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December 18, 2025

VIA EMAIL

Honorable Mayor and Councilmembers
City of Culver City - City Hall
9770 Culver Blvd.
Culver City, CA 90232
c/o Barreras, Gabriel
Gabriel.Barreras@culvercity.org

Re: Response to Appeal of Planning Commission's Approval of Conditional Use Permit P2025-0174CUP and CEQA Determination at 10150-10200 Jefferson Blvd.

Dear Mayor and Councilmembers:

We are writing on behalf of our client Cadillac of Beverly Hills ("Applicant") regarding the appeal ("Appeal") by Lauren Fishelman ("Appellant") of the Planning Commission's approval of a Conditional Use Permit ("CUP") to allow the establishment of a new vehicle services, maintenance and repair facility ("Project") within an existing industrial building located at 10150-10200 Jefferson Boulevard (APN 4296-001-002) ("Site") in the City of Culver City ("City"). As we discuss below, the City has provided robust analysis which constitutes substantial evidence supporting approval of the Project. Appellant has failed to demonstrate that the Planning Commission's decision was based upon an error of fact, dispute of findings, or inadequacy of conditions that mitigate potential impacts. **As such, we urge the City Council to deny the Appeal**.

I. Background and Site Information

The 1.82-acre (79,133-square-foot) Site is located along Jefferson Boulevard and is currently developed with a one-story, 42,333-square-foot warehouse building and surface parking (approximately 76 spaces) located on the northeast, southeast, and southwest sides of the building. Vehicle access to the Site is provided along Jefferson Boulevard via two driveways – one located at the northwestern corner of the Site and the other at the southwestern corner. The Site is zoned Mixed Use Corridor 2 ("MU-2") and is designated under the General Plan as Mixed Use Corridor 2.

The Site is surrounded by a mix of commercial, residential and civic uses. The properties located to the north and northeast are also zoned MU-2 and designated Mixed Use Corridor 2; the properties located to the south and southwest are zoned Planned Development and designated Low Density Multi Family; the properties across Jefferson Boulevard are zoned and designated Mixed Use Industrial. The Raintree townhouse community, located to the south/southwest of the Site, is the only residential use surrounding the Site. Additionally, the Site is located within the larger Field Boundary but outside the

northwest boundary of the Surface Filed Boundary of the Inglewood Oil Field according to California Geologic Energy Management Division ("CalGEM").[1] There are no existing or former wells, or related oil facilities on Site. Six wells on adjacent parcels to the east have been properly abandoned and capped in accordance with Public Resources Code Section 3208 and Title 14 California Code of Regulations Sections 1723–1723.5. The nearest active oil well is 630 feet from the existing building on the Site.

The Site was developed with light industrial and office uses in 1966 and is predominantly surrounded by similar industrial uses. The Site was most recently used (before the Temporary Use Permit discussed below) as a warehouse facility for the storage of books and other industrial uses.

On June 19, 2025, pursuant to Culver City Municipal Code ("CCMC") Title 17, Chater 17.520, Applicant obtained a Temporary Use Permit (P2025-0141-TUP) ("TUP") to operate limited vehicle services including accessories installation, car washes and maintenance/repair at the Site. The TUP was conditionally approved for a 90-day period and was set to expire on September 17, 2025. On September 2, 2025, an extension to the TUP was approved, allowing operations under the TUP to continue until the close of the appeal period for the proposed CUP in connection with the Project.

On September 24, 2025, the City Planning Commission held a duly noticed hearing to consider and ultimately approved the Project, including: 1) the new Conditional Use Permit (P2025-0174-CUP-CE) subject to the conditions of approval as stated in proposed Resolution No.2025-P011; 2) the continuation of uses and conditions permitted under Temporary Use Permit (P2025-0141-TUP) until final building permits for the Project are issued; 3) and adoption of a Class 1 Categorical Exemption ("CE") pursuant to the California Environmental Quality Act ("CEQA") and the CEQA Guidelines Section 15301 for existing facilities.

On October 8, 2025, Appellant filed the Appeal within the appeal period, alleging: 1) the Project will be detrimental to the public interest, health, safety, and general welfare, and injurious to persons, property, and improvements in vicinity of the Site and thus the required CUP findings were not supported; 2) the Project does not comply with the General Plan; and 3) the Project does not qualify for the Class 1 CE in violation of CEQA. In response to the Appeal, the City has supplemented the record with additional CEQA findings supporting a Class 32 CE pursuant to CEQA Guidelines Section 15332 for infill development, including technical reports relating to air quality, noise, traffic and fire safety. Below, we provide responses to each of the Appeal points demonstrating they are either factually incorrect or unsupported by substantial evidence and therefore should be rejected.

II. Project Description

The Project is an adaptive reuse of the existing building and surface parking for limited vehicle services including accessories installation, car washes and maintenance/repair. The proposed uses are listed as permitted and conditionally permitted uses in the MU-2 zone in accordance with the Culver City Municipal Code ("CCMC") Section 12.220.015, Table 2-6. The Project would include 39 automotive hoists, one-half roughly dedicated for electric vehicle ("EV") service needs and one-half for internal combustion engine ("ICE") vehicle service needs. No gasoline or diesel fueling would occur on the Project Site. Only

[1] See the Inglewood Oil Field Context Map from the City's Inglewood Oil Field Specific Plan, available at https://www.culvercity.org/files/assets/public/v/1/documents/city-manager/maps/figure_03inglewoodoilfield.pdf (last accessed 12/17/25).

one EV battery will be stored on site at any given time, and that is only in the event that a customer needs an EV battery replacement. If that is the case, then the battery will be transported to the site from an off-site facility. The battery will be stored in a secured cabinet outside of the building on the north end of the site (furthest from the residential development). At the time of delivery and storage, the battery will be completely unpowered and will only contain a charge after it is installed in a vehicle.

All maintenance and repair service activities would occur within the building and would not occur outside or within parking areas. Operations would occur between the hours of 7:00 AM and 6:00 PM Monday through Friday, and 8:00 AM to 4:00 PM Saturday. To the extent that carrier trucks are delivering cars to the Site, which will be infrequent, such trucks would transport vehicles to and from the Site between 9:00 AM to 4:00 PM Monday through Friday, stopping within the commercial loading zone along Jefferson Boulevard[2].

Project construction involves limited interior and exterior improvements, including: exterior/interior painting; installation of additional/new exterior/interior lighting; installation of exterior/interior signage; installation of exterior architectural paneling; installation of window glazing; removal and replacement of non-load-bearing interior walls to create service and office spaces; installation of automotive hoists; restriping of parking spaces and drive aisles to include a total of 67 parking spaces, including 3 ADA-accessible spaces, 7 full EV charging stations, 7 EV ready spaces and 14 EV capable spaces; and installation of security gates at the two existing driveways. The Project would not include any other physical changes, demolitions, additions, or expansions to the existing building or Site.

III. The Planning Commission's CUP Findings Are Based on Substantial Evidence.

Based on substantial evidence, the Planning Commission made the required findings pursuant to CCMC Section 17.530.020(E) in support of its approval of the Project's CUP, including that the Project "will not be detrimental to the public interest, health, safety, or general welfare, or injurious to persons, property, or improvements in the vicinity and the zoning district in which the property is located." Appellant alleges that the Planning Commission's findings were not supported by the record.

The City's CUP findings are reviewed under an abuse of discretion standard, which is highly deferential. (*Friends of Lagoon Valley v. City of Vacaville* (2007) 154 Cal.App.4th 807, 816; *Friends of Riverside's Hills v. City of Riverside* (2018) 26 Cal.App.5th 1137, 1154.) As the finder of fact, the City's determinations outweigh any conflicting evidence presented by Appellant. (*Friends of Lagoon Valley* at p. 816; *Friends of Riverside's Hills* at p. 1154; *Save Our Peninsula Committee v. Monterey County Board of Supervisors* (2001) 87 Cal.App.4th 99, 117, 104. As discussed below, the Appeal's allegations are completely devoid of evidentiary support, which is in stark contrast to the Project record, which contains extensive analysis and information supporting the City's CUP findings.

A. The Project's Proposed Uses and the Site's Location Do Not Create Hazards in the Vicinity.

Appellant alleges that a facility involving the service, maintenance and repair of vehicles, especially EVs that utilize lithium-ion batteries, represents a fire hazard risk, which is compounded by the

[2] While carrier trucks are delivering vehicles to the Site under the TUP, they are not anticipated to make up the bulk of the vehicles serviced under the permanent CUP.

location of the Site within the Inglewood Oil Field and a Very High Fire Hazard Severity Zone ("VHFHSZ"). Not only does Appellant fail to provide actual evidence of these allegations, but the Project's record contains extensive evidence that the Project's proposed uses, including the involvement of EVs, and the Site's location do not create an increased risk of fire hazards.

In response to the Appeal, Simpson Gumpertz & Heger Inc. ("SGH") prepared a memorandum to address the Appeal's fire risk and life safety concerns ("Fire Safety Memo") related to the proposed vehicle storage and light industrial maintenance facility. Refer to Appendix D of the Class 32 CE Findings. The Fire Safety Memo analyzes potential safety impacts associated with repair, maintenance and storage of both conventional ICE vehicles and EVs, including building fire protection systems, fire risk of facility operations, and life safety measures for occupants.

1. The Project Is Subject to Extensive Regulations that Reduce Potential Risks of Fire Hazards in the Vicinity.

Regarding fire hazards associated with the Project's proposed uses, it is worth noting that the storage of multiple vehicles, including both ICE vehicles and EVs, within a building is found throughout the community (e.g., in public parking garages, residential garages, including at Raintree, and other service centers) and therefore does not represent a novel ignition hazard.

Further, the Project will comply with the 2022 California Fire Code with Culver City amendments ("CCFC") and will be fully equipped with an automatic sprinkler system in accordance with National Fire Protection Association ("NFPA") 13 standards, the nationally recognized standard for the installation of sprinkler systems. In addition to sprinklers, the facility will comply with all relevant fire and building code requirements for a vehicle repair garage occupancy (classified as a light industrial Group S-1 use). This includes features such as fire resistance rated construction where required for separations, a fire alarm system for occupant notification, and adequate means of egress for safe evacuation. Buildings in and around the community, including at Raintree, that were constructed or renovated prior to implementation of the CCFC do not contain these fire sprinkler protections.

The building will also be equipped with portable fire extinguishers and other fire protection features as required by CFCC. While not required by building codes, the building will go above and beyond current standards and will adhere to guidance in NFPA 30A, *Code for Motor Fuel Dispensing Facilities and Repair Garages*. NFPA 30A addresses construction features that limit fire growth and fuel migration, including liquid spill control and drainage that direct leaks to safe locations, separation of service bays from other uses, and housekeeping limits on combustibles. In summary, the fire protection design meets or exceeds applicable standards for this occupancy, providing a high level of protection for both occupants and property. The City Fire Department ("Department") will review design of the Project to confirm that all required fire safety measures are incorporated. Accordingly, the Project cannot be constructed without complete sign-off by the Department.

Operational fire safety provisions include hot-work permitting, limits and containerization for flammable and combustible liquids, prohibition of indoor fuel dispensing, emergency shutdowns, and staff training with spill kits and response procedures. In an ICE vehicle fire, these measures restrict the availability and spread of fuel, reduce vapor ignition potential, and work with the NFPA 13 sprinkler system to cool and control the fire before it can involve adjacent vehicles. Although NFPA 30A does not directly regulate vehicle traction batteries, its repair garage safeguards operate together with the electrical code

and listed EV charging equipment to reduce the likelihood and consequences of a battery event during charging. Ground fault and overcurrent protection in the charging equipment will automatically de-energize a faulted circuit, ventilation will help dilute smoke and gases, and the sprinkler system will provide cooling that limits heat transfer to nearby vehicles and building elements. These combined measures support early control of either an ICE or battery fire while maintaining safe egress and fire department access. As set forth in Exhibits A and B, the Applicant has detailed protocol to prevent and handle fire risks. Therefore, the Appeal fails to provide substantial evidence regarding the alleged fire risks associated with the Project's proposed uses, and thus, should be denied.

2. The Site Is Not Located within a Fire Prone Area.

The Appeal asserts that the Project is near an area designated VHFHSZ, increasing potential fire risks. However, as shown in Figure 6 of the Fire Safety Memo and as set forth in Google Maps, the Site is more than 2,500 feet from the nearest state designated VHFHSZ and 500 feet from the nearest locally designated VHFHSZ.[3] In fact, as demonstrated in Figure 7 of the Fire Safety Memo and the City's Fire Hazard Severity Zone Updates map, the Site is actually near a Moderate Fire Hazard Severity Zone, for which the CCFC does not identify any special protective measures.

Further, while the Site is located within the Inglewood Oil Field, a historically active oil-producing area within the Baldwin Hills and Culver City region, it is outside the Surface Field Boundary and oil extraction near the Site has long since ceased. According to the CalGEM Well Finder database, the six wells located on the parcel adjacent to the Site have been properly abandoned and capped in accordance with Public Resources Code Section 3208 and Title 14 California Code of Regulations Sections 1723–1723.5.[4] There are no active, idle, or newly permitted wells on or immediately adjacent to the Project Site (with the nearest active well located approximately 630 feet from the nearest corner of the existing building), and no associated aboveground equipment, tanks, or pipelines remain in operation. This distance provides both an atmospheric and radiant heat buffer that prevents heat exposure to the facility in the unlikely event of a surface fire or leak at a well. As such, a fire originating at the facility would not affect a distant well. The risk of a fire emanating from the cars parked at Raintree would have the same (very low) level of risk, such that the Project does not change existing conditions.

Further, CalGEM oversees oil and gas operations in California. CalGEM regulations include periodic pipeline integrity testing, annual inspections in sensitive areas, and ongoing mechanical integrity programs for injection and storage wells. These safety measures, combined with emergency shut-off systems (such as automatic float switches) and on-site fire protection at wellheads, further reduce the likelihood of any incident escalating or spreading. In combination, the facility's code-compliant siting, robust regulatory framework, and existing safety infrastructure point to the fact that nearby oil wells do not pose a fire hazard to the project, nor does the project create any increased risk to those wells. Accordingly, the Site's adjacency near capped, abandoned oil wells does not increase any potential fire

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[3] City of Culver City, Fire Hazard Severity Zone (FHSZ) Updates, https://experience.arcgis.com/experience/986aeb7b1a5649a18a7d6eff49776e35#data_s=id%3Awidget_22_output_config_default_geocode_0_0%3A0, accessed December 2, 2025.

[4] California Geologic Energy Management Division, Well Finder, https://maps.conservation.ca.gov/calGEM/wellfinder/v2/?utm_source=chatgpt.com#/-118.38840/34.01132/19, accessed October 25, 2025.

risk. Therefore, the Appeal fails to provide substantial evidence regarding the alleged fire risks associated with the Project's location, and thus, should be denied.

B. Project Operations, Including the Transport of Vehicles, Would Not Jeopardize Health and Safety.

The Appeal makes various allegations regarding health and safety risks associated with noise, traffic and air quality emissions from Project operations, including transport of vehicles. As discussed below, the Appeal fails to provide evidence, much less substantial evidence, of such risks. Further, a full analysis of potential impacts associated with Project operations was prepared as part of the Class 32 CE findings. Refer to Appendix B of the Class 32 CE Findings for analysis of the Project's potential noise impacts; Appendix C of the Class 32 CE Findings for analysis of the Project's potential air quality impacts; and Appendix A of the Class 32 CE Findings for analysis of the Project's potential traffic impacts. Therefore, the Appeal should be denied.

1. Project Operations Would Not Violate the City's Noise Ordinance.

The Appeal asserts that the current use of the Site under the TUP violates the City's Noise Ordinance, and that the Project would continue these violations. Although Appellant provides a link to a video allegedly showing a carrier truck unloading vehicles at the Site at 11:45 pm, the link is not active and thus confirmation of this allegation cannot be made. Nonetheless, any potential violation of the Noise Ordinance under the TUP is irrelevant to whether the uses proposed under the new CUP would result in similar violations. While it is true that the Project would involve carrier trucks operating at the Site, they will only be permitted to load and unload cars between the hours of 9:00 AM to 4:00 PM. Permitted hours and location for loading/unloading would be enforced as a condition of approval. Therefore, the Project would not result in the late-night activities alleged in the Appeal. Further, the Class 32 CE findings provide substantial evidence that the Project would not exceed any of the applicable noise thresholds or violate the City's Noise Ordinance and would thus not result in any significant noise impacts.

2. Project Operations Would Not Result in Traffic Hazards.

The Appeal also asserts without any supporting evidence that the Project will result in traffic hazards due to carrier truck operations. The Project would involve on average approximately four carrier truck trips per month. Further, the Project's loading and unloading activities would be restricted to the commercial loading zone on Jefferson Boulevard along the Site frontage, and carrier trucks would be prohibited from using the left-hand turn lane in the center of Jefferson Boulevard. Permitted hours and location for loading/unloading would be enforced as a condition of approval. Therefore, the Project would not result in any conditions that would create traffic-related hazards associated with the transport of vehicles.

3. The Project Would Not Violate Any Established Air Quality Threshold.

The Appeal next provides bare allegations that the Project would result in health and safety impacts associated with Project emissions from both the operation of the proposed uses and the transport of vehicles via carrier trucks, which use diesel fuel. Notably, the Appeal provides no technical analysis demonstrating emissions would exceed established regional or localized thresholds. On the other hand, the Class 32 CE findings provide substantial evidence that the Project would not result in any significant

air quality impacts. Specifically, Table 5 in the Class 32 CE findings demonstrate the Project complies with General Plan policies related to air quality. Tables 7 and 8 of the Class 32 CE findings demonstrate that the Project would not exceed the regional or localized thresholds during construction and operation. Accordingly, the Project would not result in any health and safety risks associated with air quality emissions.

IV. The Project Complies with the General Plan

The Appeal then points to various discussions and policies in the General Plan that Appellant asserts conflict with the Project. Alleged conflicts related to fire hazards, noise impacts, traffic hazards, and air quality impacts are unsupported in the Appeal and addressed in this letter above and in the Class 32 CE findings and appendices. The Appeal also restates general discussion in the General Plan about encouraging walking and biking, minimizing auto travel, and supporting greenhouse gas reduction goals in Mixed Use Neighborhoods; however, the Site is not within a Mixed Use Neighborhood and is instead in a Mixed Use Corridor. The Appeal then identifies the General Plan's intent to transition from heavy to light manufacturing uses in industrial areas. First, the Site is not located within an existing industrial area. Second, the Project proposes a vehicle repair and maintenance facility, which is not a heavy manufacturing use; and therefore, the Project does not conflict with this intent.

The Planning Commission Resolution sets forth the Project's consistency with the General Plan in detail, so we will not repeat it here. Even if the Appeal did identify any inconsistencies with the General Plan, which it did not, such inconsistency would not require disapproval of the Project. California law does not require perfect consistency with the General Plan. Instead, the standard is whether a project is "in agreement or harmony with the terms of the applicable plan, not in rigid conformity with every detail" of such plan. (*San Franciscans Upholding the Downtown Plan v. City & County of San Francisco* (2002) 102 Cal.App.4th 656, 678; see also Government Code § 66473.5.) In addition, the City Council's decision regarding consistency with its own general plan is afforded great deference because it has unique competence to interpret those policies. (*The Highway 68 Coalition v. County of Monterey, et al.* (2017) 14 Cal.App.5th 883.) The City's findings that the project is consistent with its own general plan can be reversed only if it is based on evidence from which no reasonable person could have reached the same conclusion. (*Id*.) Appellant has provided no evidence, let alone substantial evidence, of the Project's conflicts with the General Plan. Therefore, the Appeal should be denied.

V. The City's CEQA Exemption Findings Are Supported By Substantial Evidence in the Record.

The Appeal asserts that the Project does not qualify for the Class 1 CE because its operation constitutes more than a negligible expansion of use and its location within the Inglewood Oil Field constitutes an unusual circumstance that results in a significant impact. Although the Appeal provides bare conclusions and does not provide supporting evidence, the use of a CE is reviewed under the highly deferential substantial evidence standard of review. (*Friends of the College of San Mateo Gardens v. San Mateo County Community College Dist.* (2017) 11 C.App.5th 596, 603; *Committee for Re-Evaluation of the T-Line Loop v. San Francisco Mun. Transp. Agency* (2016) 6 CA5th 1237, 1248; *Mani Bros. Real Estate Group v. City of Los Angeles* (2007) 153 CA4th 1385, 1398.) Under the substantial evidence standard, all reasonable doubts must be resolved in favor of the City's determination, and the court may not set aside the City's decision even if the opposite conclusion is more reasonable. (*Western States Petroleum Association v. Superior Court* (1995) 9 Cal.4th 559, 572; *Laurel Heights Improvement Association v. Regents*

of Univ. of California (1988) 47 Cal.3d 376, 393; *San Diego Citizenry Group v. County of San Diego* (2013) 219 Cal.App.4th 1, 12; *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490, 1497.)

The Appeal states that the conversion of the building on the Site from an "office use" to a service station would require a "massive buildout." First, the Site was previously primarily used as a warehouse, not an office use, and is currently being used for vehicle storage under the TUP. Second, the Project would not require "massive buildout." In fact, the Project would involve no expansion of the existing building. The Class 1 CE explicitly covers an increase in 10,000 square feet of floor area, which would inherently involve some level of intensification of use. While there would be a small increase in vehicle trips, the Project would result in a negligible expansion of use of the existing building without any physical expansion. Therefore, the Project's record supports the use of a Class 1 CE.

Further, in response to the Appeal, findings supporting a Class 32 CE for infill projects have been prepared and accompanied by various technical reports, including air quality, noise, traffic and fire safety. The Project's Class 32 CE Findings are supported by substantial evidence in the record. Under this approach, the Project could rely on either the Class 1 or the Class 32 CE to cover the entire Project as CEQA does not limit the number of exemptions relied upon, so long as the exemptions cover the project as a whole. (*California Farm Bureau Federation v. California Wildlife Conservation Board* (2006) 143 Cal.App.4th 173; See *Surfrider Foundation v. California Coastal Commission* (1994) 26 Cal.App.4th 151.)

Both the Class 1 and Class 32 CE are subject to a set of exceptions under CEQA Guidelines Section 15300.2 that would disqualify a project from the use of a CE, one of which is that the Project involves unusual circumstances that would cause the project to result in significant impacts. The Appeal asserts that the Project's proposed use as a vehicle service center in combination with its location in a fire prone area and near residential uses and within the Inglewood Oil Field constitutes an unusual circumstance. Notably, the storage of multiple vehicles, including both ICE vehicles and EVs, within a building is found throughout the community (e.g., in public parking garages, residential garages, and other service centers). Further, vehicle service centers are often located in close proximity to residential uses in order to provide convenient access to their services (e.g., Larsen Automotive, 10707 Jefferson; Kartek Automotive & Import Motorworx, 5879 Washington; Pep Boys Auto Service, 4520 Sepulveda; Ed Little Auto Service, 4318 Sepulveda; Grant Auto Repair, 12902 Washington. Also, given the State's GHG-reduction goals, EVs are increasingly used throughout the State in the City, and thus vehicle service centers generally serve both EVs and ICE vehicles. Therefore, Appellant does not present evidence that the Project constitutes an unusual circumstance.

Nonetheless, a showing of unusual circumstances is not sufficient to disqualify a project under the CE exceptions. It needs to be demonstrated that the Project would result in significant impacts as a result of the unusual circumstance. Notably, the Appeal provides no evidence whatsoever that the Project's proposed uses at the Site would result in significant impacts. As discussed in detail above, the Project's construction and operation would comply with extensive regulations under the CCFC and the NFPA, which reduces any fire hazard risks. The Site is not located within any fire hazard area and is notably 500 feet away from the nearest VHFHSZ as designated by the City. Further, the Fire Safety Memo demonstrates that the Site's location within the Inglewood Oil Field does not present increased fire hazard risks. First, there are no active, idle, or newly permitted wells on or immediately adjacent to the Project Site (with the nearest active well located approximately 630 feet from the nearest corner of the existing building), and no associated aboveground equipment, tanks, or pipelines remain in operation. Second, CalGEM provides strict regulations that govern oil and gas operations in the State, which protect against

potential hazards associated with such operations, including those that would impact adjacent uses. Finally, Section 2 of the Settlement Agreement between the City and Sentinel Peak Resources California, LLC (dated December 7, 2023) requires termination of all oil related uses at the Inglewood Oil Field by December 31, 2029. Therefore, the record demonstrates that the Project would not result in any significant impacts due to unusual circumstances.

Given the deficiencies in the Appeal and the extensive support in the record for the City's determination that the Project qualifies for the use of the Class 1 and Class 32 CE, we urge the City Council to deny the Appeal.

Sincerely yours,

Elisa Paster

Elisa Paster
Managing Partner
of RAND PASTER & NELSON, LLP

Exhibit A

Standard Operating Procedure

Title: Response to Thermal Event Involving Electric Vehicles (EVs)

Department: Fixed Operations
Approved by: Director of Operations
Effective Date: Jan 3, 2025
Review Cycle: Annually or as OEM/fire code guidelines change

1**. Purpose**

To establish a consistent and safe response protocol in the event of a thermal incident (e.g., fire, smoke, or suspected battery overheating) involving an electric vehicle (EV) at any facility within the Silvertip Automotive Group. This Standard Operating Procedure ensures the safety of personnel, customers, and property while maintaining compliance with OEM, OSHA, NFPA, and local authority guidelines.

2**. Scope**

This Standard Operating Procedure applies to all employees at all locations within the Silvertip Automotive Group, including service departments, showroom floors, parking lots, and storage facilities, where EVs are stored, charged, or operated.

3**. Definitions**

- Thermal Event: Any incident involving heat, smoke, fire, or battery off-gassing from an EV.
- EV: Electric Vehicle (including battery electric and plug-in hybrid electric vehicles).
- High Voltage (HV): Any vehicle system operating above 60 volts DC or 30 volts AC.
- OEM: Original Equipment Manufacturer.

4**. Responsibilities**

- All Employees: Must report any signs of a thermal event immediately and evacuate the area if necessary.
- Service Manager / Fixed Ops Manager: Acts as the site incident lead until emergency responders arrive.
- VP of Fixed Operations and HR: Assists with post-incident review and reporting.
- Director of Operations: Reviews incident reports, ensures compliance, and updates procedures.

5**. Procedure**

5.1 Immediate Actions (Upon Discovery of a Thermal Event)

1. *Recognize and Report:*

- Signs include smoke, unusual odors, hissing/popping sounds, excessive heat, or visible fire.
- Yell “FIRE, FIRE, FIRE”
- Call 911 immediately if fire or smoke is present.
- Notify the Service Manager or the highest-ranking supervisor on-site.
- Activate the building fire alarm if indoors.
- DO NOT disconnect the vehicle battery system

2. *Evacuate:*

    - Clear the immediate area of all personnel and customers. (see Emergency Response Map)
    - Evacuate to primary muster point.
    - Maintain a minimum 50-foot safety perimeter around the vehicle.
    - Check Headcount
    - Do not attempt to move, cover or extinguish the vehicle unless trained to do so and safe to attempt.

3. *Isolate the Vehicle (if safe to do so):*

    - If indoors and safe to approach, do not open doors, hoods, or trunks.
    - Shut down any nearby chargers and disconnect power from EVSE (Electric Vehicle Supply Equipment).
    - Keep the vehicle in open air and away from structures, drains, or other vehicles, if possible.

5.2 Fire Department Engagement

- *Provide responding fire personnel with:*
    - Business Name and Address
    - Make and model of the EV.
    - Location of battery (if known).
    - Status of charging.
    - Key fob or method to disable the vehicle if requested.

- Follow the fire department’s instructions and do not re-enter the area until cleared.

5.3 Post-Incident Handling

1. *Vehicle Handling:*
    - Once extinguished, EVs involved in a thermal event may reignite hours or days later.
    - Move the vehicle to an isolated, outdoor quarantine zone, at least 50 feet from other structures or vehicles. (see Emergency Response Guide)
    - Use OEM-recommended quarantine duration, typically 48–72 hours.

2. *Documentation:*
    - Take photos and document:
        - Vehicle VIN
        - Time, location, and conditions of the event
        - Actions taken
        - Emergency response details

3. *Notify OEM & Insurance: - CFO / Director Of Operations.*
    - Contact OEM field representative.
    - File a claim with insurance provider if property was damaged.

4. *Internal Reporting:*
    - Submit an Incident Report to the Director of Operations within 24 hours.
    - Schedule internal safety debrief within 3 business days.

6. **Training & Preparedness**

- EV Techs are required to wear EV compliant (non-steal toe boots) and appropriate work uniforms
- All service and sales staff must complete annual EV safety and fire response training through the Dealer Group's KPA Compliance platform.
- All EV Technicians must have completed EV Training (EV Master & EV Expert) training in General Motors Center of Learning - updated annually or when new courses are offered.
- All staff trained on Emergency Response Plan.
- Keep updated Emergency Response Guides (ERGs) accessible to all service techs and managers.

7. **References**

- NHTSA OEM Emergency Response Guides https://www.nhtsa.gov/emergency-response-guides
- Local fire code regulations
- OSHA Guidelines for EV and HV systems

8. **Contact Information**

- Emergency: 911
- VP of Fixed Operations: Bruce Brennan - 310 428 0601
- Cadillac of Beverly Hills Service Manager: Daniel Lorenzana - 818 331 7505
- Santa Monica GMC Service Manager: Del Howard - 310 717 5332
- Director of Operations: Tony Plett - 661 219 1890
- Human Resources: Nicole Chavez - 424 240 1294

Failure to follow this SOP may result in disciplinary action and increases the risk of injury or property loss.

Exhibit B

Standard Operating Procedure

Title: Fire Preparedness and Response Involving Internal Combustion Engine (ICE) Vehicle

Department: Fixed Operations
Approved by: Director of Operations
Effective Date: Jan 3, 2025
Review Cycle: Annually or as OEM/fire code guidelines change

1. **Purpose**

To ensure the safety of all employees, customers, and property in the event of a fire involving a gasoline or diesel-powered vehicle within the service department. This Standard Operating Procedure outlines preventive measures, emergency response procedures, and recovery actions to minimize risk and damage.

2**. Scope**

This Standard Operating Procedure applies to all employees at all locations within the Silvertip Automotive Group, including service departments, showroom floors, parking lots, and storage facilities, where ICE vehicles are stored or operated.

3**. Responsibilities**

- All Employees: Must report hazards, fuel leaks, or unsafe conditions immediately.
- Service Manager / Fixed Ops Manager: Ensures all personnel are trained on fire response procedures and that all fire suppression equipment is maintained and accessible.
- VP of Fixed Operations and HR: Assists with post-incident review and reporting.
- Director of Operations: Reviews incident reports, ensures compliance, and updates procedures.

4. Fire Prevention Measures

- **Fuel Handling & Storage**
    - Store fuel in approved containers away from ignition sources.
    - Inspect vehicles for fuel leaks before performing welding, grinding, or electrical work.
    - No smoking within 25 feet of vehicles or fuel storage areas.

- **Battery Safety**
    - Disconnect vehicle batteries during major repairs to prevent sparks or shorts.
    - Inspect battery cables and terminals for corrosion or wear.

- **Electrical Equipment**
    - Ensure all tools and chargers are properly grounded.
    - Avoid overloading electrical circuits or leaving extension cords coiled.

- **Shop Cleanliness**
    - Keep work areas free of oil, grease, and rags.
    - Store oily rags in closed, fireproof containers.

- **Fire Extinguishers**
    - Maintain fire extinguishers in all work areas.
    - Inspect extinguishers annually and tag after each inspection.

5. **Emergency Response Procedure**

If an ICE Vehicle Fire Occurs:

- **Activate Alarm & Notify**
    - Pull the nearest fire alarm and alert others in the shop.
    - Call 911 immediately and provide details
        - Business Name and Address
        - Vehicle type
        - Fuel source
        - Evacuation Information

- **Evacuate**
    - Evacuate all personnel and customers from the immediate area to primary Muster Point (see Map)
    - Do not open vehicle hoods or doors if flames are visible—oxygen may intensify the fire.

- **Attempt to Extinguish (Only if Safe)**
    - Use an ABC extinguisher.
    - Aim at the base of the fire, sweeping side to side.
    - If the fire is near the fuel tank or intensifying, evacuate immediately—do not attempt to control it.

- **Isolate Area**
    - Shut off all power sources and ventilation fans if safe to do so.
    - Keep all personnel at least 50 feet away from the burning vehicle.

- **Fire Department Arrival**
    - Provide responding firefighters with vehicle make, model, fuel type, and any known hazards.
    - Allow professionals to take over once on scene.

6. **Training & Preparedness**

- Techs are required to wear appropriate provided work uniforms
- All service and sales staff must complete annual Fire safety and response training through the Dealer Group's KPA Compliance platform
- All Fire Extinguishers certified annually
- Semi Annual Evacuation Drills
- All staff trained on Emergency Response Plan

7. **References**

- NFPA 10: Standard for Portable Fire Extinguishers
- OSHA – Fire Protection
- Local Fire Department Codes and Regulations

8. **Contact Information**

- Emergency: 911
- VP of Fixed Operations: Bruce Brennan - 310 428 0601
- Cadillac of Beverly Hills Service Manager: Daniel Lorenzana - 818 331 7505
- Santa Monica GMC Service Manager: Del Howard - 310 717 5332
- Director of Operations: Tony Plett - 661 219 1890
- Human Resources: Nicole Chavez - 424 240 1294

Failure to follow this SOP may result in disciplinary action and increases the risk of injury or property loss.