Culver CITY

(310) 253-5710
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PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

PROPOSED MITIGATED NEGATIVE DECLARATION

Project Title and File No.: Culver Studios Comprehensive Plan Amendment No. 6
P2015-0069-CP/MAM - Comprehensive Plan Major Modification
P2015-0069-HPCA – Historic Preservation Certificate of Appropriateness
P2015-0069-MND - Mitigated Negative Declaration

Project Location: 9336 Washington Boulevard

Project Sponsor: The Culver Studios

Project Description: The Culver Studios has submitted a development project application for a Comprehensive Plan Amendment (No. 6) and a Historic Preservation Certificate of Appropriateness to update and modernize their facilities and operations. The proposed development project consists of the following:

- Three new office buildings ranging in heights of 52.5' to 56' and resulting in a net increase of 180,093 sq. ft. of office facilities (297,965 sq.ft. of office total).
- The demolition of 41,096 sq.ft. of support and stage facilities (188,581 sq.ft. of stage and support facilities to remain).
- The relocation of four historic bungalows.
- A new 56' high multi-level (6 levels above grade and 2 levels below grade) parking structure located off of Van Buren Place containing 1,408 parking stalls (total spaces onsite is 1,875 spaces).

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 this 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 proposed 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 measure, and any other material which constitute the record of proceedings upon which the City based its decision to adopt this MITIGATED NEGATIVE DECLARATION may be obtained at:

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

The public is invited to comment on the proposed MITIGATED NEGATIVE DECLARATION during the review period, which ends **Wednesday, November 18, 2015.**

Susan Yun, Senior Planner October 28, 2015

ATTACHMENT 6

Culver CITY

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PLANNING DIVISION

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

INITIAL STUDY

ENVIRONMENTAL CHECKLIST FORM AND ENVIRONMENTAL DETERMINATION

Project Title/ Case Nos:	Culver Studios Comprehensive Plan Amendment No. 6 P2015-0069-CP/MAM - Comprehensive Plan Major Modification P2015-0069-HPCA – Historic Preservation Certificate of Appropriateness P2015-0069-MND - Mitigated Negative Declaration		
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:	9336 Washington Boulevard		
Nearest Cross Street:	Culver Boulevard, Washington Boulevard and Ince Street	**APN:**	4206-022-001 4206-022-002 4206-022-003 4206-022-004 4206-022-005
Project Sponsor's Name & Address:	The Culver Studios 9336 Washington Boulevard Culver City, CA 90232		
General Plan Designation:	Studio	**Zoning:**	Studio (S)
Overlay Zone/Special District:	Redevelopment Project Component Area No. 3		

Project Description and Requested Action: *(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)*

The Culver Studios has submitted a development project application for a Comprehensive Plan Amendment (No. 6) and a Historic Preservation Certificate of Appropriateness to update and modernize their facilities and operations. The proposed development project consists of the following:

- Three new office buildings ranging in heights from 52.5' to 56' and resulting in a net increase of 180,093 sq. ft. of office facilities (297,965 sq.ft. of office total).
- The demolition of 41,096 sq.ft. of support and stage facilities (188,581 sq.ft. of stage and support facilities to remain).
- The relocation of four historic bungalows.
- A new 56' high multi-level (6 levels above grade and 2 levels below grade) parking structure located off of Van Buren Street containing 1,408 parking stalls (total spaces onsite is 1,875 spaces).

The three new production office buildings and a new parking structure will be integrated into an existing studio lot environment, comprising the following:

	Total GSF	Height/Stories	
Building O*	90,000	55.5'[1] / 4 stories	
Building Y	84,700	56'[2] / 4 stories	
Building R*	31,000	52.5'[3] /4 stories	
Total	**205,700**		
Van Buren Parking Structure	455,000	56'[4] / 5 stories / 6 Levels	1,408 Parking Spaces

*Basement level not included in square footage totals – used as infrastructure utility rooms only (Building O: 21,400 gsf, Building B: 27,300 gsf)

Culver Studios will demolish a total of eight structures, including existing Building O and Y, the Commissary Building, Building X, L and Z, Stage 10, and the existing parking structure near Van Buren Place resulting in a total building reduction of 66,703 sf of either office, support or stage spaces.

Buildings removed to accommodate the construction of a new and expanded Building O include the Commissary Building, Building L, Building X, and existing Building O, all abutting Ince Boulevard. The removal of Building X, which houses the fire pump, is in conjunction with a realignment of the entrance at Gate 3. This realignment will also include the relocation of the guard shack at Gate 3, with the goal to make the entry at this location more efficient for studio vehicles and emergency vehicles, while reducing potential impacts to Ince Boulevard from queuing activities at the gate. Existing Building O, Building L and the commissary would be replaced by a new and expanded "Building O". Building O will be four stories and 55.5 feet in height.

Other buildings removed consists of the demolition of three existing buildings at the southernmost end of the studio property to support the construction of the new and expanded Building Y at that location. Buildings that would be removed include Buildings Y (existing) and Z, and Stage 10. Buildings Y (existing) and Z are primarily used for studio support functions. Stage 10 is used as a support stage for studio operations/filming. These three structures would be replaced by the new and expanded "Building Y", identified for use as office. Buildings Y is four stories and 56 feet tall. Building Y would step down to approximately 32 feet tall adjacent to the residential buildings located to the south.

Gate 4, located at the southern end of the property near Building Y will be realigned closer to Carson street to provide more efficient ingress and egress and improved maneuverability for emergency vehicles accessing the Culver Studios. Further, the proposed gate 4 will create two 14 foot lanes.

Building R is a wedged shaped addition proposed where currently there is a surface parking lot. Building R is proposed to be built alongside Stages 2, 3 & 4 located near the rear lawn of the studio administration building. Building R is four stories, will have a height of 52'-06", and will be used primarily for office space.

[1] Building O- 69' to Top of Architectural Projection/Mechanical Screen
[2] Building Y- 69' to Top of Architectural Projection/Mechanical Screen
[3] Building R – 52'- 06" to Top of Mechanical Screen/Roofline
[4] Van Buren Parking Structure – 59'.06" to Top of Parapet.

Existing Building J, located adjacent to Gate 2 along Ince Boulevard, will undergo a façade renovation of the studio elevation and a portion of the north elevation so that the building is better integrated with the design of the adjacent new Building O and other new and existing buildings on the lot. The vertically-oriented façade strategy of the upper floors of new Building O becomes a dense screen that wraps around the studio façade of Building J, integrating it with the overall composition and bringing it into alignment with the current design concept. This new screen conceals the incongruous existing Building J façade behind a new vertical batten-style exterior, consistent with the proposed Van Buren Garage and Buildings O & Y, offering a strong counterpoint to the long, squat building dimensions that predominate on the studio lot. The screen walls blend these buildings with the dominant sound stages, protects the functional needs of the production office uses inside, provide shading devices as a sustainable feature and contributes in creating a cohesive studio-wide aesthetic. Materials include wood and wood-colored materials on the façade screens which contrast with the large expanses of stucco wall surfaces, creating warmth and texture for the office buildings. The stucco facades of the new buildings are consistent, in general, with the materiality of the studio lot.

New Van Buren Parking Structure:

The three new office buildings will be supported by a new multi-level parking structure located adjacent to Van Buren Place. In order to accommodate the new parking structure, the existing two and a half level parking structure and surface parking lot adjacent to Van Buren Street will be demolished.

The new parking structure is 56' in height and will consist of two subterranean levels and six levels above grade with a total of 1,408 parking stalls. The project will increase the Culver Studios total parking supply to 1,875 spaces. They will have a surplus of approximately 334 spaces above their required amount of 1,541 spaces. Access to the Van Buren Parking structure will be from Ince Boulevard through gates 2 and 3. There will be an emergency access for Fire Department use only off of Van Buren Place.

The new parking structure intends to accommodate additional growth of the studio and to reduce the offsite impacts of production vehicles access and parking by having a dual function of also being a production vehicle staging area. The proposed Van Buren Garage will incorporate high clearance parking bays on both the ground level and 1st Basement level which are designed and structured to allow production vehicles to use the garage as a "base camp" in lieu of current operations (along the west side of Ince Boulevard between Gates 2 and 4). These levels will allow sufficient clear heights and structural capacity to shift those aspects of Studio operations within the property boundaries.

As a noise and visual buffer to the neighboring residences on Van Buren, the parking structure includes a landscaped linear parklike setback of 15' for the entire length of the structure. On the either side of the parking structure there is an 18' building setback from the property line. Also, the structure façade fronting Van Buren will have a green metal screen attached to it. Climbing type vines shall be planted to the metal mesh along the Van Buren frontage and on both north and south sides of structure to further enhance the façade treatment.

A Historic Preservation Certificate of Appropriateness is requested to relocate the historic Bungalows currently located next to the parking structure near Van Buren Place. The project will also involve the relocation of four existing historic bungalows, Buildings S, T, U, & V, from the westerly portion of the property to a new location behind the Mansion Building, respecting the historic spacing and alignment of the bungalows as it has existed in the past.

The project also includes offsite improvements including new curb, gutter, sidewalk, and new or replacement of some street trees, street lights and parking meters along Ince Boulevard. It also includes new driveway and one new street tree on Van Buren Boulevard

Other studio improvements include upgrades to aging infrastructure on the lot such as the electrical distribution system, centralized air conditioning systems, and domestic/fire water systems supporting the stages and production office buildings. Many of these systems were installed during the early decades of lot operations, and anticipated upgrades will promote efficiency and modernize equipment.

Existing Conditions of the Project Site:

The Culver Studios project area is relatively flat, covering approximately 14 acres, and is developed with approximately 347,549 sq. ft. of office, stage and support space. The Studios include subterranean, surface and an above ground multi-level parking structure. Vehicle access to the site is provided from Washington Boulevard and Ince Boulevard via four gates, with an emergency access gate provided on Van Buren Place. The existing buildings vary in height from single-story structures to approximately 80 feet in height, with varying setbacks. A cluster of historic buildings, including the Mansion building (Building C), form the primary view of the studios from the north. The Mansion faces a vacated portion of Washington Boulevard, separated by a front lawn.

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

The Culver Studios is located within a developed urban setting. Due to the size of the studios project area it sits adjacent a variety of uses, including single-family and multi-family residences, commercial development and other studio uses

West: Offices, single and multi-family residential dwelling units and an elementary school.
East: Light industrial, studio facilities, and single and multi-family residential.
North: The vacated portion of Washington Boulevard and a surface parking lot entitled for development with a commercial development.
South: Single-family and multi-family residential.

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

Culver City City Council for the Design for Development Amendment

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
- ☐ Agriculture and Forestry Resources
- ☐ Air Quality
- ☐ Biological Resources
- ☐ Cultural Resources
- ☐ Geology /Soils
- ☐ Greenhouse Gas Emissions
- ☐ Hazards & Hazardous Materials
- ☐ Hydrology / Water Quality
- ☐ Land Use / Planning
- ☐ Mineral Resources
- ☐ Noise
- ☐ Population / Housing
- ☐ Public Services
- ☐ Recreation
- ☐ Transportation/Traffic
- ☐ Utilities / Service Systems
- ☐ 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 REPO**RT 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 — 10/28/15 Date

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	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?	☐	☐	☒	☐

Responses:

a) **Less Than Significant Impact.** The project is located in an urbanized area, with commercial and residential buildings in the immediate vicinity. The topography surrounding the site is relatively flat with no substantial ocean or mountain views that can be considered scenic that will be affected by the project. Although the project proposes new buildings up to 56' in height and the immediate surrounding area consists of primarily of one to three story buildings, the proposed buildings would not block any scenic vistas that are not already obscured or blocked by other buildings and structures in the area.

Mansion (Building C) and Front Lawn from Washington Blvd.: Under the project, the Mansion (Building C) would not be physically demolished, relocated or altered, including the primary view looking south into the studio from the public right of way directly at the front of the Mansion. The project does not currently include plans to alter the front lawn landscaping. However, approval of the project includes a condition that any proposed plans for changes to the Mansion's front lawn landscaping in the future identify the character-defining features of that area and that plans be reviewed by a qualified preservation professional for submittal to the City according to the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes.

Stage 2/3/4 and Building I from Gate 2: While the Manson's immediate surroundings would be changed on the south side - a secondary elevation, the surroundings would not be materially impaired and Building C would continue to convey its historical significance. Stage 2/3/4's north elevation which is partially visible from the public right of way looking south into the studio from Gate 1, is a secondary elevation and has a characteristic shape and profile but otherwise is a blank wall with "The Culver Studios" painted wall sign. The painted wall sign does not appear in historic photographs and is a recent alteration, not a historic sign. The north front of Stage 2/3/4 would project above the new Building R, exposing the distinctive character defining parapet. Stage 2/3/4 would remain otherwise intact, and would still be visually prominent when viewed from the center of the studio lot and from Gate 2. As the primary (east elevation) of Stage 2/3/4 is oriented toward the center of the studio lot, the construction of Building R (and completion of the entire project) would not obscure primary views of the east front of Stage 2/3/4. Therefore, the project would result in a less than significant impact because Stage 2/3/4 would remain eligible as a historical resource under national and state criteria A/1 and would remain eligible for local designation for its association with early motion picture production on the lot. Building I's visibility from Gate 1 should not be altered under the project. As included below in the Cultural Resources section, mitigation measure CR-4 stipulates that detailed plans for the new Building R - are to be developed according to the Secretary of the Interior's Standards.

Bungalows (Buildings S, T, U and V): After relocation, the four bungalows which are currently not visible as a group from the public right of way (through Gate 3) will have greater visibility from Gate 2. The configuration and layout of Buildings S, T, U and V under the project would retain the historic grouping of the four bungalows within the studio lot, including the existing architectural hierarchy and elements of the bungalows' original setting. The orientation, however, and site plan will be slightly altered due to the confined setting of the proposed new site. The special relationship of

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

the relocated bungalows to the adjacent Building I, the Mansion, Stage 2/3/4 and the new Building R is consistent with distances between buildings in their current location.

b). **Less Than Significant Impact.** The proposed Project will involve the continued development of an existing, fully developed studio use in an urbanized area of the City of Culver City. The project will not result in an impact on scenic resources such as trees, rock outcroppings or historic buildings within a state scenic highway. There are no identified state scenic highways adjacent to the project site. No mitigation measures are necessary.

c). **Less Than Significant Impact with Mitigations Incorporated.** The project will modify the existing view-scape along the Ince Boulevard portion of the site, with the replacement of three structures with one new structure of different massing and appearance. Building O will replace existing Building O. The existing Building O is approximately 39 feet in height. The new Building O will have a height of 55.5' feet to the top of the roof and 69 feet to the top of the proposed rooftop equipment. The exterior of Building O facing Ince Boulevard and the Krueger Street intersection is a large stucco wall with windows of varying sizes and a curved roof. The design for the new Building O will include the use of steel windows and doors, painted plaster, painted steel, metal panels, and glass. The base of Building O has a series of steel framed windows with a transom level of clear glass above a higher set of translucent glass panes, giving the facade scale and variety. The rooflines of the new Building O will be more distinct than the existing buildings it will replace, in that it be sloped and gabled to complement existing sound stages. The existing commissary building has a height of 17 feet and Building L has a height of 26 feet, which will also be removed as part of the project.

Building Y will employ similar strategies to Building O, but at different scales and for different functions. Both have solid double height bases-a reference to the solidity and mass of the historic buildings on site; both have more dynamic, sculptural upper floors which are contemporary interpretations of industrial buildings. The new Building Y will be located in generally the same footprint of the existing Building Y. In addition, about a 30' portion of Building Y, in reference to the existing height of Building Y which is 29' high, is stepped down in building height to from 55'-6" to 32' to minimize negative visual impacts to the adjacent residences directly to the south and to the west.

The Van Buren Parking Structure is functionally different from the other buildings and requires a design response sensitive to its day to day operations and its location along a residential street. The garage is 56' in height to the roofline and has a building length spanning 415'. In efforts to minimize potential negative noise and visual character or quality of its residential surrounding, the mass of the building is setback 15' from the western property line and a lineal landscape creates a buffer between the west façade and the street. In addition, the garage is setback 18' on the north and south, reducing potential conflicts with neighboring uses. The façade is heavily planted and rendered in muted colors which are a natural extension of the coloration of the drought –tolerant landscape below. Additional visual mitigations include installation of columnar trees and climbing vines along the north and south of the parking structure. Climbing type vines will also be planted to the metal mesh along the Van Buren frontage to further enhance the façade treatment. Incorporation of the mitigations mentioned above reduces the potential impact to less than significant.

c.1). **Less Than Significant Impact** The Project would modify the height of existing structures on the Project Site, which could introduce new or increased shade/shadow effects on adjacent shade-sensitive uses. In order to determine the extent of the shading from these uses, shading diagrams were prepared (included in the Comprehensive Plan for the Project) to indicate the shading patterns that would occur during the times specified in the *City of L.A. CEQA Thresholds Guide*. Culver City does not have specific shade/shadow thresholds. Thus, the City defers to guidance from the City of LA CEQA Thresholds Guide (2006).

According to the City of *L.A.'s CEQA Thresholds Guide*, significant shading impacts would occur if a shade-sensitive use is shaded for more than three consecutive hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (PST) from mid-November through mid-March, or for more than four consecutive hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (PDT) from mid-March through mid-November.

Uses that would be sensitive to shading impacts include "routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

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.[5] .

As illustrated by the shading diagrams for the Project contained in the Comprehensive Plan, shadows for all other times of the year can be interpolated between the four seasons and would not exceed the shadows identified as occurring at these four points in time. Shadow lengths, based on the Project's building heights, are identified for specific times of the day and vary according to the season of the year. In the Project area, sensitive receptor sites include outdoor areas associated with single-family and multi-family residences to the east and west of the existing on-site parking structure on the north side of Van Buren Place, as well as the multi-family residences to the north of Ince Boulevard. No other uses, including various industrial and warehouse uses surrounding the site, are considered shade-sensitive uses.

(a) Winter Solstice

The shading diagrams for winter solstice conditions, which is based on the Project's height and mass, depicts the shading pattern that would be created by the Project's structural components. As shown in the shading diagram, the Project's 9:00 A.M. shadow would extend to the west of the parking structure along Van Buren Place into a predominantly multi-family residential area, casting shadows onto the three adjacent residential parcels to the west of the structure. However, by 12 P.M., only a very small portion of the eastern edge of the most proximate residential properties (4014 and 4016 Van Buren Place), is still shaded and this portion of the parcel does not contain any routinely useable outdoor spaces. Specifically, this property consists of two, two-story multi-family structures aligned along a north-south axis, which generally causes shading between the two buildings for most of the day (during any season), the northern edge of the building is generally shaded throughout the day based on the sun's path of travel in the Northern Hemisphere, and the concrete walkway on the east edge of the property is currently shaded by the existing parking structure between the hours of 9:00 A.M. and 12:00 P.M. under existing conditions and nonetheless does not contain any routinely usable outdoor space. The only portion of the property that would be considered routinely usable outdoor space would be the property's front yard along Van Buren Place; however, as illustrated in the shading diagram, shadows would not be cast on this area at any time between 9:00 A.M. and 3:00 P.M. As such, the Project would not cast shadows on any routinely usable outdoor spaces or other shade-sensitive uses for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. during winter solstice conditions. Therefore, shading impacts at this location would be considered less than significant.

As also shown in the shading diagrams, the Project would shade various multi-family residential uses and associated outdoor spaces to the north side of Ince Boulevard beginning after 12:00 P.M. By 3:00 P.M., however, the shadows that would affect the shade-sensitive uses at the noon hour would have moved completely out these affected residential parcels. Similarly, those shade-sensitive properties that were not shaded at the 12:00 P.M. hour would be shaded at the 3:00 P.M. hour. Nonetheless, new shading effects at any one of these properties between 12:00 P.M. and 3:00 P.M. would occur for less than the three-hour threshold limit in the affected residential areas. Therefore, the Project would not exceed the City's accepted threshold during the afternoon period at these locations and shading impacts would be less than significant.

Thus, overall, any new shading at off-site, shade-sensitive sites would not occur for more than three consecutive hours between the hours of 9:00 A.M. and 3:00 P.M. PST. Therefore, shading from the Project would not exceed the City's accepted shade threshold and would have a less than significant impact during the winter solstice.

[5] City of Los Angeles. *L.A. CEQA Thresholds Guide*. 2006. Page A.3-1

(b) Spring and Autumn Equinoxes

The shading diagrams contained in the Comprehensive Plan for the Project illustrate future shade conditions during the spring and fall equinox (which are identical and therefore are evaluated as one set of shade conditions for both seasons). As shown in the shading diagrams, at 9:00 A.M., the shadow from the Project would extend to the adjacent residential properties to the west of the parking structure on Van Buren Place (4014 and 4016 Van Buren Place). By 12:00 P.M., however, the shadow would be entirely to the east of this residential property and would not affect any off-site, shade-sensitive sites. Any new shading during the morning period would occur less than the three-hour threshold limit in the adjacent residential area. Therefore, the Project would not exceed the City's accepted threshold during the morning period.

Between 12:00 P.M. and 3:00 P.M., the Project's shadow would generally occur on the street right-of-way and sidewalks along Ince Boulevard. This area does not contain off-site, shade-sensitive uses. However, as shown in the shading diagrams, shading would occur at two shade-sensitive locations at the 3:00 P.M. hour, including the front yard of multi-family residential uses north of Ince Boulevard and residential use immediately east of the proposed expanded parking structure on the north side of Van Buren Place (4064 Van Buren Place). However, based on the shading diagrams, shading effects at these locations would begin to occur at approximately 2:00 P.M. based on interpolation of shadows between 12:00 P.M. and 3:00 P.M. As such, the Project could cast shadows on these properties between the hours of 2:00 P.M. and 5:00 P.M., or up to three hours. However, the duration of shading would not occur for more than four consecutive hours prior to 5:00 P.M. PDT. Therefore, any new shading at off-site, shade-sensitive sites would not occur for more than four consecutive hours between the hours of 9:00 A.M. and 5:00 P.M. PDT. Therefore, shading from the Project would not exceed the City's accepted shade threshold and would have a less than significant impact during the spring or autumn equinoxes.

(c) Summer Solstice

The shading diagrams contained in the Comprehensive Plan for the Project illustrate future shadow conditions during the summer solstice. As shown therein, at 9:00 A.M., the shadow from the Project would extend to the west of the on-site parking structure to the eastern edge of the adjacent multi-family residential uses located at 4014 and 4016 Van Buren Place and to the northernmost portion of the rear yard of single-family residential units east of the parking structure located at 4114 through 4120 Van Buren Place. By 12:00 P.M., however, these shadows would move to the north and east of these residential areas and would not affect any off-site, shade-sensitive sites. Any new shading during the morning period would occur less than the four-hour threshold limit in the residential area. Therefore, the Project would not exceed the City's accepted shade threshold during the morning period.

During afternoon hours, between 12:00 P.M. and 3:00 P.M., the Project would shade a small section of the western portion of the multi-family residential use located at 4064 Van Buren Place as well as the buildings in the western portion of the multi-family residential parcel located immediately east of the Project site at 4175 Ince Boulevard. The outdoor areas at both of these sites would be shaded for a maximum of approximately three hours between approximately 2:00 P.M. and 5:00 P.M. The duration of shading would not occur for more than four consecutive hours prior to 5:00 P.M. PDT. As such any new shading at off-site, shade-sensitive sites would not occur for more than four consecutive hours between the hours of 9:00 A.M. and 5:00 P.M. PDT. Therefore, shading from the Project would not exceed the City's accepted shade threshold and would have a less than significant impact during the summer solstice.

d). **Less than Significant Impact.** Excessive or inappropriately directed lighting can adversely impact night-time views by reducing the ability to see the night sky and stars. Glare can be caused from unshielded or misdirected lighting sources. Reflective surfaces (i.e., polished metal) can also cause glare. Impacts associated with glare range from simple nuisance to potentially dangerous situations (i.e., if glare is directed into the eyes of motorists).

There are lighting sources adjacent to this site, including free-standing street lights, light fixtures on buildings, pole-mounted lights, traffic signals and vehicle headlights. The proposed project includes building interior and exterior lighting, parking structure lighting (interior/ceiling and roof top pole lights) and lighting in the landscaped area in front of the new Van Buren Parking structure. Light spillover and glare will be prevented by requiring lighting fixtures to be

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

recessed and/or shielded and directed downward to prevent the light from shining directly onto surrounding property per the requirements of the Culver City Municipal Code. The light poles at the top level of the parking structure is restricted in height at no more than 18' including any base it sits on. They are located at the center of the parking structure, away from the edges of the parking structure so as to minimize glare onto neighboring properties. Compliance with the Municipal Code standards and special lighting guidelines as set forth in the Comprehensive Plan for lighting will ensure that lighting and glare impacts associated are less than significant.

Sources of daytime glare are typically concentrated in commercial areas containing large surface areas that may produce glare. Glare results from development and associated parking areas that contain reflective materials such as glass, highly polished surfaces, and expanses of pavement. The proposed building's exterior walls will primarily be surfaced with painted plaster, but does have corrugated metal and standing seam metal surfaces as well as glass windows. These metal surfaces and windows have the potential to produce glare. Substantial glare would only likely occur when the sun is low in the sky so as to reflect off of vertical surfaces onto other lower elevations. At other times, when the sun is higher in the sky, reflection would be directed immediately downwards. The windows and metal materials make up a similar percentage of the wall surface area as is typical for the area. The corrugated metal has a low reflectivity rating and the curved undulating curved surface of it will prevent any substantial directed glare from occurring. In addition, the standing seam metal surfaces will be painted thus reducing the potential for glare. The materials are not placed in any manner that would create a collective glare on any other location. Given the low potential for glare from the materials in the design of the proposed building, reflective glare impacts would be less than significant.

Mitigation Measure(s):

A-1: The Van Buren parking structure shall include a linear landscape area within the 15' building setback area from the western property line for the entire length of the parking structure as demonstrated in the final approved Comprehensive Plan CPA No. 6 document. Climbing type vines shall be planted to the metal mesh that is proposed along the parking structure frontage.

A-2: On the north and south side of the Van Buren parking structure, there shall be a landscape area within the 18' building setback area from the property line. The landscape buffer area shall include columnar and evergreen type trees. Further, climbing vines that will grow along the north and south side parking structure walls shall be installed in the landscape area. The landscaping details as to the type and number of trees shall be included in the project landscaping and irrigation plans during building permit phase and shall be prepared to the satisfaction of the Planning Manager.

II. AGRICULTURE RESOURCES 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?	☐	☐	☐	☒

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact
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 12220(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?	☐	☐	☐	☒

Responses:

a). **No Impact.** The proposed project will be located in a fully developed, commercial, urbanized area that does not contain agriculture or forest uses. The map of Important Farmland in California (2010) prepared by the Department of Conservation does not identify the project site as being Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. In addition, the Culver City General Plan does not identify any areas for agriculture use. Therefore, there will be no conversion of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance to a non-agricultural use as a result of this project. No impact will occur.

b). **No Impact.** No Williamson Act contracts are active for the project site. In addition the project site is currently zoned Studio (S), which do not permit agricultural uses. Therefore, there will be no conflict with existing zoning for agricultural use or a Williamson Act contract. No impact will occur.

c). **No Impact.** Public Resources Code Section 12220(g) identifies forest land as *land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.* The project site and surrounding properties are not currently being managed or used for forest land as identified in Public Resources Code Section 12220(g). The USDA Forest Service vegetation maps for the project site identify it as *urban* type, indicating that it is not capable of growing industrial wood tree species. The project site has already been graded and developed with Studio related uses, with a lawn area in front of the Mansion building and ornamental landscaping in and around the site. Therefore, development of this project will have no impact to any timberland zoning.

d). **No Impact.** The project site is already graded land with existing development with limited ornamental landscaping; thus, there will be no loss of forest land or conversion of forest land to non-forest use as a result of this project. No impact will occur.

e). **No Impact.** The project site is a previously developed site within an urban environment. The project is surrounded by other commercial and residential uses. None of the surrounding sites contain existing forest uses. Development of this project will not change the existing environment in a manner that will result in the conversion of forest land to a non-forest use. No impact will occur.

Mitigation Measure(s): None required

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	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?	☐	☐	☒	☐

Responses:

a). **Less Than Significant Impact.** The project site is within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Orange, Riverside, and San Bernardino counties. Air quality conditions in the Basin are under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD and the Southern California Association of Governments (SCAG) are responsible for formulating and implementing an Air Quality Management Plan (AQMP) for the basin. The current 2012 AQMP was approved by the SCAQMD Governing Board on December 7, 2012, and incorporates the latest scientific and technological information and planning assumptions, including the 2012 Regional Transportation Plan/Sustainable Communities Strategy and updated emission inventory methodologies for various source categories. The 2012 AQMP included the new and changing federal requirements, implementation of new technology measures, and the continued development of economically sound, flexible compliance approaches.

AQMD staff is processing the 2016 AQMP, which will be a comprehensive and integrated Plan primarily focused on addressing the ozone standards. The Plan will be a regional and multi-agency effort (SCAQMD, California Air Resources Board, SCAG, and US Environmental Protection Agency). State and federal planning requirements include developing control strategies, attainment demonstrations, reasonable further progress, and maintenance plans. The 2016 AQMP will incorporate the latest scientific and technical information and planning assumptions, including the latest applicable growth assumptions, Regional Transportation Plan/Sustainable Communities Strategy, and updated emission inventory methodologies for various source categories

Implementation of the AQMP is based on a series of control measures that vary by source type, such as stationary or mobile, as well as by the pollutant targeted. Since the 2012 AQMP is based on growth projections reflected in local general plans, only new or amended general plans or projects that exceed the level of development contemplated in the general plan have the potential to conflict with the AQMP. The proposed project does not require an amendment to the General Plan land use designation of General Corridor and is consistent with expected commercial development potential build out along the Washington/Culver Boulevard commercial corridor. There is no conflict with the 2012 AQMP, nor is there an expected conflict with the Draft 2016 AQMP, and no mitigation measures are necessary.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

b)-c). **Less Than Significant Impact.** Future new development in Culver City may contribute both at the project level and cumulatively to pollutant emissions over existing non-attainment conditions due to both construction and operation of individual projects. The project, would permit development on the studio site of three production office Buildings totaling 205,700sf, plus a parking structures with a total of 1,408 spaces. CPA #6 would include the construction of a new parking structure, and three new buildings providing production office space. Buildings to be removed as part of CPA #6 would include the Commissary Building, Building L, Building O, Building X, Building Y, Building Z and Stage 10, all abutting Ince Boulevard. The removal of Building X is in conjunction with a realignment of the entrance at Gate 3 along Ince Boulevard. This realignment will also include the relocation of the guard shack at Gate 3, with the goal to make the entry at this location more efficient for studio vehicles and emergency vehicles. Building O, Building L and the commissary would be replaced by a new 90,000 sf "Building O" along Ince Boulevard. Buildings Y, Z and Stage 10 will be replaced by a new 84,700 sf "Building Y" at the southeast end of the Site. New Building R will be constructed on the front of Stages 2-3-4 in place of existing surface parking and concrete walkways, and will total 31,000 sf. A new multi-level Parking Structure will replace the existing 3-level parking structure adjoining Van Buren Place, which will have two subterranean levels and six levels on/above-grade levels, with a total of 1,408 parking spaces. The four existing bungalows, Buildings S, T, U and V, currently located on the proposed parking structure site will be relocated to a Bungalow Lot behind the Mansion (Building C).

The overall project will include total demolition of 66,703 GSF of existing buildings and the addition of 205,700 GSF of new buildings plus 1,408 parking spaces. The net land use addition of the proposed CPA #6 is 1,105 parking spaces and 138,997 sf of office use.

During construction, air contaminant emissions would result from the use of construction equipment such as bulldozers, trucks, scrapers, loaders, graders, and backhoes, as well as construction workers that would be traveling to and from the project. Project related construction traffic would have a temporary effect on air quality in the vicinity of the project. Construction worker traffic and diesel powered equipment would emit nitrogen oxides, carbon monoxide, sulfur oxides, hydrocarbons, and particulates. These emissions would increase local concentrations temporarily but would not be expected to increase the frequency of violations of air quality standards because the project would be subject to limits on the construction hours contained in the Municipal Code. The project will be subject to standard conditions that will reduce construction related pollutant emissions and dust emissions such as SCAQMD Rule 403- Fugitive Dust.

Operationally the project is also not expected to create significant air quality impacts. Based on the Traffic Study prepared for the site, the proposed project will not generate, after mitigation measure are incorporated, significant traffic impacts at any of the studied intersections and roadway segments. Thus, emissions resulting from the number of vehicles related to the proposed project in the AM and PM peak hours are not expected to be significant. Overall, construction emissions would be short-term and limited only to the time period when construction activity is taking place. Maximum daily emissions from the construction of the project could result in excessive emissions of volatile organic chemicals (identified as reactive organic gases) associated with interior and exterior coating activities. To avoid any potential for excessive VOC/ROG emission from coating activities, the project will utilize low-VOC coatings during construction activities to less than the threshold established by SCAQMD. Further, The requirement for use of low-VOC coatings is part of the City's Green Building Ordinance LEED Equivalency requirements. With use of low-VOC coatings criteria pollutants would not exceed the daily emissions thresholds established by SCAQMD. Construction impacts would be less than significant and construction emissions would not add to long-term air quality degradation. Further the proposed project will implement standard SCAGMD-approved construction procedures and will comply with applicable provisions of SCAGMD Rule 403.

d). **Less Than Significant Impact.** The Project is located in an area which is primarily developed by residential and commercial uses. The nearest sensitive receptors to the Project site are residential uses adjacent to and surrounding the proposed parking structure. Residential uses are located to the west, south and east of the Parking Structure. Residential uses are located north of Building Y and O. Additional sensitive receptors include Linwood E Howe Elementary School, located to the south across Van Buren Place.

The proposed project will not generate toxic pollutant emissions because the proposed project is characterized as a commercial use that does not produce such emissions. The proposed project, therefore, would have a less than significant impact on sensitive receptors relating to toxic pollutant emissions.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

A carbon monoxide (CO) hotspot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. CO hotspots have the potential to violate State and Federal CO standards at intersections, even if the broader Basin is in attainment for Federal and State levels. In general, SCAQMD and the California Department of Transportation *Project-Level Carbon Monoxide Protocol* (CO Protocol) recommend analysis of CO hotspots when a project increases traffic volumes at an intersection that is operating at LOS E or F, by more than two percent. Utilizing a screening threshold of 31,600 vehicles per hour and per the project's traffic study, the project passes the screening protocol and the project would thus not result in a CO hotspot that exceeds state or federal standards. Impacts to sensitive receptors due to localized carbon monoxide emissions will be less than significant.

e). **Less Than Significant Impact.** According to the CEQA Air Quality Handbook, land uses associated with odor complaints include agricultural operations, wastewater treatment plants, landfills, and certain industrial operations (such as manufacturing uses that produce chemicals, paper, etc.). The proposed project is sited within an existing primarily commercial and residential area with some light industrial land uses, but does not include any such uses or other uses that utilize any substantial odor causing chemicals or processes. The proposed studio support and I office aspects of the development, in turn, do not produce odors that would affect a substantial number of people considering that the development will not result in the manufacturing of any products. During construction diesel-powered equipment used for construction could cause odors and emissions that may be offensive to sensitive persons. This would be a temporary impact and would be mitigated by existing AQMD regulations requiring proper maintenance of vehicle engines and exhaust systems, and by standard construction conditions. Therefore, the proposed project would not contribute to or subject a substantial number of people to objectionable odors.

Mitigation Measure(s): None required

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 wildlife nursery sites?	☐	☒	☐	☐

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
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?	☐	☐	☐	☒

Responses:

a) **No Impact.** The study area contains no suitable habitat for sensitive plant or wildlife species. A site visit by the applicant's consultant, PCR Services Corporation, was conducted on March 19, 2015, to observe all species on the study area or project site. Based on their report, Appendix A, *Floral and Faunal Compendium*, no plants or wildlife species were found that have special status recognition by California Department of Fish and Game (CDFG) or U.S. Fish and Wildlife Service (USFWS). No mitigation is required and no further analysis is needed.

b). **No Impact.** The study area does not contain natural communities and was found to not support plant communities considered by the CDFW under the CNDDB as sensitive (high inventory priority). No riparian habitat occurs in the study area. Therefore, no impact will occur to riparian or sensitive natural communities. No further analysis is needed.

c). **No Impact.** No drainages or wetlands are found within the study area. The channelized Ballona Creek is located about 0.10 miles to the south of the study area and will not be interrupted by this project. Therefore, no impact will occur to federally or State regulated waters or wetlands and no further analysis is needed.

d). **Less Than Significant Impact with Mitigation Incorporation.** The study area is located within an entirely urbanized environment and there are no natural areas immediately surrounding the study area that would support native wildlife species. The Baldwin Hills (Kenneth Hahn State Recreational Area), an isolated partial open space area with oil extraction facilities, is approximately 1 mile southeast of the study area, with which there is no wildlife movement connection. The ornamental trees and shrubs of the landscaped setting within the study area could harbor native and migratory bird nests; therefore, potentially significant impacts could occur to nesting birds as a consequence of the project-related tree removals or trimming and elevated ambient noise levels from nearby construction activities. In order to reduce potential impacts to these birds to less than significant, mitigation measures are required.

If these were to occur during the nesting season (usually accepted as being February/March through end of August) and result in disturbance or destruction of active bird nests, such circumstances would be a violation of the federal Migratory Bird Treaty Act. In addition, bird nests and eggs are protected under California Fish and Game Code Section 3503. Mitigations to avoid the taking of active nests may be accomplished in two ways.

The first way would be to avoid tree removal during the bird nesting season (i.e., February/March through end of August). If this is not feasible, the second way to avoid active nests within the breeding season would be to conduct preconstruction or pre-trimming nesting bird survey prior to tree removal or trimming and/or construction near trees potentially supporting bird nests. . This would entail the applicant's retention of a qualified biologist, familiar with bird nesting and breeding bird behavior, to survey for the presence of active nests within the project area prior to the initiation of construction or tree removal or trimming. If any active native bird nests are detected, a suitable construction setback to be determined by the qualified biologist should be established around the nest site until the nestlings have successfully fledged or it is determined that the nest has failed.[1] This is a standard mitigation practice accepted by federal and State wildlife agencies; and no further analysis is needed.

1 A suitable construction setback should be determined by the biological monitor and should consider such factors as the intensity of the construction-related disturbance, line of sight between the nest and construction, and intervening physical structures that attenuate noise.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

e). **Less Than Significant.** No biological resources regulated by the federal, State or local agencies are found on-site. In particular, no protected trees were found to occur within the project area during the March 19, 2015 site visit. Therefore, no conflict with local policies or ordinances protecting biological resources will occur; and, no further analysis is needed.

f). **No Impact.** The study area is located within an established urbanized environment and does not provide habitat for any sensitive biological resources. The study area is not located within a habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan. Further analysis of this is not necessary because no impacts would occur in conflict with an adopted habitat conservation plan.

Mitigation Measure(s):

B-1: Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit taking of all birds and their active nests, including raptors and other migratory nongame birds (as listed under the Federal MBTA)

Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from March 1-August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs and/or young resulting from disturbances which cause abandonment of active nests. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.

B-2: If avoidance of the avian breeding season is not feasible, beginning thirty days prior to the initiation of project activities, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in a suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than three (3) days prior to the initiation of project activities. If a protected native bird is found, the project proponent shall delay all project activities within 300 feet of on- and off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31, annually. Alternatively, the qualified biologist shall continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing shall be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the project activities and the nest. Project personnel, including all contractors working on site, shall be instructed on the sensitivity of the area. The project proponent should provide the City of Culver City the results of the protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds.

If the biological monitor 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 Department of Fish and Game ("Department"). Based on the submitted information, the City of Culver City (and the Department, if the Department requests) will determine whether to allow a narrower buffer.

B-3: The biological monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain within the project footprint (i.e., outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor shall send weekly monitoring reports to the City of Culver City

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact
during the grubbing and clearing of vegetation, and shall notify the City immediately if project activities damage active avian nests.				
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?	☐	☒	☐	☐

Responses:

a) *Less Than Significant Impact with Mitigation Incorporated.* In 2015, PCR Services Corporation completed *a Historical Resources Assessment and Environmental Impact Analysis Report* ("Report") for The Culver Studios. The purpose of the Report was to identify and evaluate historical resources that may be affected by the implementation of The Culver Studios Comprehensive Plan Amendment 6. PCR's Report includes descriptions, integrity analysis and significance evaluations for individual buildings that in many instances reflect additional research and data not referenced in prior reports. PCR's Report underwent a peer-review process and the final Report incorporates comments provided during peer review. Potential impacts to historical resources and mitigation measures as included in this CEQA Initial Study are, for the most part, based on the PCR Report's findings.

Summary of Report Findings: The Culver Studios does not appear eligible for listing as a historic district at the federal, state or local level due to lack of integrity. The site has been significantly altered throughout its history, resulting in the loss of essential features to convey its historical significance as an early twentieth-century Major Motion Picture Studio. The Culver Studios possesses only five (5) of the twelve (12) Essential Physical Features of the Major Motion Picture Studio property type dating from the period of significance (1918-1949): Administration Facilities, Stages, Talent Facilities, Power House, and its distinctive landscaping. The subject property is missing important examples of Film Processing Facilities, Construction Facilities, Storage Facilities, Service Facilities, Gates and Gatehouses, as well as its Back-Lot and Water Tower. Several individual structures, some already designated at the local level, appear eligible for listing on the National Register. These are Building C (the Mansion, including the DeMille Theatre); Building D; and, Buildings S, T, U and V. In addition, Stages 2/3/4, 7/8/9, 11/12/14, and 15/16 appear eligible for listing on the National Register, and Buildings E, H and I appear eligible for local designation. A total of thirteen (13) individual buildings on the property are considered historical resources as defined by CEQA.

The Culver Studios Comprehensive Plan Amendment 6 includes the demolition of seven buildings found ineligible as historical resources. These are: the Commissary, Buildings L, O, X, Y, Z and Stage 10. However, there are several individually eligible historical resources that would be directly impacted by the project.

Bungalows: A seven-level parking structure will replace the existing 3-level parking structure adjoining Van Buren Place. The four existing bungalows, Buildings S, T, U and V, currently located on the proposed parking structure site will be relocated behind the Mansion (Building C). The bungalows will be removed from their historic setting in proximity to Stage 11/12/14 and within the residential corridor on Van Buren Place. The configuration and layout of Buildings S, T, U and V under the project would retain the historic grouping of the four bungalows within the studio lot, including the

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

existing architectural hierarchy and elements of the bungalows' original setting. The orientation, however, and site plan will be slightly altered due to the confined setting of the proposed new site. The bungalows were originally laid out following the development of the site with the older structures to the front (northeast) and the newer structures to the rear (southwest). The project would have an adverse impact to these four historical resources and appropriate mitigation measures are recommended to reduce potential impacts to less than significant.

As part of this project, a Certificate of Appropriateness application was submitted for the relocation of Buildings S, T, U and V which are designated SIGNIFICANT Cultural Resources under Culver City's Historic Preservation Program. Approval of the Certificate of Appropriateness shall be conditioned upon all exterior alternations complying with the US Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. With the implementation of a Relocation and Rehabilitation Plan as outlined below, the exterior features and appurtenances of the four structures would be preserved and the relocated bungalows would be integrated into the new site in a compatible manner adjacent to Building I and the Mansion.

Stage 2/3/4: The new Building R will have a triangular foot print and will be constructed on the north front of Stage 2/3/4. Building R will contain four stories of office space totaling 31,000 sf with 52'-6" of height. Building R will abut the north end of Stage 2/3/4, and will be adjacent to the access road from Gate 2 and the relocated bungalow lot. Building R will partially obscure the north front of Stage 2/3/4, and may physically impact the north front wall and/or structure of Stage 2/3/4 depending upon how Building R may be attached and/or structurally tied to the north wall of Stage 2/3/4. Sound Stage 2/3/4 is a large utilitarian structure on the northwest portion of the lot which is eligible for local designation and listing on the National Register. The three-story structure has a rectangular footprint that is oriented fronting north towards the Mansion (Building C). The structure is clad with stucco and topped with a low pitched roof with a cupola or monitor roof that runs the length of the building. The primary character defining features of the building are located on the east elevation which will remain visible. The north elevation is a secondary elevation and has a characteristic shape and profile but otherwise is a blank wall with "The Culver Studios" painted wall sign. The painted wall sign does not appear in historic photographs and is a recent alteration, not a historic sign. The north front of Stage 2/3/4 would project above the new Building R, exposing the distinctive character defining parapet. Stage 2/3/4 would remain otherwise intact, and would still be visually prominent when viewed from the center of the studio lot. As the primary (east elevation) of Stage 2/3/4 is oriented toward the center of the studio lot, the construction of Building R would not obscure primary views of the east front of Stage 2/3/4. After project completion, Stage 2/3/4 would remain intact and the primary views of the east façade of the building would be retained. Therefore, the project would result in a less than significant impact because Stage 2/3/4 would remain eligible as a historical resource under national and state criteria A/1 and would remain eligible for local designation for its association with early motion picture production on the lot. However, the project would result in adverse impacts that would reduce the integrity of the north front of Stage 2/3/4; therefore, mitigation measures are provided below to reduce potential impacts to historical resources.

Mansion (Building C): Under the project, the Mansion (Building C) would not be physically demolished, relocated or altered, including the primary view looking south into the studio from the public right of way directly at the front of the Mansion. While the Manson's immediate surroundings would be changed on the south side, a secondary elevation, the surroundings would not be materially impaired and Building C would continue to convey its historical significance. Approval of the project includes a condition that any proposed plans for changes to the Mansion's front lawn landscaping identify the character-defining features of that area and that proposed plans be reviewed by a qualified preservation professional for submittal to the City according to the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes.

Indirect Impacts: Indirect impacts were analyzed to determine if the project would result in a substantial material change to the integrity of the resources and their immediate surroundings that would detract from the significance of historical resources within the project vicinity. For the purpose of this assessment, the indirect impacts study area is defined as the area occupied by properties within viewing range of the subject property. There are several primary views within the studio lot, along the long axis north and south, along the short cross axis from Gate 3 toward the existing bungalow court (Buildings S, T, U and V), from Washington Boulevard south toward the Mansion (Building C), from the Mansion (Building C) toward the studio lot, and from the long axis north toward the Mansion (Building C). The primary view along the long axis north and south would be retained under the project and the visual character of the individually eligible Stages 2/3/4, 7/8/9, 11/12/14, 15/16, would be retained unimpaired. Views of the north front of Stage 2/3/4

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

would be impaired under the project, and mitigation measures have been provided below. However, it is important to note that Stage 2/3/4 is significant for its role in early film production on the lot and *not* for its architectural features. Although Building R will result in impaired views of Stage 2/3/4, the project would not impact Stage 2/3/4's historical significance. The stage would remain eligible as a historical resource under national and state criteria A/1 and would remain eligible for local designation for its association with early motion picture production on the lot. The south lawn of the Mansion (Building C) has been substantially altered over the years and does not retain integrity. Buildings H and I have been relocated, and a new elevator house for the subterranean parking structure has further compromised the integrity of the south lawn landscape. As such, views of the Mansion (Building C) and south lawn from the studio lot have been materially impaired. Construction of Building's O and R, and relocation of the bungalows, will not have an impact on views of the south lawn or the Mansion (Building C). With regard to off-site historical resources within view of the project, indirect impacts would be less than significant because the historical significance of the nearby properties would be retained and unimpaired. Thus, indirect impacts under the project would be less than significant.

Mitigation Measures:

CR-1: Recordation: Prior to the issuance of a relocation permit for the bungalows, a recordation document in accordance with Historic American Buildings Survey (HABS) Level III requirements shall be completed for the existing buildings. The HABS document shall be prepared by a qualified architectural historian or historic preservation professional. This document shall include a historical narrative on the architectural and historical importance of the subject property and record the existing appearance of the four bungalows in professional large format HABS photographs. The building exteriors, representative interior spaces, character-defining features, as well as the setting and contextual views shall be documented. All documentation components shall be completed in accordance with the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation (HABS standards). Original archivally-sound copies of the report shall be submitted to the HABS collection at the Library of Congress, and South Central Coastal Information Center, California State University, Fullerton, CA. Non-archival copies will be distributed to the City of Culver City and the Los Angeles County Julian Dixon Public Library. In addition, any existing and available design and/or as-built drawings shall be compiled, reproduced, and incorporated into the recordation document.

CR-2: Relocation, Storage, and Rehabilitation. Prior to relocation, the bungalows shall be recorded before being moved to an appropriate on-site location with compatible setting and association qualities. A Relocation and Rehabilitation Plan shall be commissioned by the applicant and developed by a qualified historic preservation consultant. The Plan shall include relocation methodology recommended by the National Park Service (NPS), which are outlined in the booklet entitled "Moving Historic Buildings," by John Obed Curtis (1979). The Plan shall include an assessment of the building condition by a qualified engineer, and a shoring plan for relocation and storage, and relocation to the final site. If temporary storage is required, the storage conditions should closely follow the recommendations of NPS Preservation Brief 31: Mothballing Historic Buildings with regard to recommendations for structural stabilization, pest control, protection against vandalism, fire, and moisture, adequate ventilation which should be applied to the building at the temporary storage location to ensure the safety of the building during storage. A periodic maintenance and monitoring plan shall also be included in the Plan and implemented during the storage period in accordance with the guidance outlined in NPS Preservation Brief 31. The Relocation and Rehabilitation Plan shall be reviewed and approved by the City of Culver City prior to its implementation. Upon relocation of the structures to the new site, any maintenance, repair, stabilization, rehabilitation, preservation, conservation, or reconstruction work performed in conjunction with the relocation of the building shall be undertaken in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Properties. In addition, a plaque describing the date of the move and the original location shall be placed in a visible location on each of the buildings. The removal, storage, relocation and rehabilitation process shall be monitored by a qualified historic preservation consultant at key intervals to ensure conformance with the Standards and NPS guidelines. The preservation consultant shall also be available to provide technical expertise to reduce potential impacts to historical resources from unforeseen circumstances.

CR-3: Interpretative Plaque/Marker: A permanent metal plaque will be affixed to the primary elevation of each of the relocated bungalows or a marker will be imbedded in the pavement in front of each, which will briefly explain that the buildings were relocated and their original site.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

CR-4: Preservation Design Recommendations: The project design for Building R is presently conceptual and while it appears to have a less than significant level of impact as it relates to Stage 2/3/4 and the relocated bungalow court in terms of scale, massing and design, a qualified architectural historian shall provide input to the project architect as detailed plans are developed to ensure the design is in accordance with the Secretary of the Interior's Standards. Once the design has been finalized, the architectural historian will conduct a Secretary of the Interior's Standards review for submittal to the City of Culver City. The areas of concern are how the new Building R will structurally impact the Stages 2/3/4 where the two buildings abut and tie together, views of the north front of Stage 2/3/4, and potential impacts to the setting of the relocated bungalow court.

CR-5: Virtual Museum/Exhibition: A web-based educational resource that outlines the development of The Culver Studios site from 1918 to the present shall be developed, the layout and content of which is subject to review and approval by the City of Culver City. The Virtual Museum shall be operating and web accessible prior to the last certificate of occupancy issuance; further the Virtual Museum shall operate in perpetuity.

b)-c). **Less than Significant Impact with Mitigation Incorporated.** Culver City is located in a region of the western Los Angeles basin known to contain paleontological and archeological resources and upon significant excavation for projects that involve subterranean parking areas or occupiable space such resources could surface[1]. The project site is located in an urbanized area that has been previously disturbed and heavily affected by past activities, specifically construction of previously existing on-site structures. Given that the project site has been substantially disturbed by previous construction, any cultural resources that may have existed at one time likely have been previously unearthed or disturbed.

However, the project does propose substantial excavation of the site that could potentially unearth currently unknown resources. A Phase-1 Archaeological/Paleontological Resources Survey (Mathew A, Boxt, Phd., April 27, 2015) determined that the project site is located within an area with medium sensitivity for paleontological and archaeological resources. The potential exists for resources related to Native American habitation of the area to be uncovered during excavation of the site. Further, the project site is located within an area that at relatively shallow depths there is great potential for substantial fossils to exist. Due to the excavation proposed by the project, it is possible that such paleontological resources could be discovered. No known human burials have been identified on the project site or its vicinity. However, it is possible that unknown human remains could be located on the project site, and if proper care is not taken during proposed project construction, particularly during excavation activities, damage to or destruction of these unknown remains could occur.

As such, the Phase 1 Study recommends that archaeological and paleontological monitoring occur during excavation/grading activities as well as monitoring of human remains during ground disturbing activities. This is included as Mitigation Measure C-1. Impacts to buried cultural resources, paleontological resources and human remains will be less than significant with this mitigation incorporated.

Mitigation Measure(s):

CR-6: Archaeologist and Paleontologist professionals approved by the City shall monitor all phases of excavation for the project site in order to identify and recover where feasible, the presence of archaeological and/or paleontological resources. Should such resources be identified established Federal and State rules and guidelines for the cataloging and final disposition of such resources shall be applied and followed. This shall include but not be limited to halting of construction activities in the work area where the resources are identified, notifying the Los Angeles County Coroner and the appropriate Native American organization of such resources, and notifying the Los Angeles County Natural History and Page museums. Final disposition of Native American remains shall follow Federal and State rules and guidelines for such remains. Identified paleontological resources shall be donated to the Los Angeles County Natural History/Page museums or some other museum as deemed appropriate by the Paleontologist. A final report or reports cataloging all findings shall be submitted to the City by the Archaeologist and/or Paleontologist professional within one year of issuance of the Certificate of Occupancy.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact
1. Culver City General Plan Program EIR, November 1995, page 226				
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Responses:

a.i). **Less Than Significant Impact.** The project site is situated in seismically active Southern California and is located approximately 0.95 miles east of the of a mapped surface trace of the Overland fault and 0.72 miles west of the mapped surface trace of the Newport-Inglewood fault. However, the site is not located within an Alquist-Priolo Earthquake Fault Zone. No impact will occur from ground rupture due to the distance from the faults. Further, standard code requirements require the submittal of the detailed comprehensive geotechnical report to ensure adequate seismic safety and soils stability of all proposed development improvements for the project. In addition, the project grading plan and building plans shall conform to the recommendations in the geotechnical report in a manner meeting the approval of the City. A condition of approval is applied to the project requiring submittal of a preliminary Geotechnical report prior to building permit issuance to reflect any recommendations as a result of final project design, grading and structural plans. Compliance with the recommendations in the geotechnical report and standard building code requirements will reduce this impact to a level that is less than significant.

a.ii) **Less Than Significant Impact.** The proposed project will be subject to ground shaking impacts should a major earthquake occur in the future. Potential impacts include injury or loss of life and property damage.

The project site is subject to strong seismic ground shaking, as are virtually all properties in Southern California. The proposed buildings are subject to the seismic design criteria of the California Building Code (CBC) and the project-specific design requirements of the project geotechnical report based on the site seismic coefficients. The 2013 California Building Code (CBC; Title 14, California Code of Regulations, Part 2) contains seismic safety provisions with

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

the aim of preventing building collapse during a design earthquake, so that occupants would be able to evacuate after the earthquake. A design earthquake is one with a two percent chance of exceedance in 50 years, or an average return period of 2,475 years. Adherence to these requirements and consideration of the site's seismic coefficients will reduce the potential of the building from collapsing during an earthquake, thereby minimizing injury and loss of life. Although structures may be damaged during earthquakes, adherence to seismic design requirements will minimize damage to property within the structure because the structure is designed not to collapse. The CBC is intended to provide minimum requirements to prevent major structural failure and loss of life. The recommendations of the geotechnical report will be implemented during preparation of construction drawings for review and approval by the City. Adherence to existing regulations will reduce the risk of loss, injury, and death; impacts due to strong ground shaking will be less than significant.

a.iii) **Less Than Significant Impact with Mitigation Incorporated.** Liquefaction is a phenomenon that occurs when soil undergoes transformation from a solid state to a liquefied condition due to the effects of increased pore-water pressure. This typically occurs where susceptible soils (particularly the medium sand to silt range) are located over a high groundwater table. Affected soils lose all strength during liquefaction and foundation failure can occur.

According to the project geotechnical report the project site is located in an area mapped as potentially liquefiable on State of California Seismic Hazards map (CDMG, 1999); additionally the City's GIS liquefaction map indicates the site is within a liquefaction zone. According to the project geotechnical report, based on soil borings performed on the site, soils with the potential for liquefaction do exist between a depth of approximately 15 feet and 33 feet below the existing ground surface. Three of the project's new buildings will have subterranean levels:

- Building O, will have a 21,400 square foot basement level at 12 feet below grade;
- Building Y, will have a 27,300 square foot basement level at 12 feet below grade;
- Van Buren Parking Garage will have two levels of subterranean parking at a total depth of 46 feet below grade.

The report recommended that the project be built with a either a deep foundation system, mat foundation systems provided they can withstand liquefaction induced total and differential settlements during a seismic event, or soil improvement techniques with conventional footing. This measure has been included as Mitigation Measure G-1. With the inclusion of this mitigation measure, impacts from liquefaction would be less than significant.

a.iv) **Less than Significant Impact.** Structures built below or on slopes subject to failure or landslides may expose people and structures to harm. The project site slopes gently downward in a southerly direction. The project site and surrounding area are generally flat with the closest notable area of slope approximately 0.2 miles to the south beyond Jefferson Boulevard. Also per the City GIS liquefaction map, the site is located outside the areas identified as susceptible to earthquake induced landslides. Due to these existing conditions, impacts from landslide will be less than significant.

b). **Less Than Significant Impact.** Topsoil is used to cover surface areas for the establishment and maintenance of vegetation due to its high concentrations of organic matter and microorganisms. Little, if any, native topsoil is likely to occur on site since the site is covered with paving and structures. The underlying soils consist of approximately three feet to 15 feet of fill below the ground surface and/or disturbed alluvium deposits beneath the fill. The alluvial deposits consist of interlayered clay, silt, sand, and some gravel. The site will be over excavated to accommodate the two office basements and the underground portions of the parking structure. The project has the potential to expose surficial soils to wind and water erosion during construction activities. Wind erosion will be minimized through soil stabilization measures required by South Coast Air Quality Management District (SCAQMD) Rule 403 (Fugitive Dust), such as daily watering. Water erosion will be prevented through the City's standard erosion control practices required pursuant to the California Building Code and the National Pollution Discharge Elimination System (NPDES), such as silt fencing or sandbags. Following project construction, the site would be covered completely by paving, structures, and landscaping. Impacts due to erosion of topsoil will be less than significant with implementation of existing regulations.

c). **Less Than Significant Impact with Mitigation Incorporated.** Impacts related to liquefaction and landslides are discussed above in Section VI.a. 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

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

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 lesser extent on ground surfaces with a very gentle slope. Despite the potential for liquefaction on the site, due to the absence of any channel, slope, or river within or near the subject site, the potential for lateral spread occurring on or off the site is considered to be negligible. The project-specific geotechnical report concludes that site soils would be capable of supporting proposed structures with the recommended foundation design measures. The project is required to be constructed in accordance with the CBC and the requirements of the project geotechnical report. The CBC includes a requirement that any City-approved recommendations contained in the soil report be made conditions of the building permit.

Due to the depth of excavation and proximity of adjacent buildings, utilities, and streets and sidewalks, a braced shoring system is required for construction. Tiebacks may also be required. Should any tiebacks be proposed for location on adjacent private property or public rights-of-way, the project applicant will require permission by those property owners and the City of Culver City Public Works Department. This requirement for tieback permission will be a project condition. Also The project-specific geotechnical report concludes that site soils would be capable of supporting proposed structures with the recommended foundation design measures. Excavation and shoring construction are required to be compliant with CBC and the requirements of the project geotechnical report. The CBC includes a requirement that any City-approved recommendations contained in the soil report be made conditions of the building permit

Additionally the report indicates that the existing underground parking garage adjacent to Historic Building C is continuously pumping groundwater utilizing a pump located at the base level near the middle of the eastern side of the parking garage. Groundwater could lead to unstable soil and the report indicates that historic high groundwater is at approximately 15 feet below the ground surface. The groundwater pumping at the underground parking structure may be lowering the groundwater levels observed in the study's boring samples. To reduce the hydro-static pressure imposed on the new parking structure due to groundwater, a long term continuously pumping groundwater system shall be installed (Mitigation Measure G-2). Compliance with existing CBC regulations and Mitigation Measure G-2 would limit hazard impacts arising from unstable soils to less than significant. Further, as a project condition, the applicant will be required to reclaim the pumped water in an amount that is practicable to water the existing lawn and other landscaped areas of the studios.

d). **Less Than Significant Impact.** Expansive soils shrink and swell in response to moisture due to high percentages of clay. The project preliminary soils report indicates that underlying soils consist of alluvium including clay. However the project-specific geotechnical report concludes that site soils would be capable of supporting proposed structures with the recommended foundation design measures. The project is required to be constructed in accordance with the CBC and the requirements of the project geotechnical report. The CBC includes a requirement that any City-approved recommendations contained in the soil report be made conditions of the building permit. Compliance with existing CBC regulations would limit hazard impacts arising from expansive soils to less than significant.

e). **No Impact.** The project site is served by a fully functional municipal sewer system. The project will connect to this system and will not require use of septic tanks. No impact will occur.

Mitigation Measure(s):

G-1: Foundation design shall follow the recommendations of the project's geotechnical report, which include, but are not limited to a deep foundation system, mat foundation systems provided they can withstand liquefaction induced total and differential settlements during a seismic event, or soil improvement techniques with conventional footing. Final foundation design and inspection shall be determined and approved by the structural and geotechnical engineer.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

G-2: To reduce the hydro-static pressure imposed on the new parking structure due to groundwater, a long term continuously pumping groundwater system shall be installed.

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

Responses:

a). **Less Than Significant Impact.** Climate change is the distinct change in measures of climate for a long period of time. Climate change is the result of numerous, cumulative sources of greenhouse gas emissions all over the world. Natural changes in climate can be caused by indirect processes such as changes in the Earth's orbit around the Sun or direct changes within the climate system itself (i.e. changes in ocean circulation). Human activities can affect the atmosphere through emissions of greenhouse gases (GHG) and changes to the planet's surface. Human activities that produce GHGs are the burning of fossil fuels (coal, oil and natural gas for heating and electricity, gasoline and diesel for transportation); methane from landfill wastes and raising livestock, deforestation activities; and some agricultural practices.

Greenhouse gases differ from other emissions in that they contribute to the "greenhouse effect." The greenhouse effect is a natural occurrence that helps regulate the temperature of the planet. The majority of radiation from the Sun hits the Earth's surface and warms it. The surface in turn radiates heat back towards the atmosphere, known as infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping back into space and re-radiate it in all directions. This process is essential to supporting life on Earth because it warms the planet by approximately 60° Fahrenheit. Emissions from human activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the gases in the atmosphere that trap heat, thereby contributing to an average increase in the Earth's temperature. Greenhouse gases occur naturally and from human activities. Greenhouse gases produced by human activities include carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), hydro fluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF6). Since 1750, it is estimated that the concentrations of carbon dioxide, methane, and nitrous oxide in the atmosphere have increased over 36 percent, 148 percent, and 18 percent, respectively, primarily due to human activity. Emissions of greenhouse gases affect the atmosphere directly by changing its chemical composition while changes to the land surface indirectly affect the atmosphere by changing the way the Earth absorbs gases from the atmosphere.

A GHG Study was prepared by PCR Services Corporation for the project (dated July, 2015). GHG emissions for the project were quantified utilizing the California Emissions Estimator Model (CalEEMod); these projected emissions were analyzed to determine if the project could have a cumulatively considerable impact related to greenhouse gas emissions. The emissions inventory accounts for GHG emissions from construction activities and operational activities. The emissions data is presented as metric tons of carbon dioxide equivalent ($MTCO_{2e}$) meaning that all emissions have been weighted based on their Global Warming Potential (GWP) (a metric ton is equal to 1.102 US short tons). Mobile sources are based on annual vehicle miles traveled (VMT) based on daily trip generation identified in the project traffic study. Natural gas usage, electricity usage, water/wastewater demand, and solid waste disposal are based on default demand figures utilized in CalEEMod.

A numerical threshold for determining the significance of greenhouse gas emissions in the South Coast Air Basin (Basin) has not officially been adopted by the SCAQMD. An interim threshold based on guidance provided by the

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

SCAQMD GHG Working Group, establishes a numerical threshold based on capture of approximately 90 percent of emissions from future development. The latest threshold developed by SCAQMD using this method is 3,000 $MTCO_{2e}$/Yr for all land use or mixed-use projects.

Operation emissions associated with the proposed project would include GHG emissions from mobile sources (vehicles, water conveyance, waste disposal, electricity, and natural gas usage). GHG emissions from electricity use are indirect GHG emissions from the energy (purchased energy) that is produced offsite. Area sources are owned or controlled by the project (e.g., natural gas combustion, boilers, and furnaces) and produced onsite. Construction activities are short term and cease to emit greenhouse gases upon completion, unlike operational emissions that are continuous year after year until operation of the use ceases. Because of this difference, SCAQMD recommends amortizing construction emissions over a 30-year operational lifetime. This normalizes construction emissions so that they can be grouped with operational emissions in order to generate a precise project-based GHG inventory.

Additionally the proposed project will comply with CALGreen Code requirements and Project features will incorporate applicable mandatory CALGreen and Culver City Green Building and Photovoltaic measures. Some measures will include low-flush toilets, low-flow faucets, low-flow showers, motion sensor parking structure lighting, and CALGreen compliant HVAC systems. These various measures will reduce overall GHG emissions.

The GHG Study determined that the project's long-term greenhouse gas emissions would be 2,913 $MTCO_{2e}$ per year. This includes both operational and construction amortized GHG emissions. GHG gas emissions associated with the proposed project would not exceed the 3,000 MT CO_{2e}/Yr threshold; therefore, impacts will be less than significant.

b). **No Impact.** Although the City does not currently have a Climate Action Plan, the City does have standard code required conditions of approval to help reduce greenhouse gas emissions and the project will be subject to the City's Mandatory Green Building Program and Solar Photovoltaic requirement. The project will also meet the design standards of the U.S. Green Building Council (USGBC)'s and equivalent Leadership in Energy Environmental Design (LEED). Also as noted above the project will be consistent with the CALGreen Code.

Mitigation Measure(s): None required

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?	☐	☒	☐	☐

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact
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 intermixed with wildlands?	☐	☐	☐	☒

Responses:

a). **Less Than Significant Impact with Mitigation Incorporated.** During construction, there would be a minor level of transport, use, and disposal of hazardous materials and wastes that are typical of construction projects. This would include fuels and lubricants for construction machinery, coating materials, etc. Routine construction control measures and best management practices for hazardous materials storage, application, waste disposal, accident prevention and clean-up, etc. would be sufficient to reduce potential construction related hazardous material impacts to a less than significant level.

The proposed office uses will not engage in the routine transport, use, or disposal of hazardous materials or wastes. Widely used hazardous materials common for office land uses include paints and other solvents, cleaners, discarded office supplies, pesticides, household hazardous waste (HHW) that includes dead batteries, electronic wastes, and other wastes. Use of common household hazardous materials and office supplies and their disposal does not present a substantial health risk to the community. Impacts associated with these types of routine transport, use of hazardous materials or wastes will be less than significant.

A Phase I Environmental Site Assessment (the "Study") was prepared by GRS Group and submitted to the City on August 4, 2015. The Study concluded that there were no Recognized Environmental Conditions identified during the course of the assessment with the exception of a Controlled Recognized Environmental Condition. There were however other environmental issues as discussed herein.

Based on the historical sources reviewed by GRS, the Property was undeveloped from as early as 1896 until as late as 1902. From 1917 to the present the Project Site was (and is) developed for Motion Picture Studio uses and occupied over the past 98 years by the Thomas Ince Studios, Pathe Studios Inc., RKO Radio Pictures Inc., Desilu Productions Inc., Selznick Company Inc., Beverly Hills Studios, Laird International Studios, Sony Pictures Entertainment, and The Culver Studios.

Regulatory environmental records indicate that over the years former occupants such as NBC/Rockford Files, Day One Productions, NBC Universal, Town & Country Production, I'll be You Production, Fallen Production Inc. and Turbulence Production were identified as HAZNET facilities. According to the HAZNET listing, the se motion picture production (or motion picture production related companies) generated hazardous waste at various times from 1996 to 2010. Records indicate the generated wastes were transported off- site under manifest and disposed at a recycling facility.

Former occupant, Sony Picture Entertainment (former The Culver Studios) was identified as an EMI, Los Angeles County HMS, ERNS, CHMIRS and ENF facility. According to EMI listing, Culver Studio was issued permit to emit

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

total organic hydrocarbon gases, reactive organic gases, carbon monoxide, NOX, SOX, and particular matters into the air between 2002 and 2004. No non-compliance citations were reported against the Culver Studio. According to Los Angeles County HMS listing, Sony Pictures Entertainment was issued permits to: discharge treated groundwater from a subterranean parking garage due to a rising water table, into the sewer system via two 1,000-gallon carbon filter tanks; to treat, store and dispose of hazardous waste (water based paint and paint sludge solvents) generated from movie studios operations; discharge wastewater generated from restaurant operations into the county sewer system via a belowground grease interceptor; and discharge wastewater from trash compactor wash down into the county sewer system via a belowground clarifier. Quarterly Self- Monitoring Reports consists of on-site wastes disposal were submitted to the County of Los Angeles Department of Public Works between 1993 and 2004.

According to ERNS listing; this site experienced a release of ethylene-glycol from a failed cooling line at the in June 1994. The release was reportedly cleaned up, and no additional regulatory action appears to have been conducted due to this release incident. According to CHMRIS listing, an underground sump has been collecting groundwater since 1989. It originally pumped groundwater into the street and then into the storm drain. The estimated amount of discharge is 3,000-gallons per day 1989. The groundwater contained dichloromethane, measured at 7 micrograms per liter and trichloroethane, measured at 9 micrograms per liter. These two chemicals have action levels of 5 micrograms per liter. According to ENF listing, Sony Pictures Entertainment was issued a violation and enforcement action in 2003 for discharging without permit in 2003. Two carbon filter tanks were subsequently installed in the lowest level of the subterranean parking garage, and were used to remove the contaminants from the groundwater prior to discharge into the storm water system. Dueto the installation of a groundwater treatment system (carbon canisters) which are reportedly effective in removing the solvent prior to discharge into the storm water system, it is highly unlikely that additional regulatory action or investigation regarding the contaminants (solvents) will be required. Because the condition is subject to engineering controls, this groundwater contamination is considered a Controlled Recognized Environmental Condition.

Former occupant, Lair International Studio was identified as a SWEEPS UST and Los Angeles Co. HMS facility. According to the Los Angeles County HMS Listing, one 550- gallon gasoline UST was removed from the Property in April 1987. Upon removal of the UST, two soil samples were collected from the UST excavation and were analyzed for Total Recoverable Petroleum Hydrocarbons (TRPH) and BTEX. The analytical results indicated elevated levels of TRPH (1,180 & 28.9 milligrams per kilogram (mg/kg)) in the soil samples. Due to the presence of TRPH in the soil samples, additional soil was excavated from the tank site on August 12, 1987. Two soil samples were collected at 8.5 feet bgs and were analyzed for TPRH and BTEX. No TRPH was detected in the soil samples; however, elevated levels of benzene and toluene were detected in the soil samples. On August 22, 1987, additional soil was excavated. Two soil samples were collected at 11 feet bgs and were analyzed for TRPH and BTEX. No TRPH, Benzene or Toluene were detected in the soil samples. Based on these findings, LACDPW issued a No Further Action Letter to Culver Studios on November 13, 1987. This is considered a Historical Recognized Environmental Condition.

The current occupant, The Culver Studios, was identified as a HAZNET, RCRA LQG and FINDS facility. According to the HAZNET listing, The Culver Studios generated off-specification, aged or surplus organics, asbestos containing wastes, aqueous solution with total organic residues 10 percent or more, other inorganic solids, solvent recovery and unknown wastes between 2004 and 2012. The generated wastes were transported off-site under manifest and disposed at a recycling facility. According to RCRA LQG listing, this facility is registered with the USEPA as a large quantity hazardous waste generator with no reported violation.

The report concluded except for the Controlled Recognized Environmental Condition noted above, no evidence exists for Recognized Environmental Conditions in connection with the project site.

In addition to the findings reported in the Study, as a studio use the site is part of the CUPA/Hazardous Materials Disclosure Reporting Program. The site is required to report to the Culver City Fire Department the Studio's listing, storage, and disposal of hazardous materials. Additionally the Culver City Fire Department conducts and annual inspection to ensure compliance with Federal, State, County, and City requirements with regard to Hazardous Materials usage.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

Based on the Study findings and additional information noted above the project will not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials provided the following mitigations are incorporated as project conditions:

Existing carbon filter tanks installed in the existing subterranean parking garage in order to remove contaminants from the groundwater prior to discharge into the storm water system (the garage is currently pumping groundwater into the storm water system) shall be maintained and shall continue to filtrate for as long as the pumping system in the existing garage is maintained or for as a long as the appropriate regulatory authorities require such filtration.

In relation to Mitigation No. G-2, under Geology which requires continuous groundwater pumping, carbon filter tanks shall be installed in the new parking garage in order to remove contaminants from the groundwater prior to discharge into the storm water system; the filters shall be maintained and shall continue to filtrate for as long as the pumping system in the new garage is maintained or for as a long as the appropriate regulatory authorities require such filtration.

The site shall continue to comply with Los Angeles County and Culver City Fire Department regulations regarding the CUPA/Hazardous Materials Disclosure Reporting Program. This shall include but not be limited to the reporting of hazardous materials and the manner in which they are stored and disposed.

The site shall continue to obtain permits as required by Federal, State, County, or City authorities for the regulated use and disposal or emission of hazardous materials and groundwater for as long as the site is used for studio purposes.

b). **Less Than Significant Impact with Mitigation Incorporated.** Construction of the proposed project will require the use and transport of hazardous materials such as asphalt, paints, and other solvents. Construction activities could also produce hazardous wastes associated with the use of such products. Construction of the proposed project requires ordinary construction activities and will not require a substantial or uncommon amount of hazardous materials to complete. All hazardous materials are required to be utilized and transported in accordance with their labeling pursuant to federal and state law. Routine construction practices include good housekeeping measures to prevent/contain/clean-up spills and contamination from fuels, solvents, concrete wastes and other waste materials. The Phase I Environmental Site Assessment noted above in section (a) determined that due to the age of some of the studio buildings asbestos may be present. Should there be a potential asbestos disturbance during demolition and construction, the project will be required to comply with standard Building Code asbestos abatement regulations.

Operationally the project could potentially create a significant hazard to the public or the environment through the accidental release of hazardous materials. This would include contaminants released into the storm drain system with routine groundwater pumping at the existing and future parking garages and the regulated routine use and disposal of hazardous material associated with studio uses. The mitigations noted in section (a) above will reduce significant hazards to the public or the environment through the accidental release of hazardous materials into the environment to less than significant.

c). **Less Than Significant Impact with Mitigation Incorporated.** There are two schools located within a quarter mile of the project site; Lynwood Howe Elementary School is located approximately 60 feet west of the project site (across the street from the new parking garage and Park Century School is located approximately 0.25 miles east of the project site. Existing standard regulations address potential off-site construction-related hazards associated with demolition of buildings that may have asbestos and construction of new buildings. Impacts would be less than significant with implementation of existing construction and demolition regulations. Operation of the proposed project—office use in support of studio operations generally will not generate substantial hazardous emissions. However, as indicated in section (a) above there could be accidental release of hazardous materials into the storm drain system with routine groundwater pumping at the existing and future parking garages or accidental release due to the regulated routine use and disposal of hazardous material associated with studio uses. The mitigations noted in section (a) above will reduce significant emissions of hazards within one-quarter mile of an existing or proposed school less than significant.

d). **Less Than Significant Impact with Mitigation Incorporated.** Although the Phase I Environmental Site Assessment did not specifically report the site as on the State *Cortese List,* it did note that the site is on several listings

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

for the regulated and permitted use and disposal of hazardous materials including US EPA which lists Culver Studios as a large quantity hazardous waste generator with no reported violation.
The mitigations noted in section (a) above which require that:

- The site shall continue to comply with Los Angeles County and Culver City Fire Department regulations regarding the CUPA/Hazardous Materials Disclosure Reporting Program; this shall include but not be limited to the reporting of hazardous materials and the manner in which they are stored and disposed; and
- The site shall continue to obtain permits as required by Federal, State, County, or City authorities for the regulated use and disposal or emission of hazardous materials and groundwater for as long as the site is used for studio purposes, will reduce impacts associated with the listing of the site as a user or emitter of hazardous materials, potentially creating significant hazards to the public or the environment, to less than significant.

e-f). **No Impact.** There are no public airports or private airstrips within two miles of the project site. The nearest airports are Santa Monica Municipal Airport located approximately three miles to the west, and Los Angeles International Airport located approximately 4.8 miles to the southwest. No impact will occur.

g). **Less Than Significant Impact.** The proposed project will increase traffic on the surrounding roadways. The addition of the vehicles from this project on alternate roadways and on the evacuation routes will not present a significant impact to the evacuation plans for the City of Culver City. The project site's main access is located on Ince Boulevard (Gates 2 and 3) south of the intersection of Ince Boulevard with Washington Boulevard A secondary exit only onto Washington Boulevard is located at the north end of the project facing the vacated portion of "old" Washington Boulevard – the future Town Plaza and Parcel B development. Washington Boulevard is main arterial and Ince Boulevard serves as a secondary arterial; both are arterials that may function as evacuation routes. Also the project does not propose to close off streets or create physical obstructions that impede an emergency evacuation of the City. The current street system and infrastructure surrounding the project site is of adequate width to service an emergency evacuation incident. As is further discussed in the Transportation and Traffic section, the project will not create, interrupt, or otherwise reduce the ability of these streets to convey traffic. Therefore, the project will have a less than significant impact on emergency response and evacuation plans.

h). **No Impact.** The project site is not located within a fire hazard zone, as identified on the latest Fire Hazard Severity Zone (FHSZ) maps prepared by the California Department of Forestry and Fire Protection (CALFIRE). There are no wildland conditions in the urbanized area that the project site is located. No impact would occur.

Mitigation Measure(s):

HM-1 Existing carbon filter tanks installed in the existing subterranean parking garage in order to remove contaminants from the groundwater prior to discharge into the storm water system shall be maintained and shall continue to filtrate for as long as the pumping system in the existing garage is maintained or for as a long as the appropriate regulatory authorities require such filtration. A written and signed statement by the applicant certifying that this on-going filtration will be maintained shall be provided to the City prior to issuance of City permits.

HM-2 In relation to Mitigation No. G-2, under Geology which requires continuous groundwater pumping, carbon filter tanks shall be installed in the new parking garage in order to remove contaminants from the groundwater prior to discharge into the storm water system; the filters shall be maintained and shall continue to filtrate for as long as the pumping system in the new garage is maintained or for as a long as the appropriate regulatory authorities require such filtration. The filtration system shall be installed prior to the new parking garage Certificate of Occupancy issuance and a written and signed statement by the applicant certifying that this on-going filtration will be maintained shall be provided to the City prior to issuance of City permits.

HM-3 The site shall continue to comply with Los Angeles County and Culver City Fire Department regulations regarding the CUPA/Hazardous Materials Disclosure Reporting Program. This shall include but not be limited to the reporting of hazardous materials and the manner in which they are stored and disposed. A written and signed statement by the applicant certifying that this on-going reporting will be maintained shall be provided to the City prior to issuance of City permits.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

HM-4 The site shall continue to obtain permits as required by Federal, State, County, or City authorities for the regulated use and disposal or emission of hazardous materials and groundwater for as long as the site is used for studio purposes. A written and signed statement by the applicant certifying that this on-going permitted activity will be maintained shall be provided to the City prior to issuance of City permits.

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?	☐	☐	☒	☐

Responses:

a). **Less Than Significant Impact.** During excavation and construction, erosion and siltation could occur resulting in water pollution and a violation of Regional Water Quality Control Board standards if proper steps are not implemented. Standard code requirements and conditions of approval to the project requires the preparation of erosion/sediment control plans such as the Local Storm Water Pollution Prevention Plan (LSWPPP) and Standard Urban Storm Water Mitigation Plan (SUSMP), to regulate and control pollutant run-off by using Best Management Practices (BMP's) in

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

accordance with National Pollutant Discharge Elimination System (NPDES). These plans shall show all temporary and permanent erosion control devices, effective planting of graded slopes, practical accessibility for maintenance purposes and proper precautions and fences to prevent public trespass on to certain areas where impounded water may create hazardous conditions. City and State standard code requirements and site design elements would reduce this potential impact to a level that is less than significant. No mitigation measures are necessary.

b). **Less Than Significant Impact.** The proposed building footprint areas and paved parking areas would not appreciably increase impervious surface coverage on the site, thereby reducing the total amount of infiltration on site, as the proposed impervious area is relatively equivalent to existing conditions. According to the project geotechnical report the existing underground parking garage adjacent to Historic Building C is continuously pumping groundwater. Groundwater could lead to unstable soil and the report indicates that historic high groundwater is at approximately 15 feet below the ground surface. The groundwater pumping at the underground parking structure may be lowering the groundwater levels observed in the study's boring samples. To reduce the hydro-static pressure imposed on the new parking structure due to groundwater, a long term continuously pumping groundwater system will be required (Mitigation Measure G-2). Since this site is currently developed and is not managed for groundwater supplies, this change in infiltration would not have a significant effect on groundwater supplies or recharge. There is no current use on-site or in nearby areas for the groundwater. The project site and surrounding areas are urban in nature, not agricultural, and rely on the existing water utility infrastructure for water supply. Golden State Water, the local water supplier, receives its water from the Metropolitan Water District which imports a significant amount of its water from the San Joaquin and Sacramento Rivers and the Colorado River Aqueduct. Further the amount of water that is pumped out currently has dropped due to the extended drought that has naturally depleted ground water. Significant impacts due to substantial depletion of groundwater supplies or interference with groundwater recharge or the lowering of the local groundwater table level will be less than significant.

c). **No Impact.** Potentially significant impacts to the existing drainage pattern of the site or area could occur if development of the project results in substantial on- or off-site erosion or siltation. The project site was developed several decades ago and the proposed project will result similar amounts of impervious surfaces as currently exist. Therefore the proposed project is anticipated to generate similar levels of runoff as currently are generated by the developed site. Although the new parking garage will have a water pumping system, this water is not coming from a stream (Ballona Creek) but is instead coming from on-site groundwater (see section (b) above). The existing and proposed site conditions are fully developed and no exposed soils will be present to provide for any erosion potential. No impact will occur.

d-e). **Less Than Significant Impact.** No streams traverse the project site; thus, the project will not result in the alteration of any stream course. During construction, the project applicant will be required to develop and implement a SWPPP; this will prevent polluted runoff from leaving the construction site.

With regard to project operation, on-site drainage will continue to function through sheet flow driveways and inlets, discharging onto the surrounding streets or directly into the existing storm drain facilities. Construction of the proposed project will not appreciably increase the net area of impermeable surfaces on the site because the site is currently covered by paving and structures; therefore, substantially increased discharges to the City's existing storm drain system will not occur and will not impact local storm drain capacity. The project is not an industrial use and therefore will not result in substantial pollutant loading such that treatment control BMPs would be required to protect downstream water quality. Impacts will be less than significant.

f). **No Impact.** The project does not propose any uses that will have the potential to otherwise degrade water quality beyond those issues discussed in Section IX herein.

g). **No Impact.** The project does not propose new housing. Further, the project is not located within a designated 100-year flood hazard area, therefore no impact will occur.

h). **No Impact.** The proposed project is not located within a 100-year floodplain, as mapped by the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps. Therefore, no rising of a flood plain will occur.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

i). **Less than Significant Impact.** A portion of the project is located within the Mullholland Dam Inundation Zone. The project site is located several miles from the dam 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. Other responsible agencies carry out theses inspections. There has been no indication by responsible agencies that the dam is in imminent threat of failure. Based on the distance of the project site from the dam and the continued maintenance of this dam, impacts due to dam inundation will be less than significant.

j). **Less than Significant Impact.** The project site is not located near any lakes or other bodies of water that would be subject to potential seiche. According to the *Tsunami* Map prepared by the Tsunami Research Center at the University of Southern California, no portion of the city is within a tsunami inundation area. The County of Los Angeles' emergency response plans as administered by the County of Los Angeles Office of Emergency Management along with mutual aid from local jurisdictions would implement their evacuation plans should such tsunamis threaten the area. Due to the distance from the ocean as well as existing emergency response plans, impacts from tsunami would be less than significant.

Mitigation Measure(s): None required

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, 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?	☐	☐	☐	☒

Responses:

a). **Less Than Significant.** The proposed project is surrounded by residential and commercial uses. The proposed development project is consistent and compatible with the surrounding land uses and will not divide an established community. The project does not propose construction of any roadway, flood control channel, or other structure that would physically divide any portion of the community. . Therefore, no impact will occur.

a) **No Impact**. The project is seeking an Amendment to the Comprehensive Plan guiding the physical development of the Culver Studios District. The studio use is consistent with the General Plan designation for the property. The project site is located within the Studio zone which permits the use of studio related uses, including stage, office, support and post-production activities. The project does not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. Therefore, there will be no impacts related to this issue.

c). **No Impact**. The proposed project site and surrounding areas are not part of any habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. As such, no impact will occur.

Mitigation Measure(s): None required

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Responses:

a-b). **No Impact.** The project site and its surrounding area are currently developed with residential and commercial urban uses. Current site conditions indicate that there are no mineral resources on or within the project site and no locally important mineral resource recovery areas located in the project area. Therefore, project implementation would not result in impacts associated with the loss or availability of a known mineral resource that would be of value to the region and the residents of the state. No mitigation measures are necessary.

Mitigation Measure(s): None required

XII. NOISE --Would the project result in:				
a) Exposure of persons to or generation of noise levels 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 ground borne vibration or ground borne 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?	☐	☐	☐	☒

Responses:

a), b), and d) ***Less Than Significant Impact with mitigation incorporated.*** There are two potential sources of concern regarding noise: 1) noise generated on adjacent properties during construction and 2) noise impacts caused by operations and the additional traffic generated by such operations (future occupants of the proposed project).

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

A Noise and Vibration Technical Report (the Report) was drafted by PCR Services Corporation for the project (dated July 2015). A short-term noise increase during construction would be expected to occur from the use and transport of heavy construction equipment. Generally in an outdoor environment such as a construction site, sound reduces by approximately 6 decibels (dB) per doubling of distance from the noise source. This report estimated construction noise levels at nearby sensitive receptors (residential areas); noise was measured in four different sensitive receptor areas adjacent to the project site. The Report indicated that the nearest residential areas would be exposed to construction noise levels up to 71 dBA in one of the four areas measured and up to 106 dBA in the other three areas measured. This 106 dBA maximum assumes construction equipment is at the boundary of the project site. As construction equipment nears the center of the project site, the sound must travel further to the sensitive receptors and therefore dissipates or is reduced by a factor of 6 dBA per doubling of distance.

Construction activity will temporarily increase noise, However, pursuant to the City's standard condition of approval, construction shall be limited to the hours of 8:00 a.m. to 8:00 p.m. Monday through Friday, 9:00 a.m. through 7:00 p.m. on Saturday, and 10:00 a.m. through 7:00 p.m. on Sundays and national holidays. Dirt hauling and construction material deliveries or removal are prohibited during the peak traffic periods; morning (7:00 a.m. to 9:00 a.m.) and afternoon (4:00 p.m. to 6:00 p.m.). Further the project will be subject to standard noise reducing conditions for both mobile and stationary sources during construction activity. This includes use of muffling and routine maintenance of equipment. These standard conditions of approval will reduce potential impact from construction noise to a level that is less than significant. Further as implied above, construction equipment will be moved on site as needed and will not statically remain along the perimeter. As the equipment moves towards the center of the project, construction related noise will decrease as it nears residential areas.

A short-term increase in ground borne vibration and noise would be expected to occur during grading and construction. The report stated that equipment used during construction will not cause excessive ground borne vibration and that operational activity – office uses – will also not generate excessive ground borne vibrations. The standard noise and hours of construction conditions noted above will reduce this impact to a level that is less than significant.

The project will cause an increase in traffic noise. Future roadway noise levels attributable to the project were calculated along various road segments adjacent to the Project using methodologies provided in the Caltrans Technical Noise Supplement (Caltrans TeNS) document. Project traffic noise calculations were compared to baseline noise levels that would occur without project conditions. The maximum project traffic noise levels over existing traffic noise levels would be 3.0 dBA which would occur along Ince Boulevard between Culver Studios Gates 3 and 2. Changes in noise levels of less than 3 dBA in an urban setting are generally not discernable to most people while changes in noise levels greater than 5 dBA are readily noticeable and would be considered a significant increase. Other than the area between Gates 3 and 2 noted above, the traffic noise calculations indicates that the increase from no project traffic noise to project traffic noise would range from 0.2 dBA to 1.6 dBA, well below 3 or 5 dBA. Traffic related noise will be less than significant. Additionally the project is located in an urban area consisting of one commercial boulevard (Washington Boulevard) and residential streets with high traffic volumes.

Operational noise levels will primarily come from mechanical equipment such as air conditioning units, vehicles entering and exiting the new multi-level parking structure, and noise typically generated from office uses. Mechanical equipment will require landscape, CMU wall, or both landscape and CMU wall screening. Mechanical equipment will also be subject to the City's noise standards. The parking structure with openings out to the adjacent residential areas will replace an existing garage that also has openings; noise levels from the new parking structure will be consistent with existing conditions. Further there will be a mitigation that the all parking structure levels be treated with a no-skid surface reducing potential noise impact from turning tires. Offices uses do not generate excessive noise and activity would occur within enclosed structures. Additionally, the area is currently characterized by noise consistent with urban developed areas with residential and commercial traffic and activity.

On November 5, 2015, a supplemental noise study prepared by Newson Brown Acoustics, LLC for the new Van Buren parking structure was submitted to the City, after the notice of availability of the Mitigated Negative Declaration was issued. The public review period of the Mitigated Negative Declaration began on October 28, 2015. Pursuant to Section 15073.5, of the CEQA Guidelines, the Mitigated Negative Declaration may be modified after the notice of availability and before its adoption, if new information is added to the Mitigated Negative Declaration which merely clarifies,

amplifies, or makes insignificant modifications to the Mitigated Negative Declaration; or if measures or conditions of project approval are added which are not required by CEQA, which do not create new significant environmental effects and are not necessary to mitigate an avoidable significant effect. Information or language that is added to the Mitigated Negative Declaration as a result of the supplemental noise study is marked with an "underline".

The supplemental noise analysis clarify the conclusions of the original noise study that there would not be a significant noise impact on the adjoining neighbors as a result of the operations of the new Van Buren parking study. Specifically, the supplemental noise study analyzed existing noise and projected noise generated from the area where the new Van Buren parking structure is located. Additional noise measurements were taken at the northwest corner of top level of the existing Van Buren parking structure and at the southern property line between the existing surface parking lot and the neighboring residences. All measurements obtained was within the acceptable noise thresholds of the City's Noise Element and noise regulations of the City's Municipal Code.

The supplemental noise study reported that operational noise from the parking garage will not impact the adjacent residential properties provided that a concrete wall shielding the full first level from adjoining residential uses is installed along the garage's west elevations, facing Van Buren Place. This would be consistent with the structure's north and south elevations which is proposed to be enclosed with pre-cast concrete panels with no openings from the ground level to top of the garage. The supplement noise study stated the pre-cast concrete panels at the north and south sides of the structure should weigh at least 4lbs per square foot and form a continuous façade where there are no gaps between the panels to maximize the benefits of an enclosed elevation. Additionally, the noise study recommended to further reduce any potential for noise impact to neighbors, that all parking structure exhaust or ventilation systems is designed so as to reduce noise emissions to neighboring residential properties. These recommendations have been incorporated as additional mitigation measures.

In addition and separate from the recommendations of the supplemental noise study, because the new parking garage will be open to the general public who purchase tickets for live performances or show tapings, the applicant is required as a condition of project approval, to post signs at all parking levels that remind people to respect neighboring residential uses and to prohibit honking of horns and loud music from cars or vehicles. Studio parking staff shall enforce this requirement and potential violations especially during live audience shows or special events.

With these added mitigations and project conditions of approval, noise impacts associated with the new parking structure operations will be reduced to less than significant.

As stated above standard noise reducing conditions during construction will lessen project generated noise. However the study recommended certain noise reducing project conditions that correlate with standard noise conditions noted herein. Two additional mitigations will be added from the study's recommendations: 1) The applicant shall utilize quiet air compressors and similar equipment, where available, and 2) The applicant shall provide minimum 12-foot tall noise barriers such as noise blankets with a noise reduction coefficient (NRC) of 0.85 and a minimum of sound transmission coefficient (STC) of 20 to block the line-of-site between the construction equipment and residential areas during construction. Noise blankets shall be placed around all construction fencing or in various sections of the construction site wherein there is line-of-site between construction equipment and residential areas. This second mitigation will reduce construction noise levels at adjacent residential areas by up to 10 dBA.

With these mitigations, exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance; exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels; and a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project will be reduced to less than significant.

c.) ***Less Than Significant Impact***: As noted in the noise studies discussed above under Sections a), b), and c), the project's operational noise levels will not create significant impacts and a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project will be less than significant.

e,f). ***No Impact.*** No airport land use plans apply to the area, and the proposed project site is not located within two miles of an airport. The nearest airports are Santa Monica Municipal Airport located approximately three miles to the west, and Los Angeles International Airport located approximately 4.8 miles to the southwest. No impacts to airport land use plans or airports could occur. There are also no private airstrips in the project vicinity; there would be no impacts related to excessive noise near a private airstrip. No mitigation measures are necessary.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

Mitigation Measure(s):

N-1: The applicant shall utilize quiet air compressors and similar equipment, where available. This shall be done during construction.

N-2: The applicant shall provide minimum 12-foot tall noise barriers such as noise blankets with a noise reduction coefficient (NRC) of 0.85 and a minimum of sound transmission coefficient (STC) of 20 to block the line-of-site between the construction equipment and residential areas during construction. Noise blankets shall be placed around all construction fencing or in various sections of the construction site wherein there is line-of-site between construction equipment and residential areas. The noise blankets shall reduce construction noise levels at adjacent residential areas by up to 10 dBA. This shall be done during construction.

N-3: All parking structure levels in the new parking garage shall be treated with a broom finish or some other treatment that results in a no-skid surface.

N-4: A concrete wall shall be placed along level 1 of the new Van Buren parking structure that extend from the ground up to the underside of the Level 2 slab and the concrete wall shall be free from gaps or penetrations.

N-5: The pre-cast concrete panels at the north and south side of the parking structure shall weigh at least 4 lbs per square foot, form a continuous façade with no gaps between precast concrete panels.

N-6: All parking structure exhaust or ventilation systems shall be designed, through the use of quiet fans and duct silencers or similar methods, to not exceed 55 dB(A) Leq from 7:00 AM to 10:00 PM and 50 dB(A) Leq from 10:00 PM to 7:00 AM at the neighboring property lines including the west property line per sound level limits of the Culver City Noise Element.

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?	☐	☐	☐	☒
c)	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Responses:

a) **Less Than Significant Impact.** The project does not propose to add new homes that might induce substantial population growth, however indirectly the increase in employment opportunities at the Culver Studio property may induce demand for additional housing within the region. Therefore, impacts on population growth in the area are anticipated to be less than significant.

b&c) **No Impact.** The project would not displace any existing housing or people. Therefore, impacts related to these issues are non-existent.

Mitigation Measure(s): None required

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the 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?	☐	☐	☐	☒

Responses:

Less Than Significant Impact. Fire and Police Protection. The project potentially could increase the need for fire protection services at the project site by increasing the number of employees, however according to the Culver City Fire Department (CCFD), the existing CCFD staffing and equipment could accommodate the project's need for fire protection services.

The Culver City Police Department, like the CCFD, could potentially be impacted with the increase in worker population at the site. However, based on existing staffing and equipment, the City's police resources will be able to adequately serve the project. Neither the Fire Department nor the Police Department during the internal review of the project identified impacts to their response times as noted above; further they did not identify impacts to their ability to provide adequate services. Fire Prevention has been involved in the review of the proposed structures and maintenance of paths of travel for emergency access during all phases of internal review. Impacts related to fire and police protection will be less than significant.

Schools. The project will not result in an increase in new residential dwelling units that would result in and increase population in the city, therefore there will be no impacts on existing school services in the community.

Parks. Maintenance of public facilities and requirements for other public services, including parks, are expected to be incidental, and no significant adverse impacts are expected. Thus, the project will not create the need for new or expanded parks and recreation facilities.

Other Public Facilities. No other facilities will be impacted by the project.

Mitigation Measure(s): None required

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?	☐	☐	☐	☒

Responses:

a. **Less Than Significant Impact.** The project will result in the removal of existing structures on-site and the addition of new buildings related to the studio use. It is not anticipated that there will be a significant increase in usage of

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

park facilities by employees of Culver Studios or any on-site personnel of ongoing productions, as it is not anticipated that the increase in employment will directly result in an increase in population of the city. Impacts related to recreational facility usage will therefore be less than significant.

b. **No Impact**. The project does not include recreational facilities or require the construction/expansion of recreational facilities. Therefore, there are no impacts related to this issue.

Mitigation Measure(s): None required

Traffic				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulating 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)?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Responses:

a). **Less Than Significant Impact with Mitigation Incorporation.** A traffic study prepared for the project, dated September 2015, by Fehr & Peers. was reviewed and accepted by the City's Traffic Engineer. The traffic study indicated that with required mitigation measures there would be no adverse impact from the proposed Project.

LOS IMPACTS

The Institute of Traffic Engineers (ITE) Trip Generation Manual, 9th edition was used to estimate trip generation rates for office and warehouse land uses. The ITE warehousing rates were used to estimate the number of trips generated by passive production support and stage uses. The ITE manual does not have specific trip generation rates for active studio production support and the trip rate for active studio production support was derived by comparing research and empirical data from other studios to standard office trip generation data from the ITE. Research data was derived from

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

the Burbank Media District Specific Plan, the Playa Vista Dreamworks EIR Addendum, and the Warner Brothers Hollywood Studio EIR; empirical data came from Hollywood Center Studio, NBC Studios, and The Walt Disney Studio.

The traffic study reported that project is estimated to generate a gross total of 1,929 daily trips, of which 205 trips (180 inbound & 25 outbound) are estimated for the morning peak hour and 195 trips (54 inbound & 141 outbound) are estimated in the evening peak hour. A 15% transit credit was applied to the proposed project and existing uses. This credit accounts for studio trips made using transportation modes other than the automobile (bicycles, buses, light rail, walking). The project site is served by several buses and the Expo Light Rail providing flexible transportation options for employees – especially users of the Expo Light Rail line. A further trip credit was applied because although the project will result in 205,700 new gross square of office and studio use it will also include demolition of 66,703 gross square feet of the same types of uses noted herein. The NET NEW AREA will be 138,997 gross square feet (205,700 – 66,703). Based on these credits and the study's trip generation analysis the project's net trip generation is estimated to be 1,564 net new daily vehicle trips, of which 169 trips (149 inbound & 20 outbound) are estimated for the morning peak, and 159 trips (45 inbound & 114 outbound) are estimated for the evening peak hour.

The traffic analysis evaluated the existing (year 2015) and forecast future (year 2018) conditions (future conditions with and without the proposed project) at twenty four (24) intersections, including the Studio's Gates 2 and 3 (the project's main entrance and exit gates) in the vicinity of the project site during both the AM and PM peak hours. Of the 24 intersections, 18 are located within the City of Culver City and 6 intersections within the City of Los Angeles.

In order to assess the potential impact of the proposed project on the local street system, and using the City's significance criteria, the traffic study compared the volume to capacity (V/C) ratio, which is a numerical measure of traffic congestion, at each study location to determine the incremental difference in V/C ratios caused by the proposed project. The "Level of Service" method of intersection capacity analysis was used to determine the intersection V/C ratio and corresponding level of service (LOS), which is a letter-grade measure of traffic congestion, at each of the 21 signalized intersections and the three (3) all-way stop controlled intersections.

LOS is a professional industry standard by which to measure the operating conditions of a given roadway segment or intersection. LOS is defined on a scale of A to F, where LOS A represents free flowing traffic conditions with no restrictions on maneuvering or operating speeds, low traffic volumes and high speeds; LOS B represents stable flow, more restrictions, operating speeds beginning to be affected by traffic volumes; LOS C represents stable flow, more restrictions, speed and maneuverability more closely controlled by higher traffic volumes; LOS D represents conditions approaching unstable flow, traffic volumes profoundly affect arterial flow; LOS E represents unstable flow and some stoppages; and LOS F represents forced flow, many stoppages and low operating speeds.

Using the adopted threshold criteria for both the City of Culver City and the City of Los Angeles for determining the project's significance impacts at a specific location, the traffic analysis concluded for existing conditions plus the project, one (1) out of the 24 analyzed intersection locations would be impacted by Project generated traffic. The impacted intersection is Robertson Boulevard/Exposition Boulevard and Venice Boulevard in the AM peak; this is a City of Los Angeles intersection. A similar analysis was done for 2018 future base traffic plus future project traffic. Using the adopted threshold criteria for both the City of Culver City and the City of Los Angeles for determining the project's significance impacts at a specific location, the traffic analysis concluded for future conditions plus the project, two (2) out of the 24 analyzed intersection locations would be impacted by Project generated traffic. The impacted intersections include Robertson Boulevard/Exposition Boulevard and Venice Boulevard in both the AM and PM peaks and Ince Boulevard and Washington Boulevard in the PM peak (Ince and Washington is a Culver City intersection).

In order to reduce the Project's LOS impact to a less than significant level, traffic mitigations measures described below are required to improve and enhance the vehicular capacity of the intersections noted above:

Ince Boulevard and Washington Boulevard: The project will result in significant LOS impacts (at future baseline plus project) at this intersection in the PM peak hour using its current lane configuration. Therefore, the raised island shall be modified and the eastbound approach shall be restriped from one shared through/right-turn lane to one through lane and one shared through/right-turn lane that lines up with the existing striping on the east side of Ince Boulevard. This mitigation will prohibit the eastbound left-turn movement, may require signal modification, and will improve traffic

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

flow thereby lessening LOS impacts. The project will be required to submit construction design plans for approval of this mitigation prior to issuance of city permits and the project shall pay for and install this mitigation prior to the first certificate of occupancy issuance.

Robertson Boulevard/Exposition Boulevard and Venice Boulevard: The project will result in significant LOS impacts (at future baseline plus project) at this intersection in both the AM and PM peak hours. Therefore the project will provide cost reimbursements to the City of Los Angeles Department of Transportation (LADOT) to upgrade signal controllers in up to six (6) intersections within the vicinity of the project and that are identified by LADOT. Further, Culver Studios shall install Close Circuit Television (CCTV) cameras at the two intersections of Cadillac Avenue and Robertson Boulevard and Fairfax Avenue and Pico Boulevard (CCTV cameras are used by City Traffic Engineers to monitor intersections from remote locations and adjust signaling as appropriate). LADOT provided a letter to Culver Studios on September 3, 2015 confirming an agreement to accept a monetary payment for signal controller upgrades and CCTV installments. This mitigation will enhance LADOT's ability to monitor traffic flows and adjust signal timing adaptively thus improving traffic flows and lessening LOS impacts. The project will be required to complete this mitigation prior to first certificate of occupancy issuance.

It should be noted that the LOS impacts at the City of Los Angeles intersection at existing conditions plus project noted above for the AM Peak only, will be reduced to less than significant by the mitigation noted above since the mitigation will address both AM and PM peak impacts. Further, several intersections at future conditions are expected to operate at LOS E and F even without the project. They were not identified as significantly impacted because the increase in the V/C ratios due to the project were below adopted thresholds of significance for both the City of Culver City and the City of Los Angeles.

QUEUING IMPACTS

The flow of traffic both at the local project level and at adjacent areas near the project could be impacted, further affecting LOS levels, if there is insufficient space for vehicles to queue when making turning movements. In other words, if several cars need to make a left turn at a left turn lane, there could be enough back up resulting in congestion for the lane to the right of left turn lane. The traffic study analyzed potential queuing impacts at the intersection of Ince Boulevard and Washington Boulevard and at southbound Ince Boulevard and Gate 3. Gate 2 has an existing right-only turn lane separate from the through lane in the southbound direction; this will not change and so no queuing impact analysis was done for this gate.

Similar to the LOS analysis, the queuing analysis reviewed existing conditions and future conditions plus project conditions. The focus of the study was to determine if there is adequate vehicle storage in the westbound to southbound left turn lane at Ince Boulevard and Washington Boulevard and to determine the necessary removal of street parking along southbound Ince Boulevard for the southbound right turn at Gate 3. The installation of a right-turn only lane and a separate through southbound lane at gate 3 will require elimination of street parking and widening of Ince Boulevard.

Using the Synchro/Sim Traffic micro-simulation software program for a queuing analysis, the study determined that for future plus project conditions for westbound to southbound traffic from Washington Boulevard to Ince Boulevard, the maximum queue is expected to exceed the vehicle storage capacity of the left turn lane by 15 feet during the AM peak hour and 14 feet during the PM peak hour peak. This has the potential to create congestion at this road segment. For southbound Ince Boulevard project traffic entering the site from Gate 3, future plus project conditions results in a 15 foot increase in vehicle queuing (or 52% project related increase) during the AM peak. Without a dedicated southbound left turn lane separate from a southbound through lane, this 52% increase has the potential to create congestion along southbound Ince Boulevard.

In order to reduce the Project's queuing impacts to a less than significant level, traffic mitigations measures described below are required to improve and enhance vehicular flow:

Westbound to Southbound Left Turn Lane at Ince Boulevard and Washington Boulevard: The project will be responsible for extending the westbound left-turn lane from 118 feet to 150 feet and modifying the raised median island to accommodate the extended left-turn lane. The project will also be responsible for modifying the striping and to

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

restrict left-turns out of the Ince Parking Structure driveway into the roadway. The removal of the median island along Washington Boulevard at this location will be replaced by a two-way left turn lane further east of the extended left-turn lane. Extended lane length will increase storage capacity, lessen congestion, and improve traffic flow. The project will be required to submit construction design plans for approval of this mitigation prior to issuance of city permits and the project shall pay for and install this mitigation prior to the first certificate of occupancy issuance.

Southbound Ince Boulevard Project Traffic Entering Gate 3: The project will be responsible for widening Ince Boulevard by 2 feet to provide a 100 foot southbound right-turn pocket into Gate 3. A 30 foot reverse taper and a 30 foot red curb zone shall be installed in order to provide access to the right-turn pocket. The project shall widen the roadway width by 2 feet, narrow the sidewalk from 10 feet to 8 feet, remove parking and parking meters, remove or relocate street trees and street lights, and restripe the roadway in order to accommodate a southbound left-turn pocket, a southbound through lane, and a northbound through lane. Based on the queuing study a 100 foot right-turn pocket will sufficiently meet the queuing demand thereby lessening congestion and improving traffic flow. The project will be required to submit construction design plans for approval of this mitigation prior to issuance of city permits and the project shall pay for and install this mitigation prior to the first certificate of occupancy issuance.

Gate 3 Entrance and Exit: A further mitigation to ensure overall ease of traffic flow and lessen potential LOS impacts will require that Gate 3 be a right turn in only and left turn out only driveway. The project will be responsible for restriping the driveway at an angle that prohibits right-turn exiting or left-turn entrances and will further restripe and post signs in the public right-of-way warning motorists of the prohibited turning movements. The project will be required to submit construction design plans for approval of this mitigation prior to issuance of city permits and the project shall pay for and install this mitigation prior to the first certificate of occupancy issuance.

b). **Less than Significant Impact.** Pursuant to the Los Angeles County Metropolitan Transportation Authority Congestion Management Program (CMP), any project that adds 150 or more vehicle trips to freeway segments or 50 or more vehicle trips to roadway segments during peak hours must be examined for impact of CMP roadways and intersections.

The current CMP identifies five (5) arterial monitoring intersections nearest to the project site as listed below:

- Venice Boulevard and La Cienega Boulevard (City of Los Angeles)
- La Cienega Boulevard and Jefferson Boulevard (City of Los Angeles)
- Venice Boulevard and Overland Avenue (Culver City)
- La Cienega Boulevard and Stocker Street (Los Angeles County)
- La Cienega Boulevard and Centinela Avenue (City of Los Angeles)

Based on the traffic study's trip generation estimates, review of the net project traffic, and expected trip distribution, the project would add fewer than 50 trips through the identified arterial monitoring stations and less than 150 vehicle trips to freeway segments. The project is not expected to conflict with the County CMP or level of service standard established by the congestion management agency. Impacts would be less than significant.

c). **No Impact.** A significant impact would occur if the proposed project caused a change in air traffic patterns that would result in a substantial safety risk. The project site is not located within an airport land use plan and does not include any structures that would change air traffic patterns or uses that would generate air traffic. Therefore, no impacts related to a change in air traffic patterns would occur.

d). **Less Than Significant Impact.** A significant impact would occur if the proposed project substantially increased an existing hazardous design feature or introduced incompatible uses to the existing traffic pattern. Access to the project site is proposed via two driveways on Ince Boulevard (Gates 2 and 3) and one exit only driveway on Washington Boulevard (Gate 1). Culver Studios has operated for several decades with these gates and restriping per mitigations noted herein will reduce traffic congestion and increase flow of traffic efficiency, thus reducing the potential hazard generated by high traffic volumes at the identified driveways and intersections. The design of the proposed project would comply with all applicable City regulations, including line-of-site triangles and distances. This project would result in a less than significant traffic safety hazard.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

e). **Less Than Significant Impact**. A significant impact would occur if the design of the proposed project would not satisfy emergency access requirements of the City of Culver City Fire Department or in any other way threaten the ability of emergency vehicles to access and serve the project site or adjacent uses. The proposed project would not result in inadequate emergency access. As discussed above, access to the project site will not change but restriping of lanes will improve traffic flow along Ince and Washington Boulevards. The driveways and internal drive aisles and parking area have been designed to accommodate emergency access on site. All access features are subject to and must satisfy the City of Culver City design requirements, including the Fire Department's requirements. This project would not result in adverse impacts with regard to emergency access.

f). **Less than Significant Impact.** The project is located near a pedestrian and bicycle path along National Boulevard that was constructed in association with the Expo light rail transit line and station nearby. The project can be serviced by up to nine (9) bus lines from various transit agencies. The routes for these bus lines are located near the project site and have bus stops located nearby as well. The traffic study determined that the project will result in 42 new transit person trips in the weekday AM peak hour and 39 new transit person trips in the weekday PM peak hour. The nine bus lines and the Expo Light Rail line have an approximate total seating capacity of 6,970 persons in the peak hours. The proposed project is estimated to utilize up to 0.6% of the available transit capacity during the peak hours. Further the proposed project is consistent with the City's bicycle and pedestrian master plan (which is compatible to Metro's provision of a pedestrian and bicycle path along their LRT line) by providing onsite, secured, bicycle racks and offsite bicycle racks. The project provides adequate pedestrian access along the project frontages and onto the project site. The proposed project would result in changes to lane configuration of some surrounding roads as previously discussed. These alterations would not affect performance or safety of alternative transportation facilities. Impacts would thus be less than significant.

Mitigation Measure (s):

Prior to issuance of city permits, the project applicant will be required to submit construction design plans to the City Engineer for review and approval and shall pay for and install improvements per approved plans prior to the first certificate of occupancy issuance for the following work:.

T-1: At Ince Boulevard and Washington Boulevard, the raised island shall be modified and the eastbound approach shall be restriped from one shared through/right-turn lane to one through lane and one shared through/right-turn lane that lines up with the existing striping on the east side of Ince Boulevard. Design shall ensure that eastbound left-turn movements are prohibited and may require signal modification.

T-2: At the Westbound to Southbound Left Turn Lane at Ince Boulevard and Washington Boulevard, the westbound left-turn lane shall be extended from 118 feet to 150 feet and the raised median island shall be modified to accommodate the extended left-turn lane. The project applicant shall also modify the striping and restrict left-turns out of the Ince Parking Structure driveway into the roadway. The median island along Washington Boulevard at this location will be removed and replaced by a two-way left turn lane further east of the extended left-turn lane.

T-3: At the Southbound Ince Boulevard Project Traffic Gate 3 the project applicant shall widen Ince Boulevard by 2 feet to provide a 100 foot southbound right-turn pocket into Gate 3. A 30 foot reverse taper and a 30 foot red curb zone shall be installed in order to provide access to the right-turn pocket. The roadway shall be widened by 2 feet, the sidewalk at this location shall be narrowed from 10 feet to 8 feet, parking and parking meters shall be removed, street trees and street lights shall be removed and/or relocated, and the roadway shall be restriped in order to accommodate a southbound left-turn pocket, a southbound through lane, and a northbound through lane.

T-4: At the Gate 3 Entrance and Exit the project applicant shall restripe the driveway at an angle that prohibits right-turn exiting or left-turn entrances and will further restripe and post signs in the public right–of-way warning motorists of the prohibited turning movements.

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact
Prior to the first certificate of occupancy issuance, the applicant shall provide written proof from the City of Los Angeles Department of Transportation that the following has been completed: **T-5:** The project applicant shall provide cost reimbursements to the City of Los Angeles Department of Transportation (LADOT) to upgrade signal controllers in up to six (6) intersections within the vicinity of the project and that are identified by LADOT. Further, Culver Studios shall install Close Circuit Television (CCTV) cameras at the two intersections of Cadillac Avenue and Robertson Boulevard and Fairfax Avenue and Pico Boulevard.				
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?	☐	☐	☒	☐

Responses:

a, b, & e) **Less Than Significant Impact.** *Less Than Significant Impact*. Culver City maintains its own sewage collection facilities within the City limits and contracts with the City of Los Angeles for treatment and disposal service. Treatment occurs at the Hyperion Treatment Plant, located southwest of the City. The treatment plant has a capacity to process 450 million gallons per day. Currently the plant treats an average daily flow of 362 million gallons per day. In addition, the Hyperion Treatment Plant is a public facility and therefore is subject to the state's wastewater treatment requirements. As such, wastewater from the project would be treated according to Regional Water Quality Control Board requirements, and a less than significant impact would occur. The proposed project will connect to existing wastewater treatment facilities available to the project site. The increase in wastewater generated per day from the project could be accommodated by existing treatment facilities, therefore impacts will be less than significant.

c). **Less Than Significant Impact.** The project site is presently developed with office buildings, sound stages and paving, with existing lawn area in front and to the rear of Building C (the Mansion building). In order to prevent run-off into storm drains, the project will comply with SUSMP requirements, as conditioned by the Culver City Engineering Division. The new buildings proposed for the site will include landscape areas around the perimeter that will also

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

serve to reduce runoff. Through adherence to the City's conditions of approval for SUSMP, impacts will be less than significant.

d). **Less than Significant Impact.** Water service for this project site is provided by the Golden State Water Company (GSWC) which contracts with the Metropolitan Water District for its supply. There are sufficient water supplies to the City to serve the proposed project. Expansion of the existing services is not necessary. The proposed project will have less than significant impacts to the water system.

f). **Less than Significant Impact.** Solid waste from the proposed project area is disposed of at the Puente Hills landfill in the City of Industry. Other landfills available for City waste disposal include BKK Sanitary Landfill located in the City of West Covina and Bradley West Landfill located in the City of Sun Valley. The Municipal Code requires provision of trash containers for recyclable materials and yard waste to reduce solid waste generation. No mitigation measures are necessary.

g). **No Impact.** The primary state legislation regarding solid waste is AB939, The Integrated Waste Management Act, adopted in 1989. AB939 requires local jurisdiction to achieve a minimum 50 percent solid waste diversion rate. A minimum 50 percent diversion rate for construction demolition and debris is also required. Recently, AB341 (2011) was adopted requiring mandatory commercial recycling programs. The proposed project does not include any component that will conflict with state laws governing construction or operational solid waste diversion and will comply pursuant to local implementation requirements. Less than significant impact will occur.

Mitigation Measure(s): None

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)?	☐	☒	☐	☐
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Responses:

a). **Less Than Significant with Mitigation Incorporation.** 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. Adverse impacts to archaeological and paleontological

EVALUATION OF ENVIRONMENTAL IMPACTS:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporation	Less Than Significant Impact	No Impact

resources would not occur. Construction-phase procedures would be implemented in the event any important archaeological or paleontological resources are discovered during grading, consistent with Mitigation Measure C-1. 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. Based on responses to VIII there are potential hazardous impacts but mitigation nos. HM-1 through HM-4 will reduce impacts to less than significant. Based on response to XII, there are potential noise impacts but mitigation nos. N-1 and N-2 will reduce noise impacts to less than significant. 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 incorporation.

b). **Less Than Significant with Mitigation Incorporation.** 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 short-term and temporary, usually consisting of overlapping construction impacts, as well as long term, due to the permanent land use changes involved in the project.

The proposed project will generally result in nominal environmental impacts, as discussed herein. Short-term impacts related to noise and pollutant emissions will be at less than significant levels and therefore will 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 will not be substantial with implementation of the City's existing policies, programs, 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. Further where impacts have been identified, mitigation measures have been crafted and will be made a part of the Project Conditions of Approval. The City hereby finds that with mitigations the contribution of the proposed project to cumulative impacts will be less than significant.

c). **Less Than Significant with Mitigation Incorporation.** Based on the analysis of the project's impacts in the responses to items 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 temporary adverse effects during construction related to noise and criteria pollutant emission, these will be reduced to less than significant levels through mitigation and incorporation of standard requirements for air quality protection. 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. On-going pumping of water into the storm drain system and filtration of the pumped water along with continued reporting and discharging of hazardous materials will act as mitigations to potential hazardous impacts. 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 incorporation.

Mitigation Measure(s): Refer to Mitigation Monitoring Report.

XVIII. EARLIER ANALYSES:

None

References Utilized:

1. Geotechnical Evaluation prepared by Geotechnical and Environmental Sciences Consultants, October 14, 2015.
2. Floral and Faunal Compendium, PCR Services Corporation, March 2015
3. Air Quality Technical Report by PCR Corporation Services, July 2015
4. Phase I Environmental Site Assessment prepared by GRS Group, December 16, 2013
5. Traffic Study prepared by Fehr and Peers, September 2015.
6. Phase I Archaeological/Paleontological Resource Survey and Impact Assessment of the Culver Studios Project prepared by Matthew A. Boxt, Ph.D., April 27, 2015
7. Greenhouse Gas Technical Report, PCR Corporation Services, July 2015
8. Air Quality Technical Report, Prepared by PCR Services Corporation, Dated July 2015.
9. Noise and Vibration Technical Report by PCR Services Corporation, Dated July 2015.
10. Historical Resources Assessment and Environmental Impacts Analysis Report prepared by PCR Services Corporation, dated September 2015.
11. Culver City Redevelopment Plan Amendment and Merger Program Subsequent Environmental Impact Report, November 16, 1998.
12. Culver City General Plan Update Program Environmental Impact Report, November 1995
13. Van Buren Garage Sound Analysis Report/Report No. 15310/RPT1 by Newson Brown Acoustics LLC), November 2015

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 indicated. The mitigation measures have been identified by impact category and numbered for ease of reference.

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MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
AESTHETICS **A-1:** The Van Buren parking structure shall include a linear landscape area within the 15' building setback area from the western property line for the entire length of the parking structure as demonstrated in the final approved Comprehensive Plan CPA No. 6 document. Climbing type vines shall be planted to the metal mesh that is proposed along the parking structure frontage. **A-2:** On the north and south side of the Van Buren parking structure, there shall be a landscape area within the 18' building setback area from the property line. The landscape buffer area shall include columnar and evergreen type trees. Further, climbing vines that will grow along the north and south side parking structure walls shall be installed in the landscape area. The landscaping details as to the type and number of trees shall be included in the project landscaping and irrigation plans during building permit phase and shall be prepared to the satisfaction of the Planning Manager.	Condition of Approval	Plan Check Notes and Field Inspections	Prior to Building Permits	Planning
BIOLOGICAL RESOURCES **B-1:** Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit taking of all birds and their active nests, including raptors and other migratory nongame birds (as listed under the Federal MBTA)	Condition of Approval	Plan Check Notes and Field Inspections	Prior to Demolition, Grading and Building Permits	Planning

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Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from March 1-August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs and/or young resulting from disturbances which cause abandonment of active nests. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.				
B-2: If avoidance of the avian breeding season is not feasible, beginning thirty days prior to the initiation of project activities, a qualified biologist with experience in conducting breeding bird surveys conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than three (3) days prior to the initiation of project activities. If a protected native bird is found, the project proponent shall delay all project activities within 300 feet of on- and off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31, annually. Alternatively, the qualified biologist shall continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and there is no				

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evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing shall be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the project activities and the nest. Project personnel, including all contractors working on site, shall be instructed on the sensitivity of the area. The project proponent should provide the City of Culver City the results of the protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. If the biological monitor 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 Department of Fish and Game ("Department"). Based on the submitted information, the City of Culver City (and the Department, if the Department requests) will determine whether to allow a narrower buffer. **B-3:** The biological monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain within the project footprint (i.e., outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor shall send weekly monitoring reports to the City of Culver City during the grubbing and clearing of vegetation, and shall notify the City immediately if project activities damage active avian nests.				

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MITIGATION MEASURE	Implementing Action, Condition or Mechanism	Method of Verification	Timing of Verification	Responsible Persons
Cultural Resources ***CR-1: Recordation:*** Prior to the issuance of a relocation permit for the bungalows, a recordation document in accordance with Historic American Buildings Survey (HABS) Level III requirements shall be completed for the existing buildings. The HABS document shall be prepared by a qualified architectural historian or historic preservation professional. This document shall include a historical narrative on the architectural and historical importance of the subject property and record the existing appearance of the four bungalows in professional large format HABS photographs. The building exteriors, representative interior spaces, character-defining features, as well as the setting and contextual views shall be documented. All documentation components shall be completed in accordance with the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation (HABS standards). Original archivally-sound copies of the report shall be submitted to the HABS collection at the Library of Congress, and South Central Coastal Information Center, California State University, Fullerton, CA. Non-archival copies will be distributed to the City of Culver City and the Los Angeles County Julian Dixon Public Library. In addition, any existing and available design and/or as-built drawings shall be compiled, reproduced, and incorporated into the recordation document. ***CR-2: Relocation, Storage, and Rehabilitation*** Prior to relocation, the bungalows shall be recorded before being moved to an appropriate on-site location with compatible setting and association qualities. A Relocation and Rehabilitation Plan shall be commissioned by the applicant and developed by a qualified historic preservation consultant. The Plan shall include relocation methodology recommended by the National Park Service (NPS), which are outlined in the booklet entitled "Moving Historic Buildings," by John Obed Curtis (1979). The Plan shall include an assessment of the building condition by a qualified engineer, and	Condition of Approval	Plan Check note and Field Inspection	Prior to Issuance of a Grading Permit, Building Permit and On-Going during Construction	Building Safety Division, Building Safety Inspector, Public Works, Engineering and Planning Division

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a shoring plan for relocation and storage, and relocation to the final site. If temporary storage is required, the storage conditions should closely follow the recommendations of NPS Preservation Brief 31: Mothballing Historic Buildings with regard to recommendations for structural stabilization, pest control, protection against vandalism, fire, and moisture, adequate ventilation which should be applied to the building at the temporary storage location to ensure the safety of the building during storage. A periodic maintenance and monitoring plan shall also be included in the Plan and implemented during the storage period in accordance with the guidance outlined in NPS Preservation Brief 31. The Relocation and Rehabilitation Plan shall be reviewed and approved by the City of Culver City prior to its implementation. Upon relocation of the structures to the new site, any maintenance, repair, stabilization, rehabilitation, preservation, conservation, or reconstruction work performed in conjunction with the relocation of the building shall be undertaken in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Properties. In addition, a plaque describing the date of the move and the original location shall be placed in a visible location on each of the buildings. The removal, storage, relocation and rehabilitation process shall be monitored by a qualified historic preservation consultant at key intervals to ensure conformance with the Standards and NPS guidelines. The preservation consultant shall also be available to provide technical expertise to reduce potential impacts to historical resources from unforeseen circumstances. ***CR-3: Interpretative Plaque/Marker:*** A permanent metal plaque will be affixed to the primary elevation of each of the relocated bungalows or a marker will be imbedded in the pavement in front of each bungalow, which will briefly explain that the buildings were relocated and their original site.				

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CR-4: Preservation Design Recommendations: The project design for Building R is presently conceptual and while it appears to have a less than significant level of impact as it relates to Stage 2/3/4 and the relocated bungalow court in terms of scale, massing and design, a qualified architectural historian shall provide input to the project architect as detailed plans are developed to ensure the design is in accordance with the Secretary of the Interior's Standards. Once the design has been finalized, the architectural historian will conduct a Secretary of the Interior's Standards review for submittal to the City of Culver City. The areas of concern are how the new Building R will structurally impact the Stages 2/3/4 where the two buildings abut and tie together, views of the north front of Stage 2/3/4, and potential impacts to the setting of the relocated bungalow court.				
CR-5: Virtual Museum/Exhibition: A web-based educational resource that outlines the development of The Culver Studios site from 1918 to the present shall be developed, the layout and content of which is subject to review and approval by the City of Culver City prior to implementation. The Virtual Museum shall be operating and web accessible prior to the last certificate of occupancy issuance; further the Virtual Museum shall operate in perpetuity.				
CR-6: Archaeologist and Paleontologist professionals approved by the City shall monitor all phases of excavation for the project site in order to identify and recover where feasible, the presence of archaeological and/or paleontological resources. Should such resources be identified established Federal and State rules and guidelines for the cataloging and final disposition of such resources shall be applied and followed. This shall include but not be limited to halting of construction activities in the work area where the resources are identified, notifying the Los Angeles County Coroner and the appropriate Native American organization of such resources, and notifying the Los Angeles County Natural History and Page museums. Final				

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disposition of Native American remains shall follow Federal and State rules and guidelines for such remains. Identified paleontological resources shall be donated to the Los Angeles County Natural History/Page museums or some other museum as deemed appropriate by the Paleontologist. A final report or reports cataloging all findings shall be submitted to the City by the Archaeologist and/or Paleontologist professional within one year of issuance of the Certificate of Occupancy.				
Geology and Soils **G-1:**Foundation design shall follow the recommendations of the project's geotechnical report, which include, but are not limited to a deep foundation system, mat foundation systems provided they can withstand liquefaction induced total and differential settlements during a seismic event, or soil improvement techniques with conventional footing. Final foundation design and inspection shall be determined and approved by the structural and geotechnical engineer. **G-2**: To reduce the hydro-static pressure imposed on the new parking structure due to groundwater, a long term continuously pumping groundwater system shall be installed.	Condition of Approval	Plan Check note and Field Inspection	Prior to Issuance of a Building Permit and a Foundation Plan	Building Safety Division and Building Safety Inspector.
Hazardous Materials **HM-1** Existing carbon filter tanks installed in the existing subterranean parking garage in order to remove contaminants from the groundwater prior to discharge into the storm water system shall be maintained and shall continue to filtrate for as long as the pumping system in the existing garage is maintained or for as a long as the appropriate regulatory authorities require such filtration. A written and signed statement by the applicant certifying that this on-going filtration will be maintained shall be	Condition of Approval	Plan Check note and Field Inspection	Prior to Issuance of a Building Permit and a Foundation Plan	Building Safety Division; Building Safety Inspector; Fire Prevention; Fire Inspector; Planning Division.

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provided to the City prior to issuance of City permits.				
HM-2 In relation to Mitigation No. G-2, under Geology which requires continuous groundwater pumping, carbon filter tanks shall be installed in the new parking garage in order to remove contaminants from the groundwater prior to discharge into the storm water system; the filters shall be maintained and shall continue to filtrate for as long as the pumping system in the new garage is maintained or for as a long as the appropriate regulatory authorities require such filtration. The filtration system shall be installed prior to the new parking garage Certificate of Occupancy issuance and a written and signed statement by the applicant certifying that this on-going filtration will be maintained shall be provided to the City prior to issuance of City permits.				
HM-3 The site shall continue to comply with Los Angeles County and Culver City Fire Department regulations regarding the CUPA/Hazardous Materials Disclosure Reporting Program. This shall include but not be limited to the reporting of hazardous materials and the manner in which they are stored and disposed. A written and signed statement by the applicant certifying that this on-going reporting will be maintained shall be provided to the City prior to issuance of City permits.				
HM-4 The site shall continue to obtain permits as required by Federal, State, County, or City authorities for the regulated use and disposal or emission of hazardous materials and groundwater for as long as the site is used for studio purposes. A written and signed statement by the applicant certifying that this on-going permitted activity will be maintained shall be provided to the City prior to issuance of City permits.				

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Noise **N-1:** The applicant shall utilize quiet air compressors and similar equipment, where available. This shall be done during construction. **N-2:** The applicant shall provide minimum 12-foot tall noise barriers such as noise blankets with a noise reduction coefficient (NRC) of 0.85 and a minimum of sound transmission coefficient (STC) of 20 to block the line-of-site between the construction equipment and residential areas during construction. Noise blankets shall be placed around all construction fencing or in various sections of the construction site wherein there is line-of-site between construction equipment and residential areas. The noise blankets shall reduce construction noise levels at adjacent residential areas by up to 10 dBA. This shall be done during construction. **N-3:** All parking structure levels in the new parking garage shall be treated with a broom finish or some other treatment that results in a no-skid surface. **N-4**: A concrete wall shall be placed along level 1 of the new Van Buren parking structure that extend from the ground up to the underside of the Level 2 slab and the concrete wall shall be free from gaps or penetrations. **N-5:** The pre-cast concrete panels at the north and south side of the parking structure shall weigh at least 4 lbs per square foot, form a continuous façade with no gaps between precast concrete panels. **N-6**: All parking structure exhaust or ventilation systems shall be designed, through the use of quiet fans and duct silencers or similar methods, to not exceed 55 dB(A) Leq from 7:00 AM to 10:00 PM and 50 dB(A) Leq from 10:00 PM to 7:00 AM at the	Condition of Approval	Plan Check note, Field Inspection,	Prior to Issuance of a Building Permit and a Foundation Plan; Verified at Preconstruction Meeting with City.	Building Safety Division; Building Safety Inspector; Planning Division.

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neighboring property lines including the west property line per sound level limits of the Culver City Noise Element.				
Transportation/Traffic Prior to issuance of City permits, the project applicant will be required to submit construction design plans to the City Engineer for review and approval and shall pay for and install improvements per approved plans prior to the first certificate of occupancy issuance for the following work:. **T-1:** At Ince Boulevard and Washington Boulevard, the raised island shall be modified and the eastbound approach shall be restriped from one shared through/right-turn lane to one through lane and one shared through/right-turn lane that lines up with the existing striping on the east side of Ince Boulevard. Design shall ensure that eastbound left-turn movements are prohibited and may require signal modification. T-2: At the Westbound to Southbound Left Turn Lane at Ince Boulevard and Washington Boulevard, the westbound left-turn lane shall be extended from 118 feet to 150 feet and the raised median island shall be modified to accommodate the extended left-turn lane. The project applicant shall also modify the striping and restrict left-turns out of the Ince Parking Structure driveway into the roadway. The median island along Washington Boulevard at this location will be removed and replaced by a two-way left turn lane further east of the extended left-turn lane.	Condition of Approval	Plan Check note, Field Inspection, Receipt of Funds	Prior to any Certificate of Occupancy and Temporary Certificate of Occupancy	Culver City Traffic Engineering, LADOT, and Engineering/ Public Works and Planning Division

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T-3: At the Southbound Ince Boulevard Project Traffic Gate 3 the project applicant shall widen Ince Boulevard by 2 feet to provide a 100 foot southbound right-turn pocket into Gate 3. A 30 foot reverse taper and a 30 foot red curb zone shall be installed in order to provide access to the right-turn pocket. The roadway shall be widened by 2 feet, the sidewalk at this location shall be narrowed from 10 feet to 8 feet, parking and parking meters shall be removed, street trees and street lights shall be removed and/or relocated, and the roadway shall be restriped in order to accommodate a southbound left-turn pocket, a southbound through lane, and a northbound through lane. **T-4**: At the Gate 3 Entrance and Exit the project applicant shall restripe the driveway at an angle that prohibits right-turn exiting or left-turn entrances and will further restripe and post signs in the public right–of-way warning motorists of the prohibited turning movements. Prior to the first certificate of occupancy issuance, the applicant shall provide written proof from the City of Los Angeles Department of Transportation that the following has been completed: **T-5:** The project applicant shall provide cost reimbursements to the City of Los Angeles Department of Transportation (LADOT) to upgrade signal controllers in up to six (6) intersections within the vicinity of the project and that are identified by LADOT. Further, Culver Studios shall install Close Circuit Television (CCTV) cameras at the two intersections of Cadillac Avenue and Robertson Boulevard and Fairfax Avenue and Pico Boulevard.				