Building. Within the Residential Building, a trash room would be provided on each residential level and would include two chutes; one designed for trash while the other for recyclables. These chutes would be emptied out into trash and recycle bins located within the Ground Level and accessed via National Boulevard. Hotel trash and recyclables would be delivered by hotel staff to a designated trash room located on the Ground Level of the Hotel Building.

9. Anticipated Construction Schedule

It is anticipated that construction activities would commence as early as late 2016 with construction activities occurring for approximately three years. Full build-out and occupancy would occur in 2019. The project would be constructed in one phase.

G. NECESSARY APPROVALS

It is anticipated that approvals required for the project from the City of Los Angeles and/or Culver City would include, but may not be limited to, the following:

- **General Plan Amendments (City of Los Angeles):** The project would require three general plan amendments. The first is to exempt the project from PALMS footnote 1 because the project is requesting a height district change from 1 to 2 for FAR purposes. The second is to reclassify Exposition Boulevard from collector street to local street and then to Limited Manufacturing as Exposition Boulevard is being vacated as part of the project. The third is to remove the Open Space designation for 8900 and 8906 Venice Boulevard. 8900 and 8906 Venice Boulevard are currently dual designated as Limited Manufacturing and Open Space.

- **Height District Change (City of Los Angeles):** Pursuant to Section 12.32 of the LAMC, a height district change from M1-1 to M1-2D to allow for a building height up to 75 feet and a 3.12 FAR for the portion of the Office Building located in the City of Los Angeles.
- **Major Development Project Conditional Use Permit (City of Los Angeles):** Pursuant to Section 12.24.U.14, a Major Development Project CUP is being requested because the project includes over 100,000 square feet of floor area in nonresidential or non-warehouse uses in the M1 zone.
- **Two Conditional Use Beverage (City of Los Angeles):** Two CUBs are being requested to permit alcohol uses within two restaurants in the portion of the project in the City of Los Angeles.
- **Zoning Administrator Determination (City of Los Angeles):** Pursuant to Section 12.24.x.22 of the LAMC, a Zoning Administrator Determination to deviate from the transitional height requirements.
- **Height Exception (Culver City):** Per the CCMC, Chapter 17.240: Planned Development Zoning Districts, Section 17.240.015, Planned Development District Requirements, no building or structure within a PD Zone may exceed 56 feet in height unless a height exception is granted pursuant to Section 17.300.025, Height Measurement and Height Limit Exceptions. With a proposed building height of up to 79 feet, the project is requesting approval of a height exception within Culver City.
- **Comprehensive Plan (Culver City):** Approval of a Comprehensive Plan that is consistent with the site's PD zoning designation.
- **Demolition Permits (Culver City and City of Los Angeles):** Required to remove the existing on-site structures to allow for construction of the proposed buildings.
- **Construction Permits, including building, grading, excavation, foundation, and associated permits (Culver City and City of Los Angeles).**
- **Vesting Tentative Tract Map (City of Los Angeles) and Tentative Tract Map (Culver City).**
- **Haul Route Permit, as may be required (Culver City and City of Los Angeles).**
- **Other approvals as needed (Culver City and City of Los Angeles).**

ATTACHMENT B
EXPLANATION OF CHECKLIST DETERMINATIONS



ATTACHMENT B EXPLANATION OF CHECKLIST DETERMINATIONS

I. AESTHETICS

Would the project:

a. Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. The project site is located in a highly urbanized area, with a mix of commercial, light manufacturing and residential buildings in the immediate vicinity. The topography surrounding the project site is flat with no notable ocean, mountain or other scenic vistas that would be affected by the project. In addition, although the project proposes building heights up to six stories, the immediate surrounding area consists of a range of one- to five-story buildings (as part of the Access Culver City and Platform projects), therefore, given the flat topography in the area, the proposed buildings would not substantially obstruct views not already obscured or blocked by other buildings and structures in the area. It is also acknowledged that the Metro Platform and Expo Line is an elevated railway that provides public views. While long-range views from the Metro Platform and Expo Line would be obstructed by the project's proposed structures, these City views are typical of other areas along the line with any obstruction to the field of view caused by the project being limited. Further, the project site is not located in a scenic resource area or area with protected views designated by Culver City or the City of Los Angeles. As such, the project would have a less than significant impact with respect to scenic vistas.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The project site is currently improved with various 1- and 2-story light industrial and commercial uses along Venice Boulevard and associated surface parking for these uses. The remainder of the site includes paved surface parking areas consisting of approximately 600 parking spaces for the adjacent Metro Station.

The project site is not located in the vicinity of a City or State-designated scenic highway. In addition, the project site does not contain any unique or locally recognized, natural (i.e., rock outcroppings and trees), features. Also, as further described below under Response V.a, based on a recent historical resources survey, no buildings or improvements on the project site are eligible for the National Register, California Register, or Local designation, therefore, no damage to historical resources would occur with implementation of the project.

Vegetation on the project site is generally limited to five mature ornamental trees situated along Venice Boulevard, three mature ornamental trees situated along National Boulevard, one mature ornamental tree situated along Exposition Boulevard, and four mature ornamental trees located on-site adjacent the existing light industrial and commercial uses, all of which would be removed as part of the project. As discussed under Response IV.e, below, the project would replace or plant additional street trees consistent with applicable City

of Los Angeles and/or Culver City street tree requirements. Per Culver City's regulatory requirements and conditions of approval, the project is required to plant two new Street Right-of-Way trees or Parkway trees for each tree that is removed from the site. All street trees would be in conformity with the City's approved Street Tree Master Plan. The project would provide street trees well above this requirement and as such, would further enhance the streetscape with the additional trees provided. The project would also provide landscape treatments throughout the open space areas of the site resulting in an increase in landscaping compared to existing conditions.

Overall, based on the above, the project would not substantially damage scenic resources located within the vicinity of a scenic highway and no impact would occur.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. The project site is currently improved with various 1- and 2-story light industrial and commercial uses along Venice Boulevard and associated surface parking for these uses. The remainder of the site includes paved surface parking areas consisting of approximately 600 parking spaces for the adjacent Metro Station. The site's existing buildings and features do not convey a high level of visual quality, and as previously stated, there are no unique natural or urban features on the project site and no historic buildings. As discussed in Response I.b, above, there are a limited number of street trees around the perimeter of the site, none which are considered unique or highly valued visual resources.

The adjacent Expo Line tracks with its large concrete support columns and the Metro Station itself, border the entire site to the south. The tracks and station facilities, with heights up to approximately 50 feet, comprise a large portion of the views to and across the site. The tracks and station facilities do not contain unique architectural features or design elements that substantially contribute to the visual quality of the project site or its immediate surroundings.

Upon project completion, the project would include a stand-alone 5-story Office Building with mostly retail and restaurant uses on Level 1 (Ground Level) and office uses on Levels 1 to 5. In addition, two interconnected 5 to 6-story buildings atop a single-level podium are proposed that would include a mix of residential, hotel, and retail/restaurant uses. The architecture of the project would be closely informed by the triangular-shaped site and the proposed uses. For example, as shown in **Figure B-1, Venice - National Corner View**, the Office Building would be shear on the long side adjacent to Venice Boulevard giving it a boulevard edge appropriate to vehicular traffic along Venice. The Office Building would provide floor to ceiling glass amidst red exterior walls in a sawtooth pattern wrap along Venice Boulevard for visual appeal in a modern architectural style. With an activated first floor of retail and restaurants and setback top level, the building massing would have a defined base, middle, and top in balanced proportions.

Figure B-2, Washington - National Corner View, provides a visual perspective of the project from the corner of Washington Boulevard and National Boulevard. The interconnected Residential and Hotel Buildings would provide varying building heights between 5- and 6 stories that would utilize a variety of building materials including composite metal panels, metal shingle siding, wood siding, and cement plaster (various colors –





white, purple, green, and grey) to provide a modern architectural design. The maximum building heights (roof top) would be up to approximately 77 feet, with screening for mechanical equipment extending upwards approximately 8 feet in some areas on the rooftop. The building(s) design would have architectural details to correlate with the Office Building, but would also include material differences to provide visual interest through contrast. For example, the Hotel and Residential buildings would have deeply colored exterior walls with contrasting displays of color at the inside edges of balconies and wedges, while the Office Building would largely have glass siding with red exterior walls, as described above.

Per the CCMC, Chapter 17.240: *Planned Development Zoning Districts*, Section 17.240.015, *Planned Development (PD) District Requirements*, no building or structure within a PD Zone may exceed 56 feet in height unless a height exception is granted pursuant to Section 17.300.025, *Height Measurement and Height Limit Exceptions*. With the proposed building heights, the project is requesting approval of a height exception within Culver City.

While the proposed structures would be taller and greater in mass than some of the nearby buildings in the surrounding project vicinity, the Transit Oriented Development area is in the process of revitalization and transition with recent and new redevelopment projects occurring throughout the project vicinity. For example, the proposed building heights and massing would be compatible with the adjacent 5-story Access Culver City mixed-use project to the east and the one- and multi-story building(s) and parking structure (up to 5-stories) as part of the Platform project located to the southeast, both of which also include architecturally modern buildings that support a mix of land uses. The proposed Ivy Station project along with these adjacent projects would contribute to the local area's ongoing revitalization and would be compatible in their urban character. Further, as discussed under Response I.a, there would be no substantial or significant effects on scenic vistas due to construction of the project's buildings at the proposed height(s).

The variations in the three building's size and shape within the triangular site would create a series of V-shaped courtyards and open spaces at both the pedestrian and podium levels. The courtyards would be landscaped throughout. The project would include street trees and perimeter landscaping that would improve the street-level visual corridor of Venice Boulevard, National Boulevard, and Washington Boulevard. The project would also include terraces, café tables, seating, public art, and parkway planters that would provide visual uniformity and enhancements to the project's streetscape. Thus, the project would introduce a pedestrian friendly environment to an area that currently has minimal streetscape and landscape improvements. Per Culver City's standard conditions of approval, all planted areas on the property would be landscaped and irrigated pursuant to CCMC Chapter 17.310 - Landscaping. The buildable area of the project site is approximately 5.53 acres or approximately 240,886 square feet. The ratio of building footprint to buildable area would be approximately 46.6 percent.¹ Signage would be integrated into the architecture of the buildings and outdoor lighting installed per applicable City standards. Furthermore, the project would be consistent with vision of the site's Planned Development 11 (PD) zoning designation. The PD development program envisions an all-encompassing, mixed use transit oriented development (TOD) adjacent to the Metro Station, with both Expo Line and project parking. The TOD project is designed to be pedestrian oriented with

¹ Includes 48,966 sf of building footprint in the Office Building, 44,103 sf in the Residential Building, and 19,155 sf in the Hotel Building for a total of 112,224 sf in all three buildings. For purposes of this entire site calculation, the project's open space includes 97,434 sf of ground level open space. In addition, there would be 27,330 sf of open space within the courtyard areas of the Residential and Hotel Buildings on the 2nd level. This 2nd level open space is outside of the calculated building footprint area.

permitted uses that are intended to draw locally from the surrounding neighborhoods and regionally via the Expo Line.

As the project site does not currently reflect a high level of visual quality, and because the project has been designed at a scale and with a unified architectural aesthetic that would be compatible with existing and planned development in the vicinity, the project would not substantially degrade the visual character and quality of the site and its surroundings. Furthermore, the project would substantially increase landscaping and open space on the project site, including a streetscape design that would allow pedestrians, terraces, café tables, seating, public art, and parkway planters, as well as a Transit Plaza, a Great Lawn area, and a Central Plaza. Thus, impacts on visual quality would be less than significant.

While impacts would be less than significant, the following standard City of Los Angeles mitigation measure is prescribed to ensure that the project's proposed landscaping plan is prepared in accordance with applicable City requirements.

Mitigation Measure

- AES-1** All landscaped areas shall be maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect in accordance with LAMC Sections 12.40 and 12.41. The final landscape plan shall be reviewed and approved by the City of Los Angeles Department of City Planning during the building permit process. (City MM I-10: Landscape Plan)

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Light and Glare

Less Than Significant Impact. The project site is currently improved with various 1- and 2-story light industrial and commercial uses along Venice Boulevard and associated surface parking for these uses. The remainder of the site includes paved surface parking areas consisting of approximately 600 parking spaces for the adjacent Metro Station. The site is located in a highly urbanized area with a mix of light industrial, manufacturing, commercial, residential and public facility land uses, characterized by buildings of varying heights.

The land uses immediately adjacent to the project site include the commercial/manufacturing uses to the northwest across Venice Boulevard, light industrial uses to the northeast across National Boulevard, retail/multi-family residential (Access Culver City project) to the east across the National/Washington intersection, and the Culver City Metro Station and Expo Line tracks to the south followed by light industrial uses. Also, to the southeast across Washington Boulevard is the Platform project, which includes office, retail and restaurant uses. There will be windows/balconies of the Access Culver City building that face the project site. Also, some windows of the Platform building would face the project site, but would be partially obstructed by the Expo Line tracks and support columns.

The project vicinity exhibits considerable ambient nighttime illumination levels due to the densely developed nature of the area, including on-site lighting at the Metro Station, existing buildings and parking lot, as well as from adjacent properties. Artificial light sources from the on-site uses and other surrounding properties include interior and exterior lighting for security, parking, architectural highlighting, incidental landscape lighting, and illuminated signage. Automobile headlights, streetlights and stoplights for visibility and safety purposes along the major and secondary surface streets contribute to overall ambient lighting levels as well.

Similar to existing site and surrounding uses, the project would include low to moderate levels of interior and exterior lighting for security, parking, signage and architectural highlighting. Soft accent lighting used for signage, and architectural highlighting would be directed to permit visibility of the highlighted elements but, would not be so bright as to cause substantial light spillover. All proposed signage and outdoor lighting would be subject to applicable regulations contained within the Los Angeles Municipal Code (LAMC) and/or Culver City Municipal Code (CCMC). Compliance with these regulations would ensure that impacts regarding project lighting are less than significant.

Glare occurs from sunlight reflected from reflective materials utilized in existing buildings along the adjacent roadways and from vehicle windows and surfaces. Glare-sensitive receptors include motorists on the roadways surrounding the site. As glare is a temporary phenomenon that changes with the movement of the sun, receptors other than motorists are generally less sensitive to glare impacts than to light impacts. Glass fenestration incorporated into the Office building, as well as the Hotel and Residential Buildings, have been designed with low-reflectivity values (no mirror-like tints or films), minimizing off-site glare. To the extent glare is experienced by adjacent uses or the occupants of vehicles on nearby streets it would be temporary, changing with the movement of the sun throughout the course of the day and the seasons of the year. Based on the above, glare impacts would be less than significant.

While light and impacts would be less than significant, the following standard City of Los Angeles mitigation measures are prescribed to ensure that the project's proposed lighting and building materials minimize light and glare impacts to nearby uses.

Mitigation Measures

- AES-2** Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above. (City MM I-120: Light)
- AES-3** The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat. (City MM I-130: Glare)

Shade and Shadow

Less Than Significant Impact. Shading impacts were addressed in in the project's *Shade/Shadow Report* prepared by PCR in December 2015. The report is available for review at the Culver City Planning Division. Potential shading impacts could result when shadow-sensitive uses are located to the north, northwest, or

northeast of new structures in excess of 60 feet in height. The potential for impacts decreases the further the sensitive use is located from a project site. Facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. For purposes of this analysis, a project impact would normally be considered significant if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. between late October and early April, or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. between early April and late October.² Shade sensitive uses in the project vicinity to the north, northwest, or northeast are limited to the routinely usable outdoor spaces associated with the residential uses within the Access Culver City project to the east of the site.

The project would introduce new structures to the project site. While the Hotel Building would be roughly 77 feet in height, it would be located too far (over 200 feet) from the proposed Access Culver City residences to shade these uses for more than three (3) consecutive hours at any time of the year. Per the Shade/Shadow Report, shadows would not reach the Access Culver City project site for more than 1 hour, if at all, before 5:00 P.M. Thus, no shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. between late October and early April, or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. between early April and late October. As a result, the addition of the proposed buildings on the project site would not significantly increase the shading of adjacent shadow-sensitive uses based on the significance thresholds stated above, and a less than significant impact would occur.

II. AGRICULTURE AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

No Impact. The project site is currently developed with light industrial and commercial uses along Venice Boulevard and surface parking throughout the remainder of the site, it does not contain agricultural uses or related operations. The project site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and

² Shadow impacts thresholds based on criteria set forth in the City of LA CEQA Thresholds Guide (2006).

Monitoring Program.³ Furthermore, the Culver City General Plan and the City of Los Angeles General Plan do not identify the project site as an area designated for agriculture use. Therefore, the project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. Accordingly, project implementation would have no impact on farmland.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project site includes areas within Culver City, the City of Los Angeles, and within the Metro right-of-way. As such, there are multiple zoning classifications for the property. Within Culver City, the southern portion of the site including the Metro's Expo Line platform and station is designated for Transportation (T) uses. The remainder of the site within Culver City, including the Metro right-of-way, is zoned Planned Development 11 (PD). The portion of the project site within the City of Los Angeles is zoned Manufacturing (M1-1). No portion of the project or surrounding land uses are zoned for agriculture and no nearby lands are enrolled under the Williamson Act. As such, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract and no impact would occur in this regard.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. As discussed under Response II.b, within Culver City, the southern portion of the site including the Metro's Expo Line platform and station is designated for Transportation (T) uses. The remainder of the site within Culver City, including the Metro right-of-way, is zoned Planned Development 11 (PD). The portion of the project site within the City of Los Angeles is zoned Manufacturing (M1-1). No forest land or timberland zoning is present on the project site or in the surrounding area. As such, the project would not conflict with existing zoning for forest land or timberland and no impact would occur in this regard.

d. Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. No forest land exists on the project site or in the surrounding area. As such, the project would not result in the loss of forest land or conversion of forest land to non-forest use and no impact would occur in this regard.

³ State of California Department of Conservation, California Important Farmland Finder, <http://maps.conservation.ca.gov/ciff/ciff.html>, accessed August 2015.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. Since there are no agricultural uses or related operations on or near the project site, the project would not involve the conversion of farmland to other uses, either directly or indirectly. No impacts to agricultural land or uses would occur.

III. AIR QUALITY

The following impact analysis pertaining to air quality impacts is based on information contained in the project's *Air Quality Technical Report* prepared by PCR in December 2015, which is available for review at the Culver City Planning Division.

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a. Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The project site is located within the 6,745-square-mile South Coast Air Basin (SoCAB). Air quality planning for the SoCAB is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The project would be subject to the SCAQMD's Air Quality Management Plan (AQMP), which contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG).

Project construction would result in an increase in short-term or temporary employment compared to existing conditions. Being generally small in number and temporary in nature, construction jobs under the project would not conflict with the long-term employment projections upon which the AQMP are based. Control strategies in the AQMP with potential applicability to temporary emissions from construction activities include strategies denoted in the AQMP as ONRD-04 and OFFRD-01, which are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment by accelerating replacement of older, emissions-prone engines with newer engines meeting more stringent emission standards. In accordance to such strategies, the project would use off-road heavy-duty equipment that meets or exceeds stringent U.S. Environmental Protection Agency (USEPA) Tier 3 emissions standards and would utilize long-haul trucks that meet or exceed USEPA model year 2010 emissions standards. Additionally, the project would comply with California Air Resources Board (CARB) requirements to minimize idling emissions from diesel-fueled vehicles. The project would also comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403. Compliance with these requirements is consistent with and meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

As discussed in Attachment A, *Project Description*, and under Response X.b, below, the project site has long been planned for and designated as PD-11 by Culver City to support a TOD. The TOD goals and objectives for the project per the PD-11 designation include: bringing shopping, housing, and employment together to

advance the goals of enhanced regional air quality and multi-modal mobility for Culver City, City of Los Angeles and the region; promoting the Expo Line connection to USC, Staples Center and Downtown Los Angeles, Westside cities, and Downtown Culver City; and connecting the project with Culver City's Hayden Tract, and Arts District, with enhanced streetscape improvements including new bike lanes, new bus stops and shelters, wider sidewalks for pedestrians with new street trees, benches, bicycle racks, and wayfinding signs. Per the the PD development program, the project would provide an all-encompassing mixed use transit oriented development adjacent to the Metro Station, with both Expo Line and project parking. The TOD project would be pedestrian oriented with permitted uses that are intended to draw locally from the surrounding neighborhoods and regionally through the Expo Line.

As discussed under Response X.b, below, the project would be consistent with applicable policies of the City of Culver City PD 11 TOD program and City of Los Angeles Transportation Element, City of Los Angeles Mobility Plan, and Southern California Association of Governments Regional Transportation Plan which support establishing a land use pattern that addresses housing needs and reduces vehicle trips and air pollution by locating residential uses within an area that has public transit (with access to rail lines), employment opportunities, restaurants and entertainment (hotel) all within walking distance.

As discussed under Response XII.a, below, the project could result in a total population increase of 732 persons, including on- and off-site areas, and approximately 400 employees. Project-related population and employment growth is within the SCAG 2012 Regional Transportation Plan (RTP) projections which forms the basis of the 2012 AQMP growth projections. Further, as the project's development intensity is consistent with the site's PD-11 designation, City plans and regional forecasts have anticipated the growth to occur as part of the project. Thus, operation of the project would have no significant impacts related to consistency with the AQMP.

The Congestion Management Program ("CMP") was enacted by Metro to address traffic congestion issues that could impact quality of life and economic vitality. The intent of the program is to provide an analytical basis for transportation decisions throughout the state. An analysis is required at all CMP monitoring intersections for which a project is projected to add 50 or more trips at any CMP intersection during any peak hour. In addition, analysis is required for all freeway segments for which a project is projected to add 150 or more hourly trips, in each direction, during the peak hours analyzed.

The project is not expected to generate 50 trips at any CMP intersection during any peak hour (refer to Response XVI.b below). As a result, the project would not exceed any CMP thresholds, and no impact to the CMP network would occur. Thus, the project would not conflict with or obstruct implementation of the CMP.

Based on the above discussion of applicable air quality plans, implementation of the project would result in less than significant impacts.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. As indicated above, the project site is located within the SoCAB, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many

parts of the SoCAB, including those monitoring stations nearest to the project location. The project would contribute to local and regional air pollutant emissions during construction (short-term or temporary) and project occupancy (long-term). However, based on the following analysis, construction and operation of the project would result in less than significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established by the SCAQMD for construction and operational phases.

Construction Impacts

Construction has the potential to create regional air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers and haul trips traveling to and from the project site. In addition, fugitive dust emissions would result from construction activities. During the finishing phase, the application of architectural coatings (i.e., paints) and other building materials would release VOCs. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Based on criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 75 pounds a day for volatile organic compounds (“VOCs”), (2) 100 pounds per day for nitrogen oxides (“NOx”), (3) 550 pounds per day for carbon monoxide (“CO”), (4) 150 pounds per day for sulfur oxides (“SOx”), (5) 150 pounds per day for PM10, and (6) 55 pounds per day for PM2.5.⁴

The project would involve demolition of existing uses (i.e., surface parking lot and structures along Venice Boulevard) and construction of a mixed-use hotel, office and residential project, in addition to potential off-site infrastructure upgrades/improvements (i.e., water and sewer lines) (discussed below in Section XVII, *Utilities and Service Systems*). Construction activities would include demolition, excavation, building construction, architectural coatings and paving. Construction would take place over approximately 2.5 years, anticipated to begin in late 2016. Full build-out and occupancy would occur in 2019. During construction, a variety of heavy-duty diesel powered equipment will be used on-site. Building construction and finishing activities will require equipment such as excavators, drill rigs, cranes, concrete pumps, and air compressors. Regional construction-related emissions associated with construction equipment were calculated using the SCAQMD-recommended California Emissions Estimator Model (“CalEEMod”). Model results are provided under separate cover available at the Culver City Planning Division.

This analysis assumes that all construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust. A summary of maximum daily regional emissions resulting from construction of the project is presented in **Table B-1, Maximum Regional Construction Emissions**, along with the regional significance thresholds for each air pollutant. As shown therein, maximum regional emissions would not exceed the thresholds for VOC, NOx, CO, SOx, PM10, or PM2.5. Therefore, regional construction impacts would be less than significant, and mitigation measures would not be required.

⁴ South Coast Air Quality Management District, Air Quality Significance Thresholds, (March 2011), <http://www.aqmd.gov/ceqa/handbook/signthres.pdf>. Accessed September 2015.

Table B-1

Maximum Regional Construction Emissions (pounds per day) ^a

Regional Emissions	VOC	NO_x	CO	SO₂	PM₁₀ ^b	PM_{2.5} ^b
Demolition/Clear Site	2	18	18	<1	5	1
Shoring/Earth Support	2	25	14	<1	2	1
Excavation	5	68	58	<1	9	4
Continuous Concrete Pour	6	81	70	<1	7	3
Building Foundation	1	9	10	<1	1	1
Building Erection, Finishes, & Closeout	45	31	58	<1	7	3
Maximum Regional (On-Site and Off-Site) Emissions	45	81	70	<1	9	4
SCAQMD Numeric Indicators	75	100	550	150	150	55
Over/(Under)	(30)	(19)	(480)	(150)	(141)	(51)
Exceed Threshold?	No	No	No	No	No	No

^a The emissions shown in table include emissions reductions from SCAQMD Rule 403 requirements. Totals may not add up exactly due to rounding in the modeling calculations

Source: PCR Services Corporation, 2015.

Operational Impacts

The SCAQMD has separate significance thresholds to evaluate potential impacts associated with the incremental increase in criteria air pollutants associated with long-term project operations. Based on criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to operational emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 55 pounds a day for VOCs, (2) 55 pounds per day for NO_x, (3) 550 pounds per day for CO, (4) 150 pounds per day for SO_x, (5) 150 pounds per day for PM₁₀, and (6) 55 pounds per day PM_{2.5}.⁵

Regional air pollutant emissions associated with project operations would be generated by the consumption of electricity and natural gas, and by the operation of on-road vehicles. Pollutant emissions associated with energy demand (i.e., electricity generation and natural gas consumption) are classified by the SCAQMD as regional stationary source emissions.

The project would be designed to meet the standards for Leadership in Energy and Environmental Design (LEED) Certified level by the U.S. Green Building Council (USGBC) through the incorporation of green building techniques and other sustainability features. The project also would be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code, the City of Los Angeles Green Building Code (LAGBC), and the Culver City Green Building Program (as required by Culver City's standard conditions of approval). Some of the project's "green building measures" as part of its design to reduce project-related criteria pollutant emissions would include, but are not limited to the following:

⁵ South Coast Air Quality Management District, Air Quality Significance Thresholds, (March 2015), <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. Accessed October 2015.

- Improvements in energy use/efficiency/loss so as to beat the Title 24 energy efficiency by 15 percent to qualify for Tier 1 under the California Green Building Code.
- Installation of a 470 kilowatt photovoltaic system, which exceeds the Culver City requirements as set forth in CCMC Section 15.02.100 and as required by the City's standard conditions of approval.
- Reliance on fluorescent, LED or other type of high efficiency systems for all interior and exterior lighting. New lighting installed in parking structures and all common areas shall be motion sensor controlled.

Regional operational emissions for the project were calculated using CalEEMod, and model results are provided under separate cover available at the Culver City Planning Division. Inputs into the CalEEMod model include project-related vehicle trips and square footage to determine energy and water usage as well as waste generation. The project would result in a net increase of 4,124 average daily vehicle trips to the site during its first operational year (2019) (as discussed in Response XVI.a, below) which were input into the CalEEMod model.

A summary of maximum daily regional emissions resulting from project operation is presented in **Table B-2, Maximum Regional Operational Emissions**, along with the regional significance thresholds. As shown in Table B-2, the project would not generate air pollutant emissions exceeding the SCAQMD thresholds of significance listed above. Therefore, the project would have a less than significant impact on air quality resulting from long-term operational emissions, and no mitigation measures would be necessary.

Table B-2

Maximum Regional Operational Emissions (pounds per day) ^a

Source	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Existing Project Emissions						
Area (Coating, Consumer Products, Landscaping)	3	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile Sources	2	4	18	<1	3	1
Subtotal Existing Emissions	5	4	18	<1	3	1
Proposed Project Emissions						
Area (Coating, Consumer Products, Landscaping)	34	<1	17	<1	<1	<1
Energy	<1	2	2	<1	<1	<1
Mobile Sources	15	35	142	<1	26	7
Subtotal Proposed Emissions	49	38	160	<1	27	8
Net Regional (On-Site and Off-Site) Emissions	44	33	142	<1	24	7
SCAQMD Numeric Indicators	55	55	550	150	150	55
Over/(Under)	(11)	(22)	(408)	(150)	(126)	(48)
Exceeds Thresholds?	No	No	No	No	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations.
Source: PCR Services Corporation, 2015.

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact. The SCAQMD's approach for assessing cumulative impacts related to operations is based on attainment of ambient air quality standards in accordance with the requirements of the Federal and State Clean Air Acts. As discussed earlier, the SCAQMD has developed a comprehensive plan, the 2012 AQMP, which addresses the region's cumulative air quality condition.

A significant impact may occur if a project were to add a cumulatively considerable contribution of a federal or state non-attainment pollutant. Because the SoCAB is currently in nonattainment for ozone, PM₁₀ and PM_{2.5}, related projects could cause ambient concentrations to exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and the SCAQMD. In particular, CEQA Guidelines Sections 15064(h)(3) provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

"A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency..."

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the project's incremental contribution to cumulative air quality impacts is determined based on compliance with the SCAQMD adopted 2012 AQMP. As discussed under Response II.a, the project would be consistent with the 2012 AQMP.

As the project is not part of an ongoing regulatory program, the SCAQMD also recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality. As discussed above, peak daily emissions of operation-related pollutants would not exceed SCAQMD regional significance thresholds. By applying SCAQMD's cumulative air quality impact methodology, implementation of the project would not result in an addition of criteria pollutants such that cumulative impacts would occur, in conjunction with related projects in the region. In addition, as discussed in Response III.d, below, construction of the project is not expected to result in a cumulatively considerable net increase of any criteria pollutant for which the SCAQMD has established a localized impact threshold. Therefore, the emissions of non-attainment pollutants and precursors generated by the project in excess of the SCAQMD project-level thresholds would be less than significant.

d. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. As defined in the SCAQMD CEQA Air Quality Handbook, a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities; (2) rehabilitation centers; (3) convalescent centers; (4) retirement homes; (5) residences; (6) schools; (7) parks and playgrounds; (8) child care centers; and (9) athletic fields.

The localized effects from the on-site portion of daily emissions were evaluated at sensitive receptor locations potentially impacted by the project according to the SCAQMD's localized daily significance threshold ("LST") methodology. Daily localized emissions caused by the project were compared to the LSTs in the SCAQMD's look-up tables to determine whether the emissions would cause violations of ambient air quality standards.⁶ The closest existing sensitive receptors to the project are single- and multi-family residential uses north of the project site across Venice Boulevard along Curts Avenue. Also, school related uses as part of the Turning Point School and Park Century School are located to the south east of the project site. The closest future sensitive receptor to the project is the Access Culver City project, a mixed-use development that will place multi-family uses to the east of the project site (over 200 feet away) across the intersection of National Boulevard and Washington Boulevard. Therefore, thresholds used for the LST analysis were based on a five-acre site within 50 meters of the nearest sensitive receptor in Source Receptor Area 2, Northwest Coastal Los Angeles County. As shown in **Table B-3, Maximum Localized Construction Emissions**, maximum daily localized emissions would not exceed the thresholds for NO_x, CO, PM₁₀, or PM_{2.5}.

Table B-3

Maximum Localized Construction Emissions (pounds per day)^a

Regional Emissions	VOC	NO_x	CO	SO₂	PM₁₀^b	PM_{2.5}^b
Demolition/Clear Site	1	12	10	<1	4	1
Shoring/Earth Support	2	24	11	<1	1	1
Excavation	2	25	22	<1	4	3
Continuous Concrete Pour	1	2	1	<1	<1	<1
Building Foundation	1	9	8	<1	1	1
Building Erection, Finishes, & Closeout	42	11	12	<1	1	1
Maximum Localized Emissions	42	25	22	<1	4	3
SCAQMD Localized Significance Thresholds^c	--	212	1,985	--	40	8
Over (Under)	--	(187)	(1,963)	--	(36)	(5)
Exceed Threshold?	--	No	No	--	No	No

^a Totals may not add up exactly due to rounding in the modeling

^b PM₁₀ and PM_{2.5} emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.

^c The SCAQMD LSTs are based on Source Receptor Area 2 (Northwest Coastal Los Angeles County) for a 5-acre site within a 50-meter receptor distance.

Source: PCR Services Corporation, 2015.

⁶ LSTs are only applicable to the following criteria pollutants: NO_x, carbon monoxide ("CO"), PM₁₀, and PM_{2.5}.

The greatest potential for toxic air contaminants (TAC) emissions would be related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. In addition, incidental amounts of toxic substances such as oils, solvents, and paints would be used. These substances would comply with all applicable SCAQMD rules for their manufacture and use. Construction activities associated with the project would be sporadic, transitory, and temporary in nature. Given the temporary duration of the construction phases of the project, construction impacts associated with TACs are addressed qualitatively based on consistency with strategies and measures that limit, minimize, or reduce diesel emissions.

According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. The project would be subject to SCAQMD rules designed to limit exposure to TACs during construction activities. The project would be required to comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation. The project would also comply with the requirements of SCAQMD Rule 1403 if asbestos is found during the renovation and construction activities.

Further, Culver City, as part of its conditions of approval, would require that during construction, dust shall be controlled by regular watering or other methods as determined by the Building inspector. Also, the City's conditions of approval require that during construction, trucks and other vehicles in loading and unloading queues must be parked with their engines off to reduce vehicle emissions. Construction deliveries must also be phased and scheduled to avoid emissions peaks as determined by the Building Official and discontinued during second-stage smog alerts.

Compliance with the above regulatory requirements and standard conditions of approval would minimize emissions of TACs during construction and would not result in long-term health risks to existing off-site sensitive populations.

Based on the above, impacts to off-site sensitive receptors from criteria pollutants and TACs would be less than significant and no mitigation measures would be necessary.

Operational Impacts

Within an urban setting, vehicle exhaust is the primary source of CO. Consequently, the highest CO concentrations are generally found within close proximity to congested intersection locations. Under typical meteorological conditions, CO concentrations tend to decrease as distance from the emissions source (i.e., congested intersection) increase. For purposes of providing a conservative, worst-case impact analysis, CO concentrations are typically analyzed at congested intersection locations, because if impacts are less than significant in close proximity of the congested intersections, impacts will also be less than significant at more distant sensitive receptor locations.

Project traffic during the operational phase of the project could have the potential to create local area CO impacts. CO levels in the project area are substantially below the federal and state standards.⁷ Carbon

⁷ See Table 3, *Pollutant Standards and Ambient Air Quality Data from Representative Monitoring Stations, in the Air Quality Technical Report.*

monoxide decreased dramatically in the Basin with the introduction of the catalytic converter in 1975. No exceedances of CO have been recorded at monitoring stations in the Basin for some time and the Basin is currently designated as a CO attainment area for both the CAAQS and NAAQS. Air quality data from local monitoring station between 2000-2014 indicate that the maximum CO levels in recent years are 3 ppm (1-hour average) and 2.2 ppm (8-hour average) compared to the thresholds of 20 ppm (1-hour average) and 9.0 (8-hour average). Thus, it is not expected that CO levels at project-impacted intersections would rise to such a degree as to cause an exceedance of these standards.

Localized areas where ambient concentrations exceed state and/or federal standards are termed CO hotspots. Emissions of CO are produced in greatest quantities from motor vehicle combustion and are usually concentrated at or near ground level because they do not readily disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind) atmospheric conditions. The potential for the project to cause or contribute to CO hotspots is evaluated by comparing impacted project intersections (both intersection geometry and traffic volumes) with prior studies conducted by the SCAQMD in support of their AQMPs. As discussed below, this comparison provides evidence that the project would not cause or contribute to the formation of CO hotspots, that CO concentrations at project impacted intersections would remain well below the ambient air quality standards, and that no further CO analysis is warranted or required.

The SCAQMD recommends a hot-spot evaluation of potential localized CO impacts when vehicle to capacity (“V/C”) ratios are increased by two percent or more at intersections with a level of service (“LOS”) of D or worse. Based on the traffic impact analysis prepared for the project (refer to Response XVI.a, below), only one study intersection would meet this criterion (National Boulevard and Robertson Boulevard). Therefore, additional analysis was performed qualitatively.

The SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Air Basin. These include: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; (d) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP, the SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County with an average daily traffic volume of about 100,000 vehicles per day.⁸ This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (one-hour average) and 3.2 (eight-hour average) at Wilshire Boulevard and Veteran Avenue.⁹ When added to the existing background CO concentrations, the screening values would be 7.6 ppm (one-hour average) and 5.6 ppm (eight-hour average).

Based on the project Traffic Study, of the studied intersections that are predicted to operate at a Level of Service (“LOS”) of D, E, or F under future year 2019 plus project conditions, one intersection at National Boulevard and Robertson Boulevard would potentially have peak traffic volumes of about 44,000 per day.¹⁰ As this intersection would result in less than 100,000 vehicles per day, CO concentrations are not expected to

⁸ South Coast Air Quality Management District, 2003 Air Quality Management Plan, Appendix V: Modeling and Attainment Demonstrations, (2003) V-4-24.

⁹ The eight-hour average is based on a 0.7 persistence factor, as recommended by the SCAQMD.

¹⁰ Kimley-Horn and Associates, Inc, Final Draft Report Traffic Impact Analysis, Washington and National Traffic and Parking Services Mixed-Use Development, (2015).

exceed SCAQMD significance thresholds. Thus, this comparison provides evidence that the project would not contribute to the formation of CO hotspots and no further CO analysis is required. Therefore, the project would result in less than significant impacts with respect to CO hotspots.

With regard to on-site sources of emissions, the project would generate emissions resulting from sources such as natural gas heaters, landscaping equipment, and consumer products. As the building footprint of the project is less than 5-acres, SCAQMD LST lookup tables were used to assess localized operational impacts. As shown in **Table B-4, Maximum Localized Operational Emissions**, on-site sources of emissions would remain below SCAQMD LST thresholds.

Table B-4

Maximum Localized Operational Emissions (pounds per day)^{a,b}

Source	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Existing Project Emissions						
Area (Coating, Consumer Products, Landscaping)	3	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Subtotal Existing Emissions	3	<1	<1	<1	<1	<1
Proposed Project Emissions						
Area (Coating, Consumer Products, Landscaping)	34	<1	17	<1	<1	<1
Energy	<1	2	2	<1	<1	<1
Subtotal Proposed Emissions	35	2	18	<1	<1	<1
Net Localized (On-Site) Emissions	31	2	18	<1	<1	<1
SCAQMD Numeric Indicators	–	212	1,985	–	10	2
Over/(Under)	–	(210)	(1,967)	–	(10)	(2)
Exceeds Thresholds?	–	No	No	–	No	No

^a Totals may not add up exactly due to rounding in the modeling calculations

^b The SCAQMD LSTs are based on Source Receptor Area 2 (Northwest Coastal Los Angeles County) for a 5-acre site within a 50-meter receptor distance.

Source: PCR Services Corporation, 2015.

During operation of the project, charbroilers may be used within the on-site restaurant uses. If char broilers are to be used at the project site, the operators would be required to comply with SCAQMD Rule 1138 which requires control of emissions from restaurant operations.

Because the Office Building would be located within 1,000 feet of the 10 Freeway, per subsection 99.05.504.5.3 of the LAMC, it would be required to have air filtration system installed and maintained with filters meeting or exceeding the ASHRAE Standard 52.2 Minimum Efficiency Reporting Value (MERV) of 13, to

the satisfaction of the City of Los Angeles Department of Building and Safety. The Hotel and Residential Buildings would be located over 1,000 feet from the 10 Freeway and within the City of Culver City, and would not require air filtration beyond standard City requirements to address air quality pollutants associated with the site's proximity to the 10 Freeway.

Also, the parking structure would be built in accordance with applicable City of Los Angeles and/or Culver City Municipal Code requirements, and as such, would be required to provide adequate mechanical ventilation and dispersion of potential emissions to acceptable ambient concentrations so as not pose any public health hazards.

Overall, based on the above, localized operational impacts would be less than significant.

e. Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. According to the SCAQMD CEQA Air Quality Handbook, construction equipment is not a typical source of odors. SCAQMD Rule 1113 limits the amount of VOCs from architectural coatings and solvents. Through adherence with mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed which would create objectionable odors. The nearest existing sensitive receptors are residences across Venice Boulevard on Curts Avenue and school uses (Turning Point School and Park Century School), and the nearest future receptors would be located across Washington and National Boulevards in the soon to be completed Access Culver City mixed use development. However, the project's proposed uses would not typically generate nuisance odors at nearby sensitive receptors.

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The project would not involve elements related to these types of uses. A series of trash rooms would be provided within the Office Building, Residential Building and Hotel Building. On-site trash receptacles used by the project would be covered and properly maintained to prevent adverse odors. With proper housekeeping practices, trash receptacles would be maintained in a manner that promotes odor control, no adverse odor impacts are anticipated from these types of land uses. While there is a potential for odors to occur, compliance with industry standard odor control practices, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts to a less than significant level.

While impacts would be less than significant, the following standard City of Los Angeles mitigation measure is prescribed to ensure that odor impacts from commercial trash receptacles are minimized to nearby residential uses.

Mitigation Measure

- AIR-1** Open trash receptacles shall be located a minimum of 50 feet from the property line of any residential zone or use. Trash receptacles located within an enclosed building or structure shall not be required to observe this minimum buffer. (City MM III-60: Commercial Trash Receptacles)

IV. BIOLOGICAL RESOURCES

Would the project:

- a. **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

No Impact. The project site is located in a highly urbanized area of Culver City and the City of Los Angeles and is currently developed with light industrial and commercial uses along Venice Boulevard and surface parking throughout the remainder of the site. The project site does not include suitable habitat for candidate, sensitive, or special status species. Due to high levels of human activity and density of development in the project area, there is no potential for sufficient natural habitat to support candidate, sensitive, or special status species on the project site. As such, the project would not have a substantial adverse effect on candidate, sensitive, or special status species and no impact would occur in this regard.

- b. **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?**

No Impact. As discussed under Response IV.a, the project site is currently developed with urban uses. No designated riparian habitat or natural communities exist on the project site or in the surrounding area. Vegetation is generally non-existent along Washington Boulevard with five mature ornamental trees situated along Venice Boulevard, three ornamental trees situated along National Boulevard, one ornamental tree situated along Exposition Boulevard, and four ornamental trees located on-site adjacent the existing light industrial and commercial uses. The project site and surrounding area does not include any vegetation that constitutes a plant community. As such, the project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community and no impact would occur in this regard.

- c. **Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

No Impact. As discussed under Response IV.a, the project site is currently developed. It does not contain any federally protected wetlands as defined by Section 404 of the Clean Water Act. As such, the project would not have a substantial adverse effect on federally protected wetlands and no impact would occur in this regard.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native nursery sites?

Less Than Significant Impact with Mitigation Incorporated. The project site is currently developed and located in a highly urbanized area of Culver City and the City of Los Angeles. No wildlife corridors or native wildlife nursery sites are present on the project site or in the surrounding area. Further, due to the urbanized nature of the project area, the potential for native resident or migratory wildlife species movement through the site is negligible.

Nonetheless, the project does include ornamental trees that could support raptor and/or songbird nests. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). The removal of vegetation with nesting birds during the breeding season is considered a potentially significant impact. Mitigation provided below would reduce this impact to a less than significant level.

Mitigation Measure

BIO-1 The Applicant shall be responsible for the implementation of mitigation to reduce impacts to migratory and/or nesting bird species to below a level of significance through one of two ways. Vegetation removal activities shall be scheduled outside the nesting season which runs from February 15 to August 31 to avoid potential impacts to nesting birds. This would insure that no active nests are disturbed.

Any construction activities that occur during the nesting season shall require that all suitable habitat be thoroughly surveyed for the presence of nesting birds by a qualified biologist, retained by the Applicant as approved by the City of Culver City, before commencement of clearing and prior to grading permit issuance. The survey shall be conducted within 72 hours prior to the start of construction. A copy of the pre-construction survey shall be submitted to the City. If any active nests are detected, a buffer of at least 300 feet (500 feet for raptors) shall be delineated, flagged, and avoided until the qualified biological monitor has verified that the young have fledged or the nest has otherwise become inactive.

If the biologist determines that a narrower buffer between the project activities and observed active nests is warranted, he/she should submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) to the City of Culver City and, upon request, the California Department of Fish and Wildlife Service. Based on the submitted information, the City of Culver City (and the Department, if the Department requests) shall determine whether to allow a narrower buffer.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. The project site does not support protected tree species. Vegetation on the project site is largely confined to five mature ornamental trees situated along Venice Boulevard, three ornamental trees situated along National Boulevard, one ornamental tree situated along Exposition Boulevard, and four ornamental trees located on-site adjacent the existing light industrial and commercial uses, all of which would be removed as part of the project. The project would result in a substantial net increase in trees on site compared to existing conditions. Project implementation would comply with the applicable provisions pertaining to the removal and replacement of street trees in the City of Los Angeles Municipal Code (LAMC) within Chapter 1: General Provisions and Zoning, Article 7: Division of Land Regulations, Section 17.08: Improvements. Section 17.08 of the LAMC states arrangements between the project applicant and City shall be made whereby the applicant replaces or plants additional street trees to the satisfaction of the Los Angeles Bureau of Street Maintenance of the Department of Public Works, or makes cash payment to the City subject to the street tree maintenance fee set for in Section 62.176, Street Maintenance Fee. Also, the project would comply with the applicable provisions pertaining to the removal and replacement of street trees in the Culver City Municipal Code (CCMC) within Title 9: General Regulations, Chapter 9.08: Streets and Sidewalks – Tree Removal, Section 9.08.220: Removal of Trees in Parkways Related to Private Improvement or Development Project.. Per Culver City's requirements, the project is required to plant two new Street Right-of-Way trees or Parkway trees for each tree that is removed from the site. The size and location of the replacement trees would be determined by the Public Works Director based on what is appropriate for the particular Street Right-of-Way or Parkway. The project would provide street trees well above this requirement. With compliance to the applicable street tree removal and replacement provisions of the LAMC and CCMC, a less than significant impact would occur in this regard.

While impacts would be less than significant, the following standard City of Los Angeles mitigation measure is prescribed to ensure that the project complies with the applicable street tree removal requirements and procedures in the portion of the site within the City of Los Angeles.

Mitigation Measure

- BIO-2** Removal of trees in the public right-of-way requires approval by the Board of Public Works. The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works (213-847-3077). The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Mitigation measures such as replacement by a minimum of 24-inch box trees in the parkway and on the site, on a 1:1 basis, shall be required for the unavoidable loss of significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) trees in the public right-of-way. All trees in the public right-of-way shall be provided per the current Urban Forestry Division standards. (City MM IV-90: Tree Removal – Public Right-of-Way)

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. As discussed above, no designated riparian habitat or natural communities exist on the project site or in the surrounding area. Additionally, there is no adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or State habitat conservation plan in place for the project site or Culver City or the City of Los Angeles. Thus, no impact would occur in this regard.

V. CULTURAL RESOURCES

Would the project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

No Impact. The following analysis pertaining to historic resources impacts is based on information contained in the *Historical Resources Assessment and Environmental Impacts Analysis* prepared by PCR in December 2015, which is available for review at the Culver City Planning Division.

A historical resource is defined in Section 15064.5(a)(3) of the CEQA Guidelines as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Historical resources are further defined as being associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined eligible for the California Register, included in a local register, or identified as significant in a historic resource survey are also considered historical resources under CEQA.

A project with an effect that may cause substantial adverse change in the significance of a resource is a project that may have a significant impact on the environment. Substantial adverse change is defined as physical demolition, relocation, or alteration of a resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.¹¹ Direct impacts are those that cause substantial adverse physical change to a historic property. Indirect impacts are those that cause substantial adverse change to the immediate surroundings of a historic property such that the significance of a historical resource would be materially impaired.

The project site is located within the City of Culver City, as well as in the City of Los Angeles in a dense urban setting surrounded by commercial and light industrial uses. The majority of the project site is located within Culver City and is improved with an asphalt surface parking lot for the Metro Station, however, the row of parcels fronting Venice Boulevard along the northwest edge of the project site are located within the City of Los Angeles. This row of parcels facing north towards Venice Boulevard is improved with six one-and-two story

¹¹. California Code of Regulations, Title 14, Chapter 3, Article 5, Section 15064.5 (b) (1)

commercial buildings. Of those six commercial buildings, four buildings are over 45 years in age and include 8910 Venice Boulevard (APN 4312-014-281), 8916 Venice Boulevard (APN 4312-014-279), 8918 Venice Boulevard (APN 4312-014-278), and 8926 Venice Boulevard (APN 4312-014-277), Los Angeles, as shown on **Figure B-3, On-site Buildings Evaluated for Historic Significance**, which require evaluation as potential historical resources. None of the buildings have been previously surveyed or determined eligible as historical resources, furthermore there are no historical resources with views of the project site in the immediate vicinity of the project site, as determined from the archival records search as presented below. The project intends to redevelop the project site and remove the aforementioned commercial buildings. To support this analysis, a site visit and property research were conducted, a historic context was prepared, and the structures were evaluated for their potential eligibility as historical resources by qualified architectural historians.¹² The results of this investigation are provided below.

Historic Resources in the Project Vicinity

The records search for cultural resources within the project vicinity (approximately 0.25-mile radius) involved review of previous surveys records and reports on file at the South Central Coastal Information Center (SCCIC) records center, PCR's in-house files, the City of Culver City, and the City of Los Angeles. Located within a dense, urban setting with limited visibility, the 0.25-mile radius records search was conducted to capture all known resources within the project vicinity which may have views of the project site for the purpose of analyzing potential direct and indirect impacts. PCR also consulted the National Register, California Register, Statewide Historical Resources Inventory (HRI), California Points of Historical Interest (PHI), California Historical Landmarks (CHL) database, City of Culver City's list of historically designated properties, and the City of Los Angeles' list of Historic Cultural Monuments to identify previously identified historical resources within the project vicinity.

None of the buildings within the project site have been previously surveyed or determined eligible as historical resources. However, there are three historical resources within a quarter-mile radius of the project site. The Helms Bakery (Primary Number 19-167071), located 0.19 (1,014 feet) to the northeast, is listed on the National Register, California Register and as a Culver City Landmark. Also, listed at the national, state, and local levels is the Los Angeles Pacific Company Ivy Park Station (Primary Number 19-162271) located at 9015 Venice Boulevard. The Ivy Park Station is 0.19 miles (1,026 feet) to the southwest of the project site. The Beacon Laundry located at 8695 Washington Boulevard (0.19 mile to the northeast) is recognized as a significant structure in Culver City. There are no historical resources immediately adjacent or across the street from the project site; the three historical resources described above are approximately 0.19 miles away from the project site and do not have direct views of the project site.

Historic Context

Commercial Corridors, 1875-1980

Culver City was founded by Harry H. Culver (1880 – 1946), who born and raised in Milford, Nebraska migrated to California in 1910 where he began his real estate training with the real estate giant I.N. Van Nuys. Located halfway between the burgeoning seaside town of Venice and downtown Los Angeles was open land, originally

¹² PCR's architectural historians meet and exceed the Secretary of the Interior's professional qualifications standards in history, architectural history and historic architecture.

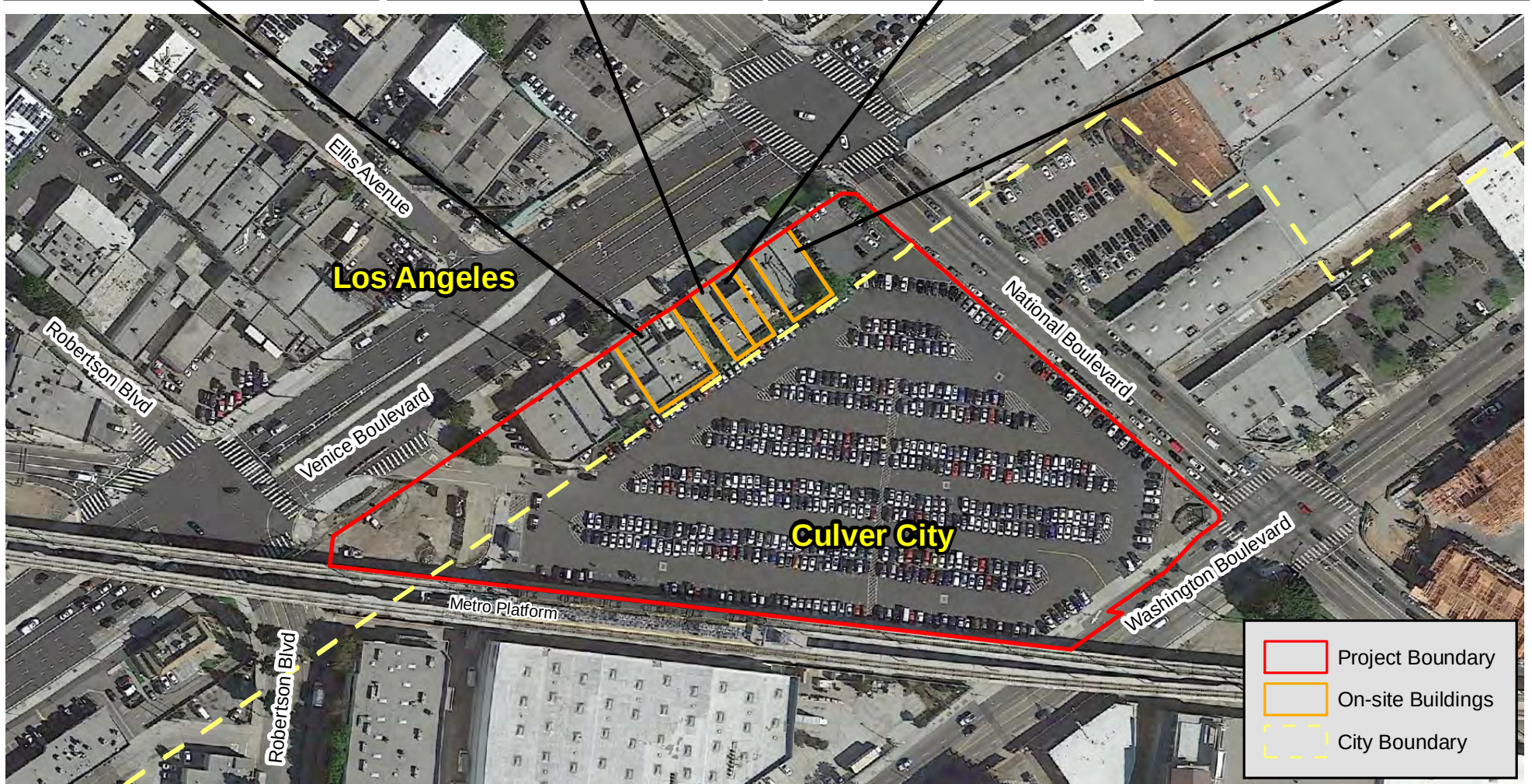
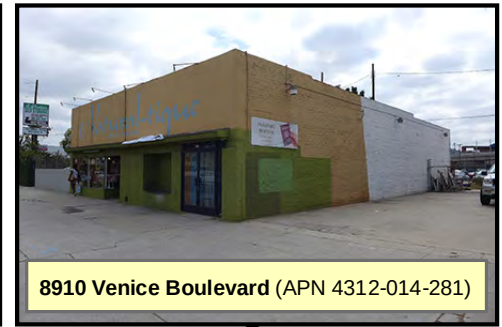
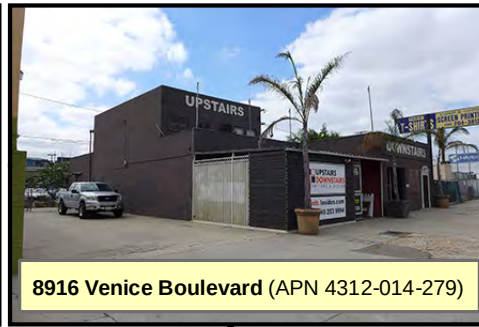
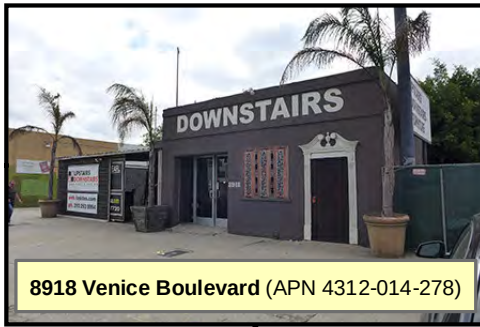
part of Rancho La Ballona, which Culver saw as an ideal opportunity to develop a new town site. In 1913 Culver announced his plan to develop Culver City; after its establishment the City continued to grow and finally incorporated in 1917. Downtown Culver City was centered on a main street (Washington Boulevard) anchored by a six-story hotel, Fire and Police Departments, a city hall, banks, restaurants, and stores. The early economics of Culver City were supported by movie studios. Industry came in the form of Western Stove in 1922, then the Helms Bakeries in 1930, and then the Hayden Industrial Tract was established in the 1940s. During the 1950s Washington Boulevard would be improved with a number of car dealerships. Over the years, more than forty annexations increased city size from 1.2 square miles to about five square miles.¹³

The project site, located in eastern Culver City, is located in Tract 5461 that was subdivided in 1922. The 1924 Sanborn Map shows the project site was an undeveloped triangular shaped block bounded by Venice Boulevard, National Boulevard, and Winship Avenue (Exposition Boulevard). Running parallel to Winship Avenue (Exposition Boulevard) was the Pacific Electric Right of Way improved with the Montgomery Lumber Company. The next Sanborn Map available from 1929 shows the same conditions, however, three buildings were developed (later demolished) at the southeast corner of the block at the intersection of National Boulevard and Exposition Boulevard that included a tile warehouse, auto repair shop, and gas station. Approximately 18 years later, in 1947 and 1948, the commercial buildings at 8910 Venice Boulevard, 8916 Venice Boulevard, 8918 Venice Boulevard, and 8926 Venice Boulevard were constructed per Los Angeles County Assessor data. These buildings are shown on the 1949 Sanborn Map, which also shows that half of the parcels on the project site were improved with other commercial buildings around the perimeter of the block. 8910 Venice Boulevard (APN 4312-014-281), was a one-story, reinforced concrete building with a storefront, office and a watchman's tool manufacturing company occupied the rear of the building. 8916 Venice Boulevard (APN 4312-014-279) was a one-and-two story building that had a store with an apartment above and a small one-story addition attached to the rear. To the immediate west was 8918 Venice Boulevard (APN 4312-014-278), a one-story commercial building, also notated as a store. Four parcels to the west was 8926 Venice Boulevard (APN 4312-014-277), a one-story clothing manufacturing building.

Between their original construction in 1947 and 1948 and the present time, the four existing commercial buildings have undergone a number of alterations and additions based upon building permits on file at the Los Angeles Department of Building and Safety. A 25 feet by 80 feet addition was constructed onto the side (west) elevation of 8910 Venice Boulevard (APN 4312-014-281) in 1955, doubling the building's original 25 feet by 80 feet footprint.¹⁴ 8910 Venice Boulevard also appears to now have new storefronts, primary entrance doors, and stucco sheathing. 8916 Venice Boulevard (APN 4312-014-279) also has a number of alterations that includes a one-story rear addition constructed in 1950, a door was cut into the west wall to create a passageway into the adjacent building at 8918 Venice Boulevard (APN 4312-014-278) in 1952, and a new

¹³ Julie Lugo Cerra, *Images of America: Culver City* (Charleston, South Carolina: Arcadia Publishing, 2004); "Culver City History: Overview," *The City of Culver City*, <http://www.culvercity.org/Visitors/CulverCityHistory/overview.aspx>, accessed September 11, 2015.

¹⁴ Los Angeles Department of Building and Safety, Building Permit Number 1955LA14962 (June 6, 1955).



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exterior doorway was added in 1955.¹⁵ Currently the appearance of 8916 and 8918 Venice Boulevard suggests the building is one building when historically they were two separate buildings. In 1961, the entire front façade of 8926 Venice Boulevard (APN 4312-014-277) was updated for approximately \$2,500 with stucco and tiles completely changing the building's original appearance.¹⁶ And in 1966 a warehouse with the dimensions of 50 feet by 50 feet and an estimated value of \$15,000 was added onto the side (west) elevation of 8926 Venice Boulevard thereby doubling the total square footage.¹⁷

Significance

Based on an intensive site survey and historic research, the four identified commercial buildings over 45 years in age on the project site that include 8910 Venice Boulevard (constructed 1947), 8916 Venice Boulevard (constructed 1948), 8918 Venice Boulevard (constructed 1947), and 8926 Venice Boulevard (constructed 1947) do not possess sufficient historical or architectural importance to reach the threshold of significance as historical resources either individually or as contributing members of a potential district, under any of the applicable federal, state or local eligibility criteria. Although the commercial strip along Venice Boulevard is associated with historic themes identified in the Los Angeles' Citywide Historic Context Statement, such as Commercial Corridors (1875-1980), the four commercial buildings are heavily altered examples of postwar commercial development related to the automobile, do not retain integrity, and are not part of a distinctive grouping of commercial buildings. Furthermore, all buildings within the project site are common, undistinguished, and altered examples of a type and style of commercial buildings built in mass throughout Southern California and the United States during the postwar era. They do not reflect or exemplify the broad cultural, political, economic, or social history of the nation, state, City of Los Angeles or City of Culver City. PCR has assigned each of the four commercial buildings at 8910 Venice Boulevard, 8916 Venice Boulevard, 8918 Venice Boulevard, and 8926 Venice Boulevard a California Historical Resource ("CHR") status code of 6Z, "found ineligible for the National Register, California Register, or Local designation through survey evaluation."

Conclusion

Because none of the commercial buildings on the project site are historical resources, the project would have no direct impacts on historical resources. Furthermore, the project would result in no indirect impacts to historical resources in the vicinity of the project site. There are three historical resources located approximately 0.19 miles away from the project site. Because of large-scale contemporary construction surrounding the triangular-shaped project site which isolates the project site from view, none of the identified historical resources in the vicinity would have views of the project site. Additionally, the historic setting in the area around the project site is already eroded by contemporary development. Pursuant to CEQA, the project would not result in direct or indirect impacts to historical resources.

¹⁵ Los Angeles Department of Building and Safety, Building Permit Number 1950LA21460 (June 6, 1955); Los Angeles Department of Building and Safety, Building Permit Number 1952LA24801 (June 6, 1955); Los Angeles Department of Building and Safety, Building Permit Number 41955LA24633 (September 12, 1955).

¹⁶ Los Angeles Department of Building and Safety, Building Permit Number 1961WL38648 (December 4, 1961).

¹⁷ Los Angeles Department of Building and Safety, Building Permit Number 1966WL61741 (January 10, 1966).

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant Impact With Mitigation Incorporated. The following analysis pertaining to archaeological resources impacts is based on information contained in the *Phase I Archaeological and Paleontological Resources Assessment* prepared by PCR in December 2015, which is available for review at the Culver City Planning Division. Included in the Phase I report is correspondence pertaining to Native American consultation conducted for the project, including correspondence with representatives of the Gabrieleno Band of Mission Indians.

Results of the cultural resources records search conducted through the California Historical Resources Information System South Central Coastal Information Center (CHRIS-SCCIC) at California State University, Fullerton, indicate that the project site has not been surveyed by a qualified archaeologist and no known archaeological resources (including historic and prehistoric period) have been recorded within the project site boundaries or within a half-mile radius. Ten cultural resource investigations have been conducted within the one-half mile radius. Of the ten studies, six were conducted immediately adjacent to the project site.

As noted in the historical resources analysis above, the project site is located in Tract 5461 that was subdivided in 1922. The 1924 Sanborn Fire Insurance Map shows the project site was an undeveloped triangular shaped block bounded by Venice Boulevard, National Boulevard, and Winship Avenue (Exposition Boulevard). Running parallel to Winship Avenue (Exposition Boulevard) was the Pacific Electric Right of Way improved with the Montgomery Lumber Company. The next Sanborn Map available from 1929 shows the same conditions; however, three buildings were developed (later demolished) at the southeast corner of the block at the intersection of National Boulevard and Exposition Boulevard that included a tile warehouse, auto repair shop, and gas station. Review of the 1950 Sanborn Fire Insurance Map indicates that, by 1950, nearly the entire project site was developed with commercial, industrial, and residential uses. For instance, the southwestern portion of the project site (corner of Robertson Blvd. and Venice Blvd.) is depicted as being developed with a one-story office building while the southern portion (immediately north of the current Culver City Station), is also shown as being developed with a building material warehouse, lumber racks yard, sash and doors building, lime and cement yard, a lumber shed, roofing and panels building, and a "Some Paint" office building. The 1950 Sanborn map also exhibits Exposition Blvd. as cutting across the middle portion of the project site and along an east-west axis. Just north of the old Exposition Blvd., the 1950 Sanborn map depicts five one-story dwellings with a large parking garage, seven one-story dwellings with two small parking garages, four one-story dwellings with two small parking garages, one large story dwelling with a walkway and detached building (possibly a private garage), a "Paint" building, a lamp manufacturing building, a metal and woodworking shop, and a "Bindery Leather Work'g" building. Along Venice Blvd., a clothing manufacturing building, a driveway, a one-story store, a one-story structure, a two-story store and two small associated buildings, a one-story store, an office and "Watchmans Tool Mfg" plant, and a gas and oil station are also depicted on the Sanborn map. Lastly, along National Blvd., a one-story office building, a one-story dwelling, a plumbing equipment manufacturing plant, a cabinet shop, a sheet metal products manufacturing plant, a dry cleaning equipment manufacturing plant, a machinery shop, an auto repair shop, and a gas and oil station are depicted also shown as having existed within the project site.

Although many of the former improvements (residential, commercial, and industrial uses) that are depicted in the Sanborn Maps were demolished sometime between 2007 and 2009 (per review of Google Earth aerial

photography), it is possible that buried historic period archaeological deposits (e.g., refuse heaps, privies, foundations, cellars, etc.) may still exist below the ground surface of the project site. Construction excavations associated with the project's proposed two-and-a-half levels of subterranean parking has the potential to impact previously unknown archaeological resources below artificial soils on site. Furthermore, on October 14, 2015, Robert Dorame of the Gabrielino Tongva Indians contacted PCR via phone and recommended Native American monitoring at the project site during ground disturbing activities, as he mentioned that "his lineal descendancy" has close ties to the project site. Mr. Dorame specifically mentioned that his great grandmother lived less than a mile away and close to the Ballona Creek area. Consistent with input per consultation with the Gabrielino Tongva Indians, Mitigation Measures CULT-1 to CULT-3 are prescribed to ensure that potentially significant impacts to previously unknown archaeological resources that are unexpectedly discovered during project implementation are reduced to a less than significant level.

Mitigation Measures

- CULT-1:** The Applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. Monitoring may be adjusted, or ceased entirely, as determined appropriate by the archaeological monitor.
- CULT-2:** In the event that archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 25 feet shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by a qualified archaeologist. The Applicant shall coordinate with the archaeologist to develop an appropriate treatment plan for the resources. In preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes.
- CULT-3:** The archaeological monitor shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources. The report and the Site Forms shall be submitted by the Applicant to Culver City, the City of Los Angeles, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact With Mitigation Incorporated. A paleontological records search was commissioned through the Natural History Museum of Los Angeles County (NHMLAC) to determine potential impacts of the proposed project on paleontological resources. Results of the record search revealed that no known vertebrate fossil localities have been recorded within the project site, but localities have been recorded in the vicinity in the same sedimentary deposits that underlie the project site. According to the NHMLAC, the project site contains younger Quaternary Alluvium deposits derived as fluvial deposits from Ballona Creek. Although these deposits typically do not contain vertebrate fossils in the uppermost layers, there are older Quaternary sediments in the area that have yielded paleontological resources. For instance, resource LACM 3368 produced a fossil horse while LACM 4250 produced a fossil mammoth-both resources were recovered at unknown depths. Moreover, LACM 4232 produced the remains of fossil human at a depth of 12 to 13 feet below the surface. These three localities (LACM 3368, 4250, and 4232) are located approximately one-half mile to three-quarters of a mile away from the project site. Additional vertebrate fossil localities (LACM 1159, LACM 3366, LACM 3367 and LACM 3369 and LACM 3370) have also been recorded between Crenshaw Boulevard and Ballona Creek (along the Southern Pacific Railway and Rodeo Road) approximately one to three miles from the project site, during excavations for the Outfall Sewer area in the 1920s. LACM 1159 yielded a fossil human at a depth between 19 to 23 feet below the surface. LACM 3366 (fossil camel), LACM 3367 (fossil mastodon), and LACM 3370 (sabretooth cat) were all recovered at unknown depths. Lastly, LACM 3369 produced a fossil horse at a depth of six feet below the surface. Based on the rich paleontological findings near the project site and given that the proposed excavations for the subterranean parking will extend into fossiliferous native soils (i.e., older Quaternary alluvium), the potential to encounter paleontological resources during construction excavations extending past artificial fill is considered high. As a result, Mitigation Measures CULT-4 to CULT-6 are prescribed to ensure that potentially significant impacts to previously unknown paleontological resources that are unexpectedly discovered during project implementation are reduced to a less than significant level.

Mitigation Measures

CULT-4: A qualified Paleontologist shall be retained to develop and implement a paleontological monitoring program for construction excavations that would encounter older Quaternary alluvium. The Paleontologist shall attend a pre-grading/excavation meeting to discuss a paleontological monitoring program. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Paleontologist during construction excavations into older Quaternary alluvium. Monitoring 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. The frequency of monitoring inspections shall be determined by the Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the paleontological monitor.

CULT-5: If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. A buffer area of at least 25 feet shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. 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 and evaluation. If preservation in place is not feasible, the paleontologist shall implement a paleontological salvage program to remove the resources from the project site. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.

CULT-6: The paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the lead agency and the Natural History Museum of Los Angeles County, and other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

d. Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact With Mitigation Incorporated. A Sacred Lands File search for the project site requested by PCR from the Native American Heritage Commission (NAHC) in Sacramento failed to indicate the presence of Native American cultural resources from the NAHC archives in the immediate project area. The NAHC noted; however, that "the absence of specific site information in the sacred lands file does not indicate the absence of cultural resources in any project area". Although the cultural resources records search revealed that no known human remains have been recorded within the project site or half-mile radius, the results of the paleontological resources records search did reveal that two fossil localities that yielded fossil human remains have been recorded in the general vicinity (within one-mile) of the project site. Since the general area has yielded buried human remains in the past, the sensitivity of the project site with respect to human remains is considered to be moderate to high. As a result, in the event that previously unknown human remains are encountered during construction excavations, Mitigation Measure CULT-7 is prescribed to ensure that potentially significant impacts to them are reduced to a less than significant level.

Mitigation Measure

CULT-7: If human remains are encountered unexpectedly during implementation of the project, 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, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may

recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

Whenever the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

VI. GEOLOGY AND SOILS

The following impact analysis pertaining to the site's underlying geology and soils is based on information contained in the *Geotechnical Engineering Investigation Proposed Mixed Use Development South side of National Boulevard between Venice Boulevard and Washington Boulevard, Culver City and Los Angeles, California* (herein referred to as the "Geotechnical Engineering Investigation"), prepared by Geotechnologies, Inc., dated December 22, 2014 (provided under separate cover available at the Culver City Planning Division).

Would the project:

- a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**
 - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

Less Than Significant Impact. Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. Based on criteria established by the California Geological Survey (CGS), faults may be categorized as active, potentially active, or inactive. Active faults are those which show evidence of surface displacement within the last 11,000 years (Holocene-age). Potentially active faults are those that show evidence of most recent surface displacement within the last 1.6 million years (Quaternary-age). Faults showing no evidence of surface displacement within the last 1.6 million years are considered inactive. In addition, there are buried thrust faults, which are low angle reverse faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The CGS has established earthquake fault zones known as Alquist-Priolo Earthquake Fault Zones around the surface traces of active faults to assist cities and counties in planning, zoning, and building regulation functions. These zones, which extend from 200 to 500 feet on each side of a known active fault, identify areas where potential surface rupture along an active fault could prove hazardous and identify where special studies are required to characterize hazards to habitable structures.

The project site is located in the seismically active Southern California region and could be subject to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. The Geotechnical Engineering Investigation conducted for the project indicates that no currently known active or potentially active surface faults traverse the project site, and the site is not located within a designated Alquist-Priolo Earthquake Fault Zone. The faults in the vicinity of the project site are shown on the Southern California Fault Map, the Earthquake Fault Zone Figure, and the Navigate L.A. Map in the Geotechnical Engineering Investigation. The nearest fault zone to the project site is the Newport Inglewood Fault Zone, located approximately 1,000 feet east of the site. The Geotechnical Engineering Investigation indicates the Newport Inglewood Fault is located approximately 1,300 feet to the east of the project site with traces of the Fault approximately 1,700 feet to the southwest and 4,100 feet to the northwest of the site. In addition, the Overland Avenue Fault is located approximately 2.2 miles southwest of the site. As such, the potential for surface rupture due to faulting occurring on the project site during the design life of the project is considered low. Furthermore, project buildings would be designed and constructed to resist the effects of seismic ground motions as provided in the Culver City and the City of Los Angeles Building Codes, as applicable, and the 2013 California Building Code (CBC). Thus, a less than significant impact would occur in this regard.

ii. Strong seismic ground shaking?

Less Than Significant Impact With Mitigation Incorporated. Seismicity is the geographic and historical distribution of earthquakes, including their frequency, intensity, and distribution. The level of ground shaking at a given location depends on many factors, including the size and type of earthquake, distance from the earthquake, and subsurface geologic conditions. The type of construction also affects how particular structures and improvements perform during ground shaking. A common measure of ground motion is the peak ground acceleration (PGA). It is not a measure of total energy of an earthquake, such as the Richter and moment magnitude scales, but rather of how hard the ground shakes in given geographic area. PGA is expressed as the percentage of the acceleration due to gravity (G), which is approximately 980 centimeters per second squared. According to the United States Geological Survey (USGS), the following chart shows the extent of perceived shaking and potential damage associated with a given acceleration:

Per the CBC, an estimated PGA is determined for a site of proposed construction based on the mapping by the USGS along with detailed analysis as an estimate of anticipated ground shaking for use by the project structural engineer in design of the proposed structures to resist. There is potential for significant ground shaking at the project site during a strong seismic event on the Newport Inglewood Fault, the Overland Avenue Fault, as well as on the other large active faults in the Southern California region. According to the Geotechnical Engineering Investigation, a maximum probable event could produce a PGA value at the project site of 0.75g. This is a relatively high acceleration due to the proximity of the Newport Inglewood Fault and the Overland Avenue Fault. If this relatively high ground acceleration was not considered in the design and construction phase, ground shaking at this intensity could result in significant damage to buildings and improvements associated with project implementation.

Acceleration (g)	Perceived Shaking	Potential Damage
< 0.0017	Not felt	None
0.0017 - 0.014	Weak None	None
0.014 - 0.039	Light	None
0.039 - 0.092	Moderate	Very Light
0.092 - 0.18	Strong	Light
0.18 - 0.34	Very Strong	Moderate
0.34 - 0.65	Severe	Moderate to Heavy
0.65 - 1.24	Violent	Heavy
> 1.24	Extreme	Very Heavy

Source: United States Geological Survey. Accessed from website at:
http://en.wikipedia.org/wiki/Peak_ground_acceleration, accessed August 2015.

The City of Culver City and the City of Los Angeles require that all new construction meet or exceed City building codes and the latest standards of the 2013 CBC for construction which requires structural design that can accommodate maximum ground accelerations expected from known faults. Furthermore, the project would comply with the CGS Special Publications 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, which provides guidance for evaluation and mitigation of earthquake-related hazards. While the project would be required to comply with applicable seismic-related regulatory requirements, implementation of the site-specific structural and seismic design parameters and recommendations for foundations, retaining walls/shoring, and excavation of the Geotechnical Engineering Investigation per Mitigation Measure GEO-1 would further ensure that seismic-related ground shaking impacts would be less than significant. The project's Final Geotechnical Engineering Investigation would consider City of Los Angeles Resiliency by Design Principles, as necessary and applicable to the project.

Mitigation Measures

GEO-1: Site-specific structural and seismic design parameters and recommendations for foundations, retaining walls/shoring, and excavation shall be implemented per the project's Final Geotechnical Engineering Investigation, subject to review and approval by Culver City Building Safety Division and/or Los Angeles Department of Building and Safety, as necessary.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact With Mitigation Incorporated. Liquefaction is a phenomenon in which saturated silty to cohesionless soils below the groundwater table are subject to a temporary loss of strength due to the buildup of excess pore pressure during cyclic loading conditions such as those induced by an earthquake. Liquefaction effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures. Liquefaction typically occurs in areas where groundwater is less than 50 feet from the surface, and where the soils are composed of poorly consolidated, fine to medium-grained sand. In addition to the necessary soil conditions, the ground acceleration and duration of the earthquake must also be of a sufficient level to initiate liquefaction.

According to the State of California Seismic Hazard Zone Map of the Beverly Hills Quadrangle, the eastern portion of the project site is located within an area designated as “liquefiable”, while the western portion of the site is not.¹⁸ This determination is based on groundwater depth records, soil types, and distance to faults capable of producing a substantial earthquake. Groundwater was encountered during exploration at depths between 27.5 and 32.5 feet below the ground surface. According to the Seismic Hazard Zone Map of the Beverly Hills Quadrangle, the historic high groundwater level for the project site ranged between 18 feet at the eastern end of the site and 23 feet at the western end of the site. To further evaluate the potential for liquefaction hazards, the Geotechnical Engineering Investigation conducted a site-specific liquefaction analyses which considered groundwater depths and soil conditions. The Geotechnical Investigation concluded that the soils underlying the project site would not be prone to liquefaction. While the project would be required to comply with applicable seismic-related regulatory requirements of the Culver City and City of Los Angeles building codes, as applicable, and the 2013 CBC, implementation of the site-specific design parameters and recommendations of the Geotechnical Engineering Investigation per Mitigation Measure GEO-1 to be implemented during construction would ensure that seismic-related ground failure impacts, including liquefaction, would be less than significant.

Mitigation Measures

Refer to Mitigation Measure GEO-1. No additional mitigation measures are necessary.

iv. Landslides?

No Impact. The project site is relatively flat with a gentle slope from the east to west, ranging from approximately 102.5 feet above sea level at the eastern boundary to approximately 105.5 feet above sea level at the western boundary for a total grade change of approximately three feet across the property. The project site is located in a highly urbanized area of Culver City and the City of Los Angeles and is currently developed with light industrial and commercial uses along Venice Boulevard and surface parking throughout the remainder of the site. According to the Geotechnical Engineering Investigation, there are no known landslides near the project site, nor is the site in the path of any known or potential landslides. Thus, the project would not be subject to, or result in, landslides and there would be no impact in this regard.

b. Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Soil erosion refers to the process by which soil or earth material is loosened or dissolved and removed from its original location. Erosion can occur by varying processes and may occur in a project area where bare soil is exposed to wind or moving water (both rainfall and surface runoff). The processes of erosion are generally a function of material type, terrain steepness, rainfall or irrigation levels, surface drainage conditions, and general land uses. Topsoil is used to cover surface areas for the establishment and maintenance of vegetation due to its high concentrations of organic matter and microorganisms.

¹⁸ The liquefaction areas within the project site are illustrated on the Seismic Hazard Zone Map in the Geotechnical Engineering Investigation.

The project site is located in a highly urbanized area of Culver City and the City of Los Angeles and is currently developed with light industrial and commercial uses along Venice Boulevard and surface parking throughout the remainder of the site. Negligible, if any, native topsoil is likely to occur on the project site as it is currently developed with structures and surface parking. Project construction would result in ground surface disruption during excavation, grading, and trenching that would create the potential for erosion to occur. Wind erosion would be minimized through soil stabilization measures required by the SCAQMD Rule 403 (Fugitive Dust), such as daily watering. Potential for water erosion would be reduced by implementation of standard erosion control measures imposed during site preparation and grading activities. As discussed in more detail under Section IX, *Hydrology and Water Quality*, the project would be subject to all existing regulations associated with the protection of water quality. Construction activities would be carried out in accordance with applicable City standard erosion control practices required pursuant to the California Building Code and the requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB), as applicable. Consistent with these requirements, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared that incorporates Best Management Practices (BMPs) to control water erosion during the project's construction period. Following project construction, the site would be covered completely by paving, structures, and landscaping. Thus, impacts due to erosion of topsoil would be less than significant with compliance to applicable regulatory requirements.

While impacts would be less than significant, the following standard City of Los Angeles mitigation measures are prescribed to ensure that the project provides on-site information of City contacts during grading activities to allow the public to provide any comments or concerns during such activities, and implements appropriate run-off control features to minimize temporary grading impacts.

Mitigation Measures

GEO-2 The applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor. (City MM VI-20: Erosion/Grading/Short-Term Construction Impacts)

GEO-3 A deputy grading inspector shall be on-site during grading operations, at the owner's expense, to verify compliance with these conditions. The deputy inspector shall report weekly to the Department of Building and Safety (LADBS); however, they shall immediately notify LADBS if any conditions are violated.

"Silt fencing" supported by hay bales and/or sand bags shall be installed based upon the final evaluation and approval of the deputy inspector to minimize water and/or soil from going through the chain link fencing potentially resulting in silt washing off-site and creating mud accumulation impacts.

"Orange fencing" shall not be permitted as a protective barrier from the secondary impacts normally associated with grading activities.

Movement and removal of approved fencing shall not occur without prior approval by LADBS. (City MM VI-40: Grading/20,00- Cubic Yards, or 60,000 Square feet of Surface Area or Greater)

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact With Mitigation Incorporated. According to the Geotechnical Engineering Investigation, existing fill over natural soils and marine sediments were encountered within the project site. The fill soils generally consist of silts and clays, which are predominantly dark brown in color, slight moist to moist, and stiff. The fill was observed between 2 and 5 feet below the existing ground surface within a majority of the project site with additional fill encountered at 15 feet below the surface near the eastern perimeter of the site. The existing fill materials are considered to be unsuitable for support of new foundations, floor slabs, or additional fill. It is anticipated that project excavation to the proposed basement levels of the project would remove the existing fill soils.

Natural alluvium was encountered below the fill. The upper alluvium consists of clays and silts to a depth of approximately 15 feet. The upper alluvium is generally dark brown to grayish brown, moist, and stiff. Below approximately 15 feet, the alluvium consists of silty sands and sands, which are light brown to gray, slightly moist to moist, dense to very dense, and fine to coarse grained with varying amounts of gravel and cobbles. Marine sediments were encountered below the alluvium at depths between approximately 22.5 and 30 feet. The marine sediments consist of silty sands, sands, and silts, which are gray, light brown, and orange brown in color. These sediments are moist to wet, dense to very dense, firm to stiff, and generally fine grained. Occasional shell fragments were observed in the sediments. Alluvial materials consist of detrital sediments deposited by river and stream action. Marine sediments are generally deposited in ocean basins or near shorelines and lagoons. Both are typical to this area within Los Angeles County.

Impacts related to liquefaction and landslides are discussed above in Responses VI.a.iii. and VI.a.iv. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to the combination of gravity and earthquake shaking. Such movement can occur on slope gradients of as little as one degree. Lateral spreading typically damages pipelines, utilities, bridges, and structures. Lateral spreading of the ground surface during a seismic activity usually occurs along the weak shear zones within a liquefiable soil layer and has been observed to generally take place toward a free face (i.e. retaining wall, slope, or channel) and to a lesser extent on ground surfaces with a very gentle slope. As stated in Response VI.a.iii., according to the site-specific liquefaction analyses within the Geotechnical Engineering Investigation, the soils underlying the project site would not be prone to liquefaction. Further, due to the absence of any channel, slope, or river within or near the project site, the potential for lateral spreading occurring on or off the site is considered to be negligible. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the project site. Thus, there appears to be little or no potential for ground subsidence due to withdrawal of fluids or gases at the project site.

While the project construction and design would be required to comply with the 2013 CBC, which is designed to assure safe construction, implementation of the site-specific design measures including foundation design

recommendations of the Geotechnical Engineering Investigation per Mitigation Measure GEO-1 would ensure that ground and soil stability hazards would be less than significant.

Mitigation Measures

Refer to Mitigation Measure GEO-1. No additional mitigation measures are necessary.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less Than Significant Impact With Mitigation Incorporated. Soils with shrink-swell or expansive properties typically occur in fine-grained sediments and cause damage through volume changes as a result of a wetting and drying process. Structural damage may occur over a long period of time, usually the result of inadequate soil and foundation engineering or the placement of structures directly on expansive soils. According to the Geotechnical Engineering Investigation, the soils within the project site are in the very low and high expansion ranges. The Expansion Index was found to range between 3 and 13 for representative samples of the soils within the project site below 20 feet. The expansion index of the upper alluvial soils was found to range between 104 and 116. Expansive soils, if encountered within the project site, would be removed and/or replaced as part of standard construction practices pursuant to Culver City, City of Los Angeles, and/or 2013 CBC building requirements, as applicable. Furthermore, with incorporation of the site-specific design measures including foundation design slabs on grade recommendations of the Geotechnical Engineering Investigation per Mitigation Measure GEO-1, a less than significant impact would occur in this regard.

Mitigation Measures

Refer to Mitigation Measure GEO-1. No additional mitigation measures are necessary.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The project site is located in an urbanized area where municipal wastewater infrastructure already exists. The project would be required to connect to the existing infrastructure and would not use septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur.

VII. GREENHOUSE GAS EMISSIONS

The following impact analysis pertaining to greenhouse gas (GHG) impacts is based on information contained in the project's *Greenhouse Gas Technical Report* prepared by PCR in December 2015, which is available for review at the Culver City Planning Division.

Would the project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. State regulated GHGs include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). CO₂ is the most abundant GHG in the atmosphere. Not all GHGs exhibit the same ability to induce climate change; as a result, GHG contributions are commonly quantified in equivalent mass of CO₂, denoted as CO₂e. Mass emissions are calculated by converting pollutant specific emissions to CO₂e emissions by applying the proper global warming potential (GWP) value. These GWP ratios are available from the U.S. Environmental Protection Agency (USEPA) and are published in the California Climate Action Registry (CCAR) General Reporting Protocol. By applying the GWP ratios, project related CO₂e emissions can be tabulated in metric tons per year.

The City of Culver City has not yet adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a local plan for reducing GHG emission. However, since 2000, the City initiated various sustainability focused community visioning efforts that ultimately helped identify is in the process of developing a Sustainable Community Plan (SCP) and has adopted and implemented a range of GHG reduction activities and strategies that would is anticipated to form the basis of the City's future Sustainable Community Plan (SCP). GHG reduction activities and strategies are grouped into six categories: Community Education and Civic Participation; Environmental Pollution and Public Health Protection; Resource Conservation; Waste Management and Recycling; Sustainable Land Use and Open Space; and Sustainable Transportation. The analysis below provides an assessment of the project's consistency with the considered strategies.

When no guidance exists under CEQA, the lead agency may look to and assess general compliance with comparable regulatory schemes.¹⁹ In its January 2008 CEQA and Climate Change white paper, the California Air Pollution Control Officer's Association (CAPCOA) identified a number of potential approaches for determining the significance of GHG emissions in CEQA documents. In its white paper, CAPCOA suggests making significance determinations on a case-by-case basis when no significance thresholds have been formally adopted by a lead agency.

¹⁹ See *Protect Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal. App. 4th 1099, 1107 [“[A] lead agency's use of existing environmental standards in determining the significance of a project's environmental impacts is an effective means of promoting consistency in significance determinations and integrating CEQA environmental review activities with other environmental program planning and resolution.”]. Lead agencies can, and often do, use regulatory agencies' performance standards. A project's compliance with these standards usually is presumed to provide an adequate level of protection for environmental resources. See, e.g., *Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal.App.4th 74, 99 (upholding use of regulatory agency performance standard).

The Office of Planning and Research released a technical advisory on CEQA and climate change that provided some guidance on assessing the significance of GHG emissions, and states that “lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice,” and that while “climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment.”²⁰ Furthermore, the technical advisory states that “CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than significant level as a means to avoid or substantially reduce the cumulative impact of a project.”²¹

On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where the SCAQMD is lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds.²² The Working Group released draft guidance regarding interim CEQA GHG indicators of significance in October 2008, proposing a tiered approach. Under Tier 1, Projects that are exempt from CEQA would be less than significant. Under Tier 2, projects that are consistent with an adopted GHG reduction plan would be less than significant. Under Tier 3, non-industrial projects with 3,000 metric tons of CO₂e per year or less would be less than significant. Tier 4 uses performance standards, which requires projects to demonstrate a percent emission reduction target below what is considered “business-as-usual” (BAU) or an efficiency-based threshold such as GHG emissions on a per service population basis. The aforementioned Working Group was inactive in 2011 through 2015 and did not formally submit the thresholds to the Governing Board for approval.

Given the lack of a formally adopted numerical significance threshold or a formally adopted local plan for reducing GHG emission applicable to this project, the significance of the project is evaluated consistent with CEQA, CAPCOA, and OPR guidelines and advisories. The significance of the project will be based on an assessment of the project’s GHG emissions sources for general compliance with comparable regulatory schemes. To provide additional information to decision makers and the public regarding the level of the project’s annual GHG emissions, for the purposes of this MND, total GHG emissions from the project were quantified, inclusive of GHG reduction measures that would be incorporated into the Project design. In order to provide context for the project’s annual GHG emissions and to provide a quantitative metric for describing the level of GHG reductions incorporated into the project, the project’s GHG emissions are compared to a business-as-usual (BAU) scenario, as defined by CARB’s most updated projections for AB 32.²³ The BAU

²⁰ Governor’s Office of Planning and Research, *Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*, (2008).

²¹ *Ibid.*

²² California Air Resources Board, *Greenhouse Gases CEQA Significance Thresholds*, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds>. Accessed November 2015.

²³ *The comparison to a BAU scenario is not used as a threshold of significance, but is used to provide information and a quantitative metric to measure the project’s GHG emissions and level of reductions from project design features and characteristics. See Center For Biological Diversity, et al. v. California Department of Fish and Wildlife (The Newhall Land and Farming Company, Real Party in Interest) (2015) __ Cal.4th __, 2015 WL 7708312. While, the high court approved the methodology analyzing the significance of the project’s GHG emissions in terms of reductions from projected BAU emissions consistent with AB 32’s statewide reductions mandate, it held the GHG analysis lacked supporting substantial evidence and a cogent explanation correlating the project-specific reductions to AB 32’s mandated state-wide reductions so as to demonstrate consistency with the latter’s goals under the approved methodology.*

scenario does not account for energy efficiency measures that would exceed the Title 24 Building Standards Code, such as LEED Certification measures, and does not account for trip reductions from co-location of uses and availability of public transportation within a quarter-mile.

The project's significance with respect to GHG emissions is evaluated based on the consistency of its GHG emissions sources with comparable regulatory schemes. The project incorporates a number of measures that would reduce its GHG emissions consistent with local strategies and actions recommended by the City of Culver City. The project would be designed to meet the standards for LEED Certified level by the U.S. Green Building Council (USGBC) through the incorporation of green building techniques and other sustainability features. The project also would be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code, the City of Los Angeles Green Building Code (LAGBC), and the Culver City Green Building Program. Some of the project's "green building measures" as part of its design to reduce GHG emissions would include, but are not limited to the following:

- Installation of efficient fixtures and flush technology will reduce indoor water use by 35 percent over the LEED baseline, which would exceed the California Green Building Code's mandatory 20 percent reduction, and reduce wastewater generation by 40 percent over the LEED baseline.
- Improvements in energy use/efficiency/loss so as to beat the Title 24 energy efficiency by 15 percent to qualify for Tier 1 under the California Green Building Code.
- Installation of a 470 kilowatt photovoltaic system, which exceeds the Culver City requirements.
- Reliance on fluorescent, LED or other type of high efficiency systems for all interior and exterior lighting. New lighting installed in parking structures and all common areas shall be occupancy-sensor controlled. A demonstration project by the United States Department of Energy indicated that the use of occupancy-sensor controlled lighting achieved a reduction of 50 percent or more in lighting energy use compared to a similarly lighted parking structure without occupancy-sensor controls.²⁴
- Incorporation of low-water and drought tolerant plants in the landscape plan, which would use at least 50 percent less potable water from irrigation than the LEED baseline.

In addition to the above measures, the project would be a transit oriented development (TOD) and would be located in a transit priority area, which is defined in Senate Bill (SB) 743 as an area located within one-half mile of a major existing or planned transit stop, or which are identified in regional transportation plans. The site meets this criterion as it is located immediately adjacent to the Metro Exposition Expo Line and Culver City Metro Station. The project would be developed with a bicycle friendly design with bicycle parking for visitors and occupants as well as flexibility to add bicycle parking for bike-share services. The project would provide a new bike lane both north and southbound along the property on National Boulevard for easier access to/from Metro by bicycle as well as connections to the Expo bike path and Culver City and City of Los Angeles bike paths. The project would provide interactive digital display screens located at the ground floor that would provide useful information to visitors about transit features such as a site map, train and bus times, car share programs, and bike rentals. The project would provide printed materials on how to use the Metro to apartment residents and hotel guests and free Metro tap cards with a month free of ridership for residents with a new

²⁴ United States Department of Energy, Building Technologies Office, SSL Demonstration: Parking Garage Lighting, Washington DC, June 2013.

lease and discounted Metro tap cards for hotel guests during the initial twelve months of operations to encourage and promote more frequent use of public transportation. The project's infill location close to jobs, shopping and entertainment uses and in close proximity to existing and future public transit stops would result in reduced vehicle trips and vehicle miles traveled (VMT), as compared to a BAU project of similar size and land uses at a greenfield site without close access to off-site destinations and public transit stops. As such, the project would result in a corresponding reduction in transportation-related emissions compared to a BAU project. According to the project Traffic Study,²⁵ the project would result in a reduction in total project VMT by a minimum of 25 percent from its proximity to major high-quality public transit stations and stops. The above referenced features, as well as those identified in Attachment A, Project Description, under subsections F.5, Sustainability Features, and subsection F.6, Mobility Features, would also be generally consistent at the project level with the City of Los Angeles' Sustainable City Plan which promotes energy efficient buildings and reducing GHG emissions.

The project's reduction in VMT is consistent with the Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), developed by SCAG. The Sustainable Communities and Climate Protection Act of 2008, or SB 375, requires SCAG to develop an SCS to reduce per capita GHG emissions through integrated transportation, land use, housing and environmental planning. Pursuant to SB375, CARB set per capita GHG emission reduction targets from passenger vehicles for each of the state's 18 MPOs. For the SCAG region, the targets are set at eight percent below 2005 per capita emissions levels by 2020 and 13 percent below 2005 per capita emissions levels by 2035. The 2012–2035 RTP/SCS achieves per capita GHG emission reductions relative to 2005 of nine percent in 2020 and 16 percent in 2035, which exceeds CARB's set targets. The SCS outlines SCAG's plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures. As discussed previously, the project would achieve a minimum VMT reduction of 25 percent and would be consistent with the goals and intent of the SCS to focus new housing and job growth in high-quality transit areas and to reduce transportation-related GHG emissions.

Table B-5, Consistency with Applicable and Comparable GHG Regulatory Schemes, contains a list of GHG-reducing strategies and actions applicable to the project. The project-level analysis describes the consistency of the project's GHG emission sources with local and regional GHG emissions reduction strategies. As discussed in detail in Table B-5, the project would be consistent with the applicable portions of Culver City's Green Building Program, is a TOD project in a transit priority area, and is consistent with applicable SCAG RTP/SCS policies intended to meet the region's GHG reduction targets as assigned by CARB. Thus the project's GHG emissions would be consistent with regulatory schemes intended to reduce GHG emissions. Therefore, the project would result in less than significant GHG emissions.

²⁵ Kimley Horn and Associates, *Ivy Station, Culver City, Mixed-Use Transit Oriented Development (TOD) at Washington Blvd. and National Blvd. Traffic Impact Analysis*, (October 2015).

Table B-5

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
City of Culver City Strategies		
Community Education and Civic Participation	Participating in the Green Communities Challenge, which is a program that encourages municipalities to make progress in ten key environmental areas: Energy Efficiency and Conservation; Green Building; Climate Friendly Purchasing; Efficient Transportation; Urban Forestry and Carbon Offsets; Water and Wastewater Systems; Waste Reduction and Recycling; Renewable Energy and Low Carbon Fuels; Land Use and Community Design; Promoting Community and Individual Action.	Not Applicable. The measure applies to municipalities and as such is not specifically applicable to the proposed project. However, as discussed in this table for subsequent measures, the project would be consistent with other applicable City measures, which would support the City's participation in the Green Communities Challenge and the City's progress in the ten key environmental areas. Thus, the project would not conflict with or impede the City's ability to implement this strategy.
	Working with Culver City Unified School District students, local businesses, and environmentally-minded groups such as Heal the Bay, the Coastal Commission, Ballona Creek Renaissance, Echo Horizon, Kiwanis, and the Culver City Bicycle Coalition to join the Worldwide Annual Coastal Clean-up Day. This event helps to educate folks on the importance of reducing trash in our streets, creek and ocean.	Consistent. The project would provide space or a kiosk for informational materials accessible by tenants, on-site residents, and visitors. Space would be made available for City-provided information on the Worldwide Annual Coastal Clean-up Day.
	Partnering with the West Basin Municipal Water District on various water conservation educational outreach programs, including Irrigation Water Management, Ocean Friendly Gardens, Toilet Exchange and Business solutions.	Consistent. The project would incorporate into the digital display screens City-provided and/or West Basin Municipal Water District-provided information on various water conservation educational outreach programs.
	Implementing a user friendly Household Hazardous Waste Program.	Not Applicable. The measure applies to the City and as such is not specifically applicable to the proposed project. However, the project would provide space or a kiosk for informational materials accessible by tenants, on-site residents, and visitors. Space would be made available for City-provided information on Household Hazardous Waste Programs.
	Promoting Energy Upgrade California and Energize the Westside to encourage residents to consider retrofitting the existing housing stock to make it more energy efficient.	Not Applicable. The project is not an existing building; therefore, this strategy does not apply to the project. The project would not conflict with or impede the City's ability to implement this strategy for existing buildings.
	Partnering with California Energy Partnership to inform the community about programs available through Southern California Edison and other utilities to help save energy and resources.	Consistent. The project would incorporate into the digital display screens City-provided and/or Southern California Edison-provided information on energy saving programs.
	Promoting programs for residents like rain barrel giveaways (in partnership with the Santa Monica Bay Restoration Commission) and home composting.	Consistent. The project would incorporate into the digital display screens City-provided information on residential resource conservation programs.
	Signing onto the US Conference of Mayors Climate Protection Agreement in 2007.	Not Applicable. The measure applies to the City and as such is not specifically applicable to the project. The project would not conflict with or impede the City's ability to implement this strategy.

Table B-5 (Continued)

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
Environmental Pollution and Public Health Protection	Working hard to improve stormwater quality by implementing a Stormwater Management Program.	Consistent. Construction activities would be carried out in accordance with the requirements of the NPDES General Construction Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB), as applicable. A Stormwater Pollution Prevention Plan (SWPPP) would be prepared and implemented by the project that incorporates Best Management Practices (BMPs) to minimize pollutant runoff during the project's construction period by preventing the off-site movement of potential contaminants. With regards to long-term water quality impacts, per the applicable requirements of Chapter 5.05, Stormwater and Urban Runoff Pollution Control, Section 5.05.040, Standard Urban Stormwater Mitigation Plan (SUSMP) Requirements for New Development and Redevelopment Projects, of the CCMC, and Chapter 6, Public Works and Property, Article 4.4, Stormwater and Urban Runoff Pollution Control, of the LAMC, the project would require a stormwater mitigation plan that complies with the most recent LARWQCB approved SUSMP. As part of the operational drainage plan, the project would implement several rainwater harvesting systems to be constructed within the subterranean parking structure, which would also provide for stormwater treatment. The stormwater runoff captured and stored within the rainwater harvesting system would be reused for irrigation of proposed on-site landscape areas.
	Catching as much trash as we can before it enters the storm drain system by installing catch basin inserts in storm drain sites throughout the City with the help of Proposition 50 grant funds and EPA appropriations.	Consistent. The project would install inserts for catch basins in storm drains on the project site.
	Creating rain gardens, funded with Proposition 50 grant money, to help capture and infiltrate stormwater and prevent pollutants from entering the creek	Consistent. As part of the operational drainage plan, the project would implement several rainwater harvesting systems to be constructed within the subterranean parking structure, which would also provide for stormwater treatment. The project would also consider a combination of pre-treatments upstream of the rainwater harvesting system including the following: flow-through planters; fossil filter inserts for catch basins; landscaped design features such as bio-swales; and flow treatment systems such as Continuous Deflective Separator (CDS) units. The stormwater runoff captured and stored within the rainwater harvesting system would be reused for irrigation of proposed on-site landscape areas.

Table B-5 (Continued)

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
	Completing significant upgrades to the sewer system, including adding smart covers. These upgrades should help the City catch potential problems early, increase system redundancy and reliability, and ultimately, prevent sewage spills.	Not Applicable. The measure applies to the City and as such is not specifically applicable to the project. The project would not conflict with or impede the City's ability to implement this strategy.
	Implementing a user friendly Household Hazardous Waste Program.	Not Applicable. The measure applies to the City and as such is not specifically applicable to the project. However, the project would incorporate into the digital display screens City-provided information on the Household Hazardous Waste Program.
	Completing improvements to make our traffic signal system more intelligent and efficient. The City has already completed a new traffic control center and traffic signal synchronization program, and has plans to implement an Adaptive Traffic Control System. These improvements will allow the City to better manage its traffic flow and reduce congestion and associated emissions.	Consistent. The project's traffic impact analysis, <i>Ivy Station, Culver City, Mixed-Use TOD at Washington Blvd. and National Blvd. Traffic Impact Analysis (2015)</i> , includes an impact assessment of project traffic as well as signalization. Details of the analysis are provided in Section XVI, Transportation and Circulation, of the Mitigated Negative Declaration (MND) document. Required improvements to the network of traffic signals in the project area would be made in accordance with the findings and recommendations of the traffic impact analysis, with traffic impacts being less than significant after implementation of the prescribed mitigation measures.
Resource Conservation	The city purchases paper with a minimum of 30 percent post-consumer fiber paper for city-wide use.	Not Applicable. The measure applies to the City and as such is not specifically applicable to the project. The project would not conflict with or impede the City's ability to implement this strategy.
	Continually seeking opportunities for upgrades to City facilities that save energy and money.	Not Applicable. The measure applies to the City and as such is not specifically applicable to the project. The project would not conflict with or impede the City's ability to implement this strategy.
	Helping the community save resources by providing opportunities to make payments and conduct other business online.	Consistent. The project would require that on-site residents have access to an online portal to conduct business, which may include payments, community message board, maintenance and service request, or other functions.
	Encouraging environmental sustainability and resource conservation through changes to the City's code. Within the last several years, the City has 1) Revised the City's Water Conservation Ordinance to bring it in line with Municipal Water District's model ordinance; 2) Passed a Mandatory Solar Photovoltaic Ordinance requiring 1 kilowatt of solar photovoltaic energy generation for each 10,000 square feet of gross floor area of new commercial or multi-family construction, including additions and major renovations. This	Not Applicable. The measure applies to the City and as such is not specifically applicable to the project. However, the project would meet applicable City Code requirements for environmental sustainability and resource conservation.

Table B-5 (Continued)

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
	was the first such mandatory program in the US; and 3) Approved a Mandatory Green Building Ordinance.	
	Managing the City's urban forest in an environmentally sustainable way, and emphasizing species in the Street Tree Master Plan that are drought-tolerant and emit low or moderate amounts of Biogenic Volatile Organic Compounds (biogenics) as practicable.	Consistent. The project would incorporate low-water and drought tolerant plants in the landscape plan, which will use less potable water from irrigation than the LEED baseline.
	Offering an online tool for residents to check tree trimming schedules. http://culvercity.wcainc.com/Guest/	Not Applicable. The measure applies to the City and as such is not specifically applicable to the project. The project would not conflict with or impede the City's ability to implement this strategy.
	Operating in compliance with California State Model Water Model Efficiency Landscape Ordinance (AB 1881) by conducting water audits at all the city parks, medians, parkways and buildings; using evapotranspiration (ET) based weather station controllers; and, upgrading existing irrigation systems using the latest technology to increase efficiency and reduce run-off.	Consistent. The project would incorporate low-water and drought tolerant plants in the landscape plan, which will use at least 50 percent less potable water from irrigation than the LEED baseline. As part of the operational drainage plan, the project would implement several rainwater harvesting systems to be constructed within the subterranean parking structure, which would also provide for stormwater treatment. The stormwater runoff captured and stored within the rainwater harvesting system would be reused for irrigation of proposed on-site landscape areas.
	Showcasing the versatility, conservation properties and beauty of native and indigenous plants in our public landscape areas through design techniques that both reduce the City's maintenance and water costs and raise public awareness of the benefits of non-traditional plantings.	Consistent. The project would incorporate low-water and drought tolerant plants in the landscape plan, which will use less potable water from irrigation than the LEED baseline. As part of the operational drainage plan, the project would implement several rainwater harvesting systems to be constructed within the subterranean parking structure, which would also provide for stormwater treatment. The stormwater runoff captured and stored within the rainwater harvesting system would be reused for irrigation of proposed on-site landscape areas. Some of the project's key open space features include the Transit Plaza area (approx. 2,600 square feet), adjacent to the Metro Station, which would serve as a transitional area to the site's centrally located Great Lawn (11,300 square feet)/Great Lawn Terrace (3,500 square feet) and Central Plaza (5,600 square feet). The open space areas within the project site would incorporate seating to serve the project residents, visitors, and the local community.
	Replacing electronic equipment such as monitors and computers with energy efficient models that are highly rated by the Electronic Product Environmental Assessment Tool.	Not Applicable. The measure applies to City-owned facilities and as such is not applicable to the project. The project would not conflict with or impede the City's ability to implement this strategy.

Table B-5 (Continued)

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
	Upgrading the City's sewer system to be more efficient and reliable. The City recently reconstructed the Braddock Pump Station and installed new, energy efficient submersible pumps. The City is also planning to consolidate the Overland, Mesmer, and old Fox Hills pump stations into a larger, more modern, and more energy-efficient pump station for the Fox Hills area. This consolidation will result in pumping cost savings and a decreased need for maintenance.	Not Applicable. The proposed project is not a sewer system or pump station project; therefore, this strategy does not apply to the project. The project would not conflict with or impede the City's ability to implement this strategy for sewer system and pump station projects.
	Providing the public with recycling opportunities to recycle a wide range of materials including: bottles, cans, plastics, paper, batteries, cell phones, hearing aids and eyeglasses.	Consistent. The project would provide areas for the collection of recyclable materials on the project site.
	Implementing a waste-reduction program at the Senior Center Nutrition Program, which serves/delivers almost 40,000 meals annually, that incorporates reusable plates and cups and recyclable aluminum containers.	Not Applicable. The measure applies to the City and as such is not applicable to the project. The project would not conflict with or impede the City's ability to implement this strategy.
	Hosting a White Elephant sale of donated items semi-annually at the Culver City Senior Center to encourage responsible consumerism and reduce waste.	Not Applicable. The measure applies to the City and as such is not applicable to the project. The project would not conflict with or impede the City's ability to implement this strategy.
	Converting, storing, and disseminating documents electronically to reduce storage and printing costs and to help save resources. An important example of this effort is the City's new finance system. With this new system, the City has digitized many processes that used to require a paper form. The City also purchased Tyler Content Manager (TCM), which is a document management system that digitally stores many finance-related documents. Eventually, the City will have very few paper Finance files as all Finance documents will live on TCM.	Not Applicable. The measure applies to the City and as such is not applicable to the project. The project would not conflict with or impede the City's ability to implement this strategy.
Waste Management and Recycling	Hosting quarterly Electronic Waste Roundups for businesses and residents to freely dispose of outdated, broken electronic equipment. These events make it easy for the community to do the right thing by allowing them to "Drive up, Drop off and Drive away."	Not Applicable. The measure applies to the City and as such is not specifically applicable to the project. However, the project would incorporate into the digital display screens City-provided information on Electronic Waste Roundups.
	Providing a battery drop off location at the Senior Center to make disposing of used batteries easier for the public. Also, providing bins throughout the City for City employees to dispose of used batteries.	Not Applicable. The measure applies to the City and as such is not specifically applicable to the project. However, the project would incorporate into the digital display screens City-provided information on Household Hazardous Waste Programs.
	Helping all businesses comply with AB 341 by providing recycling assessments, presentations, and easy to use templates to businesses starting recycling programs. AB 341 is a state law that, among other things,	Consistent. The project would provide areas for the collection of recyclable materials on the project site. Consistent with AB 341, the project would separate recyclable waste and/or subscribe to a recycling service that may include

Table B-5 (Continued)

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
	requires businesses with four or more cubic yards of commercial solid waste per week to arrange for recycling services.	mixed waste processing that yields diversion results comparable to source separation.
	Supporting a comprehensive Multi-family Recycling Program that helps apartment managers and Home Owners Associations begin sustainable programs to enable their tenants to recycle.	Consistent. The project would provide areas for the collection of recyclable materials on the project site. Consistent with AB 341, the project would separate recyclable waste and/or subscribe to a recycling service that may include mixed waste processing that yields diversion results comparable to source separation.
	Hosting Household Hazardous Waste “Too Toxic To Trash” events in Culver City every June.	Not Applicable. The measure applies to the City and as such is not specifically applicable to the project. However, the project would incorporate into the digital display screens City-provided information on Household Hazardous Waste Programs.
Sustainable Land Use and Open Space	Encouraging multi-use developments that make the City more walkable.	Consistent. The project would be a TOD and would include a mix of office, retail, restaurant, residential and hotel uses. The site is located immediately adjacent to the Los Angeles Metro Expo Line and Culver City Station. Project uses would be positioned at grade to create connectivity with the courtyards enclosed by housing and the Hotel Building, and to link the ground level open space with entry of the Office Building. Connectivity would further be achieved through the use of pathways between areas of landscape, providing pedestrian pathways linking retail and restaurant uses around the ground level open space. The perimeter of the site area would incorporate a City approved Streetscape plan which would create an attractive and inviting walkable environment.
	Promoting revitalization, encouraging reinvestment and eliminating blight in the City’s Area Improvement Projects.	Consistent. The functional plan of the site would provide view corridors and linkages from the transit station to the surrounding community and neighborhood. The perimeter of the site area would incorporate a City approved Streetscape plan which would create an attractive and inviting walkable environment. The project would include a total of approximately 139,400 square feet of outdoor open spaces, gateways, landscape treatments, and amenity spaces. Of this total, approximately 24,917 square feet would be private open space, while approximately 104,693 square feet would be public space. The open space areas within the project site would incorporate seating and would support a wide variety of entertainment and programs to serve the project residents, visitors, and the local community. Potential programs contemplated for the project’s landscaped courtyards/open space areas include design/craft/art markets, farmers markets, musical concerts, beer gardens/outdoor food, live theater (including community theater),

Table B-5 (Continued)

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
		dance performances, dance lessons, movies, discovery playground, business-oriented talks, author readings, storytelling, and aerobic classes/training. These programs are intended to be internally oriented with restricted hours of operation in accordance with applicable City event and noise regulations.
	Raising public awareness of the importance of reducing the City's overall carbon footprint by continually striving to meet the "Net Goal" of grounds maintenance; that is, achieving a net landscape benefit by producing more oxygen than carbon dioxide through the use of environmentally responsible maintenance practices. Practices that the City has implemented that have been or can be easily adopted by community members include limiting the pruning of trees and shrubs, increasing water efficient irrigation practices and utilizing energy efficient machinery to maintain landscaped areas.	Consistent. The project would include measures to reduce the overall carbon footprint. The project would install efficient water fixtures and flush technology that will reduce indoor water use by 35 percent over the LEED baseline and exceed the California Green Building Code's mandatory 20 percent potable water reduction, and reduce wastewater generation by 40 percent over the LEED baseline. The project would improve energy efficiency so as to beat the Title 24 energy efficiency by 15 percent to qualify for Tier 1 under the California Green Building Code. The project would install a 470 kilowatt photovoltaic system, which exceeds the Culver City requirements. The project would rely on fluorescent, LED, or other type of high efficiency lighting systems for all interior and exterior lighting. New lighting installed in parking structures and all common areas would be motion sensor controlled. The project would incorporate low-water and drought tolerant plants in the landscape plan and utilize rainwater harvesting systems, which will use at least 50 percent less potable water from irrigation than the LEED baseline. The project would use mixed-mode ventilation strategies to shut down mechanical cooling systems when windows are open and use high efficiency mechanical systems.
	Implementing the Parks and Recreation Master Plan, which is a comprehensive report that catalogues and analyzes the condition of the City of Culver City's recreation programs and facilities and also presents recommendations for the future growth and development of parks and recreation that are based on the cornerstones of public input, objective data, technical expertise and emerging best practices.	Consistent. The project would include a total of approximately 139,400 square feet of outdoor open spaces, gateways, landscape treatments, and amenity spaces. Of this total, approximately 24,917 square feet would be private open space, while approximately 104,693 square feet would be public space, as discussed below. The remaining 9,790 square foot hotel courtyard space (2nd level podium) would be public/private open space. The open space areas within the project site would incorporate seating and would support a wide variety of entertainment and programs to serve the project residents, visitors, and the local community. The project would far exceed the City's open space requirements. Nonetheless, to address potential impacts related to parks, the project applicant would be responsible for meeting the parkland dedication or fee requirements pursuant to the Quimby Act and Title 15: Land Usage, Chapter 15.06: New

Table B-5 (Continued)

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
		Development Fees – Residential Development Park Dedication and In Lieu Parkland Fees, Section 15.06.310: Park Dedication or Payment of Fees, of the CCMC and Chapter I: General Provisions and Zoning, Article 7: Division of Land Regulations, Section 17.12: Park and Recreation Site Acquisition and Development Provisions, of the LAMC, as applicable. Therefore, with the proposed open space features and payment of applicable fees, the project would not have a have a significant physical impact upon parks, nor would there be a significant increase in demand for existing public park facilities.
	Creating improvements along Ballona Creek, including the Ballona Creek Bikeway Project. This project restored natural habitat, enhanced the creek and bike path environment, and created educational opportunities for users of the bike path.	Not Applicable. The project would not be located along the Ballona Creek. The project would not conflict with or impede the City's ability to implement this strategy.
Sustainable Transportation	Implementing the City's first Bicycle and Pedestrian Master Plan through the installation of bicycle and pedestrian facilities, as well as education, encouragement, and enforcement efforts, including those related to Safe Routes to School.	Consistent. The project would be developed with a bicycle friendly design with bicycle parking for visitors and occupants as well as flexibility to add bicycle parking for bike-share services. The project would provide a new bike lane both north and southbound along the property on National Blvd for easier access to/from Metro by bicycle as well as connections to the EXPO bike path and Culver City and City of Los Angeles bike paths. The project would provide interactive digital display screens located at the ground floor that provide useful information to visitors about Ivy Station such as a site map with the list of stores, calendar of events, community information and hotel availability. The displays would also provide transit related information such as the train and bus times, car share programs, and bike rentals.
	Operating a Green Model Shop for automotive maintenance and repair facilities as certified by the Department of Toxic Substances Control (DTSC) from the State of California.	Not Applicable. The project does not include automotive maintenance and repair facilities. The project would not conflict with or impede the City's ability to implement this strategy.
	Relying heavily on alternative fuels to power the City's fleet. The City's use of alternative fuel vehicles and other environmentally-friendly activities has earned it high rankings as a Best Green Fleet in North America by the Top 100 Fleets Certification Program (Best Fleet in 2013) and has resulted in: - Reduced diesel fuel consumption by 60% over the past five years, annually displacing over 800,000 gallons of diesel fuel with CNG, and saving the City over \$1.2 million per year in fuel costs. - Removal of over 80,000 pounds of	Consistent. While the measure applies to the City, the project would nonetheless support the City efforts to reduce transportation-related emissions by encouraging alternative transit. The project would be a TOD and would provide nearby and convenient access to multi-modal transit with connecting bike, bus, and train routes. The property borders the Culver City Metro Station, which is the approximate center of the Expo Line, connecting Downtown Los Angeles to Santa Monica. There is also direct access to 18 bus routes and bicycle lanes/routes. The project would also be developed with a bicycle friendly design with bicycle parking for visitors and

Table B-5 (Continued)

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
	NO_x (oxides of nitrogen - the brown emission exhaust) from the air Removal of over 32,000 pounds of PM (particulate matter - the black soot exhaust) from the atmosphere.	occupants as well as flexibility to add bicycle parking for bike-share services. The project would provide a new bike lane both north and southbound along the property on National Blvd for easier access to/from the Expo Line by bicycle as well as connections to the Expo bike path and Culver City and City of Los Angeles bike paths. The project would provide interactive digital display screens located at the ground floor that provide useful information to visitors about the project site such as a site map with the list of stores, calendar of events, community information and hotel availability. The displays would also provide transport related information such as the train and bus times, car share programs, and bike rentals. The project would provide printed materials on how to use the Expo Line to apartment residents and hotel guests and free tap cards with a month free of ridership for residents with a new lease and discounted tap cards for hotel guests during the initial twelve months of operations to encourage and promote more frequent use of public transportation.
	Implementing a rideshare program to encourage employees to use alternative forms of transportation. The City's Employee Rideshare Program removes over 2.8 tons of emissions per year by encouraging alternative modes of commuting to work.	Consistent. The project would promote walking through a "walk to work" program in coordination with onsite office employees and a posted neighborhood map with approximate walking distances and times to local neighborhood amenities.
	Operating Culver CityBus, a high-quality municipal bus service that provides transportation options for the community. Culver CityBus was the first public transit fleet in the South Coast Air Quality Management District (AQMD) to operate on 100 percent compressed natural gas (CNG), and the second in the State of California.	Consistent. While the measure applies to the City, the project would nonetheless support the City efforts to reduce transportation-related emissions by encouraging alternative transit. The project would be a TOD and would provide nearby and convenient access to multi-modal transit with connecting bike, bus, and train routes. The property borders the Culver City Metro Station, which is the approximate center of the Expo Line, connecting Downtown Los Angeles to Santa Monica. There is also direct access to 18 bus routes and bicycle lanes/routes.
	Coordinating with the construction of an Expo Light Rail Station in Culver City. The Culver City station opened in 2012. It marks the furthest rail has reached into the Westside in more than 50 years, allowing commuters to travel 7.9 miles between downtown Los Angeles and the eastern area of Culver City in about half an hour.	Consistent. The project would be a TOD and would provide nearby and convenient access to multi-modal transit with connecting bike, bus, and train routes. The property borders the Culver City Metro Station, which is the approximate center of the Expo Line, connecting Downtown Los Angeles to Santa Monica. There is also direct access to 18 bus routes and bicycle lanes/routes. The project would also be developed with a bicycle friendly design with bicycle parking for visitors and occupants as well as flexibility to add bicycle parking for bike-share services. The project would provide a new bike lane both north and southbound along the property on National

Table B-5 (Continued)

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
		Blvd for easier access to/from the Expo Line by bicycle as well as connections to the Expo bike path and Culver City and City of Los Angeles bike paths. The project would provide interactive digital display screens located at the ground floor that will provide useful information to visitors about the project site such as a site map with the list of stores, calendar of events, community information and hotel availability. The displays would also provide transport related information such as the train and bus times, car share programs, and bike rentals. The project would provide printed materials on how to use the Expo Line to apartment residents and hotel guests and free tap cards with a month free of ridership for residents with a new lease and discounted tap cards for hotel guests during the initial twelve months of operations to encourage and promote more frequent use of public transportation.
Regional Strategies		
Sustainable Communities Strategy	The RTP/SCS, developed by SCAG, demonstrates the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB. The SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. The RTP/SCS successfully achieves and exceeds the GHG emission reduction targets, set by CARB by achieving a 9 percent reduction by 2020 and 16 percent reduction by 2035 compared to the 2005 level on a per capita basis.	Consistent. The project would be a TOD and would provide nearby and convenient access to high-quality multi-modal transit with connecting bike, bus, and train routes. The property borders the Culver City Metro Station, which is the approximate center of the Expo Line, connecting Downtown Los Angeles to Santa Monica. There is also direct access to 18 bus routes and bicycle lanes/routes. The project would reduce project-wide VMT by a minimum of 25 percent as compared to a BAU project of similar size and land uses (but not located in a high-quality multi-modal transit area). The project would provide bicycle parking for visitors and occupants as well as flexibility to add bicycle parking for bike-share services. The project would provide a new bike lane both north and southbound along the property on National Blvd for easier access to/from the Expo Line by bicycle as well as connections to the Expo bike path and Culver City and City of Los Angeles bike paths. The project would provide interactive digital display screens located at the ground floor that will provide useful information to visitors about Ivy Station such as a site map, transport related information such as the train and bus times, car share programs, and bike rentals. The project would provide printed materials on how to use the Expo Line to apartment residents and hotel guests and free tap cards with a month free of ridership for residents with a new lease and discounted tap cards for hotel guests during the initial twelve months of operations to encourage and promote more frequent use of public transportation. As a result, the project would be

Table B-5 (Continued)

Consistency with Applicable and Comparable GHG Regulatory Schemes

Strategy	Description	Demonstration of Project Consistency
		consistent with the goals and the intent of the RTP/SCS to focus new housing and job growth in high-quality transit areas and to reduce transportation-related GHG emissions.
Source: City of Culver City, Environment, http://www.culvercity.org/Environment/WhatGovernment.aspx. Accessed November 2015; Southern California Association of Governments, 2012-2035 Regional Transportation Plan, (April 2012); PCR Services Corporation, 2015.		

Construction and Operational Emissions

In order to provide additional information to decision makers and the public, the emissions of GHGs associated with construction and operation of the project were estimated. Construction of the project has the potential to generate temporary GHG emissions through the use of heavy-duty construction equipment and through vehicle trips generated from export and import of materials and from visitors and workers traveling to and from the project site. Construction would take place over 2.5 years (30 months), anticipated to begin in late 2016. Because the project is anticipated to start construction in mid-2016 and end in beginning of 2019, there would be construction 4 calendar years although actual construction would take place over a 2.5 year duration. Full build-out and occupancy would occur in 2019. The emissions of GHGs associated with construction of the project were calculated for each year of construction activity. The results are shown in **Table B-6, Construction Greenhouse Gas Emissions**. It should be noted that the GHG emissions shown in Table B-6 are based on construction equipment operating continuously throughout the work day. In reality, construction equipment tends to operate periodically or cyclically throughout the work day. Therefore, the GHG emissions shown reflect a conservative estimate. A complete listing of the equipment by phase, emission factors, and calculation parameters used in this analysis is included within the emissions calculation worksheets that are provided in the Greenhouse Gas Technical Report under separate cover available at the Culver City Planning Division.

The SCAQMD recommends that construction-related GHG emissions be amortized over a project’s 30-year lifetime in order to include these emissions as part of a project’s annualized lifetime total emissions, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies. In accordance with this methodology, the estimated project’s construction GHG emissions have been amortized over a 30-year period and are included in the annualized operational GHG emissions.

The results of the analysis for operational emissions are presented in **Table B-7, Annual Greenhouse Gas Emissions**. With the implementation of the project’s green building measures, the project would achieve substantial GHG reductions as compared to the BAU scenario. For comparison, under AB 32, CARB’s updated 2020 BAU emissions estimate, which accounts for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions required by regulations that were recently adopted for motor vehicles and renewable energy, is 507 MMTCO₂e. The emission reductions

Table B-6

Construction Greenhouse Gas Emissions

Emission Source	CO ₂ e (Metric Tons) ^a
Construction Year 1	607
Construction Year 2	800
Construction Year 3	866
Construction Year 4	15
Total	2,287
Annual (Amortized over 30 years)	76

^a Totals may not add up exactly due to rounding in the modeling calculations

Source: PCR Services Corporation, 2015.

necessary to achieve the 2020 emissions target of 427 MMTCO₂e would be 80 MMTCO₂e, or a reduction of GHG emissions by 15.8 percent (or 15.4 percent when converting all GHGs to the updated GWP values from the Intergovernmental Panel on Climate Change *Fourth Assessment Report*). As shown in Table B-7, the project's GHG reductions, when compared to a BAU scenario consistent with the assumptions CARB used for its most recent BAU projections for AB 32, would be almost double that of the statewide AB 32 reduction target.

Based on the above, GHG impacts would be less than significant. While impacts would be less than significant, the following standard City of Los Angeles mitigation measure is prescribed to ensure that the project's GHG emissions during construction activities are reduced to the maximum extent practicable.

Mitigation Measure

- GHG-1** Low- and non-VOC containing paints, sealants, adhesives, solvents, asphalt primer, and architectural coatings (where used), or pre-fabricated architectural panels shall be used in the construction of the Project to reduce VOC emissions to the maximum extent practicable. (City MM VII-10: Greenhouse Gases)

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

No Impact. As mentioned previously, AB 32 requires the State to achieve 1990 GHG emission levels by 2020 by setting statewide GHG reduction targets. To achieve these goals, the CARB has established an emissions cap and developed a Climate Change Scoping Plan to identify mandatory strategies for reducing statewide GHG emissions. In addition, the California Climate Action Team (CAT) was formed which consists of members of various state agencies tasked with identifying strategies to reduce GHG emissions. Several other bills have been passed as a companion to AB 32 which include SB 1368 (electricity generation standards), SB 97 (CEQA analysis for GHGs), Low Carbon Fuel Standards, SB 375 (Regional Transportation Planning and GHG emissions), CALGreen building standards and others plans to achieve the goals of AB 32.

The State has promulgated regulations and programs for the purpose of reducing GHG emissions. The GHG emissions analysis in this MND was performed in accordance with SCAQMD and CARB guidance developed

Table B-7

Annual Greenhouse Gas Emissions

Emissions Sources	CO ₂ e (Metric Tons per Year) ^a	
	Project	BAU
Existing Operational		
On Road Mobile Sources	550	550
Area	<1	<1
Electricity	152	152
Natural Gas	12	12
Water Conveyance	17	17
Waste	45	45
Existing Subtotal	776	776
Proposed Project Operational (Opening Year 2019)		
On Road Mobile Sources	4,414	5,884
Area	3	3
Electricity	1,884	2,851
Natural Gas	398	517
Water Conveyance	233	391
Waste	217	217
Proposed Subtotal	7,149	9,863
Net Operational	6,373	9,087
Construction (Amortized)	76	76
Total Annual Emissions	6,449	9,163
Project Percent Reduction Compared to BAU		29.6%

^a Totals may not add up exactly due to rounding in the modeling calculations

Source: PCR Services Corporation, 2015.

in compliance with, and as a result of, those regulations and programs. The result of the analysis of the project's potential impacts in terms of GHG and global climate change indicates that the construction-related GHG emissions from the project alone would not be expected to cause a direct physical change in the environment. Therefore, the project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHG.

According to CARB in its First Update to the Climate Change Scoping Plan, infill development that offers a mix of uses can reduce dependence on motor vehicles, thus reducing associated GHG emissions.²⁶ Thus, the transit-oriented development would be consistent with reducing GHG emissions via infill development strategies.

In support of AB 32, the State has promulgated laws and strategies aimed at reducing GHG emissions, some of which are applicable to the project. Consistent with AB 32, the project would minimize construction-related

²⁶ California Air Resources Board, First Update to the Climate Change Scoping Plan, (2014) 104.

GHG emissions by using equipment that meet stringent USEPA emissions standards, using low carbon vehicle fuels as required under state law, and prohibiting diesel-fueled commercial motor vehicle idling consistent with CARB requirements.

Since AB 32 sets statewide targets for future GHG emissions, the Scoping Plan and other implementing tools of the law are clear that the reductions are not expected to occur uniformly from all sources or sectors. As discussed previously in Table B-5, the Project would be consistent with the applicable GHG reductions strategies and local actions recommended by the City of Culver City. Additionally, the Project would be consistent with GHG reduction measures from other applicable regional plans. **Table B-8, *Applicable GHG Reduction Strategies***, contains a list of other state, regional, and local GHG-reduction strategies applicable to the project, the identified related projects, and future development similar in scope and location. Included are the regulations or guidelines from which the strategies were developed. The project-level analysis highlights the manner by which the project intends to meet the applicable strategies. Because the project would not conflict with strategies to reduce GHG emissions, it would be consistent with the overarching regulation to reduce GHG emissions.

Through incorporation of the project's green building features discussed above, the project complies with applicable portions of the Los Angeles Green Building Code, the CalGreen Code for residential and non-residential uses (Calif. Code of Regs. Title 24, Part 11), as required by Los Angeles Ordinance No. 181479, effective January 1, 2011, the City of Culver City Green Building Ordinance which requires LEED certification or equivalent, and the City of Culver City Mandatory Solar Photovoltaic requirement which requires 1 kW of solar power per 10,000 s.f. of applicable building area. In summary, the project, as designed, meets or exceeds the applicable requirement of the CalGreen Code, the LAGBC and the Culver City Green Building Ordinance, all of which is supportive of the State's GHG-reduction goals under state law AB 32. Therefore, the project would not conflict with any applicable plan, policy, or regulation to reduce GHG emissions.

Table B-8

Applicable GHG Reduction Strategies

Source	Description	Demonstration of Project Consistency
AB 1493 (Pavley Regulations)	Reduces GHG emissions in new passenger vehicles from 2012 through 2016. Also reduces gasoline consumption to a rate of 31 percent of 1990 gasoline consumption (and associated GHG emissions) by 2020	Consistent. This measure applies to all new vehicles and the project would not conflict with its implementation.
SB 1368	Establishes an emissions performance standard for power plants within the State of California.	Consistent. Southern California Edison provided power is subject to the performance standards. The project would not conflict with the implementation of this measure.
Low Carbon Fuel Standard	Establishes protocols for measuring life-cycle carbon intensity of transportation fuels and helps to establish use of alternative fuels.	Consistent. This measure applies to transportation fuels utilized by vehicles in California. The project would not conflict with the implementation of this measure. Construction and operational vehicles association with the project would utilize low carbon transportation fuels as required under this measure.
CALGREEN Requirements	Comply with applicable site development planning and design measures such as bicycle parking and light pollution reduction. Indoor water usage must be reduced by 20 percent compared to current California Building Code Standards for maximum flow. Wastewater usage shall be reduced by 20 percent compared to current California Building Standards. Comply with material conservation and resource efficiency measures including applicable weather resistance and moisture management measures. Comply with VOC emissions limits for carpet systems, composite wood products, and flooring. Requires a minimum of 50 percent recycle or reuse of nonhazardous construction and demolition debris.	Consistent. The project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen code. Consistent. The project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen code. Consistent. The project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen code. Consistent. The project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen code. Consistent. The project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen code. Consistent. The project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen code.
CALGREEN Voluntary Actions	Reduce diesel-fueled commercial motor vehicle idling.	Consistent. The project is committed to implementing this action to the extent feasible. Construction trucks would comply with CARB's anti-idling measure.
Climate Action Team	Achieve California's 50 percent waste diversion mandate (Integrated Waste Management Act of 1989) to reduce GHG emissions associated with virgin material extraction.	Consistent. CALGreen Code implements this goal, and the project would be consistent with the requirements.

Table B-8 (Continued)

Applicable GHG Reduction Strategies

Source	Description	Demonstration of Project Consistency
	Plant five million trees in urban areas by 2020 to effect climate change emission reductions.	Consistent. The project would provide appropriate landscaping on the project site including vegetation and trees.
	Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.	Consistent. CALGreen Code implements this goal, and the project would be consistent with the requirements.
	The California Energy Commission updates building energy efficiency standards that apply to newly constructed buildings and additions to and alterations to existing buildings. Both the Energy Action Plan and the Integrated Energy Policy Report call for ongoing updating of the standards.	Consistent. CALGreen Code implements this goal, and the project would be consistent with the requirements.
	Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development.	Consistent. CALGreen Code implements this goal, and the project would be consistent with the requirements.
	Apply strategies that integrate transportation and land decisions, including but not limited to promoting jobs/housing proximity, high along transit corridors, and implementing intelligent transportation systems.	Consistent. The project would be located in an infill location in proximity to existing residential and commercial businesses, which would minimize trip lengths and associated emissions.
City of Los Angeles		
LA Green Plan	Make transit information easily available and understandable in multiple languages.	Consistent. The project would provide transit information as part of the project's effort to reduce vehicle trips and VMT and encourage alternative modes of transportation for patrons and employees.
	Promote walking and biking to work.	Consistent. The project would meet or exceed this requirement as part of the incorporated physical and operational project characteristics to reduce vehicle trips and VMT and encourage alternative modes of transportation for patrons and employees.
	Reduce or recycle 70 percent of trash by 2015.	Consistent. The project would provide areas for the collection of recyclable materials on the project site.
City of Culver City		
Green Building Program	Enhance building insulation, low flow fixtures, efficient lighting and HVAC systems.	Consistent. The project would be consistent with this requirement via compliance with City ordinances and/or the Green Building Program.

Table B-8 (Continued)

Applicable GHG Reduction Strategies

Source	Description	Demonstration of Project Consistency
	For new construction totaling more than 50,000 square feet, the project must attain the Leadership in Energy and Environmental Design (LEED) "Certified" level or equivalent.	Consistent. The project would be consistent with this requirement via compliance with City ordinances and/or the Green Building Program.
	For parking garages which requires all new lighting to be motion sensor controlled and minimum base level lighting is permitted using high efficiency lighting.	Consistent. The project would be consistent with this requirement via compliance with City ordinances and/or the Green Building Program.
Photovoltaic Requirement	Requires 1 kilowatt (kw) of photovoltaic power installed per 10,000 square feet of new development	Consistent. The project would be consistent with this requirement via compliance with City ordinances.

Source: PCR Services Corporation, 2015; Climate Action Team, Attorney General's Office, 2011.

VIII. HAZARDS AND HAZARDOUS MATERIALS

The following hazardous materials discussion is based, in part, on the technical reports for the project entitled *Draft Phase I Environmental Site Assessment Venice-National-Exposition Triangle, Culver City, California* (herein referred to as the "Phase I"), prepared by Bureau Veritas North American, Inc., dated June 13, 2014; *Limited Subsurface Investigation Report Venice-National-Exposition Triangle, Culver City, California* (herein referred to as the "Phase II"), prepared by Bureau Veritas North American, Inc., dated December 10, 2015; and the *Draft Workplan for Soil Assessment at T.W.S. Products Company 8801 Washington Boulevard, Culver City, California 90232 LARWQCB Case #R-36325* (herein referred to as the "Workplan"), prepared by Alpha Environmental, dated September 22, 2015 (all provided under separate cover available at the Culver City Planning Division).

Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Hazardous materials may be used during the construction phase of the project. Hazardous materials that may be used include, but are not limited to, fuels (gasoline and diesel), paints and paint thinners, adhesives, surface coatings and possibly herbicides and pesticides. Generally these materials would be used in concentrations that would not pose significant threats during the transport, use and storage of such materials. Furthermore, it is assumed that potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, including California Occupational Safety and Health Administration (OSHA) requirements, and Title 8 and 22 of the Code of California Regulations. Accordingly, risks associated with hazards to the public or environment posed by the transport, use or disposal of hazardous materials during construction are considered less than significant due to compliance with applicable and required standards and regulations.

Operation of the residential, hotel, and retail/restaurant uses would involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance. These hazardous materials are regulated by stringent federal and state laws mandating the proper transport, use, and storage of hazardous materials in accordance with product labeling. The use and storage of these substances is not considered to present a health risk when used in accordance with manufacturer specifications and with compliance to applicable regulations.

Overall, based on the above, construction and operation of the project would result in a less than significant impact with regard to routine transport, use, or disposal of hazardous materials relative to the safety of the public or the environment.

While impacts would be less than significant, the following standard City of Los Angeles mitigation measure is prescribed to ensure that the project's hazardous materials impacts remain less than significant.

Mitigation Measure

- HAZ-1** Prior to the issuance of a use of land or building permit, or issuance of a change of occupancy, the applicant shall obtain approval from the Fire Department and the Department of Public Works, for the transport, creation, use, containment, treatment, and disposal of the hazardous material(s).

Approved plans for the transport, creation, use, containment, treatment, and disposal of the hazardous material(s) shall be submitted to the decision-maker for retention in the case file.
(City MM VIII-60: Hazards and Hazardous Materials)

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant With Mitigation Incorporated. The main objective of the Phase I was to identify the presence, or likely presence, use, or release of hazardous substances or petroleum products as defined in the American Testing and Materials Practice E 1527 as a "recognized environmental condition" (REC). In order to identify RECs at the project site, the Phase I included a site inspection, interviews with parties familiar with the properties, historical research into the past use of the properties, and hazardous materials research with regard to the site, adjacent properties, and surrounding area. In addition, the Phase I provided general information regarding hazardous substances and petroleum products, underground storage tanks (USTs), aboveground storage tanks (ASTs), liquid waste, solid waste, polychlorinated biphenyls (PCBs), and wells. The Phase I revealed the following RECs:

- Venice Boulevard Gas Station – A gasoline station was present at 8900 Venice from 1940 to 1965 when the station was demolished and tanks removed under the LAFD oversight. Records of the demolition do not indicate that samples were collected at the time of tank removal. A 1997 investigation of the reported former tank area did not identify soil impacts; however, the boring locations were based on a 1965 sketch map without a scale. The former dispenser islands and product piping do not appear to have been investigated. In addition, the area of the former repair

garage is not known to have been investigated. Use of repair garages is commonly associated with hydraulic lifts, clarifiers and other in-ground feature, parts washer and waste oil tanks. The former presence of a gas station and repair garage is a REC.

- Venice Boulevard Alignment – Industrial buildings and shops have existed on Venice Boulevard since the 1940s. The following uses were identified: machine shop/manufacturing (8912-8914); textile manufacturing, chemical storage warehouse, and plastics manufacturing/solvents (8926); and an auto repair/auto body garage (8918-8930). The likely long term use and storage of hazardous materials and petroleum products associated with the subject property parcels along Venice Boulevard do not appear to have been investigated. This finding is a REC.
- National Boulevard Machine Shops – Machine shops dating back to the 1940s were present at 8824, 8826, 8828, and 8842 National Boulevard. Tetrachloroethene (PCE) and petroleum hydrocarbons were detected in soil at 8828. PCE also was detected in soil vapor in excess of the US Environmental Protection Agency (USEPA) screening level. No volatile organic compounds (VOCs) were detected in a soil and soil vapor investigation of the former machine shop at 8824. No investigations appear to have been performed for the remaining former machine shops. The known release of petroleum hydrocarbons and PCE and long term presence of several machine shops along National Boulevard is a REC.
- National Boulevard Alignment – Other industrial buildings and shops present from the 1940s on National Boulevard included the following uses: woodworking/cabinet shop (8828-8830), paint shop/spray booth (8836), jewelry manufacturing (8834), and auto body shop with spray booth (8840). A dry cleaning machine manufacturing facility was identified at 8926. Use of petroleum distillate and chlorinated hydrocarbon-based solvents are reported for one of more of these sites. No investigations appear to have been performed at these sites. The likely long term use and storage of hazardous materials and petroleum products associated with these subject property parcels along National Boulevard do not appear to have been investigated and are a REC.
- Fuel Release at 8801 Washington Boulevard – A fuel release with documented groundwater impacts is reported in the eastern portion of the subject property. The release appears to have been discovered during tank removal activities in 2001. The site is currently an open remediation case overseen by the LARWQCB. This finding is a REC.
- Exposition Boulevard Alignment – Industrial buildings and shops present from the 1940s included the following uses: bindery/leatherworking (8829), metalworking/machine shop (8831), lamp manufacturing/furniture store with spray booth (8829-8839), woodworking (8841), and paint shop/unspecified manufacturing (8843). With the exception of a limited investigation at 8843 Exposition, which found no VOCs in soil, the subject property parcels developed for industrial uses along Exposition Boulevard do not appear to have been investigated. This finding is a REC.
- Culver City Metro Station Site – An investigation conducted during construction of the rail station encountered several buried drums, with petroleum impacts discovered in the vicinity. The presence of these buried drums with apparently associated contamination is a REC.

The Phase I recommended a subsurface investigation (Phase II) to evaluate potential impacts to subsurface soil and groundwater conditions at the project site from RECS resulting from current and historical onsite uses, and observed features and conditions. As part of the Phase II investigation, soil cores were collected from

various boring locations throughout the site.²⁷ The Phase II soil analytical results were compared to the LARWQCB Soil Screening Levels (SSLs) and USEPA Regional Screening Levels (RSLs) for commercial/industrial land use, where appropriate. Total petroleum hydrocarbons (TPH), VOCs and California assessment manual (CAM) 17 metals, asbestos and lead were not detected above laboratory reporting limits, which were below the regulatory reference values, except as follows:

- Analyzed metals were detected in soil samples at concentrations below applicable RSLs or were not detected, with the exception of arsenic. Arsenic was detected in the samples collected from several borings at concentrations ranging from 3.36 to 11.8 milligrams per kilogram (mg/kg). These concentrations exceed the established arsenic RSL of 3.0 mg/kg. SSLs are not established for metals. Arsenic concentrations detected in the soil samples collected at the site are typical of background concentrations naturally occurring throughout Southern California.
- As part of the project, the associated soils would be removed during the site excavation activities as required for the below grade parking. The arsenic concentrations found at the site are acceptable for disposal at a municipal landfill site or for reuse at another development site. Further, as discussed under Section III, Air Quality, above, construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust and other specified dust control measures. Dust control measures per the applicable SCAQMD regulatory requirements would be in place throughout the duration of the project's construction activities and would ensure that impacts associated with arsenic in removed soils would not result in significant hazards to the public or the environment.
- Total lead was detected at concentration of 6.8 to 25 mg/kg in the three surficial samples (analyzed for this metal species). The detected lead concentration are below the established RSL.

The Phase II also conducted groundwater borings to assess the potential for groundwater impacts. Groundwater analytical results were compared to RSLs and the California Department of Health Services (DHS) Maximum Contaminant Levels (MCLs) for drinking water. Analyzed parameters Total petroleum hydrocarbons as gasoline (TPH-g), TPH as diesel (TPH-d), TP as motor oil (TPH-mo) and VOCs were not detected above laboratory reporting limits, where were below the regulatory reference values, except as follows:

- TPH-g was detected in one boring (BV-7) at a concentration of 61.9 micrograms per liter. No RSL or maximum containment level (MCL) is established for TPH-g.
- Benzene was detected at one boring (BV-7) at a concentration of 1.46 micrograms per liter along with low concentrations of fuel constituents ethylbenzene, naphthalene, 1, 2, 4-trimethylbenzene and xylenes. The benzene concentration exceeds the established MCL of 1.0 micrograms per liter for this constituent, but is below the RSL. The remaining detections in this sample were below their respective RSLs and/or MCLs.
- Methyl tertiary butyl ether (MTBE) was detected at one boring (BV-3) at a concentration of 3.19 micrograms per liter, which is below the MCL value; no RSL is established for MTBE.

²⁷ For boring locations, refer to Figure 2, Site Plan with Boring Locations, of the Phase II.

- Low concentrations of the following VOCs were detected in one boring (BV-5): bromodichloromethane, chloroform, dibromochloromethane and dibromomethane. The detected concentrations were below their respective RSLs. No MCLs are established for these compounds.

Overall, the Phase II detected metals in collected soil samples which appear to be representative of background conditions; the slightly higher lead concentrations in the two surficial samples are well below the USEPA RSL Industrial standards of 800 milligrams to kilograms (mg/kg). TPH, VOCs and CAM 17 metals, asbestos and lead were not detected above laboratory limits. TPH-g and associated fuel constituents detected in the boring BV-7 grab groundwater sample likely represent residual concentrations associated with the historical presence of a gasoline service station at that location. TPH-d, TPH-mo and VOCs were not detected above laboratory reporting limits. The detected concentration does not appear to represent a significant concern. The benzene concentration slightly exceeds the drinking water California Department of Health, maximum containment level (DHS MCL); however shallow groundwater at the project site is not a source of drinking water. Also, the project site is not within a designated methane zone identified by the City of Los Angeles.²⁸ Further, the Phase I ESA did not indicate the Culver City portion of the site is located within an oil field or subject to past oil drilling operations, which are often indicative of methane hazards. Thus, no significant methane-related hazards are anticipated for the project site.

As discussed above, the fuel release at 8801 Washington Boulevard is currently an open remediation case. A gasoline station formerly occupied the southern portion of this site. Two paired 8,000-gallon gasoline USTs were removed from this site in 1989 and an additional 10,000 gallon UST and appurtenant structures were removed in 2001. The fuel releases were discovered during tank removal work. The first case was granted regulatory closure, but the second case was referred to the LARWQCB for further investigation. To date, eight groundwater monitoring wells have been installed at this site. No free product has been documented in site wells through the regulatory life of this case. Approximately 1,000 tons of impacted soil was excavated from the former UST and dispenser area during tank removal activities in 2001. In 2012, a dual-phase extraction (DPE) system was installed in a number of existing onsite wells and two soil vapor extraction (SVE) wells installed adjacent to two of the wells. Concentrations in groundwater appear to have diminished somewhat since approximately 2012, when the in-situ remediation system was installed at the site, but remain elevated across this site, with maximum concentrations reported for the northwestern portion of 8801 Washington parcel and overlapping onto the adjoining 8824 National Boulevard parcel of the project site. Results of the May 2013 sampling round, the most recent data available, indicated maximum TPH-g and benzene concentrations of 3,180 and 250 micrograms per liter, respectively. A recent soil investigation conducted in the area of the former tank pit and dispenser island revealed residual TPH-g concentration up to 316 mg/kg and benzene up to 0.06 mg/kg. As such, it is concluded that hazardous materials associated with the fuel releases discovered during the tank removal represent a potentially significant impact.

In response to a request from the LARWQCB, a Draft Workplan was created in September 2015 by the Responsible Party (the prior owner of the property) and is in the process of being submitted for LARWQCB approval. The Workplan details additional characterization of hydrocarbon releases to soil that occurred solely within boundaries of the 8801 Washington site. The Draft Workplan has been developed to describe the work necessary to advance exploratory soil borings, analyze the soil samples, and assess the analytical data. The objective of advancing and sampling soil borings would be to delineate the lateral and vertical extent of

²⁸ City of Los Angeles Zimas website - <http://zimas.lacity.org/>. Accessed October 26, 2015. The project site and surrounding City of LA properties are not within a methane hazard zone.

residual soil contamination in and around the area of the former USTs and pump islands following a previous remedial soil excavation and operation of a dual phase remediation system at the site. The data from this investigation will also be utilized to characterize hydrocarbon impacted soil for future off-site disposal during the Earthwork/Grading/Shoring Construction phase of the project which would be advanced under the Grading Permit.

This Draft Workplan will be issued to the LARWQCB for approval with the expectation that the subsurface characterization will result in case closure from the LARWQCB, in accordance with the Low Threat Case Closure Criteria, generally used for UST cases. With a case closure determination, a soil management plan (SMP) for the handling of potentially impacted soil, that contains hydrocarbons at levels below the case closure criteria, would be prepared by the project applicant for submittal and approval by the LARWQCB (Mitigation Measure HAZ-2). The SMP would be in place prior to advancement of the Earthwork/Grading/Shoring Construction phase of the project which would be advanced under the Grading Permit.

If the LARWQCB determines that the subsurface characterization results of the Draft Workplan do not meet with the Low Threat Case Closure Criteria, a Soil Remediation Plan would be entered with the LARWQCB which would agree to remove and/or treat/remediate the impacted soils to a level determined acceptable per applicable regulatory standards, under supervision of a certified environmental consultant licensed to oversee such remediation (Mitigation Measure HAZ-3). This mitigation measure would occur either before or during the Earthwork/Grading/Shoring Construction phase of the development which would be advanced under the Grading Permit.

Upon completion of the removal and/or treatment/remediation per the Soil Remediation Plan, the project applicant would contact the LARWQCB to obtain a closure letter that states no further soils testing or remediation is required on the project site (Mitigation Measure HAZ-3). Implementation of Mitigation Measures HAZ-2 and HAZ-3 would reduce this potentially significant impact to a less than significant level.

The project would involve the demolition and removal of all existing on-site structures. As most of the existing buildings were constructed over 50 years ago, it is possible that lead-based paint (LBP), asbestos and/or other hazardous paint residues are present in the buildings. Lead is a highly toxic metal that affects virtually every system of the body. LBP is defined as any paint, varnish, stain, or other applied coating that has 1 mg/cm² (or 5,000 ug/g or 0.5 percent by weight) or more of lead. If released into the environment, these materials could pose a significant hazard to construction workers or the public.

Previous investigations conducted for the project site identified the potential presence of ACMs in the drywall systems, floor tiles, floor tile mastic, and stucco in the existing on-site buildings. Interior and exterior painted surfaces that may contain lead and/or other hazardous paint residues were also observed within the on-site buildings.

Implementation of Mitigation Measures HAZ-4 and HAZ-5 require comprehensive surveys of the existing buildings prior to demolition in accordance with applicable regulations—including the National Emissions Standards for Hazardous Air Pollutants standards, SCAQMD Rule 1403, and California Division of Occupation Safety and Health (Cal/OSHA)—to verify the presence or absence of any of these materials. If LBPs and/or ACMs are encountered, Mitigation Measures HAZ-4 and HAZ-5 require remediation or abatement of these materials in accordance with all applicable regulations and standards before building demolition commences.

Adherence with these Mitigation Measures would reduce risks associated with LBPs and ACMs to acceptable levels and associated impacts would be less than significant.

As discussed in Response VIII.a, operation of the project would not create a significant risk of exposure to hazardous materials towards the public or the environment. Types of hazardous materials to be used in association with the project such as small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. The potential for creation of a significant hazard through routine transport of hazardous materials or the release of hazardous materials into the environment is considered less than significant.

Overall, implementation of Mitigation Measures HAZ-2 to HAZ-5 and compliance with applicable standards and regulations would ensure that potentially significant construction-related impacts associated with hazardous materials releases or accident conditions would be reduced to a less than significant level. Operational impacts in this regard would be less than significant.

Mitigation Measures

- HAZ-2:** If the LARWQCB issues a case closure determination upon completion of the work outlined in the Draft Workplan for impacted soils at the 8801 Washington Boulevard site in accordance with Low Threat Case Closure Criteria, a Soils Management Plan (SMP) shall be prepared if to address the proper handling of soils that contain hydrocarbons at levels below the case closure criteria during construction activities. The SMP shall include procedures for handling, transportation, disposal, onsite controls, and Personal Protective Equipment (PPE) requirements for contractors. Soil that would be excavated in order to construct the underground parking shall be monitored in accordance with the SMP as well as regulations of the South Coast Air Quality Management District (SCAQMD). Impacted soil, if encountered, shall be segregated into stockpiles, which would be transported to an offsite facility for proper disposal. The stockpile(s) shall be tested in accordance with the requirements of the disposal facility.
- HAZ-3:** If the LARWQCB determines that the subsurface soils characterization results of the Draft Workplan for impacted soils at the 8801 Washington Boulevard site do not meet the Low Threat Case Closure Criteria, the project applicant shall prepare a Soil Remediation Plan for review and approval by the LARWQCB. The plan would include measures to remove and/or treat/remediate the impacted soils to a level determined acceptable per applicable regulatory standards, under supervision of a certified environmental consultant licensed to oversee such remediation. Upon completion of the Soil Remediation Plan, the project applicant shall contact the LARWQCB to obtain a closure letter that states no further soils testing or remediation is required on the project site.
- HAZ-4:** Prior to the issuance of any permit for the demolition or alteration of the existing on-site buildings, a comprehensive asbestos-containing materials (ACMs) survey of the buildings shall be performed. If no ACMs are found, the Applicant shall provide a letter to the Culver City Building Safety Division and/or Los Angeles Department of Building and Safety, as necessary, from a qualified asbestos abatement consultant indicating that no Asbestos-Containing Materials (ACMs) are present in the on-site buildings. If ACMs are found to be present, they shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.

HAZ-5: Prior to issuance of any permit for the demolition or alteration of the existing structure(s), a comprehensive lead-based paint (LBP) materials survey shall be performed to the written satisfaction of the Culver City Building Safety Division and/or Los Angeles Department of Building and Safety, as necessary. Should LBP materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant With Mitigation Incorporated. Park Century School, located at 3939 Landmark Street, is located 0.7 miles south of the project site. Turning Point School, located at 8780 National Boulevard, is located approximately 0.13 miles east of the project site. Construction of the project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions.

As discussed in Response VIII.b, remediation at the former gasoline site at 8801 Washington Boulevard will be necessary to clean-up impacted soils and groundwater. All remediation occur in adherence with Mitigation Measures HAZ-2 and HAZ-3. Also, project demolition activities could involve the removal of ACM and LBPs. However, any such removal would occur in adherence with Mitigation Measures HAZ-4 and HAZ-5. The project's remediation activities and demolition activities would be implemented pursuant to strict regulatory requirements, would be localized to the project site, and existing schools are sufficient distance from the project site to preclude impacts from the remediation and demolition activities. Implementation of the prescribed mitigation measures would reduce risks associated with remediation activities and LBPs and ACMs to acceptable levels and associated impacts would be less than significant.

Operation of the project would not create a significant risk of exposure to hazardous materials for the public or the environment, including the schools. Occupancy of the proposed residential, hotel, and retail/restaurant uses would not cause hazardous substance emissions or generate hazardous waste. Types of hazardous materials to be used in association with the project such as small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. The potential for creation of a significant hazard through handling or routine transport of hazardous materials or the release of hazardous materials into the environment within a quarter-mile of an existing school is considered less than significant.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant With Mitigation Incorporated. Government Code Section 65962.5, amended in 1992, requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. While Government Code Section 65962.5 makes reference to the preparation of a list, many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The

DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions (such as a removal action) or extensive investigations are planned or have occurred. The database provides a listing of Federal Superfund sites [National Priorities List (NPL)]; State Response sites; Voluntary Cleanup sites; and School Cleanup sites. Geotracker is the State Water Resources Control Board's data management system for managing sites that impact groundwater, especially those that require groundwater cleanup [USTs, Department of Defense, Site Cleanup Program] as well as permitted facilities such as operating USTs and land disposal sites. CalEPA's database includes lists of sites with active Cease and Desist Orders (CDO) or Cleanup and Abatement Orders (CAO) from the State Water Board.

As part of the Phase I, a search was conducted for available Federal, State, and local environmental database records for the project site and where practicable, adjoining properties and nearby properties or surrounding areas within approximate minimum search distances from the project site. The site's property records were also reviewed within the Culver City Building Department, the Culver City Fire Department, the Los Angeles County Department of Public Health, the Los Angeles County Department of Public Works, Environmental Programs Division, the LARWQCB, the DTSC, the SCAQMD and the California Department of Oil, Gas and Geothermal Resources (DOGGR). A regulatory agency database search report prepared by EDR was reviewed within the Phase I. Based on a recent review of the above reference databases and the results of the Phase I, the project site and any of its former uses are not identified as a hazardous materials site, except for those associated with the former gasoline station use located at 8801 Washington Boulevard which appear on the State Water Quality Control Board's GeoTracker database.^{29,30,31} As discussed in Response VIII.b, the project site has the potential to contain hazards related to the fuel release at 8801 Washington Boulevard, the site of the former gasoline station, that could create a significant hazard to the public or the environment during construction and operation of the project. However, with implementation of Mitigation Measures HAZ-2 and HAZ-3 provided under Response VIII.b, potentially significant impacts regarding hazardous materials with the existing site would be reduced to a less than significant level. Further, no off-site facilities were listed on the databases reviewed that would appear to present an environmental concern for the project site.

- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?**
- f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?**

No Impact (e and f). The project site is not located within an airport land use plan or within two miles of a public or private airport. The nearest airports are the Santa Monica Municipal Airport and the Los Angeles International Airport (LAX), located approximately three miles and five miles to the west of the project site,

²⁹ Department of Toxic Substances Control, Envirostor Database at <http://www.envirostor.dtsc.ca.gov/public>; accessed September 25, 2015.

³⁰ State Water Resources Control Board, GeoTracker Database at <https://geotracker.waterboards.ca.gov/>; accessed September 25, 2015.

³¹ CalEPA's List of Active CDO and CAO sites; online at <http://www.calepa.ca.gov/SiteCleanup/CorteseList/>; accessed September 25, 2015.

respectively. Therefore, the project would not result in an airport-related safety hazard for people residing or working in the project area, and no impact would occur in this regard.

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The project site is located in an established urban area that is well served by a roadway network. Venice Boulevard, adjacent to the project Site, and Robertson Boulevard, just west of the site, are transportation facilities that could be utilized during a disaster event.^{32,33} While it is expected that the majority of construction activities for the project would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. However, through-access for drivers, including emergency personnel, along all roads would still be provided. In these instances, the project would implement traffic control measures (e.g., construction flagmen, signage, etc.) to maintain flow and access. Furthermore, in accordance with Culver City and City of Los Angeles requirements, as applicable, the project would develop a Construction Management Plan, which includes designation of a haul route, to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access.

Project operation would generate traffic in the project vicinity and would result in some modifications to access (i.e., new curb cuts for project driveways) from the streets that surround the project site. However, emergency access to the project site and surrounding area would continue to be provided similar to existing conditions. Emergency vehicles and fire access would be provided in three on-site locations: at grade access from Venice Boulevard adjacent to the Metro platform; at grade access under the podium structure from National Boulevard; and at grade access from Washington Boulevard adjacent to the Metro platform. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and potential residents. Subject to review and approval of project site access and circulation plans by the LAFD and Culver City Fire Department, as necessary, the project would not impair implementation or physically interfere with adopted emergency response or emergency evacuation plans. Since the project would not cause significant impediments along a designated emergency evacuation routes, and the proposed mix of uses would not impair implementation of the City's emergency response plan, the project would have a less than significant impact with respect to these issues.

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The project site is not located in an area of moderate or very high fire hazard.^{34,35} The nearest very high fire hazard severity zone (VHFHSZ) is located in an unincorporated area of Los Angeles County

³² City of Los Angeles General Plan Safety Element – Critical Facilities and Lifeline Systems, Exhibit H November 26, 1996.

³³ County of Los Angeles Department of Public Works. <http://dpw.lacounty.gov/dsg/disaster/routes/map/culver%20city.pdf> Accessed October 10, 2015.

³⁴ Zimas Website, <http://zimas.lacity.org/>, accessed August 2015 and Culver City Fire Department Very High Fire Hazard Severity Zones (VHFHSZ) Map, prepared by CAL FIRE, dated June 13, 2012.

known as Baldwin Hills, approximately 0.75 miles south of the project site. Further, the project site is surrounded by urban development and not adjacent to any wildlands. As such, the project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. Thus, no impacts would occur in this regard.

IX. HYDROLOGY AND WATER QUALITY

Would the project:

a. Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact With Mitigation Incorporated. There are currently no known stormwater treatment systems for the project site. The existing site has an approximate 3-foot drop in grade from Venice Boulevard to Washington Boulevard with majority of the site drainage relayed through the existing inlets within the surface parking lot. Generally, the existing site drainage pattern follows the site's slope in a southeasterly direction from Venice Boulevard to Washington Boulevard. Runoff from the existing uses enters storm drain facilities along Venice, Washington and National Boulevards.

Violations of water quality standards or waste discharge requirements, or degradation of water quality can result in potentially significant impacts to water quality and result in environmental damage or sickness in people. The project would result in a significant impact to water quality if water quality standards, waste discharge requirements, or degradation of water quality occurred.

Point-source pollutants can be traced to their original source. Point-source pollutants are discharged directly from pipes or spills. Raw sewage draining from a pipe directly into a stream is an example of a point-source water pollutant. The project consists of a development of multi-family residential, hotel, office and retail/restaurant uses and does not propose any uses that would generate point source pollutants. Therefore, water quality impacts due to point sources would be less than significant.

Non-point-source pollutants (NPS) cannot be traced to a specific original source. NPS pollution is caused by rainfall or snowmelt moving over and through surface areas. As the runoff moves, it picks up and carries away natural and human-made pollutants, finally depositing them into lakes, rivers, wetlands, coastal waters, and even underground sources of drinking water. These pollutants can include:

- Excess fertilizers, herbicides and insecticides from agricultural lands and residential areas
- Oil, grease, and toxic chemicals from urban runoff and energy production
- Sediment from improperly managed construction sites, crop and forest lands, and eroding stream banks
- Salt from irrigation practices and acid drainage from abandoned mines
- Bacteria and nutrients from livestock; pet wastes, and faulty septic systems
- Atmospheric deposition and hydro modification

³⁵ The Culver City Very High Fire Hazard Severity Zones in LRA as recommended by CAL FIRE, prepared by CAL FIRE, dated September 2011.

Impacts associated with water pollution include ecological disruption and injury or death to flora and fauna, increased need and cost for water purification, sickness or injury to people, and degradation or elimination of water bodies as recreational opportunities. Accidents, poor site management or negligence by property owners and tenants can result in accumulation of pollutant substances on parking lots, loading and storage areas, or result in contaminated discharges directly into the storm drain system.

The project would be subject to all existing regulations associated with the protection of water quality. Construction activities would be carried out in accordance with the requirements of the NPDES General Construction Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB), as applicable. A Stormwater Pollution Prevention Plan (SWPPP) would be prepared and implemented by the project that incorporates Best Management Practices (BMPs) to minimize pollutant runoff during the project's construction period by preventing the off-site movement of potential contaminants such as petroleum products, paints and solvents, detergents, fertilizers, and pesticides. As part of the SWPPP, Culver City would require BMPs as listed in the California Stormwater Quality Association's California Storm Water Best Management Practice Handbooks. Additionally, should grading activities occur during the rainy season (October 1st to April 14th), a Wet Weather Erosion Control Plan (WWECP) would be required for the project. The WWECP is a document that addresses water pollution control from grading activities during the wet weather season by specifying the use of appropriate temporary erosion and sediment control BMPs. Compliance with the NPDES permit would be reviewed by appropriate Public Works staff during the plan check phase of the project.

As discussed under Response VI.a.iii, above, groundwater was encountered below the site during exploration at depths between 27.5 and 32.5 feet below the ground surface. According to the Seismic Hazard Zone Map of the Beverly Hills Quadrangle, the historic high groundwater level for the project site ranged between 18 feet at the eastern end of the site and 23 feet at the western end of the site. As such, construction activities could encounter groundwater. Typically, groundwater removed from a construction site is disposed of in the storm drain system. However, if any removed groundwater contain contaminants that exceed acceptable water quality regulatory standards of the LARWQCB or other appropriate agencies, this could be a potentially significant impact. Thus, Mitigation Measure WQ-1 is prescribed to address this potential impact, which requires implementation and completion of a dewatering plan that would dispose of contaminated groundwater in compliance with applicable regulatory requirements. Implementation of Mitigation Measure G-3 would ensure that potentially significant impacts regarding groundwater contamination during dewatering activities on the project site are reduced to a less than significant level.

Overall, compliance with applicable stormwater requirements and implementation of the prescribed mitigation would ensure that impacts to water quality during the project's construction activities would be less than significant.

With regards to long-term water quality impacts, per the applicable requirements of Chapter 5.05, Stormwater and Urban Runoff Pollution Control, Section 5.05.040, Standard Urban Stormwater Mitigation Plan (SUSMP) Requirements for New Development and Redevelopment Projects, of the CCMC, and Chapter 6, Public Works and Property, Article 4.4, Stormwater and Urban Runoff Pollution Control, of the LAMC, the project would require a stormwater mitigation plan that complies with the most recent LARWQCB approved SUSMP. As part of the operational drainage plan, the project would implement several rainwater harvesting systems to be constructed within the subterranean parking structure, which would also provide for stormwater treatment. The surface drainage would be relayed to these structures via roof drains and podium deck drains. The project will also consider combination of pre-treatments upstream of the rainwater harvesting system including the

following: flow-through planters; fossil filter inserts for catch basins; landscaped design features such as bio-swales; and flow treatment systems such as Continuous Deflective Separator (CDS) units. Once the required treatment volume is stored in the rainwater harvesting system, the excess water or higher rain event would overflow to the existing storm drain system in surrounding streets via high flow bypass system prior to the storage device or internal bypass outlet. The stormwater runoff captured and stored within the rainwater harvesting system would be reused for irrigation of proposed on-site landscape areas, including the lawn area, as feasible. Other typical BMPs to address pollutant sources generally involve maintenance of storm drain facilities, parking lots, vegetated areas, and dissemination of educational materials. Violations of water quality standards due to urban runoff can be prevented through the continued implementation of existing regional water quality regulations. The project would not interfere with the implementation of NPDES water quality regulations and standards, including within Metro ROW. Compliance with applicable SUSMP and long-term water quality requirements would be reviewed by appropriate Public Works staff during the plan check phase of the project. Compliance with applicable stormwater requirements would ensure that impacts to water quality during the project's operational activities would be less than significant.

Mitigation Measures

WQ-1: If dewatering activities occur on-site during future redevelopment, samples shall be obtained from the water and analyzed for volatile organic compounds (VOCs) and oxygenates to ensure that they do not exceed applicable discharge requirements. Should the samples exceed VOC, oxygenates or any other applicable discharge requirement, a dewatering plan shall be prepared by the Project Applicant for submittal to the Los Angeles Regional Water Quality Control Board (LARWQCB) and other appropriate agencies determined appropriate in consultation with the LARWQCB for review and approval. The plan shall include but not be limited to sampling of groundwater that may be contaminated; and treatment and disposal of contaminated groundwater in compliance with applicable regulatory requirements. Written verification from the LARWQCB of approval of a dewatering plan completion shall be submitted to the City of Culver City Department of Planning and Public Works prior to issuance of grading permit.

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less Than Significant Impact. The project site is currently entirely developed and improved with light industrial and commercial uses and paved surface parking areas. As such, the site does not currently provide a substantial opportunity for recharge of groundwater. Furthermore, the project does not propose the development of long-term groundwater production wells. Given the size of the site at approximately 5 acres and the temporary nature of construction activities, while some dewatering could be necessary during construction activities, such dewatering activities would not be to the extent that would substantially alter groundwater supplies. Therefore, the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level, and a less than significant impact would result.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. Currently, the site is almost completely developed with impermeable surfaces, however, there are small areas of exposed landscaped and disturbed soils. No streams or rivers occur on site. The project, which would involve the replacement of the impermeable surfaces and small areas of exposed landscaped and disturbed soils, would not substantially change the amount of impervious surface area on the site given the proposed above ground and subterranean structures/facilities. In addition, site-generated surface water runoff would continue to flow into the City's storm drain system. Furthermore, the project would include appropriate drainage improvements on site to direct stormwater flows to the local drainage systems, similar to existing conditions. The current requirement for the City of Culver City's SUSMP follows closely to the Los Angeles County's Low Impact Development (LID) guidelines. The County LID manual states the following:

"All Designated Projects must retain 100 percent of the Stormwater Quality Design Volume (SWQDV) on-site through infiltration, evapotranspiration, stormwater runoff harvest and use, or a combination thereof unless it is demonstrated that it is technically infeasible to do so."

Based on the project's geotechnical investigation, the project site is not recommended for infiltration into native soils. Therefore, as discussed under Response IX.a, the project would implement the use of rainwater harvesting systems as part of its stormwater treatment design. The stormwater runoff captured and stored within the rainwater harvesting system would be reused for irrigation of proposed on-site landscape areas, with the excess water or higher rain event overflowing to the existing storm drain system in surrounding streets via a high flow bypass system prior to the storage device or internal bypass outlet. The proposed drainage facilities would capture and treat the design storm for which the SWQDV is calculated, which for the project site is the 0.75 inch, 24-hour rain event. With the proposed drainage system in place, the existing off-site drainage patterns would be maintained.

Additionally, the streetscape plan which bounds the property along Venice, National, and Washington Boulevards would be developed to include a balance of concrete pavement, permeable concrete unit pavers, and a combination of bio swales, filtration planters, and structural soil systems. The planters would filter storm water via a soil medium prior to storm discharge through a horizontal perforated storm drain pipe into the city storm water system. Due to the existing clay structure of the soil, the Geotechnical Engineer would design these filters with a non-permeable enclosure.

With the site entirely developed, paved, or landscaped, the potential for erosion or siltation would be minimal. Additionally, project construction would comply with applicable NPDES and City requirements including those regarding preparation of a SWPPP and long-term storm water mitigation plan, as discussed under Response IX.a. As such, less than significant impacts associated with alterations to existing drainage patterns would occur with project implementation.

d. Substantially alter the existing drainage pattern of the site or area, including through the alternation of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. While the project site is under construction, the rate and amount of surface runoff generated at the project site would fluctuate because exposed soils could absorb rainfall that currently leaves the project site as surface flow. However, the construction period is temporary and compliance with applicable regulations discussed above would preclude fluctuations that result in flooding.

As discussed in Responses IX.a and IX.c, project implementation would implement the use of rain harvesting systems to capture and treat stormwater. With the proposed drainage system in place, the project would not substantially change the amount of impervious surface area on site and, thus, would not result in substantial increases in surface water runoff quantities. Additionally, with implementation of the project, overall existing drainage patterns would be maintained, and the project would include appropriate on site drainage improvements to convey anticipated stormwater flows. Final plan check by the City would ensure that adequate capacity is available in the storm drain system in surrounding streets prior to project approval. The Applicant would be responsible for providing the necessary on-site storm drain infrastructure to serve the project site, as well as any connections to the existing system in the area. It is also acknowledged that no BMPs are currently located on the project site and there are no known deficiencies in the existing storm drain system. Furthermore, the project would not alter the course of any stream or rivers. Because runoff would not increase over existing conditions, and rain harvesting systems would be implemented to capture and treat runoff, the project would not result in on- or off-site flooding, and impacts would be less than significant.

e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. As discussed above in Responses IX.c-d, post-development runoff quantities would not increase measurably, and the project would include appropriate on-site drainage improvements to accommodate anticipated stormwater flows. Similar to existing conditions, operation of the proposed uses would generate pollutant constituents commonly associated with urban uses to surface water runoff. However, the project would comply with all applicable water quality control requirements as discussed under Response IX.a. Further, there are no known deficiencies in the existing storm drain system. Final plan check by the City would ensure that adequate capacity is available in the storm drain system prior to project approval. The Applicant would be responsible for providing the necessary on-site storm drain infrastructure to serve the project site, as well as any connections to the existing system in the area. Therefore, the project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Thus, less than significant impacts would occur in this regard.

f. Otherwise substantially degrade water quality?

Less Than Significant Impact. As discussed in Response IX.a above, construction and operational BMPs, including the proposed rainwater harvesting systems and good housekeeping practices during project construction and operation would preclude substantial amounts of sediment and stormwater pollutants from

entering stormwater flows. Therefore, the project would have a less than significant impact in surface water quality.

- g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**
- h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?**

No Impact (g-h). The project site is mapped by the Federal Emergency Management Agency (FEMA) as located within Zone X, an area determined to be outside the 0.2 percent Annual Change Flood Hazard Zone.³⁶ The site is not located in a 100-year or 500-year flood zone as delineated by the City of Los Angeles or Culver City.^{37,38} Since the project site is not located within a 100-year flood plain, no impact would occur in this regard.

- i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?**

Less Than Significant Impact. As discussed under Responses IX.g-h, the project site would not be located within a mapped 100-year floodplain. Per Culver City's "Natural Hazards – Fire and Flooding" map, the site is not located within a potential inundation zone, including the Stone Canyon Dam Inundation Zone, Silverlake Dam Inundation Zone, and Mullholland Dam Inundation Zone.³⁹

However, Los Angeles County's General Plan indicates that a large portion of Culver City, including the project site, is located within the potential inundation area of the Hollywood Reservoir/Mulholland Dam and Franklin Canyon Reservoir Dam.⁴⁰ The project site is located approximately 6 miles away from both dams with a variety of development, hills, and terrain that would slow and limit any impacts of dam failures on the site and surrounding area. In addition, the National Dam Safety Act of 2006 authorized a program to reduce the risks to life and property from dam failure by establishing a safety and maintenance program. The program requires regular inspection of dams to reduce the risks associated with dam failures.

Measures to maintain the safety of the dam in accordance with dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure. The California Division of Safety of Dams provides periodic review of all dams in the State; and dams and reservoirs are monitored by the City during storms. Measures are instituted in the event of potential overflow. According to the City of Los Angeles' Safety Element, the City is reducing risk and preventing loss of life and property damage from natural and human-caused hazards, including dam failure.⁴¹ Mitigation of potential seiche hazards is implemented by

³⁶ FEMA Mapping Information Platform January 2013. FEMA <https://hazards.fema.gov>. Accessed June 2015.

³⁷ City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit F – 100-Year & 500-Year Flood Plains in the City of Los Angeles.

³⁸ Culver City, Natural Hazards – Fire and Flooding Map, February 1, 2007. Available on Culver City website at: <http://www.culvercity.org/government/it/gis/mapcatalog.aspx>. Accessed October 15, 2015.

³⁹ Ibid

⁴⁰ Los Angeles County General Plan, Safety Element, December 6, 1990.

⁴¹ City of Los Angeles Department of City Planning, Safety Element of the General Plan, March 1994, page II-16.

the LADWP through regulation of the level of water in its storage facilities and the provision of walls of extra height to contain seiches and prevent overflow or inundation. If a breach were to occur at the reservoir, flood water would disperse over a large area where water flows would be redirected by intervening development and changes in topography. Reservoir water, were it to reach the project site, would generally flow along roadways adjacent to or within the vicinity of the project site. Given the low likelihood of a breach and low potential of the project to affect flows, the project would not be expected to result in a significant impact with exposure of people and structures to risk of loss or injury associated with the Hollywood or Franklin Canyon Dam.

j. Inundation by seiche, tsunami, or mudflow?

Less Than Significant Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes. Mudflows occur as a result of downslope movement of soil and/or rock under the influence of gravity.

As discussed under Response IX.i, the project site is within the inundation area for the Hollywood Reservoir/Mulholland Dam and the Franklin Canyon Reservoir Dam. However, as discussed under Response IX.i, a breach of the dam facilities is very unlikely. Reservoir water, were it to reach the project site, would generally flow along roadways adjacent to or within the vicinity of the project site. Thus, during the unlikely failure of the dams, impacts regarding flooding hazards associated with seiches would be less than significant.

According to the Geotechnical Engineering Investigation, review of the County of Los Angeles Flood Inundation Hazards Map indicates the project site is not located within the mapped tsunami inundation boundaries. Therefore, the project would not be subject to flooding hazards associated with tsunamis. The potential for mudflows to affect the proposed uses would be negligible given the distance of the nearest mountains from the project site and amount of intervening development. Furthermore, the gently sloping topography of the project site is not conducive to sustaining mudflows. Thus, impacts associated with inundation by seiche, tsunami, or mudflow would be less than significant.

X. LAND USE AND PLANNING

Would the project:

a. Physically divide an established community?

Less Than Significant Impact. The project site is currently improved with various 1- and 2-story light industrial and commercial structures along the Venice Boulevard frontage, with the remainder of the project site containing 600 commuter parking spaces for the adjacent Culver City Metro Station. The project vicinity is highly urbanized and generally built out. The local project vicinity is characterized by a blend of commercial, restaurant, office, light industrial, mixed use residential and low- and high-density residential uses. The project would provide a mix of high-density residential, hotel, office, and retail/restaurant uses. As such, the project would be an infill project providing uses in keeping with the mixed-use character of the surrounding area. Given the type of uses in the project vicinity, and the infill character of the project, the project would not physically divide an established community.

The project's enhanced pedestrian frontage and access to the Expo Line would facilitate the movement of people throughout the established community. The location of denser development in the proximity of transit stations would further support existing Regional Transportation Plan (SCAG), City of Culver City, and City of Los Angeles policies that encourage pedestrian and bicycle activity and the use of transit. Because the project would facilitate and enhance pedestrian, bicycle and vehicle access and would complement and be consistent with existing land uses in the area, impacts with respect to the division of an established community would be less than significant.

b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact.

Culver City Plans, Regulations, and Policies

Proposed planning and zoning actions related to the Culver City portion of the project site include the following:

- Height Exception Approval Per CCMC, Chapter 17.240 (Planned Development Zoning Districts): Planned Development Zoning Districts, Section 17.240.015, Planned Development District Requirements, no building or structure within a PD Zone may exceed 56 feet in height unless a height exception is granted pursuant to Section 17.300.025, Height Measurement and Height Limit Exceptions.
- Comprehensive Plan Approval: Approval of a Comprehensive Plan that is consistent with the site's PD zoning designation.
- Tentative Tract Map for ground and airspace lot subdivision and to vacate Exposition Boulevard within the Culver City portion of the site.

Height Exception

The portion of the site within Culver City is zoned Planned Development 11 (PD-11). The PD 11 zone is intended for Transit Oriented Development (TOD), with pedestrian oriented uses that draw locally from the surrounding neighborhoods and regionally via the Expo Line. The project would be consistent with PD-11 zone requirements, which envision an all-encompassing, mixed use transit oriented development adjacent to the Metro Station. The project's mix of uses would be consistent with this designation. However, the project would construct two interconnected 5 to 6-story buildings, consisting of Residential Building (up to ~79 feet tall) and a Hotel Building (up to ~77 feet tall) within the Culver City portion of the project site. A portion of the proposed 5-story, approximately 72-foot-high Office Building would also be located within Culver City. Under the CCMC, Section 17.240.015, no building or structure within a PD Zone may exceed 56 feet in height unless a height exception is granted pursuant to Section 17.300.025, Height Measurement and Height Limit Exceptions. Because the proposed building heights would exceed 56 feet, approval of a height exception would be required in the Culver City portion of the project site.

Benefits of the project facilitated by greater building height are the amount of public open space and public amenities provided within the site. The project would provide a total of approximately 139,400 square feet of outdoor open space, gateways, landscape treatments, and amenities. Of this total, approximately 24,917 square feet would be private open space, while approximately 104,693 square feet would be public space. The remaining 9,790 square foot hotel courtyard space (2nd level podium) would be public/private open space. In addition to the project's proposed 139,400 square feet of opens space area, the project's proposed balconies would include approximately 8,084 square feet of private use area for project residents.⁴² Subsection F.3, Open Space, Landscaping and Amenities, in Attachment A of this MND provides further details on the project's proposed open space areas. The buildable area of the project site is approximately 5.53 acres or approximately 240,886 square feet. The ratio of building footprint to buildable area would be approximately 46.6 percent.⁴³ Open space features and amenities are illustrated in Figure A-10, *Ground Level Open Space Programming*, in Attachment A.

The project would meet the intent of the PD-11 zone to cluster development in the vicinity of the Metro Station. The proposed increase in building height from a maximum of 56 feet to 77 feet would facilitate clustered development and the development of approximately 104,693 square feet in public open space, most of which will occur on the Culver City portion of the project site. Because the project would not result in significant impacts, such as view, aesthetic, and shade impacts (see Responses I.a - d, above) or result in other impacts that could not be reduced to less than significant levels through prescribed mitigation measures, the impact of the project with respect to the requested building height increase would be less than significant.

Comprehensive Plan

Development plans would be submitted for review by the Culver City Planning Department, who would determine consistency with the PD-11 zone and Comprehensive Plan approval. The PD 11 zone is intended for Transit Oriented Development (TOD), with pedestrian oriented uses that draw locally from the surrounding neighborhoods and regionally via the Expo Line. The project would be consistent with PD-11 zone requirements, which envision an all encompassing, mixed use transit oriented development adjacent to the Metro Station, with both Expo Line and project parking. The PD-11 designation encourages a mix of commercial, residential, hotel within a large, mixed use transit oriented development adjacent to the Metro Station, with both Expo Line and project parking. The PD-11 zone envisions a central open space, an activated street front with pedestrian amenities, small scale retail uses, hotel and cafes, and a transit plaza. Specific development standards in the PD-11 zone limit new development to a maximum of: 200 apartment units; 148 hotel rooms; 200,000 square feet of office; and building footprint not to exceed 55 percent of the lot.

The project, which would provide a 200 residential units, 148 hotel rooms, 185,229 square feet of office use, 36,635 square feet of retail uses, and 16,645 square feet of restaurant uses, and as such would be consistent with the land use requirements of the PD-11 zone. The overall building footprint of the project would be 112,224 square feet and the building footprint within the Culver City portion of the project site would be 70,574

⁴² Balcony square footage calculated by: 109 Units x Avg. 74 SF balcony = 8,084 square feet.

⁴³ Includes 48,966 sf of building footprint in the Office Building, 44,103 sf in the Residential Building, and 19,155 sf in the Hotel Building for a total of 112,224 sf in all three buildings. For purposes of this entire site calculation, the project's open space includes 97,434 sf of ground level open space. In addition, there would be 27,330 sf of open space within the courtyard areas of the Residential and Hotel Buildings on the 2nd level. This 2nd level open space is outside of the calculated building footprint area.

square feet.^{44,45} This would represent a ratio of building footprint to buildable area of approximately 46.6 percent for the total site and 39 percent within the Culver City portion of the site.^{46,47} Both of these ratios would be less than the maximum 45 percent building coverage permitted in the PD-11 zone.

The project would be consistent with the types of uses, amenities, and lot coverage envisioned under the PD-11 zone. Because it would be consistent with the planned development requirements, it would have a less than significant impact with respect to Comprehensive Plan review. In addition, no physical impacts as a result of proposed development would occur that could not be reduced to less than significant levels with the implementation of the prescribed mitigation measures in this MND document. Thus, because the development would not result in unmitigated, adverse physical impacts and would be substantially consistent with Comprehensive Plan requirements in the PD-11 zone, impacts with respect to this land use action would be less than significant.

City of Los Angeles Plans, Regulations, and Policies

Proposed planning and zoning actions related to the City of Los Angeles portion of the project site include the following:

- General Plan Amendments: The project would require three General Plan amendments. The first is to exempt the project from Palms-Mar Vista-Del Rey Community Plan Footnote 1 and the second is to reclassify Exposition Boulevard (once vacated) from collector street to local street and then to the underlying zone (M1). The third is to remove the Open Space designation for 8900 and 8906 Venice Boulevard. 8900 and 8906 Venice Boulevard are currently dual designated as Limited Manufacturing and Open Space.
- Vesting Tentative Tract Map to vacate Exposition.
- Height District Change: Pursuant to Section 12.32 of the LAMC, a height district change from M1-1 to M1-2D to allow for a building height up to 75 feet at a 3.12 FAR for the portion of the Office Building located in the City of Los Angeles.
- Major Development Project Conditional Use Permit: Pursuant to Section 12.24.U.14, a Major Development Project CUP is being requested because the project includes over 100,000 square feet of floor area of nonresidential or non-warehouse uses in the M1 zone.

⁴⁴ The overall building footprint for the site includes 48,966 sf of building footprint in the Office Building, 44,103 sf in the Residential Building, and 19,155 sf in the Hotel Building for a total of 112,224 sf in all three buildings.

⁴⁵ The building footprint in the Culver City portion of the site includes 7,316 sf of building footprint in the Office Building, 44,103 sf in the Residential Building, and 19,155 sf in the Hotel Building for a total of 70,574 sf in all three buildings.

⁴⁶ Per footnote 37 above, there is a total of 112,224 sf of building footprint in all three buildings on the entire project site. For purposes of this site calculation, the project's open space includes 97,434 sf of ground level open space. In addition, there would be 27,330 sf of open space within the courtyard areas of the Residential and Hotel Buildings on the 2nd level. This 2nd level open space is outside of the calculated building footprint area. Site area equals 240,886 sf. Thus, the entire site calculation is as follows: $112,224 \text{ sf} \div 240,886 \text{ sf} = 46.6 \text{ percent}$.

⁴⁷ Per footnote 38 above, there is a total of 70,574 sf of building footprint in all three buildings on the Culver City portion of the project site. For purposes of this Culver City only site calculation, the project's open space includes 80,245 sf of ground level open space. In addition, there would be 27,330 sf of open space within the courtyard areas of the Residential and Hotel Buildings on the 2nd level. This 2nd level open space is outside of the calculated building footprint area. Culver City site area equals 180,774 sf. Thus, the Culver City site calculation is as follows: $70,574 \text{ sf} \div 180,774 \text{ sf} = 39 \text{ percent}$.

- Zoning Administrator Determination: Pursuant to Section 12.24.x.22 of the LAMC, a Zoning Administrator Determination to deviate from the transitional height requirements is necessary.

Exposition Boulevard General Plan Amendment/Vesting Tentative Tract Map

A remnant section of Exposition Boulevard crossed the project site prior to the construction of the Metro Station and parking lot. This street section, a small segment of which occurs in the southwest corner of the site, was primarily obliterated by the construction of rail facilities. However, the remnant section occurring on the project site was not formerly vacated. The remnant section is not necessary for present or prospective public use. The proposed street vacation would be consistent with City of Los Angeles Palms-Mar Vista-Del Rey Community Plan policies to support transit, including the following:

- Goal 10: Develop a public transit system that improves mobility with convenient alternatives to automobile travel.
- Goal 11: Encourage alternative modes of transportation over the use of single-occupancy vehicles.

Because the street vacation and re-designation would cause no change from existing conditions related to the remnant segment and would be consistent with Community Plan policies, it would have a less than significant impact with respect to City of Los Angeles regulations.

Height District Change/General Plan Amendment/ Zoning Administrator Determination

The portion of the project site within the City of Los Angeles is zoned M1-1, Limited Industrial, which allows a range of multi-family, hotel, and commercial uses such as those associated with the project. This zone is also consistent with the City of Los Angeles Palms-Mar Vista-Del Rey Community Plan's "Limited Industrial" designation for the site which corresponds to CM, MR1, and M1 zones.⁴⁸ Footnote 1, pertinent to this designation would limit these designated areas as Height District No. 1. This Height District allows a FAR 1.5:1 (LAMC, Section 12.21.1.A.1) (up to one and one-half times the buildable area of a property).

The portion of the proposed Office Building within the City of Los Angeles would include approximately 14,383 square feet of retail uses, 3,571 square feet of restaurant uses, and 168,334 square feet of office uses within a 5-story, approximately 72-foot-high building. The Los Angeles portion of the project site contains approximately 1.37 acres (approximately 59,677 square feet). The FAR for the Los Angeles portion would be approximately 3.12:1 ($59,677 \div 186,288$).

The Office Building would face the Venice Boulevard median. The median is designated as open space, which is typically reserved for parks and sensitive uses. Under the LAMC, the interface of a C or M zone with a lower intensity zone requires a reduced building height within the first 100 feet of the C zone to protect the more sensitive use. Although designated as open space, the concrete median is does not provide landscaping or other open space features that would be sensitive to the height of adjacent commercial buildings. Because the height of the commercial building is not otherwise restricted by the underlying zoning or land use designation, a Zoning Administrator Determination, pursuant to Section 12.24.x.22 of the LAMC, is requested to allow a deviation from transitional height requirements.

⁴⁸ City of Los Angeles Palms – Mar Vista- Del Rey Community Plan,

Existing policies of the Palms-Mar Vista-Del Rey Community Plan do not support an FAR for the project site in excess of 1.5:1. Because the project would exceed the requirements of the No. 1 Height District, a change to Height District No. 2 and exception to Palms-Mar Vista-Del Rey Community Plan's Footnote 1, which establishes the No 1 Height District, are being requested as part of the project. Height District No. 2 would allow the proposed 3.12 FAR.

Benefits of the project facilitated by greater building height are the amount of public open space and public amenities provided within the site. The project would provide a total of approximately 139,400 square feet of outdoor open space, gateways, landscape treatments, and amenities, as discussed above. As stated above, the buildable area of the project site is approximately 5.53 acres or approximately 240,886 square feet. The ratio of building footprint to buildable area would be approximately 46.6 percent.

Although not consistent with the FAR designated in the Palms-Mar Vista-Del Rey Community Plan, the project would be consistent with stated policies of the Community Plan, which include: (i) complement the redevelopment efforts of Culver City for the revitalization of the area adjoining the community by promoting a pedestrian-oriented environment on Venice Boulevard and (ii) establish street identity and character on Venice Boulevard adjoining Culver City through pedestrian-oriented amenities and streetscape and landscape which unify the street and attract pedestrians and business patronage.⁴⁹ The location of ground level retail and restaurant uses, landscape amenities, open space and pedestrian entrances along the Venice Boulevard frontage, in addition to the incorporation of public plazas and lawns, restaurants, transit plaza, and promenades at the site's interior accessible from the Venice and National Boulevard frontages, the project would be consistent with other objectives of the Palms-Mar Vista-Del Rey Community Plan to enhance the pedestrian experience along Venice Boulevard.

In addition, it is acknowledged that the project's proposed FAR would be consistent with the City's Draft Exposition Corridor Transit Neighborhood Plan (TNP), which although not applicable to the project site, is focused on the establishment of new development regulations that better support transit ridership, such as allowing some increased development intensity near stations where appropriate, including the Culver City Station.

The project would be consistent with policies of the City of Los Angeles General Plan Transportation Element, which relate to transit oriented development along mixed use boulevards.⁵⁰ Objective 3 of the Transportation Element is to support development in regional centers, community centers, major economic activity areas and along mixed-use boulevards as designated in the Community Plans.⁵¹

The project would be consistent with specific land use policies of the Transportation Element, including the following:

⁴⁹ *City of Los Angeles Palm-Mar Vista-Del Rey Community Plan, 1997, page 1-4.*

⁵⁰ *The City of Los Angeles General Plan Framework, Figure 3-3, designates Venice Boulevard as a Mixed Use Boulevard in the Project area..*

⁵¹ *City of Los Angeles General Plan Transportation Element, Chapter IV, Objectives and Policies, September 1999.*

Policy 3.7: Promote the development of transit alignments and station locations which maximize transit service to activity centers and which permit the concentration of development around transit stations.

Policy 3.13: Enhance pedestrian circulation in neighborhood districts, community centers, and appropriate locations in regional centers and along mixed-use boulevards; promote direct pedestrian linkages between transit portals/platforms and adjacent commercial development through facilities orientation and design.

The project would also be consistent with objectives of the recently adopted City of Los Angeles Mobility Plan to cluster development in the vicinity of transit stations. Under Goal 3, Land Use Access and Mix, the Mobility Element states:

“A community with a mix of uses clustered close together makes it much easier for someone to accomplish a number of daily errands by walking or bicycling. Better still is when these uses are clustered around a transit station, offering people the opportunity to easily take care of errands on their way to work or home, without having to go out of the way. Neighborhoods with frequent, reliable transit seven days a week are the ideal place to cluster uses and services so that area residents, students, and/or employees can complete a number of errands within a single walk or bike trip. Likewise, it makes sense for land uses situated near major transit stops to be of the intensity and type that they attract a high number of transit riders. The greatest benefits of transit accrue when the greatest number of potential riders can be located within easy access of the transit service.”

The Mobility Element further states: “Transit-oriented development (TOD) planning has been a tool used by cities to promote the development of areas that have a mix of housing, jobs, and local services. However TOD refers to more than just the properties immediately adjacent to stations; the corridors themselves can be planned as destinations and job centers that add value to the area... Corridors linked to transit have the capacity to accommodate greater densities of residential and commercial uses, while increasing access to transit connections.”⁵² Program PL3 of the Mobility Plan is to encourage mixed-use residential, employment and commercial serving uses where appropriate to facilitate increased utilization of walking, bicycling, and transit use.

The transit corridor strategy of the City of Los Angeles’s *Making the Most of Transit in Los Angeles* (January 2013) provides the following policy statement: “Encourage vibrant, job-dense, mixed-use districts near transit and incentivize development that supports a more transit-oriented city.”⁵³

The project would also be consistent with State of California and SCAG’s 2012-2035 Regional Transportation Plan (RTP) policies that support increased density in proximity to transit stations. Senate Bill No. 743 supports higher densities in transit priority areas by adding to the CEQA Statute, California Public Resources Code Chapter 2.7, Section 21099(d)(1), which allows relief from certain CEQA requirements for infill sites within a transit priority areas. The provisions of SB 743 apply to projects located on a “... lot within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site

⁵² City of Los Angeles Mobility Plan, 2035, adopted August 11, 2015.

⁵³ City of Los Angeles Transit Corridors Cabinet (Building and Safety, City Planning, and Transportation Departments and Los Angeles Housing Department), *Making the Most of Transit*, January 2013, page 3.

adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses....and it is located within one-half mile of a major transit stop.”⁵⁴ The project would meet these criteria. In addition, by intensifying development within an area served by the Metro Expo Line, the project would be consistent with RTP goals to encourage land use and growth patterns that facilitate transit and to maximize the productivity of the transportation system.

The project would be substantially consistent with the policies of the Community Plan to enhance the Venice Boulevard pedestrian environment and to encourage transit. In addition, the project would be consistent with General Plan Transportation Element and Mobility Plan objectives to cluster development in proximity to transit stations. The project would also be consistent with State and regional policies that support transit priority development. Because the project would meet the intent of these plans to cluster development and because the proposed increase in FAR from Height District No. 1 to No. 2 would facilitate clustered development and respective public open space, would not result in adverse physical impacts, such as view, aesthetic, and shade impacts (see Section 1.a, above) or other physical effects that would not be reduced to a less than significant level through recommended mitigation measures, the impact of the project with respect to the requested building height and density, would be less than significant.

Major Development Project Conditional Use Permit

LAMC Section 12.24.U.14.a defines “major” development projects, which would be uses otherwise permitted by right in the zones they are located, as requiring a Conditional Use Permit (CUP) if they comprise 100,000 square feet or more of floor area in nonresidential or non-warehouse uses in the C2, C4, C5, CM, M1, M2 and M3 Zones. Because the portion of the project within the City of Los Angeles consists of approximately 186,288 square feet of office, retail, and restaurant uses, a CUP would be required. The major development project CUP process would allow the City’s decision-makers to review the effects and benefits of the project. Because the project would not result in unmitigated, adverse physical impacts, the proposed CUP request would be considered less than significant.

Other Approvals

It is noted that the other land use related approvals requested as part of the project include, but are not limited to, the following: Vesting Tentative Tract Map (City of Los Angeles) and Tentative Tract Map (Culver City); Two Conditional Use Beverage to permit alcohol uses within two restaurants; demolition permits; grading, excavation, and building permits; and haul route permits. None of these approvals would conflict with an applicable land use plan (i.e., City General Plan), policy or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. These approvals have been assessed as part of the project throughout this MND evaluation.

Conclusion

Based on the analysis above, with approval of the requested discretionary actions, the project would be consistent with the applicable General Plan and Zoning provisions of the City of Los Angeles and Culver City. As demonstrated in this MND analysis, with implementation of the project’s design features and prescribed mitigation measures, all identified potentially significant impacts associated with the proposed uses and land use designations would be reduced to a less than significant level. Therefore, with approval of the requested

⁵⁴ Per definitions included in Section 21099 (a).

discretionary actions, the project would not result in conflicts with the applicable General Plan or Zoning provisions such that significant physical impacts on the environment would occur. Thus, impacts would be less than significant.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. As discussed under Response IV.f, no designated riparian habitat or natural communities exist on the project site or in the surrounding area. Additionally, there is no adopted Habitat HCP, NCCP, or other approved local, regional, or State habitat conservation plan in place for the project site, Culver City or the City of Los Angeles. Thus, no impact to a habitat conservation or community conservation plan is anticipated.

XI. MINERAL RESOURCES

Would the project:

- a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**
- b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

No Impact (a-b). Minerals are defined as any naturally occurring chemical elements or compounds formed from inorganic processes and organic substances. The California Surface Mining and Reclamation Act of 1975 (SMARA) requires that all cities address significant mineral resources, classified by the State Geologist and designated by the State Mining and Geology Board, in their General Plans.

The Inglewood Oil Field (Oil Field) is located within Culver City and the unincorporated area of Los Angeles County known as Baldwin Hills. The current active Oil Field boundary is approximately 1,000 acres of which 100 acres are located within Culver City. The Oil Field is located approximately one mile south of the project site. The project site is located in a highly urbanized area of Culver City and the City of Los Angeles and is currently developed with light industrial and commercial uses along Venice Boulevard and surface parking throughout the remainder of the site. As such, the potential of uncovering mineral resources during project construction is considered low. Therefore, the project would not result in the loss of availability of a known mineral resource delineated on a local general plan, specific plan, or other land use plan as there are no known mineral resources or mineral resource recovery sites on or near the project site. No impact would occur in this regard.

XII. NOISE

The following impact analysis pertaining to noise and vibration impacts is based on information contained in the project's *Noise and Vibration Technical Report* prepared by PCR in December 2015, which is available for review at the Culver City Planning Division.

Would the project result in:

a. Exposure of persons to or generation of noise level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact With Mitigation Incorporated.

Applicable Noise Regulations

City of Culver City

The City of Culver City Noise Standards are developed from those of several Federal and State agencies including the Federal Highway Administration, the Environmental Protection Agency, the Department of Housing and Urban Development, the American National Standards Institute, and the State of California Department of Health Services. These standards set limits on the noise exposure level for various land uses. **Table B-9, City of Culver City Exterior Noise Standards**, lists exterior noise level standards and the type of occupancy to which they should be applied.

Table B-9

City of Culver City Exterior Noise Standards

Zone	dBA (CNEL)
Residential	65
Commercial	65

Source: City of Culver City Noise Element.

Section 9.07.055 of Culver City's Noise Regulations Chapter 9.07 states that it shall be prohibited for any persons to operate a loud speaker or sound amplified equipment for the purposes of transmitting messages, giving instructions or providing entertainment which is audible at a distance of fifty (50) feet or beyond the subject's property line without first filing an application and obtaining a permit. According to Section 9.07.055, every user of sound amplifying equipment on public or private property, except block parties which have obtained a permit from the Chief of Police or activities in public parks which have obtained a permit for use of amplifying equipment from the Parks, Recreation and Community Services Department shall file an application with the Committee on Permits and Licenses at least ten (10) days prior to the day on which the sound amplifying equipment is to be used. The commercial and noncommercial use of sound amplifying equipment shall be subject to the following restrictions:

- a. The only sounds permitted shall be either music or human speech, or both.
- b. The operation of sound amplifying equipment shall occur only between the hours of:
 - 8:00 a.m. through 8:00 p.m. Monday through Thursday
 - 8:00 a.m. through 10:00 p.m. Friday,
 - 10:00 a.m. through 10:00 p.m. Saturday,
 - 10:00 a.m. through 8:00 p.m. Sunday and City specified holidays

Table B-10, Noise and Land Use Compatibility Matrix – California, illustrates the State guidelines established by the State Department of Health Services for acceptable noise levels for counties and cities. These standards and criteria will be incorporated into the land use planning process to reduce future noise and land use incompatibilities. This table is the primary tool that allows Culver City to ensure integrated planning for compatibility between land uses and outdoor noise. Community Noise Equivalent Level (CNEL) noise levels for specific land uses are classified into four categories: (1) “normally acceptable” (2) “conditionally acceptable” (3) “normally unacceptable” and (4) “clearly unacceptable”.⁵⁵ A CNEL value of 70 dBA is considered the dividing line between a “conditionally acceptable” and “normally unacceptable” noise environment for noise sensitive land uses, including residences, transient lodgings, schools, and library.

The City’s General Plan Noise Element includes Policy 2.A, pertaining to stationary noise sources, as follows:

Policy 2.A Create a comprehensive ordinance establishing noise regulation criteria, and standards for noise sources and receptors to include but not be limited to the following:

- Noise reduction features during site planning to mitigate anticipated noise impacts on affected noise sensitive land uses, such as schools, hospitals, convalescent homes, and libraries.
- Temporary sound barrier installation at construction site if construction noise is impacting nearby noise sensitive land uses.
- Noise abatement and acoustical design criteria for construction and operation of any new development.

Chapter 9.07 of the City of Culver City Municipal Code (CCMC) provides specific noise restrictions and exemptions for noise sources within Culver City. Culver City’s noise regulations state that construction activity shall be prohibited, except between the hours of 8:00 A.M. and 8:00 P.M. Mondays through Fridays; 9:00 A.M. and 7:00 P.M. Saturdays; 10:00 A.M. and 7:00 P.M. Sundays. It is prohibited for any person to operate any radio, disc player or cassette player or similar device at a construction site in a manner that results in noise levels that are audible beyond the construction site property line.

City of Los Angeles

The Los Angeles Municipal Code (LAMC) Section XI, *Noise Regulation*, establishes regulations regarding allowable increases in noise levels as a result of project implementation, both in terms of long-term operation and temporary construction activities.

The City of Los Angeles Noise Regulation establishes acceptable ambient sound levels to regulate intrusive noises (e.g., stationary mechanical equipment and vehicles other than those traveling on public streets) within specific land use zones. In accordance with the Noise Regulation, a noise level increase of 5 dBA over the

⁵⁵ CNEL is the time average of all A-weighted sound levels for a 24-hour period with a 10 dBA adjustment (upward) added to the sound levels which occur in the night (10:00 P.M. to 7:00 A.M.) and a 5 dBA adjustment (upward) added to the sound levels which occur in the evening (7:00 P.M. to 10:00 P.M.). These penalties attempt to account for increased human sensitivity to noise during the quieter nighttime periods, particularly where sleep is the most probable activity.

Table B-10
CNEL (dBA)
Noise and Land Use Compatibility Matrix - California

Land Use Category	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Acceptable
Residential – Low density, Single-Family, Duplex, Mobile Homes	50 – 60	55 – 70	70 – 75	75 – 85
Residential – Multiple Family	50 – 65	60 – 70	70 – 75	70 – 85
Transient Lodging – Motel, Hotels	50 – 65	60 – 70	70 – 80	80 – 85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 – 70	60 – 70	70 – 80	80 – 85
Auditoriums, Concert Halls, Amphitheaters	NA	50 – 70	NA	65 – 85
Sports Arenas, Outdoor Spectator Sports	NA	50 – 75	NA	70 – 85
Playgrounds, Neighborhood Parks	50 – 70	NA	67.5 – 75	72.5 – 85
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 – 70	NA	70 – 80	80 – 85
Office Buildings, Business Commercial and Professional	50 – 70	67.5 – 77.5	75 – 85	NA
Industrial, Manufacturing, Utilities, Agriculture	50 – 75	70 – 80	75 – 85	NA

Normally Acceptable – Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

Conditionally Acceptable – New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.

Normally Unacceptable – New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable – New construction or development should generally not be undertaken.

NA: Not Applicable

Source: Office of Planning and Research, State of California General Plan Guidelines, October 2003.

existing average ambient noise level at an adjacent property line is considered a noise violation. This standard applies to all noise sources except vehicles traveling on public streets and construction noise.

The ambient noise, as defined by the Noise Regulation, is the measured noise level averaged over a period of at least 15 minutes, $L_{eq(15\text{-minute})}$. The baseline ambient noise shall be the actual measured ambient noise level or the City's presumed ambient noise level, whichever is greater. In cases in which the actual measured ambient noise level is not known, the City's presumed ambient levels will be used as the baseline. The City's presumed daytime (7:00 A.M. to 10:00 P.M.) minimum ambient noise level for properties zoned residential is 50 dBA, while the nighttime (10:00 P.M. to 7:00 A.M.) presumed minimum ambient noise level is 40 dBA.⁵⁶ To

⁵⁶ Los Angeles Municipal Code, Chapter XI, Article I, Section 111.03.

account for people's increased tolerance for short-duration noise events, the Noise Regulation provides a 5 dBA allowance for a noise source occurring more than five but less than fifteen minutes in any one-hour period and an additional 5 dBA allowance (total of 10 dBA) for a noise source occurring five minute or less in any one-hour period.⁵⁷

Section 112.03 of the LAMC limits noise levels generated by construction equipment when construction activities are located within 500 feet of a residential zone to 75 dBA, as measured at a distance of 50 feet from the source. Compliance with this standard is only required where "technically feasible."⁵⁸ In addition, the LAMC prohibits construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday or national holiday.

Section 112.04(b) of the LAMC states that no person shall operate or cause to be operated any machinery, equipment, tools, or other mechanical or electrical device, or engage in any other activity in such manner as to create any noise which would cause the noise level on the premises of any other occupied property, or, if a condominium, apartment house, duplex, or attached business, within any adjoining unit, to exceed the ambient noise level by more than five (5) decibels.

In addition to the previously described LAMC provisions, the City has also established noise guidelines that are used for planning purposes. These guidelines are based in part on the community noise compatibility guidelines established by the California State Governor's Office of Planning and Research shown in Table B-10 and are intended for use in assessing the compatibility of various land use types with a range of noise levels as seen in **Table B-11, City of Los Angeles Land Use Compatibility for Community Noise**.

Ground-Borne Vibration Guidelines

Culver City and the City of Los Angeles have not adopted policies or guidelines relative to ground-borne vibration. However, CalTrans has produced a guidance manual for evaluating potential vibration impacts ("Transportation- and Construction-Induced Vibration Guidance Manual" dated June 2004). The manual gathers data from multiple sources including the Federal Transit Administration (FTA). The manual provides thresholds for potential impacts on human comfort and damage to buildings, as well as guidance for reducing potential vibration impacts and addressing vibration issues. The potential for annoyance from vibration activity is measured in inches per second peak particle velocity (PPV). For example, transient vibration of 0.035 inches per second (PPV) is identified as a level that is "barely" perceptible, while 0.9 is identified "strongly" perceptible.⁵⁹ Continuous vibration from traffic at 0.1 PPV "begins to annoy."

Thresholds of Significance

The following significance thresholds evaluate potential noise and vibration impacts of the project based on the regulatory framework described above. The project would result in potentially significant impacts under the following circumstances:

⁵⁷ Los Angeles Municipal Code, Chapter XI, Article I, Section 111.02-(b).

⁵⁸ In accordance with the City of Los Angeles Noise Ordinances, "technically feasible" means that the established noise limitations cannot be complied with at a project site, despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques employed during the operation of equipment.

⁵⁹ Transient vibration is defined as a temporarily sustained vibration of a mechanical system.

Table B-11

City of Los Angeles Land Use Compatibility for Community Noise

Land Use	Community Noise Exposure CNEL (dBA)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Single-Family, Duplex, Mobile Homes	50 to 60	55 to 70	70 to 75	Above 70
Multi-Family Homes	50 to 65	60 to 70	70 to 75	Above 70
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 to 70	60 to 70	70 to 80	Above 80
Transient Lodging—Motels, Hotels	50 to 65	60 to 70	70 to 80	Above 80
Auditoriums, Concert Halls, Amphitheaters	—	50 to 70	—	Above 65
Sports Arena, Outdoor Spectator Sports	—	50 to 75	—	Above 70
Playgrounds, Neighborhood Parks	50 to 70	—	67 to 75	Above 72
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 to 75	—	70 to 80	Above 80
Office Buildings, Business and Professional Commercial	50 to 70	67 to 77	Above 75	—
Industrial, Manufacturing, Utilities, Agriculture	50 to 75	70 to 80	Above 75	—

Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: City of L.A. CEQA Thresholds Guide, 2006.

- NOISE 1:** Project construction activities occur between the hours of 8:00 P.M. and 8:00 A.M. Monday through Friday; 7:00 P.M. and 7:00 A.M. Saturdays; 7:00 P.M. and 10:00 A.M. Sundays in the City of Culver City; or result in noise levels exceed existing ambient exterior noise levels by 5 dBA or more at a noise-sensitive use located in the City of Los Angeles.
- NOISE 2** The project would cause ambient noise levels to increase by 5 dBA, L_{eq} or more; or
- NOISE 3** Project-related operational (i.e., non-roadway) noise sources such as outdoor building mechanical/electrical equipment exceed ambient noise level by 5 dBA, thus causing a violation of the City of Los Angeles.

- NOISE 4** Amplified sound shall not be audible at a distance of fifty (50) feet from amplified sound equipment or beyond the subject's property line without first filing an application and obtaining a permit from Culver City. The operation of sound amplifying equipment shall occur only between the hours of: 8:00 a.m. through 8:00 p.m. Monday through Thursday; 8:00 a.m. through 10:00 p.m. Friday; 10:00 a.m. through 10:00 p.m. Saturday; 10:00 a.m. through 8:00 p.m. Sunday and Culver City's specified holidays.
- NOISE -5** Potential Building Damage - Project construction activities cause ground-borne vibration levels to exceed 1.0 inch-per-second PPV at the nearest residential buildings.
- NOISE -6** Potential Human Perception - Project construction activities cause ground-borne vibration levels to exceed 0.035 inch-per-second PPV at the nearest residential buildings.

Existing Conditions

The project site is bounded by Venice Boulevard and commercial uses to the northwest; National Boulevard and commercial uses to the northeast, Washington Boulevard and commercial and light industrial uses to the southeast, and the Metro right-of-way and Metro to the south. Interstate 10 (I-10) is located approximately 0.15 miles north of the project site. Existing noise sensitive uses within 500 feet of the project site include residential uses located north of the project site across Venice Boulevard along Curts Avenue (identified as R3). Also, school facilities are located to the southeast as part of the Park Century School and Turning Point School. Future noise sensitive uses would be located east of the project site as part of the Access Culver City project (identified as R4) as shown in **Figure B-4, Noise Measurement and Sensitive Receptor Locations**.

The results of ambient sound measurements taken to establish the existing environmental setting are summarized in **Table B-12, Summary of Ambient Noise Measurements**. As shown in Table B-12, the measured daytime average noise levels on-site were 68 dBA, L_{eq}^{60} (for both the R1 and R2 locations), and measured CNEL ranges from 69 dBA (along the northern boundary) to 73 dBA (at the western boundary). Noise measurements were taken at R3 through R5 during daytime only since project-related nighttime events which may generate noise (amplified sound) would be limited by the City (Culver City or Los Angeles) noise

ordinance as discussed above.⁶¹ The measured daytime noise levels ranged from 67 dBA at R3 to 71 dBA, L_{eq} at R4 and R5. Monitoring demonstrated that the primary source of noise in the immediate area of the project site was traffic on roadways and light rail train on the Metro Expo Line. As indicated by the noise data in Table B-12, the project site is generally considered "normally unacceptable" [by the State of California General Plan Guidelines' Noise and Land Use Compatibility Matrix], for development of residential uses only after a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design (see discussion above in Applicable Noise Regulations).

⁶⁰ L_{eq} is the equivalent steady-state A-weighted sound level that would contain the same acoustical energy as the time-varying A-weighted sound level during the same time interval.

⁶¹ During the time of the noise measurements, active construction was taking place as part of the Platform Project, which would provide inaccurate noise measurements at the Park Century School site. Thus, measurement location R5 was taken closer to the project site than the Park Century School site, which represents a conservative, worse-case scenario for noise impacts to that school. Also, since the Access Culver City site is closer than the Turning Point School site to the project site, noise measurement location R4 covers noise impacts to that school.

Table B-12

Summary of Ambient Noise Measurements

Receptor Location	Measured Ambient Noise Levels, ^a (dBA)				
	Daytime (7 A.M. to 10 P.M.) Hourly L _{eq}	Daytime Average	Nighttime (10 P.M. to 7 A.M.) Hourly L _{eq}	Nighttime Average	24-Hour Average, CNEL
R1– 7/22/15 (11:00 A.M.) Wednesday / 7/23/15 (11:00 A.M.) Thursday	67 – 69	68	57 – 73	66	73
R2 – 7/22/15 (11:00 A.M.) Wednesday / 7/23/15 (11:00 A.M.) Thursday	60 – 71	68	58 – 64	60	69
R3 – 7/23/15 (10:25 A.M.) Thursday	67	N/A	N/A	N/A	N/A
R4 – 7/23/15 (10:54 A.M.) Thursday	71	N/A	N/A	N/A	N/A
R5 – 7/23/15 (11:19 A.M.) Thursday	71	N/A	N/A	N/A	N/A

^a Detailed measured noise data, including hourly L_{eq} and CNEL levels, are included in the Noise Data Worksheets provided under separate cover available at the Culver City Planning Division.

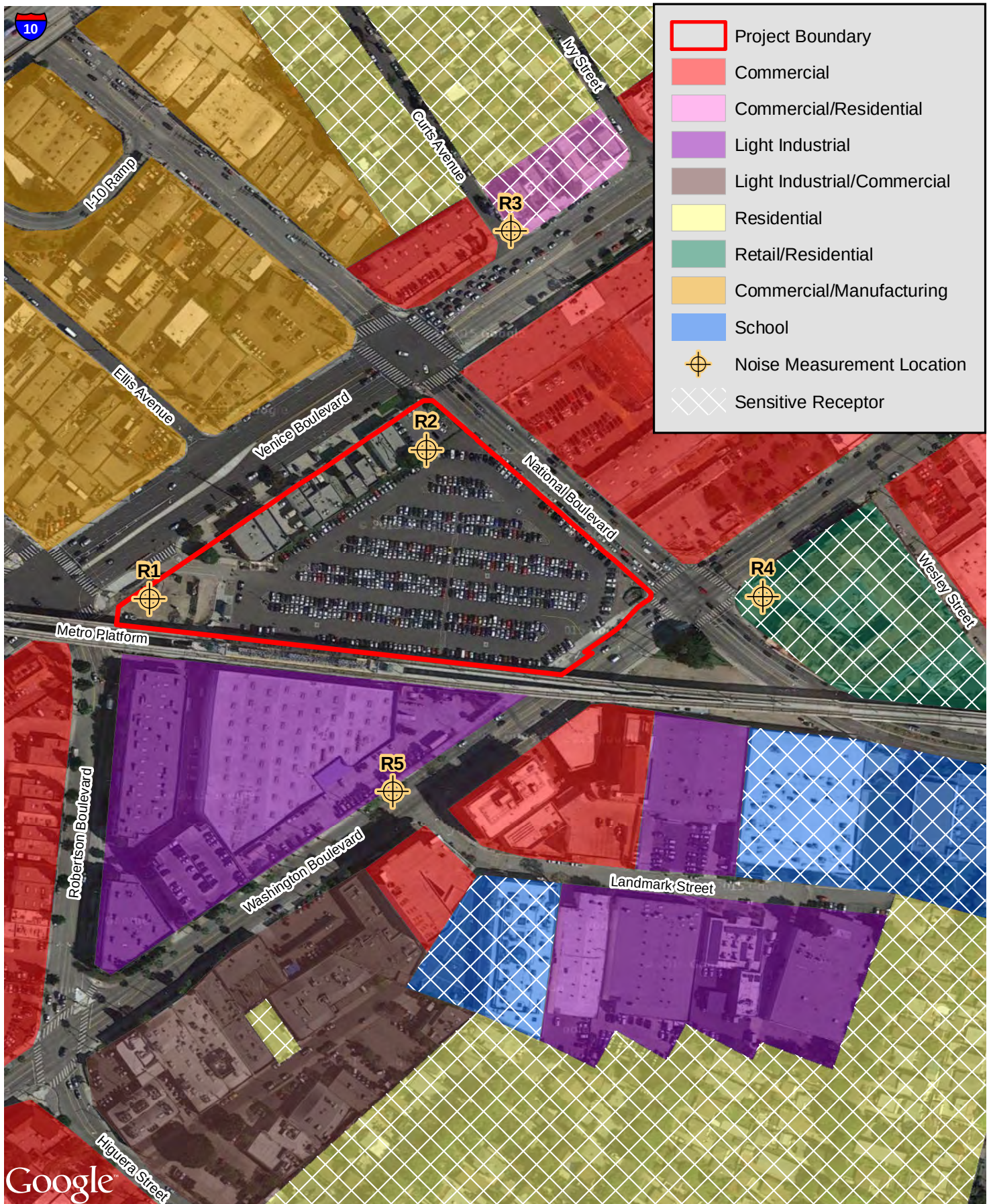
Source: PCR Services Corporation, 2015.

Construction Noise

Sections 41.40 (a) and (c) of the LAMC allows construction between the hours of 7:00 A.M. and 9:00 P.M. Monday through Friday; 8:00 A.M. and 6:00 P.M. on Saturday, and no construction on Sunday. Construction activities are anticipated to generate noise levels up to 68 dBA at the nearest residential receptors along Curts Avenue (R3) located approximately 325 north of the project site within the City of Los Angeles boundaries. The estimated 68 dBA noise level represents the worst-case condition when heavy construction equipment would be operating in vicinity of these receptors. Construction noise levels at the R3 noise sensitive receptor would diminish as construction equipment operates further away. Construction related activity noise levels would not exceed the 72 dBA significance thresholds (average daytime noise level of 67 dBA at R3 as shown in Table B-10 plus 5 dBA). As such, the project would not have a significant construction noise impact on residential uses located in the City of Los Angeles.

Construction activities would temporarily increase the existing ambient noise in close proximity of the construction site within the City of Culver City, including at the R4 (Access Culver City Project) and R5 (Park Century School) locations. Per the City's standard conditions of approval, construction activities would be subject to the following conditions:

- Comply with Culver City's allowable construction hours of 8:00 A.M. and 8:00 P.M. Mondays through Friday; 9:00 A.M. and 7:00 P.M. Saturdays; 10:00 A.M. and 7:00 P.M. Sundays and National holidays, and would be temporary in nature.



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- Dirt hauling and construction material deliveries or removal are prohibited during the morning (7:00 AM to 9:00 AM) and afternoon (4:00 PM to 6:00 PM) peak traffic periods.
- All construction workers shall be respectful of the surrounding neighborhood and keep non-construction related noise to a minimum prior to, during, and after permissible construction hours.
- When foundation shoring and/or foundation piles will be part of the project, the engineer of record shall use noise dampening measures such as the drilling of shoring supports and piles as determined by the Building Official and Planning Manager
- Compliance with the following noise standards shall be required with at all times:
 - A. No construction equipment shall be operated without an exhaust muffler, and all such equipment shall have mufflers and sound control devices (i.e., intake silencers and noise shrouds) that are no less effective than those provided on the original equipment.
 - B. All construction equipment shall be properly maintained to minimize noise emissions.
 - C. If any construction vehicles are serviced at a location onsite, the vehicle(s) shall be setback from any street and other property lines so as to maintain the greatest distance from the public right-of-way and from noise sensitive receptors.
 - D. Noise impacts from stationary sources (i.e., mechanical equipment, ventilators, and air conditioning units) shall be minimized by proper selection of equipment and the installation of acoustical shielding as approved by the Planning Manager and the Building Official in order to comply with the City's Noise Regulations and Standards as set forth in CCMC Chapter 9.07.
 - E. Stationary source equipment (i.e., compressors) shall be located so as to maintain the greatest distance from the public right-of-way and from noise sensitive receptors.

Through compliance with Culver City's allowable construction hours and conditions of approval as stated above, construction related noise impacts would be less than significant at noise sensitive receptor locations located within Culver City.

Although no significant impacts were identified related to project construction activities, Policy 2.A of the Noise Element requires noise mitigation techniques to ensure that the noise impacts associated with the project construction activities would be reduced to the maximum extent feasible. Thus, in addition to the standard conditions of approval cited above, such techniques include: equipping internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment; ensuring that during construction, trucks and equipment are running only when necessary; eliminating idling of construction vehicles, turning off engines when not in use; utilizing "quiet" air compressors and similar equipment, where available; shielding or encapsulating noisy equipment as practicable; and limiting work activities to the accepted hours of operation so that they occur during the hours of the highest ambient noise levels. Culver City's Building Safety Division (Building Safety Inspector) and/or Planning Division will coordinate with Los Angeles Department of Building and Safety, as necessary, to ensure applicable noise reduction conditions and techniques are implemented by the project.

A haul route along area roadways would be utilized to remove exported soil and debris materials from the project site during construction activities. Haul trucks would access the site from I-10 westbound taking ramp on to Robertson Boulevard, turning left on to National Boulevard and entering the site through the ramp on National Boulevard. From I-10 eastbound, haul trucks would take ramp for Robertson Boulevard/Culver City,

turning left on to Venice Boulevard, turning right on to National Boulevard, and entering the site through the ramp on National Boulevard. Haul trucks would leave the site to I-10 eastbound existing the site from ramp and turn left on to National Boulevard, crossing Venice Boulevard and turn left on to ramp to I-10 eastbound. To I-10 westbound, haul trucks would exit the site from ramp and turn left on to National Boulevard, turning left on to Venice Boulevard, turning right on to Robertson Boulevard, and entering ramp to I-10 westbound. As an alternative haul route, trucks leaving the site would turn right on to National Boulevard, right on to Robertson Boulevard, then to the I-10 westbound. Construction haul routes would cross into both City of Los Angeles and Culver City. Analysis of construction haul routes were performed separately for both City of LA and Culver City portions.

It is estimated that during continuous concrete pouring, there would be an average of 300 truck trips and 65 employee trips per day during continuous concrete pour phase. Within the City of LA, haul trucks would travel along Robertson Boulevard, Venice Boulevard and National Boulevard. During the continuous concrete pouring phase, the project's trucks and employee automobile trips would generate approximately 64 dBA (Leq) at 25 feet distance along Robertson Boulevard and 63 dBA along National Boulevard and Venice Boulevard. Project-related construction haul truck trip noise levels as high as 63 dBA would not exceed the significance threshold (existing noise level plus 5 dBA) of 68 dBA (L_{eq}) (existing noise level shown in Table B-13 is 65 dBA plus 5 dB) along Robertson Boulevard, north of Venice Boulevard; the significance threshold of 73 dBA (existing noise level shown in Table B-12 at R1 is 68 dBA plus 5 dB) along Venice Boulevard, between Robertson Boulevard and National Boulevard; and the significance threshold of 76 dBA (existing noise level shown in Table B-13 is 70.8 dBA plus 5 dBA) along National Boulevard, between I-10 EB On-Ramp and Venice Boulevard in the City of Los Angeles.

Within Culver City, haul trucks would travel along National Boulevard and Washington Boulevard. Because haul trucks would comply with the allowable construction hours based on Culver City standards, noise impacts from haul trucks traveling along haul routes near the site would be less than significant. Therefore, noise impacts from off-site construction traffic within the City of Los Angeles and Culver City would be less than significant and no mitigation measures are required.

Based on the above, construction noise and off-site construction traffic noise impacts would be less than significant on noise sensitive receptor location R3 located within the City of Los Angeles. With regard to noise sensitive receptors located within Culver City, on-site and off-site construction activities would occur only during Culver City's allowable construction hours. In addition, the project would implement noise reduction techniques consistent with City noise policies, as practicable. Thus, construction noise impacts would be less than significant.

Operational Noise

The existing noise environment in the project vicinity is dominated by traffic noise from nearby roadways, as well as nearby commercial and residential activities. Long-term operation of the project would have a minimal effect on the noise environment in proximity to the project site. Noise generated by the project would result primarily from off-site traffic, normal operation of the building mechanical equipment, on-site uses which generate noise, parking activities, and loading areas. Each is discussed separately below.

Offsite Project Traffic

Vehicle trips attributed to operation of the project would increase traffic volumes along the major thoroughfares within the project vicinity. This increase in roadway traffic volumes was analyzed to determine if any traffic-related noise impacts would result from project development.

Table B-13, *Off-Site Traffic Noise Impacts*, shows the change in mobile source noise resulting from project implementation. As shown in the table, the off-site roadway traffic volumes associated with the project would result in a maximum increase in CNEL of 0.2 dBA along the segments of National Boulevard, between I-10 EB on-ramp and Venice Boulevard. The largest cumulative (project plus ambient growth plus other known related projects in the vicinity of the project site) roadway noise impact would be 0.9 dBA CNEL, which is predicted to occur also along National Boulevard, between I-10 EB On-Ramp and Venice Boulevard, National Boulevard, between Washington Boulevard and Wesley Street, and Robertson Boulevard, north of Venice Boulevard. Since noise level increases would not exceed the 5 dBA CNEL threshold Noise 2, impacts would be less than significant.

Fixed Mechanical Equipment

The operation of mechanical equipment such as air conditioning equipment may generate audible noise levels. However, mechanical equipment would be shielded from nearby noise sensitive uses to attenuate noise and avoid conflicts with adjacent uses. In addition, the project's mechanical equipment would need to comply with the City's noise standards, which establish maximum permitted noise levels from mechanical equipment. Project compliance with the City's noise standards would ensure that operational noise impacts are minimal.

Open Space, Landscaping and Amenities

The project would include numerous public and private open space areas, as described in Attachment A, *Project Description*. As discussed therein, the ground level would include numerous public open space areas within the interior areas of the proposed, as well as along the exterior street frontages.

Figure A-10, *Ground Level Open Space Programming*, illustrates the locations of the project's proposed key ground level open space features. On the ground level, the exterior boundaries of the project site along Venice Boulevard, National Boulevard, and Washington Boulevard would include a streetscape design that would allow pedestrians, terraces, café tables, seating, public art, and parkway planters as well as access to the port-o-cochere. Each building would be positioned at grade to create connectivity with the courtyards enclosed by housing and the Hotel Building, and to link the ground level open space with entry of the Office Building. Connectivity would further be achieved through the use of pathways between areas of landscape, providing pedestrian pathways linking retail and restaurant uses around the ground level open space. All of the open spaces areas would have extensive landscaping and well-detailed hardscape.

As shown in Figure A-10, some of the project's key open space features include the Transit Plaza area, adjacent to the Metro Station, which would serve as a transitional area to the sites centrally located Great Lawn /Great Lawn Terrace and Central Plaza. In addition, to these areas, the two Pedestrian Paseos along the site's southern boundary would provide additional space next to the Expo Line platform to support outdoor gatherings and activities. The open space areas within the project site would incorporate seating and would support a wide variety of entertainment and programs to serve the project residents, visitors, and the local community. Potential programs contemplated for the project's landscaped courtyards/open space areas

Table B-13

Off-Site Traffic Noise Impacts

Roadway Segment	Calculated Traffic Noise Levels at 25 feet from Roadway, CNEL (dBA)			Project Increment ^c	Cumulative Increment ^d
	Existing	Future (2019) No Project ^a	Future (2019) with Project ^b		
Venice Boulevard					
Between Culver Boulevard and Robertson Boulevard	71.3	71.6	71.7	0.1	0.4
Between Robertson Boulevard and National Boulevard	71.9	72.6	72.4	0.1	0.5
Between National Boulevard and Helms Avenue	70.5	70.7	70.8	0.1	0.3
Between Helms Avenue and Cattaraugus Avenue	70.9	71.0	71.1	0.1	0.2
Between Cattaraugus Avenue and La Cienega Boulevard	70.6	70.9	70.9	0.0	0.3
National Boulevard					
Between Robertson Boulevard and I-10 EB On-Ramp	71.2	71.8	~~72.8~~ <u>71.8</u>	0.0	0.6
Between I-10 EB On-Ramp and Venice Boulevard	70.8	71.5	71.7	0.2	0.9
Between Venice Boulevard and Washington Boulevard	70.4	71.2	71.3	0.1	0.9
Between Washington Boulevard and Wesley Street	68.1	68.9	69.0	0.1	0.9
Washington Boulevard					
Between Higuera Street and Robertson Boulevard/National Boulevard	71.7	72.3	72.2	-0.1	0.5
Between National Boulevard and Helms Avenue	70.8	71.3	71.3	0.0	0.5
Robertson Boulevard					
Between Venice Boulevard and Washington Boulevard	68.5	69.4	69.2	-0.2	0.7
North of Venice Boulevard	65.1	66.0	66.0	0.0	0.9

^a Includes future growth plus related (cumulative) projects identified in the Traffic Study.

^b Includes future growth plus related (cumulative) projects and project traffic.

^c Increase due to project-related traffic only at project build-out.

^d Increase due to future growth, related (cumulative) projects, and project traffic.

Source: PCR Services Corporation, 2015.

include design/craft/art markets, farmers markets, musical concerts, beer gardens/outdoor food, live theater (including community theater), dance performances, dance lessons, movies, discovery playground, business-oriented talks, author readings, storytelling, and aerobic classes/training.

These programs are intended to be internally oriented with restricted hours of operation in accordance with applicable City event and noise regulations. When a program would be involved with sound amplified system, a permit shall be obtained from the Culver City at least ten (10) days prior to the day on which the sound amplifying equipment is to be used unless sound from sound amplified equipment shall not be audible at a distance of fifty feet from the sound amplified equipment or beyond the project boundaries. As such, impacts would be less than significant.

Within the Office Building, an atrium outdoor amenity space would provide external access to office tenant spaces on Levels 2 to 5 with a roof deck on Level 5 providing the opportunity for office gatherings. Located on Level 2 within the Residential Building, residential only amenities would include residential pool courtyard space, secondary residential courtyard; residential gym space, and residential club room space with an outdoor terrace. Within the Hotel Building, hotel courtyard space would be located on Level 2 and rooftop pool/spa deck and bar space would be located on Level 6. The project's open space areas would be for the most part shielded from the nearby noise sensitive receptors by the proposed project buildings. With regards to the hotel pool deck on level 6, it would be partially shielded from receptor R4 and over 275 feet way, and over 200 feet away from residential uses at the R4 location. Because of the project's building configuration/internal shielding along with the distant proximity of the nearest receptors, the project's open space and pool areas would not cause ambient noise levels to increase by 5 dBA, L_{eq} or more. Thus, a less than significant noise impact would occur.

Parking Facility

Noise associated with the surface parking primarily includes moving vehicle noise and infrequent car alarms. Noise associated with vehicle activities, (e.g. slamming doors and car alarms), would be shielded by the project buildings to each of the noise sensitive uses (R3, R4 and R5). Therefore, parking facility noise would not increase ambient noise levels at the nearby noise sensitive receptors. As such, noise impacts associated with the parking garage would be less than significant.

Loading Areas

A loading area for the Office Building is located along Venice Boulevard and approximately 450 feet from the nearest noise-sensitive receptor locations R3. Other loading areas are located further away or would be largely shielded to the nearest noise-sensitive receptors (R3) due to the proposed project buildings. Based on measured noise levels⁶², delivery trucks (at loading dock) and trash compactors (from refuse collection) would generate noise levels of approximately 71 dBA (L_{eq}) and 66 dBA (L_{eq}) at 50 feet distance, respectively. Accounting for distance attenuation (minimum 2 dBA insertion loss), loading dock related noise would be reduced to 52 dBA at the nearest noise-sensitive uses (R3). As loading dock related noise would not exceed the significance threshold of 72 dBA. Therefore, impacts would be less than significant.

Loading areas for Hotel and Residential buildings would be surrounded by Hotel and Residential Buildings. Noise associated with loading dock activities would be shielded by the project buildings to the future noise sensitive uses, R4 and R5. Therefore, loading dock related activity noise would not increase ambient noise levels at the receptor locations, R4 and R5. Therefore, impacts would be less than significant.

⁶² PCR conducted noise measurements for reference noise levels of delivery trucks at loading docks and trash compactors from refuse collection areas.

Noise/Land Use Compatibility Impacts

Based on the ambient noise monitoring data provided in Table B-12, the project would introduce noise sensitive uses (i.e., residential uses) to an ambient noise environment of up to 73 dBA (CNEL) due to traffic on roadways and light rail trains on the Metro Expo Line. According to the City of Culver City Guidelines for Noise Compatible Land Use, the project site is considered “normally unacceptable” for the proposed development. A detailed analysis of noise reduction requirements must be made and needed noise insulation features included in the design prior to issuance of building permits. As such, the following mitigation measure requires that a project-specific acoustical analysis be conducted and noise reduction features implemented to reduce these impacts.

Mitigation Measures

NOISE-1 An acoustical analysis of the architectural plans of the proposed buildings shall be prepared by a qualified acoustical engineer, prior to issuance of building permits, to ensure that the building construction (i.e., exterior wall, window, and door) would provide adequate sound insulation to meet the acceptable interior noise level of 45 dBA CNEL.

b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. The proposed project would utilize construction equipment such as impact pile drivers, bulldozers and excavators, which would generate ground-borne vibration during excavation and foundation activities. Construction-related vibration velocities at 90 feet from the project site could be expected from 0.013 inches per second to 0.0051 inches per second PPV. The nearest sensitive receptors (R3, R4 and R5) are over 100 feet from the project site. As these values would not exceed the 1.0 inch per second PPV significance threshold (potential building damage for residential building)⁶³, vibration impacts associated with construction would be less than significant at the nearest residential building.

With respect with human perception, the nearest off-site residential uses, R5 would be exposed to vibration velocities up to 0.013 inches per second PPV. As these values would not exceed the 0.035 inches per second PPV threshold, vibration impacts would be less than significant.

Post-construction on-site activities would be limited to commercial, hotel, retail, and residential uses that would not generate excessive groundborne noise or vibration. As such, ground-borne vibration and noise levels associated with the long term operation of project would be less than significant.

The Expo Line is located adjacent to south boundary of the project site. However, the rail ways are located approximately 20 feet above ground level and the Hotel and Residential buildings of the project would be located approximately 37 feet from the line of Expo Line track. According to FTA's Transportation Related Earthborne Vibrations, the highest train vibration measurement was recorded 0.36 inches per second PPV at 10 ft. The Hotel and Residential buildings would be exposed to vibration velocities up to 0.026 inches per second PPV. As vibration velocities from train operation would not exceed the 0.035 inches per second PPV

⁶³ U.S. Department of Transportation, Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, 1995

perception threshold and the 1.0 inch per second PPV significance threshold (potential building damage for residential building), vibration impacts associated with train operation would be less than significant at the Hotel and Residential uses of the project.

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. The existing noise environment in the project area is dominated by traffic noise from nearby roadways, light rail trains on the Metro Expo Line, as well as nearby commercial and residential activities. Long-term operation of the project would not have a significant effect on the community noise environment in proximity to the project Site. Noise sources that would have potential noise impacts include: off-site vehicle traffic mechanical (i.e., air-conditioning) equipment, programs and events in open spaces areas, parking areas, and loading dock areas. Motor vehicle travel on local roadways attributable to the proposed project, as discussed in Response XI.a, would have a less than significant impact on community noise levels. Noise levels associated with on-site operations (e.g., parking, loading docks, trash, open spaces, and mechanical equipment) are also considered less than significant as discussed in Response XI.a. As such, noise impacts would be less than significant.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. The project would result in a temporary increase in ambient noise near the project site during the construction period. Construction noise impacts are discussed in Response XI.a. Noise generated by on-site construction activities would have a less than significant impact on surrounding uses.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The project site is not located within an airport land use plan area or within two miles of a public airport or public use airport. Therefore, construction or operation of the project would not expose people to excessive airport related noise levels. No impact would occur in this regard.

f. For a project within the vicinity of a private airstrip, heliport or helistop, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The project site is not located within the vicinity of a private airstrip, or heliport or helistop. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels from such uses. No impact would occur in this regard.

XIII. POPULATION AND HOUSING

Would the project:

- a. **Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

Less Than Significant Impact. The project would introduce up to 200 multi-family residential units that would generate a new residential population of up to approximately 466 persons.⁶⁴ In addition, the project would include up to 117,700 square feet of hotel, 185,229 square feet of office, and 53,280 square feet of retail/restaurant that could indirectly increase the population by approximately 266 persons.⁶⁵ Thus, the project could result in a total population increase of 732 persons, including on- and off-site areas. For purposes of this analysis, it is assumed 50 percent of the project's indirect population ($266/2 = 133$ persons) would live in the City of Culver City and 50 percent would live in the City of Los Angeles. The estimated 599 direct/indirect increase in Culver City's population would represent a 1.51 percent increase to the existing population (39,691 persons) in Culver City.^{66,67} The project site has been zoned PD-11 in anticipation of the proposed project. As the project's development intensity is consistent with the PD-11 designation, City plans and regional forecasts have anticipated the growth to occur as part of the project. The estimated 133 indirect increase in Los Angeles' population would represent a nominal 0.003 percent increase in the City's existing population (3,928,864 persons).⁶⁸ Therefore, the new residents would not result in a substantial increase in the local population of the City of Culver City or the City of Los Angeles.

⁶⁴ 200 residential units X 2.33 persons = 466 direct residents (per the average household size of 2.33 persons/household for Culver City, U.S. Census Bureau, 2010 Census, <http://quickfacts.census.gov/qfd/states/06/0617568.html>, accessed October 2015.) Note: As the residential component of the project is proposed within the Culver City jurisdiction, the persons/household data was used for Culver City.

⁶⁵ 117,700 square feet (2.70 acres) of hotel X 51.91 employees per acre (per the Hotels and Motels factor of 51.91 for Los Angeles County in The Natelson Company, Table B-1, Employment Densities [employees per acre] by Anderson Code) = 140 employees. 140 employees X .25 X 2.33 = 82 indirect residents. Indirect residents are one-quarter of the employees multiplied by 2.33 persons per household. Note: As the hotel component of the project is proposed within the Culver City jurisdiction, the persons/household data was used for Culver City.

185,229 square feet (4.25 acres) of office X 55.28 employees per acre (per the Low to Medium Rise major Office Use factor in Table B-1 mentioned above) = 235 employees. 235 employees X .25 X 2.83 = 166 indirect residents (per the average household size of 2.83 persons/household for City of Los Angeles, U.S. Census Bureau, 2010 Census, <http://quickfacts.census.gov/qfd/states/06/0644000.html>, accessed October 2015.) Note: As the office component of the project is proposed within the City of Los Angeles jurisdiction, the persons/household data was used for the City of Los Angeles.

53,280 square feet (1.22 acres) of retail/restaurant X 20.18 employees per acre (per the Retail Centers factor in Table B-1 mentioned above) = 25 employees. 25 employees X .25 X 2.83 = 18 indirect residents. Note: As the retail/restaurant component of the project is proposed within both the City of Los Angeles and the Culver City jurisdictions, to be conservative, the higher persons/household data was used for the City of Los Angeles.

$82 + 166 + 18 = 266$ total indirect residents.

⁶⁶ As the residential component of the project is proposed within Culver City, all 466 generated persons would be residents of Culver City. 466 direct residents + 133 indirect residents (50 percent of 266) = 599 persons.

⁶⁷ U.S. Census Bureau, 2010 Census, <http://quickfacts.census.gov/qfd/states/06/0617568.html>, accessed October 2015.

⁶⁸ <http://quickfacts.census.gov/qfd/states/06/0644000.html>, accessed October 2015.

According to the Southern California Association of Governments (SCAG), Culver City's forecast population and household growth of 1,100 persons and 500 households is predicted between 2008 and 2035.⁶⁹ This slow rate of growth indicates that population increase due to construction of multi-family housing has been offset by other factors such as residents moving out of the City. The estimated 599 direct and indirect project generated increase in population and the proposed 200 multi-family residential units are within SCAG's growth forecast. According to SCAG, the City of Los Angeles' forecast population growth of 550,100 is predicted between 2008 and 2035.⁷⁰ The estimated 133 indirect project generated increase in population is within SCAG's growth forecast. The Culver City October 2013-2021 Housing Element indicates the total housing growth need for the City during this planning period is 185 units.⁷¹ The 185 units represents Culver City's share of the Regional Housing Needs Assessment (RHNA) approved by SCAG as a response to State mandated housing planning. As such, the 200 multi-family residential units would contribute towards the RHNA of Culver City. The project would attract new businesses to the area with the proposed hotel, office, and retail/restaurant uses. Depending on the specific type of businesses that do locate within the individual spaces, the level of employment may vary. The project is estimated to introduce up to approximately 400 employees.⁷² According to SCAG, the forecast of employment growth predicted between 2008 and 2035 for Culver City and the City of Los Angeles is 5,000 and 171,600 jobs, respectively.⁷³ Project employment is within the employment growth assumptions of Culver City and the City of Los Angeles. Furthermore, the project would be located in an area already served by existing infrastructure and anticipated within applicable Culver City infrastructure plans (i.e., roadways, utility lines, etc.). As such, the project would not induce substantial population growth in the area either directly or indirectly and impacts would be less than significant.

⁶⁹ 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, Table 18, Proposed 2012-2035 RTP/SCS Growth Forecast, page 36, prepared by Southern California Association of Governments, adopted April 2012, http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_GrowthForecast.pdf, accessed August 2015 and the Culver City October 2013-2021 Housing Element, https://www.culvercity.org/~media/Files/Planning/GeneralPlan/2013-2021_HousingElement.ashx, accessed August 2015.

⁷⁰ Ibid.

⁷¹ Culver City October 2013-2021 Housing Element, https://www.culvercity.org/~media/Files/Planning/GeneralPlan/2013-2021_HousingElement.ashx, accessed August 2015.

⁷² 117,700 square feet (2.70 acres) of hotel X 51.91 employees per acre (per the Hotels and Motels factor of 51.91 for Los Angeles County in The Natelson Company, Table B-1, Employment Densities [employees per acre] by Anderson Code) = 140 employees.

185,229 square feet (4.25 acres) of office X 55.28 employees per acre (per the Low to Medium Rise major Office Use factor in Table B-1 mentioned above) = 235 employees.

53,280 square feet (1.22 acres) of retail/restaurant X 20.18 employees per acre (per the Retail Centers factor in Table B-1 mentioned above) = 25 employees.

140 + 235 + 25 = 400 total employees.

⁷³ 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, Table 18, Proposed 2012-2035 RTP/SCS Growth Forecast, page 36, prepared by Southern California Association of Governments, adopted April 2012, http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_GrowthForecast.pdf, accessed August. Note: As the hotel, office, and retail/restaurant components of the project are proposed within both Culver City and the City of Los Angeles, employment growth forecasts were used for both cities.

- b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?**
- c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?**

No Impact (b-c). Existing uses on the project site include light industrial and commercial uses along Venice Boulevard and surface parking throughout the remainder of the site, all of which would be demolished and removed to support development of the project. As such, project implementation would not displace existing housing or people. Therefore, no impact would occur to existing housing or local populations such that construction of replacement housing would be necessary.

XIV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. Fire protection?

Less Than Significant Impact With Mitigation Incorporated. Fire protection and emergency medical services for the project site are provided by the Culver City Fire Department (CCFD) and the City of Los Angeles Fire Department (LAFD) through an automatic aid agreement. The first responder is dispatched based on department availability and nearest unit to the project site during the time of the call for service. The CCFD provides fire protection to an existing population of 39,691 persons.⁷⁴ The CCFD consists of 72 members, three fire stations, a fire administration office, a fire prevention bureau, and a training drill facility. The LAFD's approximately 3,246 uniformed personnel and 353 civilian support staff provide fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service.⁷⁵ At any given time, there are approximately 1,018 uniformed firefighters, including 270 firefighter/paramedics, on-duty at 106 fire stations across the LAFD's 471-square-mile jurisdiction.⁷⁶ LAFD fire stations within the proximity of the project site include Fire Station 43, Fire Station 58, Fire Station 62, Fire Station 68, and Fire Station 94.⁷⁷ **Table B-14, CCFD and LAFD Fire Stations Located in the Vicinity of the Project Site**, provides information on the location, type of equipment, and the approximate distance/direction from the project site. Staffing at each station is dependent on the number and type of fire apparatus at the station.

⁷⁴ U.S. Census Bureau, 2010 Census, <http://quickfacts.census.gov/qfd/states/06/0617568.html>, accessed August 2015.

⁷⁵ Los Angeles Fire Department, Department, Overview, Website, <http://lafd.org/about/lafd-overview>, accessed August 2015.

⁷⁶ These figures represent the number of uniformed firefighters that are available to respond to emergency calls and do not include other on-duty uniformed firefighters that are involved in training or various administrative and support functions (Source: Los Angeles Fire Department, Department Overview, <http://lafd.org/about/lafd-overview>, accessed August 2015).

⁷⁷ Los Angeles Fire Department, Fire Stations, Find Your Station, Website, http://www.lafd.org/fire_stations/station_results/%2A?zipcode=90232, accessed August 2015.

Table B-14

CCFD and LAFD Fire Stations Located in the Vicinity of the Project Site

Fire Station	Address	Apparatus Equipment	Approximate Distance/Direction from Project site^a
<u>Culver City Fire Department</u>			
Fire Station 1 (headquarters)	9600 Culver Boulevard	Engine One, Rescue One, Battalion Chief service vehicle, Utility One service vehicle, Strike Team “lookout” vehicle”, Engine Four Reserve Engine, Engine Five Reserve Engine, Engine Six Reserve Engine Battalion Chief Reserve command vehicle, Truck One reserve truck	0.50 miles southwest
Fire Station 2	11252 Washington Boulevard	Engine Two, Truck Two	2.0 miles southwest
Fire Station 3	6030 Bristol Parkway	Engine Three, Rescue Three, Rescue Two Reserve	2.85 miles south
<u>City of Los Angeles Fire Department</u>			
Fire Station 43	3690 Motor Avenue	Engine 43, Rescue 43	1.0 miles southwest
Fire Station 58	1556 South Robertson Boulevard	Engine 58, Engine 458, Rescue 58, Rescue 858	1.5 miles north
Fire Station 62	11970 Venice Avenue	Engine 62, Rescue 62, Rescue 862, Swift Water Rescue,	2.65 miles southwest
Fire Station 68	5023 West Washington Boulevard	Engine 68, Rescue 68	2.3 miles northeast
Fire Station 94	4470 Coliseum Street	Engine 94, Engine 294, Rescue 94, Rescue 894, Truck 94, Brush vehicle	2.5 miles southeast

^a Approximate distance/direction from project site in miles is a straight line distance, not a drive distance.

Sources:

Culver City Website, About the Department, Department Stations and Facilities,

<https://www.culvercity.org/Government/PublicSafety/Fire/AbouttheDepartment/Locations.aspx>, accessed August 2015.

Los Angeles Fire Department, Fire Stations, Find Your Station, Website, http://www.lafd.org/fire_stations/station_results/%2A?zipcode=90232, accessed August 2015.

California Firefighters Website, <http://www.cafirefighters.com/lafd.htm>, accessed August 2015.

Construction activities associated with the project may temporarily increase the demand for fire protection and emergency medical services, and may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, in compliance with the requirements of OSHA, all construction managers and personnel would be trained in fire prevention and emergency response. Further, fire suppression equipment specific to construction would be maintained on the project site. As applicable, construction activities would be required to comply with the 2013 CBC, the 2013 California Fire Code (CFD), Title 9: General Regulations, Chapter 9.02: Fire Prevention, of the CCMC, and Article 7: Fire Protection and Prevention (Fire Code) of Chapter V: Public safety and Protection, of the LAMC.

Construction activities may involve temporary lane closures for right-of-way frontage improvements and utility construction. Construction-related traffic could result in increased travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the project site during construction. As such, construction activities could increase response times for emergency vehicles to local business and/or residences within the project vicinity, due to travel time delays to through traffic. However, the impacts of such construction activity would be temporary and on an intermittent basis. Further, a Construction Traffic Management Plan for the project would be prepared in order to minimize disruptions to through traffic flow, maintain emergency vehicle access to the project site and neighboring land uses, and schedule worker and construction equipment delivery to avoid peak traffic hours (Mitigation Measure PS-1). As a component of the Construction Traffic Management Plan, the times of day and locations of all temporary lane closures would be coordinated so that they do not occur during peak periods of traffic congestion, to the extent feasible. Truck routes for material and equipment deliveries, as well as for soil export and disposal, would require approval by the Culver City Department of Public Works and the City of Los Angeles Department of Public Works, as applicable, prior to construction activities. The Construction Traffic Management Plan would be prepared for review and approval by both departments of public works prior to commencement of any construction activity. These practices, as well as techniques typically employed by emergency vehicles to clear or circumvent traffic, are expected to limit the potential for significant delays in emergency response times during project construction. Therefore, impacts regarding emergency response times and emergency access during construction would be less than significant with the incorporation of the project's Construction Traffic Management Plan (Mitigation Measure PS-1).

Overall, with compliance to applicable CCFD and LAFD requirements and implementation of the prescribed mitigation measure, and due to the temporary nature of the necessary construction activities, construction impacts on fire protection and emergency medical services would be less than significant.

Operational activities associated with the project would increase the demand for fire protection and emergency medical services. As discussed under Response XIII.a, the project could result in a total population increase of 732 persons (direct and indirect population), including on- and off-site areas. The estimated 599 direct/indirect persons increase in Culver City's population would represent a 1.51 percent increase to the existing population (39,691 persons) in Culver City. As the project's development intensity is consistent with the PD-11 designation, City plans and forecasts have anticipated the growth to occur as part of the project. The estimated 133 indirect persons increase in Los Angeles' population would represent a nominal 0.003 percent increase in the City's existing population (3,928,864 persons). As mentioned above, up to three CCFD fire stations and up to five LAFD fire stations would provide fire protection and emergency medical services to the project area and are dispatched based on availability and the nearest unit to a service call. The CCFD and LAFD desired response time parameters are five minutes, and 5:20 minutes, for 90 percent of fire incident responses, respectively.^{78,79} Due to the close proximity of multiple fire stations, including the nearest station at 0.5 miles from the site, service calls are anticipated to be responded to within the fire department's desired response times. Emergency vehicles and fire access for the project site would be provided in three on-site locations: at grade access from Venice Boulevard adjacent to the Metro platform; at grade access under the podium structure from National Boulevard; and at grade access from Washington Boulevard adjacent to the Metro platform. The project would be designed, constructed and maintained in accordance with CCFD's and

⁷⁸ Access Culver City Comprehensive Plan Mitigated Negative Declaration, October 24, 2012.

⁷⁹ 6250 Sunset Project Draft EIR, prepared by PCR Services Corporation, dated November 2014 - Captain Luke Millick, Commander, Hydrant and Access Unit, LAFD, email correspondence dated August 4, 2014.

LAFD's development and construction requirements to minimize the risks associated with fires. Based on the considerations above, the increase in both direct and indirect population from the project would not be substantial enough to significantly impact fire and emergency services on a daily or annual basis. No new fire protection facilities would be necessary as a result of project implementation.

The project site is not located in an area of moderate or very high fire hazard.^{80,81} The nearest very high fire hazard severity zone (VHFHSZ) is located in an unincorporated area of Los Angeles County known as Baldwin Hills, approximately 0.75 miles south of the project site. In addition, the project site is surrounded by urban development and is not adjacent to any wildlands. Therefore, no fuel modification for fire fuel management would be required.

The project would be subject to compliance with fire protection design standards, as necessary, per the CBC, CFD, the CCMC, the LAMC, the CCFD and the LAFD, to ensure adequate fire protection. Culver City's standard conditions of approval and City of Los Angeles mitigation requirements (as stated below) generally require that plans for building construction, fire flow requirements, fire protection devices (e.g., sprinklers and alarms), fire hydrants and spacing, and fire access including ingress/egress, turning radii, driveway width, and grading would be prepared for review and approval by the CCFD and LAFD. Another important component of ensuring fire protection services is the availability of adequate firefighting water flow. Fire flow requirements are closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazards. The ability of the water service provider to provide water supply to the project site is discussed in Section XVII, *Utilities and Service Systems*. As discussed therein, adequate water supply would be available to serve the project site, including minimum fire flow requirements.

Overall, given the overall slow rate of population growth in the City, the project's conformance to expected growth scenarios for the City, the existing number of Fire staff, and the project's planned onsite fire protection design features consistent with the applicable regulatory requirements of the CBC, CFD, the CCMC, the LAMC, the CCFD, and the LAFD, the project is not expected to be beyond the scope of available fire services. Accordingly, the CCFD's and LAFD's response times would not be substantially changed such that response time objectives are compromised in any significant manner. Further, no new or expanded fire facilities would be constructed as a result of the project. Thus, impacts regarding fire services would be less than significant.

Mitigation Measures

- PS-1:** Construction Traffic Management Plan – A Construction Traffic Management Plan shall be developed by the project contractor in consultation with the project's traffic and/or civil engineer and approved by the City of Culver City City Engineer and Planning Manager and the City of Los Angeles Department of Public Works prior to issuance of any project demolition, grading or excavation permit. The Construction Traffic Management Plan shall also be reviewed and approved by the Cities Fire and Police Departments. The Culver City City Engineer and Planning Manager reserve the right to reject any engineer at any time and

⁸⁰ Zimas Website, <http://zimas.lacity.org/>, accessed August 2015 and Culver City Fire Department Very High Fire Hazard Severity Zones (VHFHSZ) Map, prepared by CAL FIRE, dated June 13, 2012.

⁸¹ The Culver City Very High Fire Hazard Severity Zones in LRA as recommended by CAL FIRE, prepared by CAL FIRE, dated September 2011.

to require that the Plan be prepared by a different engineer. The construction management plan shall include, at a minimum, the following:

- The name and telephone number of a contact person who can be reached 24 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 site, and maps showing access to and within the 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;
- Identify the locations of the off-site truck parking and staging and provide measures to ensure that trucks use the specified haul route, and do not travel through nearby residential neighborhoods or schools;
- Schedule vehicle movements to ensure that there are no vehicles waiting off-site and impeding public traffic flow on surrounding streets;
- Establish requirements for loading/unloading and storage of materials on the project site;
- During construction activities when construction worker parking cannot be accommodated on the project site, a Construction Worker Parking Plan shall be prepared which identifies alternate parking location(s) for construction workers and the method of transportation to and from the project site (if beyond walking distance) for approval by Culver City and the City of Los Angeles. The Construction Worker Parking Plan shall prohibit construction worker parking on residential streets and prohibit on-street parking, except as approved by Culver City and the City of Los Angeles.

The following standard City of Los Angeles mitigation measure is also prescribed to further ensure impacts to fire protection services are less than significant.

- PS-2:** The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane. (City MM XIV-10: Fire)

b. Police protection?

Less Than Significant Impact. Police protection for the project site is provided by the City of Culver City Police Department (CCPD) and the City of Los Angeles Police Department (LAPD) through an automatic aid agreement. The first responder is dispatched based on department availability and nearest unit to the project site during the time of the service call. The CCPD consists of 105 sworn officers, 21 reserve officers and 50 professional staff.⁸² The nearest CCPD station is located at 4040 Duquesne Avenue, approximately 0.60 miles southwest of the project site. The CCPD is divided into four patrol districts which allows the CCPD to maintain an average emergency response time of three minutes or less. The project site is located within Patrol District 2.

The LAPD consists of approximately 9,875 sworn officers.⁸³ The LAPD operates 21 police stations within four bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. Each of the Bureaus encompasses several communities. The project site is located in the West Bureau of the LAPD, which covers approximately 124 square miles with a population of approximately 840,400 residents. The West Bureau oversees operations in the communities of Hollywood, Wilshire, Pacific, Olympic and West Los Angeles, as well as the West Traffic Division, which includes the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile. The West Bureau oversees operations at five community police stations: the Hollywood Community Police Station, the Wilshire Community Police Station, the Pacific Community Police Station, the Olympic Community Police Station and the West Los Angeles Community Police Station.⁸⁴ The nearest West Bureau police stations to the project site are the Wilshire Area Police Station, located at 4861 West Venice Boulevard and the Pacific Area Police Station, located at 12312 Culver Boulevard, approximately 2.85 miles northeast and three miles southwest of the project site, respectively. The LAPD has a standard response time of seven minutes.⁸⁵

During construction, equipment and building materials could be temporarily stored on-site, which could result in theft, graffiti, and vandalism. However, the project site is located in an area with high vehicular activity from Venice Boulevard, National Boulevard, and Washington Boulevard. In addition, the construction site would be fenced along the perimeter, with the height and fence materials subject to review approval by the Culver City City Engineer and Planning Manager, as required by the City's standard conditions of approval. As discussed above, temporary lane closures may be required for right-of-way frontage improvements and utility construction. However, these closures would be temporary in nature and in the event of partial lane closures, both directions of travel on area roadways and access to the project site would be maintained. Further, emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Given the visibility of the project site from adjacent roadways and surrounding properties, existing police presence in Culver City and the City of Los Angeles, maintained emergency access, and construction fencing, the project is not expected to increase demand on existing police services to a meaningful extent. Therefore, the project would have a less than significant temporary impact on police protection during the construction phases.

⁸² Culver City Police Department Website, <http://www.culvercitypd.org/index.html>, accessed August 2015.

⁸³ Los Angeles Police Department, COMPSTAT Citywide Profile, 7/26/15 – 8/22/15, <http://assets.lapdonline.org/assets/pdf/cityprof.pdf>, accessed August 2015.

⁸⁴ The Los Angeles Police Department, West Bureau, http://www.lapdonline.org/west_bureau, accessed August 2015.

⁸⁵ 6250 Sunset Project Draft EIR, prepared by PCR Services Corporation, dated November 2014 - Andrew J. Smith, Commanding Officer, Media Relations and Community Affairs Group, and Officer Leonid A. Tsap, Senior Lead Officer, Community Relations Section, Crime Prevention Unit, LAPD, correspondence dated September 23, 2014

Operational activities associated with the project would increase demand for police protection services. As discussed above, the estimated 599 direct/indirect persons increase in Culver City's population would represent 1.51 percent increase to the existing population in Culver City, while the 133 indirect persons increase in Los Angeles' population would represent a nominal 0.003 percent increase in the City's existing population. Implementation of the project could also indirectly increase the need for police protection by permitting up to 117,700 square feet of hotel, 185,229 square feet of office, and 53,280 square feet of retail/restaurant uses which would increase the daytime population in the project area given the new employees and patrons. As the project's development intensity is consistent with the PD-11 designation, City plans and forecasts have anticipated the growth to occur as part of the project. As discussed in Attachment A, *Project Description*, the project would incorporate a 24-hour/seven-day security program to ensure the safety of its residents and site visitors. Site security operations would include staff training and building access/design to assist in crime prevention efforts and to reduce the demand for police protection services. The project design would include lighting of entry-ways and public areas for site security purposes. The buildings would include controlled access to residential units, the hotel, and office uses in order to ensure the safety of site residents and guests. Site security would include provisions of 24-hour video surveillance and 24-hour full-time security personnel. Duties of the security personnel would include, but would not be limited to, assisting residents and visitors with site access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and patrolling the property. The site security would regularly interface and collaborate with Metro Transit Police as part of the site's security program, as well as with the Culver City Police Department and Los Angeles Police Department, as necessary. Security at events within the site would be increased, as necessary, depending on the size of the event and anticipated number of event goers.

With development on the site, patrol routes in the area would be slightly modified to include the site, as necessary. To ensure that police protection considerations are incorporated into the project design, prior to the issuance of a building permit for the project, the CCPD and LAPD would be provided the opportunity to review and comment upon building plans in order to facilitate opportunities for improved emergency access and response; ensure the consideration of design strategies that facilitate public safety and police surveillance; and other specific design recommendations to enhance public safety and reduce potential demands upon police protection services. Given the overall slow rate of population growth in the City, the project's conformance to expected growth scenarios for the City, the existing number of police staff, and the project's planned on-site security measures, the project is not expected to be beyond the scope of available police services. Additionally, the project's onsite security would minimize the need for police services on the project's public open space and public parking space areas. Accordingly, the CCPD's and LAPD's response times would not be substantially changed such that response time objectives are compromised in any significant manner. Further, no new or expanded police facilities would be constructed as a result of the project. Thus, impacts regarding police services would be less than significant.

While impacts would be less than significant, the following standard City of Los Angeles mitigation measures are also prescribed to further ensure impacts to police services are less than significant.

- PS-3:** Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. (City MM XIV-20: Public Services Police Demolition/Construction Sites)

PS-4: The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits. (City MM XIV-30: Public Services/Police)

c. Schools?

Less Than Significant Impact. The project would be served by the Culver City Unified School District (CCUSD). The CCUSD includes one high school, one continuation high school, one middle school, five elementary schools, and one adult school. The project site is located within the attendance boundaries of the Linwood Howe Elementary School, the Culver City Middle School, and the Culver City High School. The Linwood Elementary School, kindergarten through fifth grade (K-5), is located at 4100 Irving Place, approximately 0.50 miles southwest of the project site. The Culver City Middle School, (grades 6-8), is located at 4601 Elenda Street, approximately 1.6 miles southwest of the project site. The Culver City High School (grades 9-12), is located at 4401 Elenda Street, approximately 1.6 miles southwest of the project site.

Project operation would incrementally increase demand for school services. The estimated 599 direct/indirect increase in population generated by the project would represent a 1.51 percent increase in the existing population in Culver City, while the 133 indirect persons generated would represent a minimal 0.003 percent increase in the existing population in the City of Los Angeles. If project employees currently reside in neighboring communities and have school children, it is expected the children would remain enrolled in their current school. However, if some employees with school age children choose to move closer to work, or if some new employees with children are hired from the surrounding community or another City, there could be a negligible increase in student population in the nearby schools. The project is estimated to generate 39 elementary school students, 12 middle school students, and 10 high school students for a total of 61 students.⁸⁶

Project impacts related to schools would be addressed through payment of required Senate Bill 50 (SB 50) development fees pursuant to Section 65995 of the California Government Code. In accordance with SB 50, the payment of these fees are deemed to provide full and complete mitigation for impacts to school facilities. Therefore, impacts to school services and facilities would be less than significant.

⁸⁶ Student generation rates for residential uses are taken from the Draft School Facilities Needs Analysis 2012, LAUSD, September 2012. Based on the rate for multi-family residential uses: Elementary = 0.1649; Middle School = 0.045; High School = 0.0303. Student generation rates for hotel, office, retail, and restaurant uses are taken from the 2010 Commercial/Industrial Development School Fee Justification Study, LAUSD, September 27, 2010 – the most recent data available for non-residential uses. For each 1,000 square feet of non-residential space – Elementary = 0.0178; Middle School = 0.0089; High School = 0.0111. Total number of students has been rounded up, in order to provide whole student number counts.

d. Parks?

Less Than Significant Impact. The Culver City Parks, Recreation and Community Services (PRCS) division oversees the maintenance and operations of 11 City parks totaling approximately 79 acres, a community garden, community and recreational facilities, senior centers, swimming pools, and a theater facility. A joint-use partnership between Culver City and CCUSD provides additional open space and park facilities for use by residents of Culver City during non-school hours. The Los Angeles Department of Regional Planning (LADRP) is responsible for the establishment, operation, and maintenance of parks and recreational facilities in the City of Los Angeles. These facilities include parks, swimming pools, public golf courses, recreation centers, museums, youth camps, tennis courts, sports programs and programs for senior citizens. Currently, the LADRP maintains over 15,000 acres of parkland within approximately 400 neighborhood and regional parks. In addition to parkland, the LADRP operates 184 recreation centers, 61 swimming pools, 11 lakes, seven camps, more than a dozen museums and historic sites, and hundreds of programs for youth, senior, physically disabled and volunteers.⁸⁷

The project site is located within the vicinity of 11 park facilities. **Table B-15, *Culver City and City of Los Angeles Park Facilities Located in the Vicinity of the Project Site***, provides information on the park/facility, location, size, park amenities/activities, and the approximate distance/direction from the project site.

Project operation would incrementally increase demand for park services. The estimated 599 direct/indirect persons increase in Culver City's population would represent 1.51 percent increase to the existing population in Culver City, while the 133 indirect persons increase in Los Angeles' population would represent a nominal 0.003 percent increase in the City's existing population. Implementation of the project could also indirectly increase the need for parkland by permitting up to 117,700 square feet of hotel, 185,229 square feet of office, and 53,280 square feet of retail/restaurant uses which would increase the daytime population in the project area given the new employees and patrons. As the project's development intensity is consistent with the PD-11 designation, City plans and forecasts have anticipated the growth to occur as part of the project.

The project would provide a total of approximately 139,400 square feet of outdoor open space, gateways, landscape treatments, and amenities, such as gyms and large outdoor pool/deck spaces for the residential and hotel uses. Of this total, approximately 24,917 square feet would be private open space, while approximately 104,693 square feet would be public space. The remaining 9,790 square foot hotel courtyard space (2nd level podium) would be public/private open space. In addition to the project's proposed 139,400 square feet of opens space area, the project's proposed balconies would include approximately 8,084 square feet of private use area for project residents.⁸⁸ Subsection 3, Open Space, Landscaping and Amenities, in Attachment A of this MND provides further details on the project's proposed open space areas. Pursuant to Title 17: Zoning Code, Article 4: Standards for Specific Land Uses, Chapter 17.400: Standards for Specific Land Uses, Section 17.400.065: Mixed Use Development Standards of the CCMC, each residential unit shall have a minimum of 75 square feet of common and/or private open space. With 200 multi-family residential units (X 75

⁸⁷ Los Angeles Department of Recreation and Parks website, "Who We Are". <http://www.laparks.org/dos/dept/who.htm>. Accessed August 2015.

⁸⁸ Balcony square footage calculated by: 109 Units x Avg. 74 SF balcony = 8,084 square feet.

Table B-15

Culver City and City of Los Angeles Park Facilities Located in the Vicinity of the Project Site

Park/Facility	Location	Size (acres)	Parks Amenities/Activities	Approximate Distance/Direction from Project site^a
Culver City				
Ivy Substation and Media Park	9070 Venice Boulevard	N/A	99-seat theatre facility, passive grass area	0.15 miles southwest
Syd Kronenthal Park	3459 McManus Avenue	6.00	Recreation building with restroom facilities, soccer field, two softball fields, two half-court basketball courts, tennis court, picnic areas, barbeques, children's play equipment, passive grass area	0.50 miles east
Linwood E. Howe Playground	4100 Irving Place	N/A	Linwood Elementary Playground	0.50 miles southwest
Culver City Park	9700 Jefferson Boulevard	41.55	Culver City Skate Park, The Boneyard (Dog Park), recreation hut with restroom facilities, soccer field, three softball fields, two half-court basketball courts, interpretive nature trail, picnic areas, barbeques, children's play equipment, passive grass area	0.75 miles south
Blair Hills Park	5950 Wrightcrest Drive	1.62	Recreation hut with restroom facilities, picnic shelter, softball fields, basketball court, barbeques, children's play equipment, passive grass area	1.00 miles southeast
Carlson Park	Braddock Drive at Motor Avenue	2.66	Home of Culver City Public Theater, picnic shelter, restroom facilities, barbeques, fireplaces, passive grass area	1.05 miles southwest
City of Los Angeles				
Reynier Park	2803 Reynier Avenue	1.00	Basketball courts, children's play area, picnic areas, barbeques	0.50 miles north
Irving Schachter Park	2599 Beverwill Drive	Less than 1.00 acre		0.92 miles northwest
Woodbine Park	3409 S. Vinton Avenue	Less than 1.00 acre	Basketball courts, children's play area, picnic areas, barbeques	1.13 miles west
Westside Neighborhood Park	3085 Clyde Avenue	Less than 1.00 acre	Basketball courts, children's play area	1.16 miles east
Genesee Avenue Park	2330 S. Genesee Avenue	Less than 1.00 acre	Children's play area	1.28 miles northeast

^a Approximate distance/direction from project site in miles is a straight line distance, not a drive distance.

Source:

Parks, Recreation and Community Services (PRCS) Website, Park Sites, <http://www.culvercity.org/Government/PRCS.aspx> and <http://www.culvercity.org/Government/PRCS/Parks/ParkSites.aspx> and Culver City Park & Facility Information Map, http://www.culvercity.org/~media/Files/PRCS/ccliving/community_park.ashx, accessed August 2015.

City of Los Angeles Department of Recreation & Parks Website, Park Locator, <http://raponline.lacity.org/maplocator/index.cfm?lng=-118.38853289999997&lat=34.0287877&radius=5&filter=All&address=8918%20Venice%20Boulevard>, accessed August 2015.

square feet), the project would require 15,000 square feet of open space. Thus, the project would far exceed the City's open space requirements.

Nonetheless, to address potential impacts related to parks, the project applicant would be responsible for meeting the parkland dedication or fee requirements as required by Culver City's standard conditions of approval and pursuant to the Quimby Act and Title 15: Land Usage, Chapter 15.06: New Development Fees – Residential Development Park Dedication and In Lieu Parkland Fees, Section 15.06.310: Park Dedication or Payment of Fees, of the CCMC and Chapter I: General Provisions and Zoning, Article 7: Division of Land Regulations, Section 17.12: Park and Recreation Site Acquisition and Development Provisions, of the LAMC, as applicable. Therefore, with the proposed open space features and payment of applicable fees, the project would not have a have a significant physical impact upon parks, nor would there be a significant increase in demand for existing public park facilities. A less than significant impact on parks would occur in these regards.

e. Other public facilities?

Less Than Significant Impact. The Los Angeles County Public Library (LACPL) provides library services to Culver City. The project site is served by the LACPL Culver City Julian Dixon Branch Library, which located approximately 1.25 miles southwest of the project site, but is currently closed for renovations and scheduled to reopen in early 2016.⁸⁹ The temporary location for library services is within the Mayme A. Clayton Museum, located at 4130 Overland Avenue, approximately 1.25 miles southwest of the project site. Other nearby LACPL branches are the Lloyd Taber-Marina del Rey Library, West Hollywood Library, and View Park Library. The Lloyd Taber-Marina del Rey Library is located at 4533 Admiralty Way, Marina del Rey, approximately 4.4 miles southwest of the project site. The West Hollywood Library is located at 625 North San Vicente Boulevard, West Hollywood, approximately 3.75 miles north of the project site. The View Park Library is located at 3854 West 54th Street, Los Angeles, approximately 3.6 miles southeast of the project site.

To address potential impacts to libraries, the project applicant would pay the required fees per the Developer Fee Program for the LACPL as provided in Los Angeles County, Code of Ordinances, Title 22: Planning and Zoning, Division 2: Additional Regulations, Chapter 22.72: Library Facilities Mitigation Fee. Compliance would offset any incremental need for funding of capital improvements to maintain adequate library facilities and service, resulting from the project by payment of development fees per the Code. As such, impacts regarding library services would be less than significant.

The project's residents, employees, and visitors would utilize and, to some extent, impact the maintenance of public facilities, including roads. However, implementation of the project would result in a minimal population increase. Therefore, development of the project would not significantly increase the use of government services beyond current levels. Construction activities would result in a temporary increased use of the surrounding roads. However, the use of such facilities would not require maintenance beyond normal requirements. The project applicant would need to pay all applicable impact fees of Culver City and the City of Los Angeles. Overall, less than significant impacts to governmental services, including roads, would occur.

⁸⁹ Los Angeles County Public Library Website, <http://www.colapublib.org/libs/culvercity/index.php>, accessed August 2015.

XV. RECREATION

- a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**
- b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

Less Than Significant Impact (a-b). As discussed under Response XIV.d, operational activities associated with the project would increase demand for park services. However, the project would include a total of approximately 139,400 square feet of outdoor open spaces, gateways, landscape treatments, and amenities, such as gyms and large outdoor pool/deck spaces for the residential and hotel uses. The project would provide open space features that far exceed the City's open space requirements. Much of the project's ground level open space features would be utilized by project residents, guests, employees, as well as the surrounding community. As such, the demand or use of nearby by park facilities may be reduced at times by the project. Nonetheless, to offset the project's demand on park facilities and services, the project applicant would be responsible for meeting the parkland dedication or fee requirements pursuant to the Quimby Act and Title 15: Land Usage, Chapter 15.06: New Development Fees – Residential Development Park Dedication and In Lieu Parkland Fees, Section 15.06.310: Park Dedication or Payment of Fees, of the CCMC and Chapter I: General Provisions and Zoning, Article 7: Division of Land Regulations, Section 17.12: Park and Recreation Site Acquisition and Development Provisions, of the LAMC, as applicable. Therefore, with the proposed open space features and payment of applicable fees, the project would not substantially deteriorate, or accelerate the deterioration of recreational facilities or resources. Impacts would be less than significant in this regard.

XVI. TRANSPORTATION AND CIRCULATION

The following discussion is based, in part, on the Ivy Station, Culver City, Mixed-Use Transit Oriented Development (TOD) at Washington Blvd. and National Blvd. Traffic Impact Analysis (herein referred to as the "Traffic Impact Analysis"), prepared by Kimley Horn, dated ~~October~~ November 2015 (provided under separate cover available at the Culver City Planning Division). The Traffic Impact Analysis was conducted using procedures and criteria adopted by the Los Angeles Department of Transportation (LADOT) and Culver City staff, and addresses the project's trip generation and potential impacts to the surrounding roadway network. The Traffic Impact Analysis evaluates four project scenarios: Existing (2014), Existing With Project (2014), Cumulative (2019), and Cumulative With Project (2019). Future conditions take into account the potential development of 21 related projects in the general project vicinity, as identified by the City of Los Angeles and Culver City.

Subsequent to the public review period, at the City's request, Kimley Horn conducted a supplemental traffic analysis of impacts at the intersections of: Washington Boulevard/Wesley Avenue, Washington Boulevard/Cattaraugus Avenue, and Washington Boulevard/La Cienega Boulevard. The supplemental analysis was reviewed and approved by Culver City's traffic engineer. The analysis, dated January 21, 2016, showed that the project will not have a significant impact at any of these three intersections or other locations along Washington Boulevard based on applicable traffic impact thresholds. The supplemental analysis is available for review at the City's Planning Division Office at City Hall. Additions to the traffic analysis below resulting from the supplemental traffic analysis are shown with a double underline and deletions are shown with strikethrough. Given the timing of the supplemental traffic analysis, Year 2015 conditions are presented as the Existing Conditions for the three supplemental intersections.

Would the project:

- a. **Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

Less Than Significant Impact With Mitigation Incorporated. Fifteen (15) study intersections were originally selected for evaluation in the Traffic Impact Analysis in consultation with LADOT and Culver City based on project-related traffic patterns; refer to **Table B-16, Study Area Intersections**. An intersection level of service (LOS) analysis was performed at the study intersections to assess significant impacts resulting from the project. **Figure B-5, Project Intersection Lane Configuration and Traffic Control**, illustrates the existing lane configuration and traffic control for each study intersection.

The three supplemental intersections of Washington Boulevard/Wesley Avenue, Washington Boulevard/Cattaraugus Avenue, and Washington Boulevard/La Cienega Boulevard have been added to Table B-16.

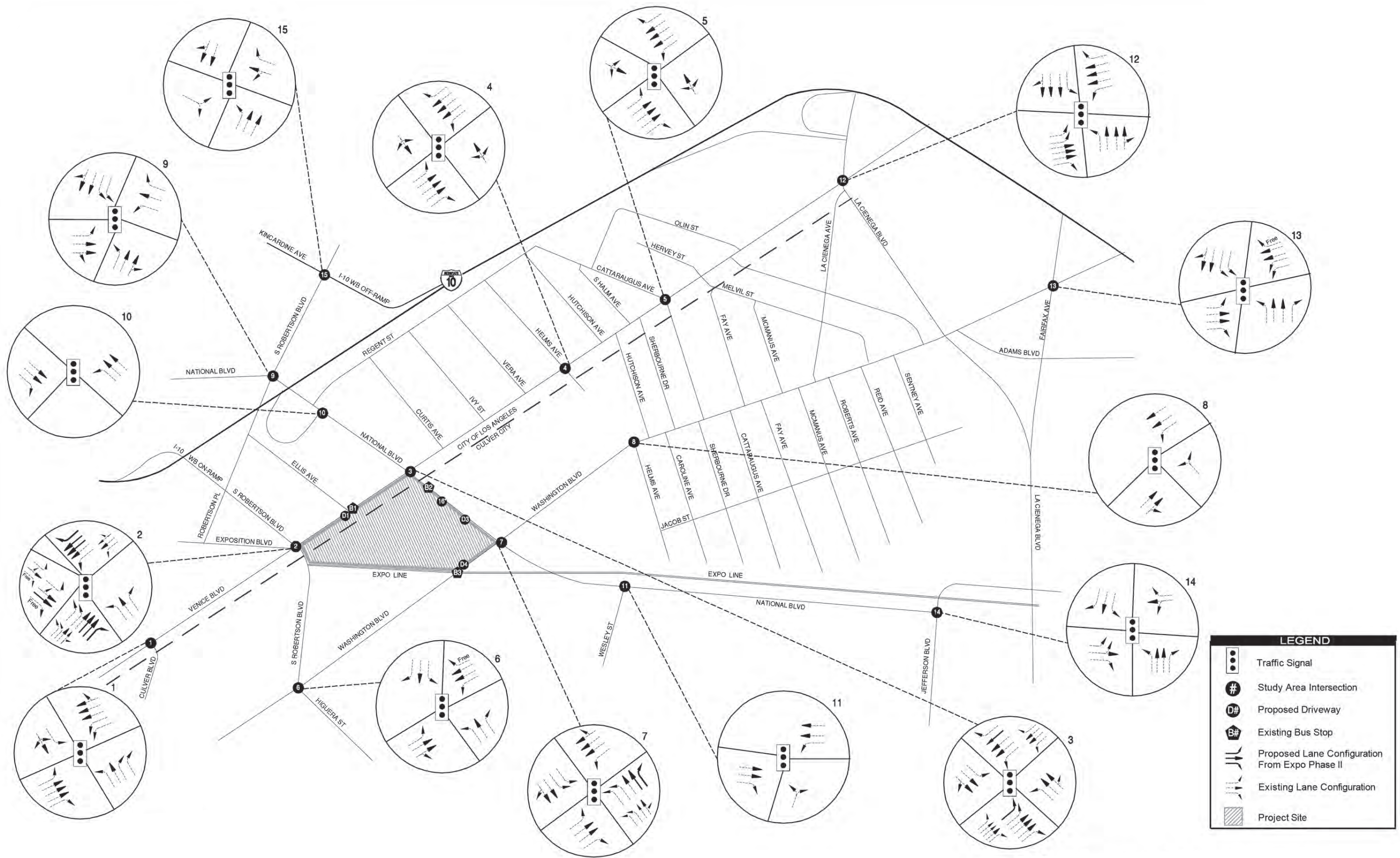
Table B-16

Study Area Intersections

Intersection #	Northbound/ Southbound	Eastbound/ Westbound	Jurisdiction	Signalized
1	Culver Boulevard	Venice Boulevard	City of Los Angeles	Yes
2	Robertson Boulevard	Venice Boulevard	City of Los Angeles	Yes
3	National Boulevard	Venice Boulevard	City of Los Angeles	Yes
4	Helms Avenue	Venice Boulevard	City of Los Angeles	Yes
5	Cattaraugus Avenue	Venice Boulevard	City of Los Angeles	Yes
6	Robertson Boulevard/Higuera St.	Washington Boulevard	Culver City	Yes
7	National Boulevard	Washington Boulevard	Culver City	Yes
8	Helms Avenue	Washington Boulevard	Culver City	Yes
9	Robertson Boulevard	National Boulevard	City of Los Angeles	Yes
10	National Boulevard	I-10 Eastbound On-Ramp	Caltrans	Yes
11	Wesley Street	National Boulevard	Culver City	Yes
12	La Cienega Boulevard	Venice Boulevard	City of Los Angeles	Yes
13	<u>Fairfax Boulevard Avenue</u>	Washington Boulevard	City of Los Angeles	Yes
14	Jefferson Boulevard	National Boulevard	City of Los Angeles	Yes
15	Robertson Boulevard	I-10 Westbound Off-ramp	Caltrans	Yes
<u>SUP #1</u>	<u>Wesley Avenue</u>	<u>Washington Boulevard</u>	<u>Culver City</u>	<u>No¹</u>
<u>SUP #2</u>	<u>Cattaraugus Avenue</u>	<u>Washington Boulevard</u>	<u>Culver City</u>	<u>No¹</u>
<u>SUP #3</u>	<u>La Cienega Boulevard</u>	<u>Washington Boulevard</u>	<u>Culver City</u>	<u>Yes</u>

¹ Signalized intersections with ATSAC signal system for future (2019) scenarios.

Source: Kimley Horn and Associates, Inc., 2015 and 2016.



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Level of Service Methodology

LADOT and Culver City traffic analysis guidelines require the use of the Transportation Research Board's Critical Movement Analysis (CMA), Circular 212 Planning Method, to analyze traffic operating conditions at the study intersections. CMA is a method which determines the volume to capacity (V/C) ratio on a critical lane basis and LOS associated with each V/C ratio at a signalized intersection. V/C ratios are measured on a scale of 0 to 1.000. LOS describes the quality of traffic flow and is a measure of such factors as travel speed, travel time, and flow interruptions. LOS ranges from "A" to "F". **Table B-17, Intersection Level of Service (LOS) Definitions**, presents the V/C ratio using the Circular 212 method.

Table B-17

Intersection Level of Service (LOS) Definitions

V/C Value Signalized ^a	Related LOS Rating
0 to 0.600	A – Excellent free flow conditions
0.601 to 0.700	B – Unconstrained flow
0.701 to 0.800	C – Somewhat constrained flow, maneuverability is reduced
0.801 to 0.900	D – Constrained flow, little maneuverability
0.901 to 1.000	E – Significant vehicle queuing; not all vehicles clear intersection in one cycle
Greater than 1.000	F – Excessive delay; vehicles require more than one signal cycle to clear the intersection

^a Based upon Circular 212 methodology for signalized intersections

Source: Kimley Horn and Associates, Inc., 2015.

City of Los Angeles Traffic Impact Criteria

The threshold criteria for the City of Los Angeles considers a project to have a significant impact if the conditions are met within **Table B-18, LADOT Criteria for Significant Traffic Impact**.

Table B-18

LADOT Criteria for Significant Traffic Impact

Level of Service	V/C Ratio	Project-Related Increase in V/C Ratio
C	0.701 – 0.800	≥ 0.040
D	0.801 – 0.900	≥ 0.020
E, F	> 0.900	≥ 0.010

Source: Kimley Horn and Associates, Inc., 2015.

Culver City Traffic Impact Criteria

The threshold criteria for Culver City considers a project to have a significant impact if the conditions are met within **Table B-19, Culver City Criteria for Significant Traffic Impact**. Using this criteria, a project would not have a significant impact at an intersection if it operates at LOS “D” after the addition of the project traffic and the incremental change in V/C is less than 0.040. However, if the intersection is operating at LOS “F” after the addition of the project traffic and the V/C ratio is 0.020 or greater, the project would be considered to have a significant impact.

Table B-19

Culver City Criteria for Significant Traffic Impact

Level of Service	V/C Ratio	Project-Related Increase in V/C Ratio
C	0.701 – 0.800	≥ 0.050
D	0.801 – 0.900	≥ 0.040
E, F	> 0.900	≥ 0.020

Source: Kimley Horn and Associates, Inc., 2015.

Existing (2014)/(2015) Without Project Conditions LOS Analysis

Table B-20, Existing (2014)/(2015) Without and With Project Conditions Intersection LOS, presents the Existing (2014)/(2015) Without Project conditions peak hour V/C ratio and the corresponding LOS for each intersection. Table B-20 indicates that for Existing (2014)/(2015) Without Project conditions during the A.M. peak period, one intersection operates at LOS “F”, ~~two~~ four intersections operate at LOS “D” and the remaining ~~12~~ 13 intersection operate at LOS “C” or better. During the P.M. peak period, ~~two~~ three intersections operate at LOS “D” and the remaining ~~13~~ 15 intersection operate at LOS “C” or better.

Project Trip Generation

To determine the project’s impacts on area intersections, the Traffic Impact Analysis calculated the number of traffic trips generated by the project using the trip generation rates outlined in the Institute of Transportation Engineers (ITE) handbook titled *Trip Generation, 9th Edition*. Trip generation rates and the resulting trips that would be generated by the project are presented in **Table B-21, Traffic Trip Generation Table**. The project is estimated to generate approximately 4,124 new daily trips, 256 new trips during the A.M. peak hour and 301 new trips during the P.M. peak hour.

Project Trip Credits

Trip credits were applied to the estimated project trip generation to account for internal capture and pass-by trips based upon the guidelines approved by LADOT and Culver City. Additionally, the project would result in a net reduction of 300 Metro Station parking spaces that would require project trip generation adjustments. ITE trip generation estimates allow for one trip credit per parking space; however to represent a conservative scenario and due to limited data available from ITE trip generation manual, only a 0.5 trip per parking space

Table B-20

Existing (2014)/(2015) Without and With Project Conditions Intersection LOS

		Existing (2014) Without Project				Existing (2014) With Project				Change	
		LOS Analysis Results				LOS Analysis Results					
		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour			
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	A.M.	P.M.
Signalized Intersections		Ratio	LOS	Ratio	LOS	Ratio	LOS	Ratio	LOS		
1	Culver Blvd at Venice Blvd	0.548	A	0.491	A	0.562	A	0.503	A	0.014	0.012
2	Robertson Blvd at Venice Blvd	1.041	F	0.839	D	1.048	F	0.853	D	0.007	0.014
3	National Blvd at Venice Blvd	0.604	B	0.647	B	0.637	B	0.676	B	0.033	0.029
4	Helms Avenue at Venice Blvd	0.265	A	0.271	A	0.268	A	0.278	A	0.003	0.007
5	Cattaraugus Avenue at Venice Blvd	0.713	C	0.607	B	0.746	C	0.647	B	0.003	0.010
6	Robertson Blvd/Higuera Street at Washington Blvd	0.690	B	0.660	B	0.693	B	0.662	B	0.003	0.002
7	National Blvd at Washington Blvd	0.680	B	0.788	C	0.690	B	0.800	C	0.010	0.012
8	Helms Avenue at Washington Blvd	0.435	A	0.469	A	0.444	A	0.478	A	0.009	0.009
9	Robertson Blvd at National Blvd	0.847	D	0.753	C	0.867	D	0.771	C	0.020	0.018
10	National Blvd at I-10 Eastbound On-Ramp	0.219	A	0.353	A	0.229	A	0.359	A	0.010	0.006
11	Wesley Street at National Blvd	0.343	A	0.317	A	0.349	A	0.323	A	0.006	0.006
12	La Cienega Blvd at Venice Blvd	0.787	C	0.797	C	0.797	C	0.802	D	0.010	0.005
13	Fairfax Blvd Ave at Washington Blvd	0.692	B	0.658	B	0.701	C	0.662	B	0.009	0.004
14	Jefferson Blvd and National Blvd	0.846	D	0.655	B	0.854	D	0.664	B	0.008	0.009
15	Robertson Blvd and I-10 WB Offramp	0.593	A	0.810	D	0.601	B	0.818	D	0.008	0.008
Supplemental Intersections		Existing (2015) Without Project				Existing (2015) With Project				Change	
<u>1</u>	<u>Wesley Ave at Washington Blvd</u>	<u>0.682</u>	<u>B</u>	<u>0.531</u>	<u>A</u>	<u>0.693</u>	<u>B</u>	<u>0.542</u>	<u>A</u>	<u>0.011</u>	<u>0.011</u>
<u>2</u>	<u>Cattaraugus Ave at Washington Blvd</u>	<u>0.803</u>	<u>D</u>	<u>0.588</u>	<u>A</u>	<u>0.814</u>	<u>D</u>	<u>0.599</u>	<u>A</u>	<u>0.011</u>	<u>0.011</u>
<u>3</u>	<u>La Cienega Blvd at Washington Blvd</u>	<u>0.870</u>	<u>D</u>	<u>0.882</u>	<u>D</u>	<u>0.879</u>	<u>D</u>	<u>0.891</u>	<u>D</u>	<u>0.009</u>	<u>0.009</u>

Notes:

Grey highlighted and **bold** intersections represent a potentially significant traffic impact.

Source: Kimley Horn and Associates, Inc., 2015 and 2016.

Table B-21

Traffic Trip Generation Table

ITE Code	Land Use Description	Unit	No. of Units	Daily Rate	A.M. Rate	P.M. Rate	Daily Trips	A.M. Trips	P.M. Trips
932	High-Turnover (Sit-Down) Restaurant	1,000 Sq Ft	10	127.15	10.81	9.85	1272	108	99
	Pass-by credit for High turnover (25%) ^a						-318	-27	-25
931	Quality Restaurant	1,000 Sq Ft	10	89.95	0.81	7.49	900	8	75
223	Mid-Rise Apartment	Dwelling Unit(s)	200		0.30	0.39	840	60	78
310	Hotel	Room(s)	148	8.17	0.53	0.60	1210	78	89
710	General Office Building (1)	1,000 Sq Ft	201	11.03	1.56	1.49	2218	314	299
826	Specialty Retail Center (P.M.)	1,000 Sq Ft	24	44.32		2.71	1064		65
	Specialty Retail Center (A.M.) ^c	1,000 Sq Ft	24		1.20		960	29	
	Pass-by credit for retail under 300 ksf (25%) ^a						-506	-7	-16
093	Credit for Existing Use (Light Rail Transit Station w/ Parking)	Parking Space(s)	-300	2.51	0.50	0.50	-754	-150	-150
942	Automobile Care Center	1,000 Sq Ft	-10		2.25	3.11	-180	-23	-31
876	Apparel Store	1000 Sq Ft	-8	66.4	1.00	3.83	-532	-8	-31
890	Furniture Store (1)	1000 Sq Ft	-6	5.06	0.17	0.45	-32	-1	-3
890	Furniture Store (2)	1000 Sq Ft	-6	5.06	0.17	0.45	-32	-1	-3
	Subtotal of Trips						6110	380	446
	Internal Capture Credits (based upon ITE - 10% for Daily, 10% for A.M., and 10% for P.M. peak)						-611	-38	-45
	Transit Credits (25% - adjacent to Metro Station) ^b						-1359	-85	-100
	Total Trip Generation						4,124	256	301

^a Credit determined based upon Attachment I in LADOT Guidelines

^b 25% max transit credit is based on the high land use density on the project site and 10-12 minute headways on Expo Line

^c A.M. Trips determined based on SANDAG Trip Generation Manual

Source: Kimley Horn and Associates, Inc., 2015.

adjustment was taken into account based upon consultation with LADOT. The trip credits that were applied are shown in Table B-21.

Existing (2014)/(2015) With Project Conditions LOS Analysis

Existing (2014)/(2015) With Project traffic volumes represent the sum of the Existing (2014)/(2015) traffic volumes plus the project trips. Table B-20 presents the Existing (2014)/(2015) With Project conditions peak hour V/C ratio and the corresponding LOS for each intersection. Table B-20 indicates that for Existing (2014)/(2015) With Project conditions during the A.M. peak period, one intersection is projected to operate at LOS "F", ~~two~~ four intersections would operate at LOS "D" and the remaining ~~12~~ 13 intersections operate at LOS "C" or better. During the P.M. peak period, ~~three~~ 4 intersections are projected to operate at LOS "D" while the remaining ~~12~~ 14 intersections would operate at LOS "C" or better. In the A.M. peak period, there would be an increase from 0.847 to 0.867 in V/C ratio at the intersection of Robertson Boulevard at National Boulevard when compared against the Existing (2014) Without Project conditions. Based on LADOT criteria, this would represent a potentially significant traffic impact.

Cumulative (2019) Base Conditions

Traffic volumes from related projects (approved or pending projects expected to be built by the year 2019 in the project vicinity) were added to the study intersections to simulate future traffic conditions with expected new growth in development in the area.⁹⁰ The Cumulative (2019) base conditions traffic represents the sum of existing volumes, ambient growth and the traffic estimated from related projects. These volumes were assigned to the future baseline network that would be in place at the time the project is completed.

Regional ambient traffic growth was estimated as an annual percentage increase over the existing traffic volumes. A growth rate of 1.0 percent per year was applied to the peak hour traffic volumes to represent year 2019 traffic volumes, in accordance with discussions with LADOT and Culver City staff. The 1.0 percent increase per year is anticipated to account for projects that will be built by 2019 within the project vicinity. While this rate is slightly higher than the annual growth rate of 0.5 percent identified in *Congestion Management Program for Los Angeles County* (CMP) (Los Angeles County Metropolitan Transportation Authority, 2010), it was used to provide for a more a conservative analysis of cumulative traffic conditions. Due to the fact that this project is located in an urban setting, it is unlikely that there will be a higher percentage of growth.

Cumulative (2019) Without Project Conditions LOS Analysis

Table B-22, Cumulative (2019) Without and With Project Conditions Intersection LOS, presents a summary of the Cumulative (2019) Without Project conditions V/C ratio and the corresponding LOS for each intersection. Table B-22 indicates that for Cumulative (2019) Without Project conditions during the A.M. peak period, ~~two~~ three intersections are projected to operate at LOS "E", two intersections would operate at LOS "D" and the remaining ~~11~~ 13 intersections would operate at LOS "C" or better. During the P.M. peak period, one intersection is projected to operate at LOS "E", four intersections would operate at LOS "D" and the remaining ~~11~~ 13 intersections would operate at LOS "C" or better.

⁹⁰ Traffic volumes for the related projects are included in Table 6 of the Traffic Impact Analysis.

Table B-22

Cumulative (2019) Without and With Project Conditions Intersection LOS

Signalized Intersections		Cumulative (2019) Without Project LOS Analysis Results				Cumulative (2019) With Project LOS Analysis Results				Change	
		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour			
		V/C Ratio	LOS	V/C Ratio	LOS	V/C Ratio	LOS	V/C Ratio	LOS	A.M.	P.M.
1	Culver Blvd at Venice Blvd	0.639	B	0.597	A	0.653	B	0.609	B	0.014	0.012
2	Robertson Blvd at Venice Blvd	0.883	D	0.703	C	0.888	D	0.713	C	0.005	0.010
3	National Blvd at Venice Blvd	0.634	B	0.708	C	0.690	B	0.756	C	0.056	0.048
4	Helms Avenue at Venice Blvd	0.285	A	0.294	A	0.288	A	0.301	A	0.003	0.007
5	Cattaraugus Avenue at Venice Blvd	0.785	C	0.677	B	0.788	C	0.687	B	0.003	0.010
6	Robertson Blvd/Higuera Street at Washington Blvd	0.781	C	0.753	C	0.784	C	0.755	C	0.003	0.002
7	National Blvd at Washington Blvd	0.797	C	0.893	D	0.806	D	0.904	E	0.019	0.011**
8	Helms Avenue at Washington Blvd	0.469	A	0.510	A	0.477	A	0.518	A	0.008	0.008
9	Robertson Blvd at National Blvd	0.930	E	0.837	D	0.950	E	0.856	D	0.020	0.019
10	National Blvd at I-10 Eastbound On-Ramp	0.351	A	0.543	A	0.370	A	0.549	A	0.019	0.006
11	Wesley Street at National Blvd	0.407	A	0.390	A	0.413	A	0.396	A	0.006	0.006
12	La Cienega Blvd at Venice Blvd	0.837	D	0.848	D	0.847	D	0.853	D	0.010	0.005
13	Fairfax Blvd and Ave at Washington Blvd	0.747	C	0.732	C	0.756	C	0.737	C	0.009	0.005
14	Jefferson Blvd and National Blvd	0.945	E	0.769	C	0.953	E	0.778	C	0.008	0.009
15	Robertson Blvd and I-10 WB Offramp	0.785	C	0.857	D	0.797	C	0.865	D	0.012	0.008
16	Main Project Driveway	*	*	*	*	0.383	A	0.474	A	*	*
Supplemental Intersections											
<u>1</u>	<u>Wesley Ave at Washington Blvd</u>	<u>0.670</u>	<u>B</u>	<u>0.593</u>	<u>A</u>	<u>0.680</u>	<u>B</u>	<u>0.602</u>	<u>B</u>	<u>0.010</u>	<u>0.009</u>
<u>2</u>	<u>Cattaraugus Ave at Washington Blvd</u>	<u>0.681</u>	<u>B</u>	<u>0.488</u>	<u>A</u>	<u>0.691</u>	<u>B</u>	<u>0.498</u>	<u>A</u>	<u>0.010</u>	<u>0.010</u>
<u>3</u>	<u>La Cienega Blvd at Washington Blvd</u>	<u>0.926</u>	<u>E</u>	<u>0.943</u>	<u>E</u>	<u>0.935</u>	<u>E</u>	<u>0.952</u>	<u>E</u>	<u>0.009</u>	<u>0.009</u>

* This is the project's main driveway and analysis was conducted only for the Cumulative (2019) With Project Conditions.

** Based on Culver City significant threshold criteria, a V/C change does not result in a significant impact.

Notes:

Grey highlighted and **bold** intersections represent a potentially significant traffic impact.

Source: Kimley Horn and Associates, Inc., 2015 and 2016.

Cumulative (2019) With Project Conditions LOS Analysis

Cumulative (2019) With Project conditions add the estimated project traffic to the cumulative base conditions and are used to evaluate the net change in the traffic conditions and to identify potential traffic impacts associated with the project. The Cumulative (2019) With Project traffic volumes represent the sum of existing traffic volumes raised by the ambient growth factor, the traffic estimated from related projects, and the project trips. These volumes were assigned to the future baseline network that will be in place at the time the project is completed in 2019. Table B-22, presents a summary of the Cumulative (2019) With Project conditions peak hour V/C ratio and the corresponding LOS for each intersection. For this scenario, the main project driveway along National Boulevard was also analyzed as a full access signalized intersection, which is prescribed as Mitigation Measure TRAF-3. Mitigation Measure TRAF-3 requires the project to install a traffic signal at the project's main driveway on National Boulevard between Venice Boulevard and Washington Boulevard, and provide traffic signal interconnection to adjacent traffic signals to the satisfaction of Culver City. Table B-22 indicates that for Cumulative (2019) With Project conditions during the A.M. peak period, ~~two~~ three intersections are projected to operate at LOS "E", three intersections would operate at LOS "D" and the remaining ~~11~~ 13 intersections would operate at LOS "C" or better in the A.M. peak period.

During the P.M. peak period, ~~one~~ two intersections would operate at LOS "E", three intersections would operate at LOS "D" and the remaining ~~12~~ 14 intersections would operate at LOS "C" or better. In the A.M. peak period, there is an increase from 0.930 to 0.950 in V/C at the intersection of Robertson Boulevard at National Boulevard when compared against the Cumulative (2019) Without Project conditions. In the P.M. peak period, there is an increase from 0.708 to 0.756 in V/C at the intersection of National Boulevard at Venice Boulevard and an increase from 0.893 to 0.904 in V/C at the intersection of National Boulevard at Washington Boulevard. The intersection of National Boulevard at Washington Boulevard is located within Culver City and based on Culver City significant threshold criteria, the increase in V/C does not result in a significant impact.

Robertson Boulevard at National Boulevard - Based on the significant impact criteria as defined by LADOT, the project would have a significant impact at the intersection of Robertson Boulevard at National Boulevard in the A.M. peak period when the Cumulative (2019) Without Project conditions is compared against the Cumulative (2019) With Project conditions. This intersection would also have a potentially significant traffic impact under Existing Conditions (see Table B-20). The potentially significant impact at this intersection can be mitigated by re-striping the eastbound approach to provide two left-turn, one through and one through-right lanes (Mitigation Measure TRAF-1). The available roadway width would allow for an additional left-turn lane in the eastbound direction by re-striping without additional physical improvements to the intersection. Reduced lane widths for eastbound through and left turns lanes are proposed to allow sufficient width for the westbound receiving lane. Geometric constraints may exist for the eastbound left-turn movement but would be reviewed by LADOT and Culver City during the design phase. With implementation of Mitigation Measure TRAF-1, this intersection would no longer operate from LOS "D" and would operate to an acceptable LOS "C" in the A.M. peak period for Existing (2014) With Project conditions and from LOS "E" to an acceptable LOS "D" in the A.M. peak period for Cumulative (2019) With Project conditions. As such, the project would result in a less than significant impact in this regard.

National Boulevard at Venice Boulevard - Based on the significant impact criteria as defined by LADOT, the project would have a significant impact at the intersection of National Boulevard at Venice Boulevard in the P.M. peak period when the Cumulative (2019) Without Project conditions is compared against the Cumulative (2019) With Project conditions. The potentially significant impact at this intersection can be mitigated by re-

striping the northbound approach to provide two left-turn, two through and one right-turn lanes (Mitigation Measure TRAF-2). The available roadway width along with the widening along the project frontage would allow for an additional right-turn lane in the northbound direction by re-striping without additional physical improvements to the intersection. This may require minor striping re-alignment for the north leg of National Boulevard. With implementation of Mitigation Measure TRAF-2, this intersection is projected to operate at an acceptable LOS “B” in the P.M. peak period. As such, the project would result in a less than significant impact in this regard.

As a result of Mitigation Measures TRAF-1 and TRAF-2, a total of 35 on-street parking spaces would be removed and eight on-street spaces would be provided. **Table B-23, On-Street Parking with Mitigation**, presents the location of both the removed and additional on-street parking to be provided in Culver City and the City of Los Angeles. Parking impacts are discussed below.

Table B-23

On-Street Parking with Mitigation

Street Name	Parking Space Location	Jurisdiction	Number of Spaces Added/ Removed
Venice Boulevard	National Boulevard and Robertson Boulevard	City of Los Angeles	-7
National Boulevard	Venice Boulevard and Washington Boulevard	City of Culver City	-18
National Boulevard	I-10 EB On-Ramp and Venice Boulevard	City of Los Angeles	-3
National Boulevard	Livonia Avenue and Robertson Boulevard	City of Los Angeles	- 7
Venice Boulevard	National Boulevard and Robertson Boulevard	City of Los Angeles	+8

Source: Kimley Horn and Associates, Inc., 2015.

Cumulus Project Traffic Analysis (Information Purposes Only)

A Memorandum of Understanding (MOU) showing the scope and assumptions of the Traffic Impact Analysis was approved by the City of Culver City before the commencement of the project's traffic study. The Ivy Station MOU was approved in December 2014 and did not include the Cumulus project on the list of related projects since it was not recognized as a project at that time by the City of Los Angeles. The Cumulus project is an approximately 1.9 million square foot transit oriented, mixed-use development located at the northwest corner of La Cienega and Jefferson Boulevards in the City of Los Angeles.

Once an MOU is approved, new projects that come on line, such as the Cumulus project, are not added and other projects that are abandoned are not removed from the list. To do so would be unreasonable, as it would require developers to continuously alter the traffic analysis, as projects are added and removed.

Related projects are a factor in the traffic analysis in that they are added to the existing year traffic conditions along with an ambient growth of 1% per year to arrive at the future year in which the project will be completed. That future year becomes the base year conditions, in which the impact of the project is examined. The project's traffic is added to the future base year to determine if the project has an impact at any intersection or

residential street. The project is responsible for any significant impacts it alone creates and/or substantially contributes traffic to already deficient intersections per applicable traffic impact thresholds. It is not responsible for existing traffic conditions or for the traffic generated by any of the related projects, as project traffic impacts are based on the project's traffic contribution to the roadway network.

While not being a requirement per CEQA or by Culver City, an analysis was conducted for informational purposes only to determine if the Cumulus project, if included in the project's Traffic Impact Analysis, would result in any additional significant traffic impacts. The Cumulative (2019) With Cumulus Project – Without and With Project Conditions Intersections LOS table shown below illustrates future 2019 traffic conditions with inclusion of the Cumulus project as a related project. The analysis shows that with the Cumulus project included as a related project, traffic at the Venice and National intersection would exceed acceptable thresholds during the AM and PM peak periods. Per the project's Traffic Impact Analysis, the Ivy Station project created an impact at the same intersection during the PM peak period and Mitigation Measure TRAF-2 prescribed for that impact also mitigates the AM peak period traffic condition. In addition, the same AM peak hour traffic impact at the intersection of Robertson Boulevard at National Boulevard as identified in the project's Traffic Impact Analysis would occur with the Cumulus project added to the related projects. Therefore, no additional traffic mitigation measures would be required for the Ivy Station project beyond those prescribed above (for the Venice and National intersection). Further, no additional intersections would be significantly impacted by the Ivy Station project beyond those identified above. The traffic modeling results supporting the Cumulus Project Traffic Analysis (Informational Purposes Only) is available for review at the City's Planning Division Office at City Hall.

Parking Standards

The project would include 1,555 vehicular parking spaces (300 residential spaces; 268 spaces for the hotel uses; 490 office spaces; 197 retail/restaurant spaces; and the 300 required Metro spaces) distributed over the Ground Level parking and 2.5-half levels of subterranean parking (Garage Levels P1, P2, and P3). All required 300 Metro spaces would be provided in Garage Level P3 and primarily accessed at National Boulevard. The 300 Metro parking space requirement was prescribed by Metro; not by the local agencies. The parking assignment for Residential, Hotel, and Metro uses would be clearly segregated with access control. The Culver City Municipal Code (CCMC) and PD-11 requirements for vehicular parking are summarized in Table A-2, *Project Vehicular Parking Code Requirements*, in Attachment A of this MND. As shown in Table A-2, the project would meet the minimum number of vehicular parking spaces required by the CCMC.

Neighborhood Traffic Assessment

Potential impacts to neighboring residential streets were qualitatively assessed to see if the project would result in increased cut-through traffic on residential streets, specifically Higuera Street. Residential streets typically experience cut-through traffic when the adjacent intersections operate at or exceed their capacity levels. Higuera Street is the primary collector street that connects several residential streets southeast of the project site.

**Cumulative (2019) With Cumulus Project -
Without and With Project Conditions Intersection LOS**

Signalized Intersections		Cumulative (2019) Without Project LOS Analysis Results				Cumulative (2019) With Project LOS Analysis Results								Change (Without and With Project Conditions)	
		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour				P.M. Peak Hour				A.M.	P.M.
		V/C Ratio	LOS	V/C Ratio	LOS	V/C Ratio	LOS	V/C W/out Cumulus	LOS W/out Cumulus	V/C Ratio	LOS	V/C W/out Cumulus	LOS W/out Cumulus		
1	Culver Blvd at Venice Blvd	0.642	B	0.602	B	0.656	B	0.653	B	0.614	B	0.609	B	0.014	0.012
2	Robertson Blvd at Venice Blvd	0.888	D	0.707	C	0.892	D	0.888	D	0.716	C	0.713	C	0.005	0.009
3	National Blvd at Venice Blvd	0.660	B	0.715	C	0.716	C	0.690	B	0.763	C	0.756	C	0.056	0.048
4	Helms Avenue at Venice Blvd	0.285	A	0.294	A	0.288	A	0.288	A	0.301	A	0.301	A	0.003	0.007
5	Cattaraugus Avenue at Venice Blvd	0.785	C	0.677	B	0.788	C	0.788	C	0.687	B	0.687	B	0.003	0.010
6	Robertson Blvd/Higuera Street at Washington Blvd	0.784	C	0.758	C	0.787	C	0.784	C	0.760	C	0.755	C	0.003	0.002
7	National Blvd at Washington Blvd	0.816	D	0.918	E	0.825	D	0.806	D	0.929	E	0.904	E	0.009	0.011**
8	Helms Avenue at Washington Blvd	0.469	A	0.510	A	0.477	A	0.477	A	0.518	A	0.518	A	0.008	0.008
9	Robertson Blvd at National Blvd	0.940	E	0.846	D	0.959	E	0.950	E	0.865	D	0.856	D	0.019	0.019
10	National Blvd at I-10 Eastbound On-Ramp	0.357	A	0.543	A	0.375	A	0.370	A	0.549	A	0.549	A	0.018	0.006
11	Wesley Street at National Blvd	0.407	A	0.390	A	0.434	A	0.413	A	0.419	A	0.396	A	0.006	0.006
12	La Cienega Blvd at Venice Blvd	0.846	D	0.860	D	0.855	D	0.847	D	0.865	D	0.853	D	0.009	0.005
13	Fairfax Ave at Washington Blvd	0.782	C	0.773	C	0.791	C	0.756	C	0.778	C	0.737	C	0.009	0.005
14	Jefferson Blvd and National Blvd	1.004	F	0.833	D	1.012	F	0.953	E	0.842	D	0.778	C	0.008	0.009
15	Robertson Blvd and I-10 WB Offramp	0.788	C	0.861	D	0.800	C	0.797	C	0.870	D	0.865	D	0.012	0.009
16	Main Project Driveway	*	*	*	*	0.397	A	0.383	A	0.495	A	0.474	A	*	*
Supplemental Intersections															
1	Wesley Ave at Washington Blvd	0.670	B	0.593	A	0.680	B	0.680	B	0.602	B	0.602	B	0.010	0.009
2	Cattaraugus Ave at Washington Blvd	0.681	B	0.488	A	0.691	B	0.691	B	0.498	A	0.498	A	0.010	0.010
3	La Cienega Blvd at Washington Blvd	0.934	E	0.994	E	0.944	E	0.935	E	1.004	F	0.952	E	0.010	0.010

* This is the project's main driveway and analysis was conducted only for the Cumulative (2019) With Project Conditions.

** Based on Culver City significant threshold criteria, a V/C change does not result in a significant impact.

Notes:

Grey highlighted and bold intersections represent a potentially significant traffic impact.

Source: Kimley Horn and Associates, Inc., 2016.

In response to concerns expressed by area residents regarding traffic impacts on the neighborhood streets surrounding the project, the daily traffic volumes for both the existing and future conditions were reviewed. A review of the “With Project” LOS at the intersections of Higuera Street/Washington Boulevard/ Robertson Boulevard and Washington Boulevard/National Boulevard indicate LOS “D” or better conditions. The increase in project related traffic at the intersection of Higuera Street/Washington Boulevard/Robertson Boulevard would be fairly minor compared to existing conditions. Due to the additional available capacity at these intersections as well as the minimal amount of project traffic that would be going through Higuera Street/Washington Boulevard/National Boulevard, the project is not expected to result in or significantly increase cut-through traffic through these residential streets. The City of Culver City is committed to maintaining and improving the quality of residential neighborhoods by mitigating impacts that may detract or adversely affect the residential neighborhoods close to the project. Positive street design and good traffic management were the guiding principles for traffic analysis.

Mitigation Measures

TRAF-1: Robertson Boulevard at National Boulevard Intersection. Re-stripe the eastbound approach to provide two left-turn, one through and one through-right lane per consultation with and approval by LADOT and Culver City. Should improvement be deemed infeasible by LADOT and/or Culver City, the City(s) shall substitute an alternative measure of equivalent effectiveness.

TRAF-2: National Boulevard at Venice Boulevard Intersection. Re-stripe the northbound approach to provide two left-turn, two through and one right-turn lanes per consultation with and approval by LADOT and Culver City. Provide minor striping re-alignment for the north leg of National Boulevard if required per the direction of LADOT and Culver City. Should improvement be deemed infeasible by LADOT and/or Culver City, the City(s) shall substitute an alternative measure of equivalent effectiveness.

TRAF-3: National Boulevard. Install a traffic signal at the project’s main driveway on National Boulevard between Venice Boulevard and Washington Boulevard, and provide traffic signal interconnection to adjacent traffic signals to the satisfaction of Culver City. A southbound right turn lane shall be installed along National Boulevard at the intersection of Washington/National and at the Main Project Driveway/National.

- b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?**

Less Than Significant Impact. The CMP is a State-mandated program enacted by the State legislature to address the impacts that urban congestion has on local communities and the region as a whole. Metro is the local agency responsible for implementing the requirements of the CMP. New projects located in the City of Los Angeles and Culver City must comply with the requirements set forth in the Metro’s CMP. These requirements include the provision that all freeway segments where a project could add 150 or more trips in each direction during the peak hours be evaluated. The guidelines also require evaluation of all designated

CMP intersections where a project could add 50 or more trips during either peak hour. The I-10 Freeway and the intersection of Venice/La Cienega Boulevard are the nearest CMP facilities in the study area. The project would not generate 150 or more trips to the I-10 Freeway segment in either peak hour, nor would it contribute 50 or more peak hour trips to the Venice/La Cienega Boulevard intersection. Therefore, further analysis of CMP facilities is not required for CMP purposes.

Per the direction of LADOT and Culver City, a freeway impact screening analysis, freeway mainline analysis, and freeway ramp analysis were conducted as described below:

Freeway Impact Screening Analysis

A freeway impact screening analysis was conducted as per LADOT Traffic Study Guidelines. The methodology from the agreement between City of Los Angeles and Caltrans District 7 on freeway impact analysis procedures was used for the freeway impact screening analysis. As per the criteria provided by the agreement, if the project meets any of the following criteria, the applicant will be directed to work with Caltrans to prepare a freeway impact analysis, utilizing Caltrans' "Guide for the Preparation of Traffic Impact Studies":

- The project's peak hour trips would result in a one percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS "E" or "F" (based on an assumed capacity of 2,000 vehicles per hour per lane); or
- The project's peak hour trips would result in a two percent or more increase to the freeway mainline capacity of a freeway segment operating at LOS "D" (based on an assumed capacity of 2,000 vehicles per hour per lane); or
- The project's peak hour trips would result in a one percent or more increase to the capacity of a freeway off-ramp operating at LOS "E" or "F" (based on an assumed ramp capacity of 1,500 vehicles per hour per lane); or
- The project's peak hour trips would result in a two percent or more increase to the capacity of a freeway off-ramp operating at LOS "D" (based on an assumed ramp capacity of 1,500 vehicles per hour per lane).

Freeway Mainline Analysis

The above criteria was used for the freeway mainline analysis for the project. Based on the available freeway mainline traffic data from Caltrans, the project is expected to add less than one percent traffic to the I-10 mainline capacity and therefore does not meet the mainline capacity criteria provided above. Project trips on the I-10 mainline freeway in the study area during the A.M. and P.M. peak hours are shown in **Table B-24, Freeway Mainline Analysis**. The existing I-10 freeway in the study area is operating at LOS "E" based upon Highway Capacity Software (HCS) software. Per the one percent criteria on freeway mainline, the project would need to add 80 trips in the eastbound (EB) and westbound (WB) directions during the A.M. and P.M. peak hours to meet the traffic impact analysis requirement. As shown in Table B-23, the project is projected to add between four to 18 trips to the freeway mainline in each direction. Because the project trips are less than the required 80 trips, a freeway impact analysis is not required.

Table B-24

Freeway Mainline Analysis

Location	Peak Hour	Project Trips		Facility Capacity ^a		1% Criteria for Impact Analysis ^b		Impact Analysis Required?
		EB	WB	EB	WB	EB	WB	
I-10 Freeway Mainline at Venice Boulevard	A.M.	4	18	8,000	8,000	80	80	NO
	P.M.	9	13	8,000	8,000	80	80	NO

^a The freeway capacity is 2,000 vehicles per hour per lane.

^b The project's peak hour trips resulting in a one percent or more increase to the freeway mainline capacity for a freeway segment operating at LOS "E" or "F" would require a freeway impact analysis.

Source: Kimley Horn and Associates, Inc., 2015

Freeway Ramp Analysis

The above criteria was used for the freeway off-ramp analysis for this project. Project trips on the I-10 freeway off-ramp at Robertson Boulevard during the A.M. and P.M. peak hours are shown in the following **Table B-25, Freeway Off-Ramp Analysis**. The freeway off-ramp is currently operating and projected to operate at LOS "C" in the A.M. peak hour and LOS "B" in the P.M. peak hour based upon HCS software.

Table B-25

Freeway Off-Ramp Analysis

Location	Peak Hour	Project Trips	Freeway Off-Ramp Capacity ^a	2% Criteria for Impact Analysis ^b	Significant Impact Criteria Met?	Impact Analysis Required?
I-10 Westbound Off-Ramp at Robertson Boulevard	A.M.	18	1,500	30	NO	NO
	P.M.	13	1,500	30	NO	NO

^a The freeway off-ramp capacity is 1,500 vehicles per hour per lane.

^b The project's peak hour trips resulting in a two percent or more increase to the capacity of a freeway off-ramp operating at LOS "D" would require a freeway impact analysis.

Source: Kimley Horn and Associates, Inc., 2015.

As shown in Table B-25, the project would need to add 30 new trips on the freeway off-ramp during the A.M. and P.M. peak hours if the two percent criteria for the freeway off-ramp was used, the project would need to add 15 new trips on the freeway off-ramp during the A.M. and P.M. peak hours to meet the traffic impact analysis requirements. The project is projected to add 18 new trips during the A.M. peak hour and 13 new trips during the P.M. peak hour. Because the new trips during the A.M. peak hour or P.M. peak hour do not meet the two percent criteria for the off-ramp, further freeway off-ramp analysis is not required.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. As discussed under Responses VIII.e and f, the project site is not located within an airport land use plan or within two miles of a public or private airport. The nearest airports are the Santa Monica Municipal Airport and LAX, located approximately three miles and five miles to the west of the project site, respectively. The project would not introduce structures substantial enough to interfere with existing flight paths, or result in a measureable increase in airport traffic that would result in substantial safety risks. As such, no impacts would occur.

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact With Mitigation Incorporated. The project would not alter existing street patterns in the vicinity. There are no existing hazardous design features such as sharp curves or dangerous intersections on-site or within the project vicinity. The project would result in some modifications to access (i.e., new curb cuts for project driveways) from the streets that surround the project site. The project would introduce four new driveways. One driveway would be located along Venice Boulevard and would provide right-in right-out access to/from the project site for parking and delivery. One driveway located along Venice Boulevard, north of Ellis Avenue, would provide access and parking to service and delivery trucks. A service and fire access driveway are also provided along Venice Boulevard frontage. One driveway located along National Boulevard, adjacent to Venice Boulevard, would provide full signalized access to/from the project site. Another driveway along National Boulevard, adjacent to Washington Boulevard would provide right-in right-out access to the project site. The fourth driveway would be located along Washington Boulevard and would provide in/out right-turn-only access to the project site main parking area as well as valet parking for the proposed hotel.

Due to close spacing between the two proposed site driveways on National Boulevard and nearby intersections of National Boulevard/Venice Boulevard and National Boulevard/Washington Boulevard, the queue lengths along National Boulevard under Cumulative (2019) With Project conditions peak hour traffic were calculated. One of the driveways would include a signalized intersection per the prescribed mitigation measures. A Synchro microsimulation analysis was completed to determine these queue lengths as well as to determine any traffic operational issues at the adjacent intersections. The results indicated that the 95th 85th percentile queue in the southbound direction at the signalized driveway is ~~102 feet in A.M. peak and 148~~ 106 feet in the P.M. peak. In the northbound direction, the 95th 85th percentile queue is ~~92 46 feet in the A.M. peak and 138 feet in P.M. peak.~~ Implementation of Mitigation Measures TRAF-1 to TRAF-3 would mitigate any queueing issues at these intersections.

~~**Table B-26, Driveway Queueing Analysis,** presents these results. If an average vehicle length of 25 feet is used, the queueing at the signalized driveway would not cause blockage at nearby intersections of National Boulevard/Venice Boulevard and National Boulevard/Washington Boulevard. The analysis also indicates that the addition of a signalized driveway between the two existing signalized intersections on National Boulevard will not adversely impact the traffic operations on the corridor if appropriate turn pockets lengths and signal timing treatment is provided.~~

Table B-26
Driveway Queuing Analysis

National Boulevard at Signalized Driveway	95th Percentile Peak Hour Queue Length (Feet)^a	
	A.M.	P.M.
Northbound	92	138
Southbound	102	148

^a— An average vehicle length of 25 feet was used for this analysis.

Source: Kimley Horn and Associates, Inc., 2015.

Per Culver City regulatory requirements which would become a condition of approval, the project would provide the following design feature:

- Cut-outs along Venice Boulevard for loading and trash pickup shall be constructed to the satisfaction of Culver City, City of Los Angeles and Caltrans. Cut-outs along National Boulevard for trash pickup should be constructed to the satisfaction of Culver City.

Also, Culver City staff is in the process of providing a bus stop layout on Venice Boulevard which would be located west of the proposed driveway entrance to the Office Building. In order to minimize the queuing impacts and to provide adequate line of sight, the bus stop would be positioned at an adequate distance from the driveway to promote safe ingress and egress from the project site.

In order to minimize the pedestrian-vehicular conflicts, several measures have been incorporated throughout the project design including:

- Reducing or eliminating left turns to or from project driveways where possible.
- Adequately timing yellow and all-red clearance signals at traffic signals to ensure that drivers have sufficient time to clear the intersection before the display of pedestrian walk signals.
- Restricting (e.g. removal of on-street parking spaces on National Boulevard) parking around the project site since parked vehicles could obscure the vision of pedestrians and drivers.
- Provision of sidewalks all around the project site along Venice, National and Washington Boulevards.

In addition, per Culver City regulatory requirements which would become a condition of approval, the project would be required to or comply with the following measures:

- Visibility for motorists at all driveways and cut-outs shall be constructed to provide adequate sight distance for the 85th percentile speed of traffic.
- A Pedestrian Protection Plan shall be submitted to and approved by the Building Official. Such plan shall identify all areas of pedestrian protection and indicate the method of pedestrian protection or

pedestrian diversion when required. When pedestrian diversion is required, the Pedestrian Protection Plan must also be approved by the Public Works Director.

- Construction vehicles shall not be permitted to stage or queue where they would interfere with vehicular and pedestrian traffic or block access to adjacent properties. Off-site staging shall be at locations approved by the City Engineer and shall 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 Property. Construction-related vehicles shall not be permitted to park on public streets.
- 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 Property.

Further, the City of Los Angeles requires standard mitigation measures to reduce the potential for accidents where there could be conflicts between pedestrians and vehicles, including conflicts with students traveling to and from nearby schools. See Mitigation Measures TRAF-4 to TRAF-8 below.

All the above referenced design features, conditions of approval, and mitigation measures would be effective countermeasures for reducing the potential of vehicular-pedestrian crashes and would reduce any potentially significant impacts to less than significant levels.

Mitigation Measures

TRAF-4 The developer and contractors shall maintain ongoing contact with administrator of Hamilton High School. The administrative offices shall be contacted when demolition, grading and construction activity begin on the project site so that students and their parents will know when such activities are to occur. The developer shall obtain school walk and bus routes to the schools from either the administrators or from the LAUSD's Transportation Branch (323)342-1400 and guarantee that safe and convenient pedestrian and bus routes to the school be maintained. (City MM XIV-40: Public Services – Construction Activities Near School)

TRAF-5 LADBS shall assign specific haul route hours of operation based upon Hamilton High School hours of operation. Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the school during periods when school is in session especially when students are arriving or departing from the campus. (City MM XIV-50: Public Services – Schools Affected by Haul Route)

TRAF-6 The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety.

(Non-Hillside): Projects involving the import/export of 20,000 cubic yards or more of dirt shall obtain haul route approval by the Department of Building and Safety.

Projects involving the import/export of 1,000 cubic yards or more of dirt shall obtain haul route approval by the Department of Building and Safety. (City MM XVI-30: Transportation – Haul Route)

TRAF-7 The applicant shall submit a parking and driveway plan that incorporates design features that reduce accidents, to the Bureau of Engineering and the Department of Transportation for approval. (City MM XVI-40: Safety Hazards)

TRAF-8 Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.

Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.

Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.

Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account. (City MM XVI-80: Pedestrian Safety)

e. Result in inadequate emergency access?

Less Than Significant Impact. The project site is located in an established urban area that is well served by the surrounding roadway network. As discussed under Response VIII.g, Venice Boulevard, adjacent to the project site, and Robertson Boulevard, just west of the site, are transportation facilities that could be utilized during a disaster event.^{91,92} While it is expected that the majority of construction activities for the project would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day, including during construction of potential off-site infrastructure upgrades/improvements (i.e., water and sewer lines) (discussed below in Section XVII, *Utilities and Service Systems*). However, through-access for drivers, including emergency personnel, along all roads would still be provided. In these instances, the project would implement traffic control measures (e.g., construction flagmen, signage, etc.) to maintain flow and access. Furthermore, in accordance with Culver City and City of Los Angeles requirements, as applicable, the project would develop a Construction Management Plan, which includes designation of a haul route, to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access.

⁹¹ City of Los Angeles General Plan Safety Element – Critical Facilities and Lifeline Systems, Exhibit H November 26, 1996.

⁹² County of Los Angeles Department of Public Works. <http://dpw.lacounty.gov/dsg/disasteroutes/map/culver%20city.pdf> Accessed October 10, 2015.

Project operation would generate traffic in the project vicinity and would result in some modifications to access (i.e., new curb cuts for project driveways) from the streets that surround the project site. However, emergency access to the project site and surrounding area would continue to be provided similar to existing conditions. Emergency vehicles and fire access would be provided in three on-site locations: at grade access from Venice Boulevard adjacent to the Metro platform; at grade access under the podium structure from National Boulevard; and at grade access from Washington Boulevard adjacent to the Metro platform. The Project Applicant has coordinated with the LAFD and Culver City Fire Department throughout the development of the Comprehensive Plan and associated project site plans to ensure adequate emergency access. Nonetheless, future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and potential residents. Subject to review and approval of project site access and circulation plans by the LAFD and Culver City Fire Department, as necessary, the project would not result in inadequate emergency access. Therefore, project operation would result in a less than significant impact in this regard.

While impacts would be less than significant, the following standard City of Los Angeles mitigation measure is also prescribed to ensure impacts regarding emergency access are less than significant.

TRAF-9: The applicant shall submit a parking and driveway plan to the Bureau of Engineering and the Department of Transportation for approval that provides code-required emergency access. (City MM XVI-50: Inadequate Emergency Access)

f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less Than Significant Impact. As discussed in Attachment A, *Project Description*, and under Response X.b, above, the project site has been planned for and designated as PD-11 by Culver City to support a TOD. The TOD goals and objectives for the project per the PD-11 designation include: bringing shopping, housing, and employment together to advance the goals of enhanced regional air quality and multi-modal mobility for Culver City, City of Los Angeles and the region; promoting the Expo Line connection to USC, Staples Center and Downtown Los Angeles, Westside cities, and Downtown Culver City; and connecting the project with Culver City's Hayden Tract, and Arts District, with enhanced streetscape improvements including new bike lanes, new bus stops and shelters, wider sidewalks for pedestrians with new street trees, benches, bicycle racks, and wayfinding signs.

Per the the PD development program, the project would provide an all encompassing, mixed use transit oriented development adjacent to the Metro Station, with both Expo Line and project parking. In addition, per Culver City's standard conditions of approval, the project is required to meet the applicable provisions of CCMC Section 7.05.015 – "Transportation Demand and Trip Reduction Measures," which promote the use of public transit, ridesharing and other trip reduction measures. The project would provide a direct connection to the Metro Station via the proposed Transit Plaza. Pedestrian connections from each of the project's enhanced street frontages to the Metro Station would be provided by the project. The project would provide the required number of bicycle and parking spaces for Metro passengers. As discussed in Attachment A, once the second phase of the Expo Line is completed, the Metro Station will require only 300 spaces on-site, as opposed to the current 600 spaces. These requirements are as prescribed by Metro; not by the local agencies. As such, the

reduction in parking would not have an impact on Metro Expo Line public transit. Further, the project would be pedestrian oriented with permitted uses that are intended to draw locally from the surrounding neighborhoods and regionally through the Expo Line. Because the project has been designed as a TOD project per the PD-11 designation, it would be consistent with the City's plans and policies supporting increased alternative transportation use and facilities within a Transit Oriented Development area for which the site is located. Refer to Response X.b, above, for further discussion of the project's consistency with applicable policies supporting increased alternative transportation use and facilities.

The project site is located in an area well served by public transportation. In the existing transit system, 10 bus lines currently operate under four different transportation agencies that currently serve the project site. Three bus lines are operated by the Culver City Bus (CC); four bus lines are operated by the Los Angeles County Metropolitan Transportation Authority (MTA); two bus lines are operated by the Santa Monica Big Blue Bus (SM); and one bus line is operated by LADOT. There are three existing bus stops located adjacent to the site, with one each located on Venice, National, and Washington Boulevards. When the project is built (and the Washington Boulevard bus stop is extended to 180 feet), the National Boulevard bus stop would be eliminated. The bus stops on Venice and Washington Boulevards would be retained and maintained by the project.

The proposed TOD project would include a mix of office, retail, restaurant, residential and hotel uses including 300 dedicated parking spaces to Metro and 211 bicycle spaces. As shown in Table A-3, *Project Bicycle Parking Requirements*, in Attachment A of this MND, the project would be required to prove a total of 156 bicycle spaces based on applicable Culver City and City of Los Angeles Municipal Code requirements. By providing 211 bicycle parking spaces, the project would be well above the required number of bicycle spaces.

There is a Class II dedicated bicycle lane along Venice Boulevard in both east and west directions. A bicycle path (Class I) was constructed along most of the Expo Line rail alignment except between National Boulevard/Wesley Street and Venice Boulevard/Robertson Boulevard. Culver City is proposing to include a Class III (bike route) on Wesley Street and stripe Class II bike lanes on Washington Boulevard between Wesley Street and National Boulevard.

Per Culver City regulatory requirements which would become conditions of approval, the project would include the following features:

- The project would construct a Class II bicycle lane on National Boulevard between Washington Boulevard and Venice Boulevard in both directions and would serve as a key connection for bicyclists traveling between Washington Boulevard and Venice Boulevard.
- The project would restripe Washington Boulevard and National Boulevard, including bicycle lanes on both sides of Washington Boulevard and National Boulevard to the satisfaction of Culver City.
- The project would install a bike box, located on the west leg of the intersection of Washington Boulevard at National Boulevard, forward (easterly) of the marked crosswalk and the number two eastbound lane. The bike box will serve left turns for bicyclists transitioning from the southbound bike lane on National Boulevard to the eastbound bike lane on Washington Boulevard. This movement will provide continuity between the bike paths northerly of Venice Boulevard and southerly of Washington Boulevard.

These improvements combined with the City proposed improvements would result in a well-connected bicycle network in this area.

Overall, the project is not expected to interfere with or degrade the performance or safety of public transit, bicycle, or pedestrian facilities, and a less than significant impact would result.

XVII. UTILITIES AND SERVICE SYSTEMS

The following impact analysis pertaining to utilities and service systems includes information contained in the *Sewer Capacity Availability Report (SCAR)* processed by the City of Los Angeles Bureau of Sanitation (BOS) on November 17, 2014; the *Service Advisory Request (SAR)* approved by the Los Angeles Department of Water and Power on October 27, 2014; and SAR approved by the Golden State Water Company on November 3, 2014. These documents are provided under separate cover available at the Culver City Planning Division.

Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. As discussed in detail in Section IX, *Hydrology and Water Quality*, under the LARWQCB NPDES permit system, all existing and future municipal and industrial discharges to surface waters within Culver City and the City of Los Angeles are subject to applicable local, State and/or federal regulations. The project must comply with all provisions of the NPDES program and other applicable waste discharge requirements (WDRs), as enforced by the LARWQCB. Therefore, implementation of the project would not result in an exceedance of wastewater treatment requirements.

The City of Los Angeles Department of Public Works provides wastewater services for the project site. The project site is within the Hyperion Treatment System, which includes the Hyperion Treatment Plant (HTP), the Tillman Water Reclamation Plant (TWRP), the Los Angeles-Glendale Water Reclamation Plant (LAGWRP), and the Terminal Island Treatment Plant (TITP). Wastewater discharges from the project would be treated at the HTP. Following the secondary treatment of wastewater, the majority of effluent from HTP is discharged into the Santa Monica Bay while the remaining flows are conveyed to the West Basin Water Reclamation Plant for tertiary treatment and reuse as reclaimed water. HTP has two outfalls that presently discharge into the Santa Monica Bay (a one-mile outfall pipeline and a five-mile outfall pipeline). HTP effluent is required to meet the LARWQCB requirements for a recreational beneficial use, which imposes performance standards on water quality that are more stringent than the standards required under the Clean Water Act permit administered under the system's NPDES permit. Accordingly, HTP effluent to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. The Los Angeles County Department of Health Services also monitors flows into the Santa Monica Bay. Further, the HTP is required to comply with associated WDRs and any updates or new permits issued. WDRs set the levels of pollutants allowable in water discharged from a facility. Compliance with applicable WDRs would ensure that project implementation would not exceed the applicable wastewater treatment requirements of the LARWQCB with respect to discharges to the sewer system. As such, impacts would be less than significant in this regard.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Wastewater

Less Than Significant Impact. During project construction, a negligible amount of wastewater would be generated by construction workers. It is anticipated that portable toilets would be provided by a private company and the waste disposed off-site. Wastewater generation from construction activities is not anticipated to cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. Additionally, construction is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled collection of the HTP. Therefore, construction impacts to the local wastewater conveyance and treatment system would be less than significant.

Existing sewer lines within the City of Los Angeles are maintained by the City of Los Angeles Department of Public Works, Bureau of Sanitation. Existing sewer infrastructure within the City of Los Angeles adjacent the project site includes three, 8-inch sewer lines within Venice Boulevard; two of which are beneath the existing sidewalk along the frontage of the project site. Existing sewer lines within Culver City are maintained by City's Public Works Department. Existing sewer infrastructure within Culver City adjacent the project site include an 8-inch sewer line beneath both National Boulevard and Washington Boulevard.

The project sewer flows would be separated between the City of LA system in Venice Boulevard and City of Culver City system on Washington Boulevard. The proposed Office Building along Venice Boulevard would be connected to the 8-inch sewer lines adjacent to the site. Based on the project's Sewer Capacity Availability Report (SCAR), the City of Los Angeles' Bureau of Sanitation (BOS) provided a will serve letter noting that capacity is available for the project with the Venice Boulevard sewer lines.

Remaining project programming including the hotel and residential buildings within the Culver City boundary would be connected to the existing sewer system in Washington Boulevard based on the City requirements. The City has previously conducted a utility infrastructure study in November 2010 for the three potential projects (Access Culver City Project, Platform Project and Ivy Station Project) in the Washington National TOD area. The study concluded that Ivy Station project would need to extend the existing 12" sewer line located southwest of the project site by approximately 840 linear feet to serve the site. However, the City has recently discovered that additional sewer flows are needed for the system flowing northeasterly. In addition, the project sewer flows are being separated between the City of LA system in Venice Boulevard and City of Culver City system on Washington Boulevard, so the loading onto the Culver City system would be reduced. There are two sewer routing options for the project pending additional sewer study that would include sewer metering at key locations to determine existing capacities. The proposed sewer routing options are as follows:

- Option 1 – Connection to the existing 10" main immediately adjacent to the project site on Washington Boulevard intersection (west or northwest corner), if capacity is available. The City GIS map indicates an 8" main for this stretch, but the record as-built plan from the City shows an existing 10" line. The previous sewer study conducted for the Access Culver City site (8770 Washington Blvd) has shown that there is sufficient capacity further downstream of the project site

where both Access Culver City's sewer flow and the project site's flow converge at City MH ID B7-27 at Faye Avenue and National Boulevard, approximately 2,500 feet southeast of the project site. However, the existing stretch of 10" sewer main along Washington Boulevard and 12" sewer main along Faye Avenue would need to be assessed for adequate capacity to relay the additional sewer flow from the TOD site.

- If the existing 10" sewer main on Washington Boulevard has adequate capacity for the project, then there would be minimal disturbance immediate to the intersection for the proposed sewer connection. The project would also consider utilizing an existing sewer at this location along with any new service laterals.
- If the project requires an upgrade of the existing 10" main along Washington Boulevard, the following activities are anticipated:
 - o Curb Lane closure for traffic control along Washington Boulevard including Washington and National intersection. Construction traffic control plans would be generated for approval by the City.
 - o Phased construction to allow access to existing driveways and side streets.
 - o Utility trench plating for peak and off work hours.
 - o Construction timeframe would depend on the extent of the sewer main requiring upgrade. However, there would be limited utility conflicts since utilizing existing routing and manhole structures. Assuming that the sewer replacement would be limited to Helms Avenue (1,100 line feet), the anticipated construction timeframe would be 2-3 weeks.
- Option 2 – Extension of the existing 12" sewer main southwesterly of the project site per City's 2010 utility study. The recommendation states approximately 840 linear feet, but based on a review of the record plans and potential routing, the extension would be limited to approximately 725 linear feet with three manhole structures. Anticipated impact and activities for the improvements include the following:
 - Curb Lane closure for traffic control along Washington Boulevard. Construction traffic control plans would be generated for approval by the City.
 - Phased construction to allow access to existing driveways.
 - Utility trench plating for peak and off work hours.
 - Construction timeframe is anticipated to be approximately 2 weeks with traffic control, phasing, utility pot holing/verifications, etc. Critical utility verification for this routing would be the existing 39" storm drain crossing due to the shallow depth (+4') of the proposed sewer system.

Construction of the project would include all necessary on and off-site sewer pipe improvements and connections to adequately link the project to the existing City sewer system. The necessary improvements under either Option 1 or 2 above would be verified through the permit approval process of obtaining a sewer capacity and connection permit from the City. Under either option, construction-related impacts would be temporary and within the scope of impacts evaluated in this MND. However, the impacts of such construction activity would be temporary and on an intermittent basis. Further, a construction management plan (Mitigation Measure PS-1) for the project would be prepared in order to minimize disruptions to through traffic flow, which

would consider any off-site utility improvements, as necessary. See Response XIV.a above, for further discussion of the project's construction management plan.

As shown in **Table B-27, *Estimated Wastewater Generation***, implementation of the project would generate 107,255 gallons per day (gpd), or 102,350 gpd of wastewater beyond existing conditions. The HTP is designed to treat 450 million gallons per day (mgd) with an average dry water flow of approximately 362 mgd, leaving approximately 88 mgd of treatment capacity available.^{93,94} Given the current capacity of the HTP, project wastewater generation would account for a less than one percent increase in demand at the HTP and there would be ample capacity to treat this increase.

Table B-27

Estimated Wastewater Generation

Land Use	Quantity	Factor	Average Daily Flow (gpd)
Existing Land Uses			
Commercial	15,058 s.f.	50 gpd/1,000 s.f.	753 gpd
Light Industrial	6,434 s.f.	50 gpd/1,000 s.f.	322 gpd
Parking	191,500 s.f.	20 gpd/1,000 s.f.	3,830 gpd
		Total	4,905 gpd
Proposed Land Uses			
Residential	200 units	190 gpd/d.u.	38,000 gpd
Hotel	148 rooms	120 gpd/room	17,760 gpd
Office	185,229 s.f.	120 gpd/1,000 s.f.	22,227 gpd
Retail & Restaurant	53,280 s.f.	300 gpd/1,000 s.f.	15,984 gpd
Parking	664,200 s.f.	20 gpd/1,000 s.f.	13,284 gpd
		Total	107,255 gpd
Net Increase (Existing/Proposed)			102,350 gpd

s.f. = square feet; gpd = gallons per day; d.u. = dwelling unit.

Source: Generation factors based on Los Angeles Department of Public Works, Bureau of Sanitation, Sewerage Facilities Charge Sewage Generation Factor for Residential and Commercial Categories, dated April 6, 2012.

Based on the above, and given existing and anticipated future capacity at the wastewater treatment facilities and wastewater generation expected from the project, impacts regarding wastewater facilities would be less than significant.

⁹³ The HTP is an end-of-the-line plant, subject to diurnal and seasonal flow variation. It was designed to provide full secondary treatment for a maximum-month flow of 450 mgd, which corresponds to an average daily waste flow of 413 mgd, and peak wastewater flow of 850 mgd.. (Information regarding peak flow is included in the IRP, Facilities Plan, Volume 1, Wastewater Management, July 2004; page 7-3.)

⁹⁴ City of Los Angeles Bureau of Sanitation, Wastewater: Facts & Figures. Available at: <http://www.lacitysan.org/wastewater/factsfigures.htm>. Accessed September 2015.

Water

Less Than Significant Impact. During construction activities associated with the future development within the project site, there would be a temporary, intermittent demand for water for such activities as soil watering for site preparation, fugitive dust control, concrete preparation, painting, cleanup, and other short-term activities. Construction-related water usage is not expected to have an adverse impact on available water supplies or the existing water distribution system, and impacts would be less than significant.

Existing water lines within Culver City adjacent the project site include: two 6-inch water lines along the project site frontage on National Boulevard which combine into single 12-inch water lines near the intersection of Washington Boulevard and National Boulevard; and a single 16-inch water line within Washington Boulevard. The Golden State Water Company (GSWC) provides water and water treatment to Culver City, including the project site. The 8-inch line in Exposition Boulevard is to be abandoned. There is an existing 16-inch line in Washington Boulevard.

Existing water lines within the City of Los Angeles are operated by the LADWP. Existing water lines within the City of Los Angeles adjacent the project site include: an 8-inch water line on Venice Boulevard beneath the existing sidewalk along the frontage of the project site; a 54-inch water line within the center of Venice Boulevard; and an 8-inch water line across Venice Boulevard beneath the westbound lanes prior to running northwesterly along Ellis Avenue. Along with the GSWC, the LADWP provides additional water and water treatment to the project site.

The Office Building along Venice Boulevard would be connected to the 8-inch water line adjacent to the project site. The Hotel Building and Residential Building would be connected to the existing 6-inch and 12-inch water lines along National Boulevard. There are no water service connections proposed along Washington Boulevard. Each building (Office, Hotel, Residential) would have one on-site booster (duplex) pump to provide the necessary water pressure to the buildings. All connections and water-related infrastructure improvements would be provided by the project in consultation with the GSWC, LADWP, CCFD, and LAFD, as necessary. Further, all water line improvements and connections would be provided in consultation with the CCFD and LAFD to ensure that the minimum fire flow requirements would be provided to serve the proposed development.

GSWC purchases water from the West Basin Municipal District (WBMWD). The 2010 WBMWD Urban Water Management Plan (UWMP) provides water demand and water supply projections in five-year increments through 2035, which are based on regional demographic data provided by SCAG, as well as billing data for each major customer class, weather, and conservation. Year 2015 WBMWD water demand is 160,647 AFY while projected year 2035 water demand is 136,261 AFY; refer to **Table B-28, Projected West Basin Service Area Water Demand (AFY)**. Although the WBMWD's service area population is projected to increase, the overall potable demand in AFY is expected to decrease given further water use efficiency and recycled water program implementation. According to the water supply section of the UWMP, Year 2015 WBMWD water supply is 192,134 AFY while projected 2035 water supply is 197,275 AFY. Year 2015 has a water supply surplus of 31,487 AFY while projected year 2035 has a projected water supply surplus of 61,014 AFY. The WBMWD is projecting to more than double current recycled water supplies as well as invest in over 20,000 AFY of ocean-water desalination supply. Coupled with an additional doubling of conserved water supply through water use efficiency programs, the overall imported water use is expected to be cut nearly in half by 2035. According to the UWMP, the water supplies available to the WBMWD in single dry and multiple dry

Table B-28

Projected West Basin Service Area Water Demand (AFY)

Year	2010	2015	2020	2025	2030	2035
Baseline Demand ¹	168,987	192,134	198,218	197,408	197,451	197,275
Planned Conservation ²	14,000	15,119	21,039	21,640	22,971	23,632
Final Total Retail Demand	154,987	177,015	177,179	175,768	174,480	173,643
Recycled Water Demand ³	14,182	16,368	33,882	33,882	37,382	37,382
Final Potable Demand	140,805	160,647	143,297	141,886	137,098	136,261

1. Projections based on Water Demand Forecasting Model, 2010

2. Water Use Efficiency Plan, Alliance for Water Efficiency Model, 2010

3. Projections based on the Capital Implementation Master Plan 2009

Source: West Basin Municipal Water District, 2010 Urban Water Manage Plan, Table 3-3, prepared by RMC, dated May 2011.

years, will be sufficient to meet all present and future water supply requirements within the WBWMD's service area for at least the next 20 years.

The City of Los Angeles water supply comes from the Los Angeles Aqueduct, water purchased from the Metropolitan Water District of Southern California (MWD) (obtained from the California Aqueduct and the Colorado River Aqueduct), and local groundwater sources. LADWP's 2010 UWMP provides water demand projections in five-year increments through 2035. **Table B-29, Water Demand Forecast Through 2035**, shows the projected water demand for the City of Los Angeles through 2035. As shown in Table B-28, the City of Los Angeles water demand is projected to reach 599,563 AFY in 2015 while projected year 2035 water demand is 641,622 AFY. According to the water reliability section of the UWMP, LADWP expects to have a reliable supply of up to 614,800 AFY in 2015 and 710,800 AFY in 2035. This is in contrast to LADWP's estimated demand of 599,563 AFY, or a difference of 15,237 AFY in 2015 and 641,622 AFY, or a difference of 69,178 AFY in 2035. As further discussed in the UWMP, LADWP expects to maintain a reliable water supply, in part by increasing the City sources of water and reducing purchases from the MWD. During times of severe water shortages, when MWD allocates its imported water, LADWP customers have adapted and reduced consumption per restrictions in the Emergency Water Conservation Plan Ordinance. For example, current implementation of Shortage Year Rates and appropriate phase related conservation measures of the Ordinance has resulted in reducing the total customer water usage, on average, by approximately 17.3 percent for the months of June 2009 through June 2013. Regarding the MWP's ability to sell water to the LADWP, the MWD's 2010 Regional UWMP shows that with its investments in storage, water transfers and improving the reliability of the Delta, water shortages are not expected to occur within the next 25 years.

Table B-29

Water Demand Forecast Through 2035^a
(In Acre-Feet Per Year)

Water Use Sector	2005^b	2010^b	2015	2020	2025	2030	2035
Single-Family	233,192	196,500	225,699	236,094	241,180	246,879	247,655
Multi-Family	185,536	166,810	178,782	193,220	202,999	213,284	218,762
Commercial/Gov	107,414	130,386	135,112	133,597	129,761	126,567	120,420
Industrial	62,418	19,166	18,600	16,852	14,708	12,634	10,513
Non-Revenue	26,786	32,909	41,370	42,969	43,627	44,421	44,272
Total	615,346	545,771	599,563	622,732	632,275	643,785	641,622

^a Based on normal weather conditions and with passive conservation.

^b Actual data reflecting water used for 2005 and 2010, respectively.

Source: Los Angeles Department of Water and Power, 2010 Urban Water Management Plan, Exhibit 2J.

The project would result in an estimated water demand of 128,706 gpd, or 46,977,690 gallons per year, (approximately 144 AFY) when fully occupied, or 137.4 AFY beyond existing conditions.⁹⁵ The estimated 137.4 AFY increase in water demand generated by the project would constitute approximately 0.07 percent and 0.09 percent of the WBMDW year 2015 water supply and water demand, respectively. The estimated 137.4 AFY increase in water demand would constitute approximately 0.02 percent and 0.02 percent of the MWD year 2015 water supply and water demand, respectively.⁹⁶ Further, the project would comply with Chapter XII: The Water Conservation Plan of the City of Los Angeles, of the LAMC and Title 5: Public Works, Chapter 5.03: Water Conservation and Water Supply Shortage Program, of the CCMC, as applicable. In addition, the project has committed to measuring its sustainable performance by using LEED for New Construction and LEED for Neighborhood Development, in addition to meeting the Culver City and City of Los Angeles mandatory green building requirements. The project would also comply with the WBMWD UWMP and LADWP UWMP recommendations regarding drought management and water conservation. An example of water the project's water conservation measures would include the use of a stormwater harvesting system, which treat and store rainwater and then allow the project to reuse the rainwater for irrigation through the site. This would allow the project to use less potable water for irrigation. With implementation of water conservation measures per the requirements cited above, the project's actual water demand would be well below the conservative amount stated above. Based on the above, no additional water treatment facilities are required to meet the water supply demands associated with the project, and the project would not require the construction or expansion of water treatment facilities. Therefore, water infrastructure impacts associated with the project operation would be less than significant.

⁹⁵ The water demand would be consistent with the estimated wastewater generation of the project per Table B-26, Estimated Wastewater Generation. To be conservative, 20 percent was added (to account for outdoor water use). $107,255 \text{ gpd} \times 1.20 = 128,706 \text{ gpd}$. $128,706 \times 365 = 46,977,690 \text{ gallons per year} = 144 \text{ AFY}$ estimated project water demand. Existing: $4,905 \times 1.20 = 5,886 \text{ gpd}$. $5,886 \times 365 = 2,148,390 \text{ gallons per year} = 6.6 \text{ AFY}$. 144 AFY estimated project water demand – 6.6 AFY estimated existing water demand = 137.4 AFY beyond existing conditions.

⁹⁶ These are conservative percentages as both Culver City (GSWC) and LADWP would provide water and water treatment to the project site.

c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. As discussed in detail in Section IX, *Hydrology and Water Quality*, the project would include new stormwater drainage facilities that would be constructed in accordance with applicable regulatory requirements. The proposed design would create localized drainage inlets between the proposed buildings to capture the stormwater runoff and relay it to the stormwater treatment system for the project. The proposed condition would capture, treat, and control all on-site stormwater runoff prior to discharging or connecting to the off-site storm drain system. Environmental impacts associated with development of the project, including on-site drainage facilities, have been evaluated throughout this document. As concluded in this document, all potentially significant impacts associated with development of the project, including on-site stormwater drainage facilities, would be less than significant after implementation of the prescribed mitigation measures, where necessary. Therefore, impacts would be less than significant in this regard.

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant Impact. As described in Response XVII.b, above, the project would fall within the 2010 WBMWD UWMP and 2010 LADWP UWMP available and projected water supplies. According to the UWMPs, the water supplies available in single dry and multiple dry years would be sufficient to meet all present and future water supply requirements within the applicable service areas for at least the next 20 years, including the project. As a result, the project is within the capacity of the GSWC and LADWP to serve the project as well as existing and planned future water demands of its service area.

Sections 10910-10915 of the State Water Code (Senate Bill [SB] 610) requires the preparation of a water supply assessment (WSA) demonstrating sufficient water supplies for a project that is: 1) a shopping center or business establishment that will employ more than 1,000 persons or have more than 500,000 square feet of floor space; 2) a commercial office building that will employ more than 1,000 persons or have more than 250,000 square feet of space, or 3) any mixed-use project that would demand an amount of water equal to or greater than the amount of water needed to serve a 500 dwelling unit subdivision. As discussed under Response XVII, the project would generate a net water demand of 137.4 AFY beyond existing conditions (without accounting for water conservation features). With implementation of water conservation measures per the requirements cited above, the project's actual water demand would be well below the conservative amount stated above. A typical 500 dwelling unit subdivision would have a water demand of approximately 154 AFY.⁹⁷ As the project does not meet the established thresholds, no WSA is required for this project.

Thus, for the reasons listed above, the project would have a less than significant impact with respect to water entitlements and supply.

⁹⁷ Based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates, a Residential Single-Family (3-BR) unit generates 230 gallons per day (gpd) of wastewater. Assuming water demand is 20% greater than wastewater, single-family unit would have a water demand of 138,000 gpd or 154 AFY.

While impacts would be less than significant, the following standard City of Los Angeles mitigation measure is prescribed to further ensure that the project's water supply impacts remain less than significant.

Mitigation Measure

UTIL-1 Install/retrofit high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate.

Install/retrofit restroom faucets with a maximum flow rate of 1.5 gallons per minute.

Install/retrofit and utilize only restroom faucets of a self-closing design.

Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.

Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.). (City MM XVII-60)

e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As indicated in the Response XVII.b, implementation of the project would generate 107,255 gpd of wastewater, or a net increase of 103,350 gpd of wastewater beyond existing conditions. The HTP is designed to treat 450 mgd with an average dry water flow of approximately 362 mgd, leaving approximately 88 mgd of treatment capacity available. Given the current capacity of the HTP, project wastewater generation would account for a less than one percent increase in demand at the HTP and there would be ample capacity to treat this increase. Therefore, the project would have a less than significant impact with respect to wastewater treatment capacity.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. The Culver City Sanitation Division collects residential solid waste. Commercial and industrial solid waste is picked up by private haulers. The division also provides a curbside recycling program including paper, cardboard, cans/aluminum, plastic, and glass. The recyclable materials are

hailed to private recyclable material companies. Culver City does not own or operate any landfill facilities, and the majority of its solid waste is disposed of at County landfills.

Solid waste management in the City of Los Angeles involves both public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. The BOS is responsible for developing strategies to manage solid waste generation and disposal in the City of Los Angeles. The BOS collects solid waste generated primarily by single-family dwellings, small multi-family dwellings, and public facilities. Private hauling companies collect solid waste generated primarily from large multi-family residential, commercial, and industrial properties. The City of Los Angeles does not own or operate any landfill facilities, and the majority of its solid waste is disposed of at County landfills.

The remaining disposal capacity for the County's Class III landfills is estimated at approximately 129.2 million tons as of December 31, 2012, the most recent data available.⁹⁸ In addition to in-County landfills, out-of-County disposal facilities may also be available to Culver City and the City of Los Angeles. Aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County's landfills, and based on the Los Angeles County Integrated Waste Management Plan (ColWMP), the County anticipates that future Class III disposal needs can be adequately met through 2027 through a combination of landfill expansion, waste diversion at the source, out-of-County landfills, and other practices.

As illustrated in **Table B-30, *Projected Solid Waste Generated During Operation***, and based on solid waste generation factors from the California Integrated Waste Management Board (CIWMB), the project could generate approximately 2,473 lbs/day (1.236 tons/day or 451.15 tons/year) of solid waste, or approximately 2,366 lbs/day (1.182 tons/day or 431.44 tons/year) of solid waste beyond existing conditions. The annual amount of solid waste generated by the project would represent a minor amount of the estimated 129.2 million tons of remaining disposal capacity for the County's Class III landfills. As such, the solid waste generated by the project could be accommodated by the County's available regional landfills.

The California Department of Resources and Recycling and Recovery (CalRecycle) is the California State Agency that promotes the importance of reducing waste and oversees California's waste management and recycling efforts. CalRecycle has issued jurisdiction waste diversion rate targets equivalent to 50 percent of the waste stream as expressing in pounds per person per day. Thus, it is important to note that the estimate of solid waste generated by the project is conservative, in that the amount of solid waste that would need to be landfilled would likely be less than this forecast based on the City's implementation of solid waste diversion targets.

Construction of the project would result in generation of solid waste such as scrap, lumber, concrete, residual wastes, packing materials, and plastics which could require disposal of construction associated debris at the landfills. It is anticipated that a large amount of the construction debris would be recycled. Disposal and recycling of the construction debris would be required to comply with all federal, State, and local regulations. Culver City's standard conditions of approval specifically require the following:

⁹⁸ County of Los Angeles Department of Public Works, *County of Los Angeles Countywide Integrated Waste Management Plan: 2012 Annual Report*. August 2013.

Table B-30

Projected Solid Waste Generated During Operation

Land Uses	Quantity	Factor^a	Solid Waste Generated (lbs/day)	Solid Waste Generated (tons/day)	Solid Waste Generated (tons/year)
Existing Land Uses					
Commercial	15,058 s.f.	5 lbs/k.s.f./day	75	0.038	13.87
Light Industrial	6,434 s.f.	5 lbs/k.s.f./day	32	0.016	5.84
		Total	107	0.054	19.71
Proposed Land Uses					
Residential	200 units	4 lbs/unit/day	800	0.400	146.00
Hotel	148 rooms	2 lbs/room/day	296	0.148	54.02
Office	185,229 s.f.	6 lbs/k.s.f./day	1,111	0.555	202.58
Retail & Restaurant	53,280 s.f.	5 lbs/k.s.f./day	266	0.133	48.55
		Total	2,473	1.236	451.15
Net Increase (Existing/Proposed)			2,366	1.182	431.44

Notes: d.u. = dwelling unit; s.f. = square feet; k.s.f.= thousand square feet; lbs. = pounds.

^a Generation factors provided by the CalRecycle website, refer to Estimated Solid Waste Generation Rates.
<http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/default.htm>, accessed September 2015.

Source: PCR Services Corporation, 2015.

- Reasonable efforts shall be used to reuse and recycle construction and demolition debris, to use environmentally friendly materials, and to provide energy efficient buildings, equipment and systems. A Demolition Debris Recycling Plan that indicates where select demolition debris is to be sent shall be provided to the Building Official prior to the issuance of a demolition permit. The Plan shall list the material to be recycled and the name, address, and phone number of the facility of organization accepting the materials.

In addition, the project would comply with Title 5: Public Works, Chapter 5.01: Solid Waste Management, of the CCMC (as required by Culver City's conditions of approval) and Chapter 6, Public Works and Property, Article 6, Garbage, Refuse Collection, of the LAMC. According to the CCMC and LAMC, the Project Applicant would submit a construction and demolition recycling and waste assessment plan prior to issuance of the permit. Monthly reports would be submitted throughout the construction of the project. Further, summary reports with documentation would be submitted prior to final inspection. Therefore, the project would not cause any significant impacts from conflicting with statutes or regulations related to solid waste.

Based on the above, a less than significant impact regarding solid waste would occur.

g. Comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. All local governments, including Culver City and the City of Los Angeles, are required under Assembly Bill 939 (AB 939), the Integrated Waste Management Act of 1989, to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to landfills. Cities must divert at least 50 percent of their solid waste generation into recycling. If the City's target is exceeded, the City would be required to pay fines or penalties from the State for not complying with AB 939. The waste generated by the project would be incorporated into the waste stream of Culver City, and diversion rates would not be substantially altered. The project does not include any component that would conflict with state laws governing construction or operational solid waste diversion and would comply pursuant to local implementation requirements. Thus, less than significant impacts regarding compliance with AB 939 would occur with project implementation.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact With Mitigation Incorporated. The preceding analysis does not reveal any significant unmitigable impacts to the environment. Based on these findings, the project is not expected to degrade the quality of the environment. The existing site is developed with one- and two-story residential structures. The site does not support sensitive plant or animal species. As discussed above in Response V.a, impacts regarding historical resources would be less than significant. Therefore, impacts would be less than significant, and no mitigation measures are necessary.

The proposed project would not substantially impact any scenic vistas, scenic resources, or the visual character of the area, as discussed in Section I, and would not result in excessive light or glare. The project site is located within an urbanized area with no natural habitat. The project would not significantly impact any sensitive plants, plant communities, fish, wildlife or habitat for any sensitive species after incorporation of mitigation, as discussed in Section IV. Potentially significant impacts to nesting birds and street trees would be reduced to a less than significant level with implementation of the prescribed mitigation measures. Adverse impacts to archaeological and paleontological resources could occur. However, construction-phase procedures would be implemented in the event any important archaeological or paleontological resources are discovered during grading and excavation activities, consistent with Mitigation Measures CULT-1 to CULT-7.

This site is not known to have any association with an important example of California's history or prehistory. The environmental analysis provided in Section III concludes that impacts related to emissions of criteria pollutants and other air quality impacts will be less than significant. Sections VII and IX conclude that impacts related to climate change and hydrology and water quality will be less than significant after implementation of the prescribed mitigation measures, where applicable. Based on the preceding analysis of potential impacts in

the responses to items I thru XVII, no evidence is presented that this project would degrade the quality of the environment. The City hereby finds that impacts related to degradation of the environment, biological resources, and cultural resources will be less than significant with mitigation incorporated, as necessary.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact With Mitigation Incorporated Cumulative impacts can result from the interactions of environmental changes resulting from one proposed project with changes resulting from other past, present, and future projects that affect the same resources, utilities and infrastructure systems, public services, transportation network elements, air basin, watershed, or other physical conditions. Such impacts could be temporary, usually consisting of overlapping construction impacts, as well as long term, due to the permanent land use changes involved in the project.

The project would generally result in nominal environmental impacts, as discussed herein. Construction-related impacts related to noise and pollutant emissions would be at less than significant levels and therefore would not contribute substantially to any other concurrent construction programs that may be occurring in the vicinity. The project's contribution to long-term, cumulative impacts would not be substantial with implementation of the City's existing policies, programs, conditions of approval and regulatory requirements. Particularly, the project is subject to development impact fees and property taxes to offset project-related impacts to public services and utility systems, such as fire protection services, traffic control and roadways, storm drain facilities, and other public facilities and equipment. Where impacts have been identified, mitigation measures have been crafted and will be made a part of the project's conditions of approval. Further, consistent with CEQA, since the project would not result in significant and unavoidable impacts, it would not result in impacts that are cumulative considerable. The City hereby finds that with mitigation measures incorporated the contribution of the project to cumulative impacts would be less than significant.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact With Mitigation Incorporated. Based on the analysis of the project's impacts in the Responses I thru XVII, there is no indication that this project could result in substantial adverse effects on human beings. While there would be a variety of effects during construction related to traffic, noise and air quality, these impacts would be less than significant based on compliance with applicable regulatory requirements and established impact thresholds, as well as the prescribed mitigation measures, where applicable. Long-term effects would include increased vehicular traffic, traffic-related noise, periodic on-site operational noise, minor changes to on-site drainage, and changing of the visual character of the site, with a majority of these impacts affecting adjacent roadway segments and intersections. The analysis herein concludes that direct and indirect environmental effects will at most require mitigation to reduce to less than significant levels. Generally, environmental effects will result in less than significant impacts. Based on the analysis in this Initial Study, the City finds that direct and indirect impacts to human beings will be less than significant with mitigation incorporated, as necessary.

XIX. EARLIER ANALYSIS

None.

REFERENCES

1. *Shade/Shadow Report* prepared by PCR in December 2015.
2. *Air Quality Technical Report* prepared by PCR in December 2015.
3. *Historical Resources Assessment and Environmental Impacts Analysis* prepared by PCR in December 2015.
4. *Phase I Archaeological and Paleontological Resources Assessment* prepared by PCR in December 2015.
5. *Geotechnical Engineering Investigation Proposed Mixed Use Development South side of National Boulevard between Venice Boulevard and Washington Boulevard, Culver City and Los Angeles, California*, prepared by Geotechnologies, Inc., dated December 22, 2014.
6. *Greenhouse Gas Technical Report* prepared by PCR in December 2015.
7. *Draft Phase I Environmental Site Assessment Venice-National-Exposition Triangle, Culver City, California*, prepared by Bureau Veritas North American, Inc., dated June 13, 2014.
8. *Limited Subsurface Investigation Report Venice-National-Exposition Triangle, Culver City, California*, prepared by Bureau Veritas North American, Inc., dated December 10, 2015.
9. *Draft Workplan for Soil Assessment at T.W.S. Products Company 8801 Washington Boulevard, Culver City, California 90232 LARWQCB Case #R-36325*, prepared by Alpha Environmental, dated September 22, 2015.
10. *Noise and Vibration Technical Report* prepared by PCR in December 2015.
11. *Ivy Station, Culver City, Mixed-Use Transit Oriented Development (TOD) at Washington Blvd. and National Blvd. Traffic Impact Analysis*, prepared by Kimley Horn, dated ~~October~~ November 2015.
12. *Ivy Station TOD Supplemental Traffic Analysis*, prepared by Kimley Horn, dated January 21, 2016.
13. *Ivy Station TOD Cumulus Project Traffic Analysis (Information Purposes Only)*, prepared by Kimley Horn, dated March 2016.
14. *Sewer Capacity Availability Report (SCAR)* processed by the City of Los Angeles Bureau of Sanitation on November 17, 2014.
15. *Service Advisory Request (SAR)* approved by the Los Angeles Department of Water and Power on October 27, 2014.
16. *Service Advisory Request (SAR)* approved by the Golden State Water Company on November 3, 2014.

ATTACHMENT C
MITIGATION MONITORING PROGRAM



ATTACHMENT C MITIGATION MONITORING PROGRAM

The following environmental mitigation measures shall be incorporated into the project development as conditions of approval. The project applicant shall secure a signed verification for each of the mitigation measures which indicate that mitigation measures have been complied with and implemented, and fulfills the City environmental and other requirements (Public Resources Code Section 21081.6.). Final clearance shall require all applicable verification as included in the following table. The City of Culver City will have primary responsibility for monitoring and reporting the implementation of the mitigation measures unless otherwise determined appropriate per consultation with the City of Los Angeles. The mitigation measures have been identified by impact category and numbered for ease of reference.

MITIGATION MONITORING PROGRAM				
P2015-0141-CP - Comprehensive Plan; P2015-0141-HTEX – Height Exception; P2015-0141-TTM – Tentative Tract Map				
February 1, 2016				
MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<u>AESTHETICS</u> AES-1: All landscaped areas shall be maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect in accordance with LAMC Sections 12.40 and 12.41. The final landscape plan shall be reviewed and approved by the City of Los Angeles Department of City Planning during the building permit process. (City of Los Angeles MM I-10: Landscape Plan). AES-2: Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above. (City of Los Angeles MM I-120: Light) AES-3: The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat. City of Los Angeles MM I-130: Glare)	Condition of Approval	Plan Check Notes and Field Inspections	Prior to Building Permits	Los Angeles Department of City Planning, Building and Safety; Culver City Planning, Building Safety Division



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February 1, 2016				
MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<u>AESTHETICS</u> AES-1: All landscaped areas shall be maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect in accordance with LAMC Sections 12.40 and 12.41. The final landscape plan shall be reviewed and approved by the City of Los Angeles Department of City Planning during the building permit process. (City of Los Angeles MM I-10: Landscape Plan). AES-2: Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above. (City of Los Angeles MM I-120: Light) AES-3: The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat. City of Los Angeles MM I-130: Glare)	Condition of Approval	Plan Check Notes and Field Inspections	Prior to Building Permits	Los Angeles Department of City Planning, Building and Safety; Culver City Planning, Building Safety Division

MITIGATION MONITORING PROGRAM P2015-0141-CP - Comprehensive Plan; P2015-0141-HTEX – Height Exception; P2015-0141-TTM – Tentative Tract Map February 1, 2016				
MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
<u>AIR QUALITY</u>				
AIR-1: Open trash receptacles shall be located a minimum of 50 feet from the property line of any residential zone or use. Trash receptacles located within an enclosed building or structure shall not be required to observe this minimum buffer. (City of Los Angeles MM III-60: Commercial Trash Receptacles)	Condition of Approval	Plan Check Note and Field Inspections	Prior to Issuance of Building Permit	Los Angeles Department of Building and Safety; Culver City Building Safety Division
<u>BIOLOGICAL RESOURCES</u>				
BIO-1: The Applicant shall be responsible for the implementation of mitigation to reduce impacts to migratory and/or nesting bird species to below a level of significance through one of two ways. Vegetation removal activities shall be scheduled outside the nesting season which runs from February 15 to August 31 to avoid potential impacts to nesting birds. This would insure that no active nests are disturbed. Any construction activities that occur during the nesting season shall require that all suitable habitat be thoroughly surveyed for the presence of nesting birds by a qualified biologist, retained by the Applicant as approved by the City of Culver City, before commencement of clearing and prior to grading permit issuance. The survey shall be conducted within 72 hours prior to the start of construction. A copy of the pre-construction survey shall be submitted to the City. If any active nests are detected, a buffer of at least 300 feet (500 feet for raptors) shall be delineated, flagged, and avoided until the qualified biological monitor has verified that the young have fledged or the nest has otherwise become inactive. If the biologist determines that a narrower buffer between the project activities and observed active nests is warranted, he/she should submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) to the City of Culver City and, upon request, the	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Demolition, Grading and Building Permits	Los Angeles Department of Building and Safety, Public Works; Culver City Planning

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California Department of Fish and Wildlife Service. Based on the submitted information, the City of Culver City (and the Department, if the Department requests) shall determine whether to allow a narrower buffer. BIO-2: Removal of trees in the public right-of-way requires approval by the Board of Public Works. The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works (213-847-3077). The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Mitigation measures such as replacement by a minimum of 24-inch box trees in the parkway and on the site, on a 1:1 basis, shall be required for the unavoidable loss of significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) trees in the public right-of-way. All trees in the public right-of-way shall be provided per the current Urban Forestry Division standards. (City of Los Angeles MM IV-90: Tree Removal – Public Right-of-Way)				
<u>CULTURAL RESOURCES</u> CULT-1: The Applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the project. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (younger alluvium vs. older alluvium), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. Monitoring may be adjusted, or ceased entirely, as determined appropriate by the archaeological monitor.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Los Angeles Department of Building and Safety; Culver City Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division

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CULT-2: In the event that archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 25 feet shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by a qualified archaeologist. The Applicant shall coordinate with the archaeologist to develop an appropriate treatment plan for the resources. In preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes. CULT-3: The archaeological monitor shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources. The report and the Site Forms shall be submitted by the Applicant to Culver City, the City of Los Angeles, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.				

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CULT-4: A qualified Paleontologist shall be retained to develop and implement a paleontological monitoring program for construction excavations that would encounter older Quaternary alluvium. The Paleontologist shall attend a pre-grading/excavation meeting to discuss a paleontological monitoring program. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Paleontologist during construction excavations into older Quaternary alluvium. Monitoring 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. The frequency of monitoring inspections shall be determined by the Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the paleontological monitor. CULT-5: If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. A buffer area of at least 25 feet shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. 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 and evaluation. If preservation in place is not feasible, the paleontologist shall implement a paleontological salvage program to remove the resources from the project site. Any fossils encountered and recovered shall be prepared to the point of				

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identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school. CULT-6: The paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the lead agency and the Natural History Museum of Los Angeles County, and other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures. CULT-7: If human remains are encountered unexpectedly during implementation of the project, 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, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation				

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may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment. Whenever the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.				
<u>Geology and Soils</u> GEO-1: Site-specific structural and seismic design parameters and recommendations for foundations, retaining walls/shoring, and excavation shall be implemented per the project's Final Geotechnical Engineering Investigation, subject to review and approval by Culver City Building Safety Division and/or Los Angeles Department of Building and Safety, as necessary. GEO-2: The applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading and Building Permits and a Foundation Plan	Los Angeles Department of Building and Safety; Culver City Building Safety Division and Building Safety Inspector

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Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor. (City of Los Angeles MM VI-20: Erosion/Grading/Short-Term Construction Impacts) GEO-3: A deputy grading inspector shall be on-site during grading operations, at the owner's expense, to verify compliance with these conditions. The deputy inspector shall report weekly to the Department of Building and Safety (LADBS); however, they shall immediately notify LADBS if any conditions are violated. "Silt fencing" supported by hay bales and/or sand bags shall be installed based upon the final evaluation and approval of the deputy inspector to minimize water and/or soil from going through the chain link fencing potentially resulting in silt washing off-site and creating mud accumulation impacts. "Orange fencing" shall not be permitted as a protective barrier from the secondary impacts normally associated with grading activities. Movement and removal of approved fencing shall not occur without prior approval by LADBS. (City of Los Angeles MM VI-40: Grading/20,00- Cubic Yards, or 60,000 Square feet of Surface Area or Greater)				
Greenhouse Gases GHG-1: Low- and non-VOC containing paints, sealants, adhesives, solvents, asphalt primer, and architectural coatings (where used), or pre-fabricated architectural panels shall be used in the construction of the Project to reduce VOC emissions to the maximum extent practicable. (City of Los Angeles MM VII-10: Greenhouse Gases).	Condition of Approval	Plan Check Notes and Field Inspection	Prior to Building Permit	Los Angeles Department of Building and Safety; Culver City Building Safety Division and Building Safety Inspector

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<u>Hazards and Hazardous Materials</u> HAZ-1: Prior to the issuance of a use of land or building permit, or issuance of a change of occupancy, the applicant shall obtain approval from the Fire Department and the Department of Public Works, for the transport, creation, use, containment, treatment, and disposal of the hazardous material(s). Approved plans for the transport, creation, use, containment, treatment, and disposal of the hazardous material(s) shall be submitted to the decision-maker for retention in the case file. (City of Los Angeles MM VIII-60: Hazards and Hazardous Materials). HAZ-2: If the LARWQCB issues a case closure determination upon completion of the work outlined in the Draft Workplan for impacted soils at the 8801 Washington Boulevard site in accordance with Low Threat Case Closure Criteria, a Soils Management Plan (SMP) shall be prepared if to address the proper handling of soils that contain hydrocarbons at levels below the case closure criteria during construction activities. The SMP shall include procedures for handling, transportation, disposal, onsite controls, and Personal Protective Equipment (PPE) requirements for contractors. Soil that would be excavated in order to construct the underground parking shall be monitored in accordance with the SMP as well as regulations of the South Coast Air Quality Management District (SCAQMD). Impacted soil, if encountered, shall be segregated into stockpiles, which would be transported to an offsite facility for proper disposal. The stockpile(s) shall be tested in accordance with the requirements of the disposal facility. HAZ-3: If the LARWQCB determines that the subsurface soils characterization results of the Draft Workplan for impacted soils at the 8801 Washington Boulevard site do not meet the Low Threat Case Closure Criteria, the project applicant shall prepare a Soil Remediation Plan for review and approval by the LARWQCB. The	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Grading Permit and Building Permit and On-Going during Construction	Los Angeles Department of Building and Safety, Public Works, and Fire Department; Culver City Building Safety Division; Building Safety Inspector; Fire Prevention; Fire Inspector; Planning Division

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plan would include measures to remove and/or treat/remediate the impacted soils to a level determined acceptable per applicable regulatory standards, under supervision of a certified environmental consultant licensed to oversee such remediation. Upon completion of the Soil Remediation Plan, the project applicant shall contact the LARWQCB to obtain a closure letter that states no further soils testing or remediation is required on the project site. HAZ-4: Prior to the issuance of any permit for the demolition or alteration of the existing on-site buildings, a comprehensive asbestos-containing materials (ACMs) survey of the buildings shall be performed. If no ACMs are found, the Applicant shall provide a letter to the Culver City Building Safety Division and/or Los Angeles Department of Building and Safety, as necessary, from a qualified asbestos abatement consultant indicating that no Asbestos-Containing Materials (ACMs) are present in the on-site buildings. If ACMs are found to be present, they shall be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations. HAZ-5: Prior to issuance of any permit for the demolition or alteration of the existing structure(s), a comprehensive lead-based paint (LBP) materials survey shall be performed to the written satisfaction of the Culver City Building Safety Division and/or Los Angeles Department of Building and Safety, as necessary. Should LBP materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations.				
<u>Hydrology and Water Quality</u> WQ-1: If dewatering activities occur on-site during future redevelopment, samples shall be obtained from the water and analyzed for volatile organic compounds (VOCs) and oxygenates to ensure that they do not exceed applicable discharge requirements. Should the samples exceed VOC, oxygenates or any other applicable	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	On-Going During Construction	Los Angeles Department of Building and Safety; Culver City Planning, Public Works, and Building

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discharge requirement, a dewatering plan shall be prepared by the Project Applicant for submittal to the Los Angeles Regional Water Quality Control Board (LARWQCB) and other appropriate agencies determined appropriate in consultation with the LARWQCB for review and approval. The plan shall include but not be limited to sampling of groundwater that may be contaminated; and treatment and disposal of contaminated groundwater in compliance with applicable regulatory requirements. Written verification from the LARWQCB of approval of a dewatering plan completion shall be submitted to the City of Culver City Department of Planning and Public Works prior to issuance of grading permit.				Safety Division
<u>Noise</u> NOISE-1: An acoustical analysis of the architectural plans of the proposed buildings shall be prepared by a qualified acoustical engineer, prior to issuance of building permits, to ensure that the building construction (i.e., exterior wall, window, and door) would provide adequate sound insulation to meet the acceptable interior noise level of 45 dBA CNEL.	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Building Permit	Los Angeles Department of Building and Safety; Culver City Building Safety Division; Building Safety Inspector; Planning Division
<u>Public Services</u> PS-1: <u>Construction Traffic Management Plan</u> – A Construction Traffic Management Plan shall be developed by the project contractor in consultation with the project's traffic and/or civil engineer and approved by the City of Culver City City Engineer and Planning Manager and the City of Los Angeles Department of Public Works prior to issuance of any project demolition, grading or excavation permit. The Construction Traffic Management Plan shall also be reviewed and approved by the Cities Fire and Police Departments. The Culver City City Engineer and Planning Manager reserve the right to reject any engineer at any time and to require that the Plan be prepared by a different engineer. The construction management plan shall include, at a	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Demolition, Grading and Building Permits and On-Going during Construction	Los Angeles Department of Building and Safety, Public Works, Fire and Police Departments; Culver City Planning, Public Works, Fire and Police Departments

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minimum, the following: ▪ The name and telephone number of a contact person who can be reached 24 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 site, and maps showing access to and within the 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; ▪ Identify the locations of the off-site truck parking and staging and provide measures to ensure that trucks use the specified haul route, and do not travel through nearby residential neighborhoods or schools; ▪ Schedule vehicle movements to ensure that there are no vehicles waiting off-site and impeding public traffic flow on surrounding streets; ▪ Establish requirements for loading/unloading and storage of materials on the project site; ▪ During construction activities when construction worker parking cannot be accommodated on the project site, a Construction Worker Parking Plan shall be prepared which identifies alternate parking location(s) for construction workers and the method of transportation to and from the				

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project site (if beyond walking distance) for approval by Culver City and the City of Los Angeles. The Construction Worker Parking Plan shall prohibit construction worker parking on residential streets and prohibit on-street parking, except as approved by Culver City and the City of Los Angeles. PS-2: The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane. (City of Los Angeles MM XIV-10: Fire) PS-3: Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. (City of Los Angeles MM XIV-20: Public Services Police Demolition/Construction Sites) PS-4: The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department.				

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Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits. (City of Los Angeles MM XIV-30: Public Services/Police)				
<u>Transportation/Traffic</u> TRAF-1: <u>Robertson Boulevard at National Boulevard Intersection.</u> Re-stripe the eastbound approach to provide two left-turn, one through and one through-right lane per consultation with and approval by LADOT and Culver City. Should improvement be deemed infeasible by LADOT and/or Culver City, the City(s) shall substitute an alternative measure of equivalent effectiveness. TRAF-2: <u>National Boulevard at Venice Boulevard Intersection.</u> Re-stripe the northbound approach to provide two left-turn, two through and one right-turn lanes per consultation with and approval by LADOT and Culver City. Provide minor striping re-alignment for the north leg of National Boulevard if required per the direction of LADOT and Culver City. Should improvement be deemed infeasible by LADOT and/or Culver City, the City(s) shall substitute an alternative measure of equivalent effectiveness. TRAF-3: <u>National Boulevard.</u> Install a traffic signal at the project's main driveway on National Boulevard between Venice Boulevard and Washington Boulevard, and provide traffic signal interconnection to adjacent traffic signals to the satisfaction of Culver City. A southbound right turn lane shall be installed along National Boulevard at the intersection of Washington/National and at the Main Project Driveway/National. TRAF-4: The developer and contractors shall maintain ongoing contact with administrator of Hamilton High School. The administrative offices shall be contacted when demolition, grading and construction activity begin on the project site so that students and their parents will know when	Condition of Approval	Plan Check Notes, Reports, Surveys and Field Inspections	Prior to Building Permit Issuance and Prior to any Certificate of Occupancy and Temporary Certificate of Occupancy	Los Angeles Department of Transportation, Building and Safety; Culver City Traffic Engineering, Engineering/ Public Works and Planning Division

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such activities are to occur. The developer shall obtain school walk and bus routes to the schools from either the administrators or from the LAUSD's Transportation Branch (323)342-1400 and guarantee that safe and convenient pedestrian and bus routes to the school be maintained. (City of Los Angeles MM XIV-40: Public Services – Construction Activities Near School). TRAF-5: LADBS shall assign specific haul route hours of operation based upon Hamilton High School hours of operation. Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the school during periods when school is in session especially when students are arriving or departing from the campus. (City of Los Angeles MM XIV-50: Public Services – Schools Affected by Haul Route). TRAF-6: The developer shall install appropriate traffic signs around the site to ensure pedestrian and vehicle safety. (Non-Hillside): Projects involving the import/export of 20,000 cubic yards or more of dirt shall obtain haul route approval by the Department of Building and Safety. Projects involving the import/export of 1,000 cubic yards or more of dirt shall obtain haul route approval by the Department of Building and Safety. (City of Los Angeles MM XVI-30: Transportation – Haul Route) TRAF-7: The applicant shall submit a parking and driveway plan that incorporates design features that reduce accidents, to the Bureau of Engineering and the Department of Transportation for approval. (City of Los Angeles MM XVI-40: Safety Hazards) TRAF-8: Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant				

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to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times. Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility. Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects. Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account. (City of Los Angeles MM XVI-80: Pedestrian Safety) TRAF-9: The applicant shall submit a parking and driveway plan to the Bureau of Engineering and the Department of Transportation for approval that provides code-required emergency access. (City of Los Angeles MM XVI-50: Inadequate Emergency Access)				
Utilities and Service Systems UTIL-1: Install/retrofit high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate. Install/retrofit restroom faucets with a maximum flow rate of 1.5 gallons per minute. Install/retrofit and utilize only restroom faucets of a self-closing design. Install and utilize only high-efficiency Energy	Condition of Approval	Plan Check Notes, and Field Inspections	Prior to Building Permit	Los Angeles Department of City Planning, Building and Safety; Culver City Planning, Building Safety Division

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Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance. Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.). (City of Los Angeles MM XVII-60)				